



Benchmark Methodology – Apparel & Footwear Sector
Version 2 (January 2018)

Indicator Name	Indicator Description	Indicator Elements
1.0 Commitment and Governance		
1.1 Commitment	The company publicly demonstrates its commitment to addressing human trafficking and forced labor.	The company: (1) has publicly demonstrated its commitment to addressing human trafficking and forced labor.
1.2 Supply Chain Standards	The company has a supply chain standard that requires suppliers throughout its supply chain to uphold workers’ fundamental rights and freedoms (as articulated in the ILO Declaration on Fundamental Principles and Rights at Work), including the elimination of forced labor. The standard has been approved by a senior executive, is easily accessible on the company’s website, is regularly updated, and is communicated to the company’s suppliers.	The company’s supply chain standard: (1) requires suppliers to uphold workers’ fundamental rights and freedoms (those articulated in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work), including the elimination of forced labor; (2) has been approved by a senior executive; (3) is easily accessible from the company’s website; (4) is updated regularly, following internal review and input from external stakeholders; and (5) is communicated to the company’s suppliers.
1.3 Management and Accountability	The company has established clear responsibilities and accountability for the implementation of its supply chain policies and standards relevant to human trafficking and forced labor, both within the company and at board level.	The company: (1) has a committee, team, program, or officer responsible for the implementation of its supply chain policies and standards that addresses human trafficking and forced labor; and (2) has tasked a board member or board committee with oversight of its supply chain policies and standards that address human trafficking and forced labor.

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1.4 Training	The company has training programs in place to ensure that relevant decision-makers within the company and its supply chain are aware of risks related to human trafficking and forced labor and are effectively implementing the company's policies and standards.	The company undertakes programs which include: (1) the training of all relevant decision-makers within the company on risks, policies, and standards related to human trafficking and forced labor; and (2) the training and capacity-building of suppliers on risks, policies, and standards related to human trafficking and forced labor, covering key supply chain contexts.
1.5 Stakeholder Engagement	The company engages with relevant stakeholders on human trafficking and forced labor. This includes engagement with policy makers, worker rights organizations, or local NGOs in countries in which its suppliers operate, as well as active participation in one or more multi-stakeholder or industry initiatives.	In the last three years, the company has engaged relevant stakeholders by: (1) providing at least two examples of engagements on forced labor and human trafficking with policy makers, worker rights organizations, local NGOs, or other relevant stakeholders in countries in which its suppliers operate, covering different supply chain contexts; and (2) actively participating in one or more multi-stakeholder or industry initiatives focused on eradicating forced labor and human trafficking across the industry.

2.0 Traceability and Risk Assessment

2.1 Traceability	The company demonstrates an understanding of the suppliers and their workers throughout its supply chain, the company publicly discloses the names and addresses of its first-tier suppliers, the countries of below first-tier suppliers, the sourcing countries of raw materials at high risk of forced labor and human trafficking, and some information on its suppliers' workforce.	The company discloses: (1) the names and addresses of its first-tier suppliers; (2) the countries of below first-tier suppliers (this does not include raw material suppliers); (3) the sourcing countries of raw materials at high risk of forced labor and human trafficking; and (4) some information on its suppliers' workforce.
2.2 Risk Assessment	The company has a process to assess forced labor risks, and it publicly discloses forced labor risks identified in different tiers of its supply chain.	The company discloses: (1) details on how it conducts human rights supply chain risk or impact assessments that include forced labor risks or assessments that focus specifically on forced labor risks; and

Indicator Name	Indicator Description	Indicator Elements
2.2 Risk Assessment (cont'd)		(2) details on forced labor risks identified in different tiers of its supply chain.

3 . 0 P u r c h a s i n g P r a c t i c e s

3.1 Purchasing Practices	The company is taking steps towards responsible raw materials sourcing. It is adopting responsible purchasing practices in the first tier of its supply chain, and provides procurement incentives to first-tier suppliers to encourage or reward good labor practices.	Purchasing practices and pricing may both positively impact labor standards in the company's supply chain, and increase risks of forced labor and human trafficking. The company: (1) is taking steps towards responsible raw materials sourcing; (2) is adopting responsible purchasing practices in the first tier of its supply chain; and (3) provides procurement incentives to first-tier suppliers to encourage or reward good labor practices (such as price premiums, increased orders, and longer-term contracts).
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3.2 Supplier Selection	The company assesses risks of forced labor at potential suppliers prior to entering into any contracts with them, as well as risks related to subcontracting.	The company: (1) assesses risks of forced labor at potential suppliers prior to entering into any contracts with them. (2) addresses risks of forced labor related to sub-contracting.
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3.3 Integration into Supplier Contracts	The company integrates supply chain standards addressing forced labor and human trafficking into supplier contracts.	The company: (1) integrates supply chain standards addressing forced labor and human trafficking into supplier contracts.
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3.4 Cascading Standards through the Supply Chain	The company extends its supply chain standards beyond its first tier by requiring that its first-tier suppliers take steps to ensure that their own suppliers implement standards that are in-line with the company's standards.	The company: (1) requires its first-tier suppliers to take steps to ensure that their own suppliers implement standards that are in-line with the company's supply chain standards addressing forced labor and human trafficking.
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Indicator Name**Indicator Description****Indicator Elements****4 . 0 R e c r u i t m e n t****4.1 Recruitment Approach**

The company has a policy that requires direct employment in its supply chain, and requires employment and recruitment agencies in its supply chain to uphold workers' fundamental rights and freedoms. The company discloses information on the recruitment agencies used by its suppliers.

The company:

- (1) has a policy that requires direct employment in its supply chain;
- (2) requires employment and recruitment agencies in its supply chain to uphold workers' fundamental rights and freedoms (those articulated in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work), including the elimination of forced labor; and
- (3) discloses information on the recruitment agencies used by its suppliers.

4.2 Recruitment Fees

In its relevant policies or standards the company requires that no fees be charged during any recruitment process in its supply chain—the costs of recruitment should be borne not by the worker but by the employer ("Employer Pays Principle"). In the event that it discovers that fees have been paid by workers in its supply chain, the company takes steps to ensure that such fees are reimbursed to the workers.

The company:

- (1) requires that no worker in its supply chain should pay for a job—the costs of recruitment should be borne not by the worker but by the employer ("Employer Pays Principle"); and
- (2) takes steps to ensure that such fees are reimbursed to the workers, in the event that it discovers that fees have been paid by workers in its supply chain.

4.3 Monitoring and Ethical Recruitment

The company takes steps to ensure employment and/or recruitment agencies used in its supply chain are monitored to assess and address risks of forced labor and human trafficking, and provides details of how it supports ethical recruitment in its supply chain.

The company:

- (1) takes steps to ensure employment and/or recruitment agencies used in its supply chain are monitored to assess and address risks of forced labor and human trafficking; and
- (2) provides details of how it supports ethical recruitment in its supply chain.

4.4 Migrant Worker Rights

To avoid the exploitation of migrant workers in its supply chain, the company takes steps to ensure migrant workers understand the terms and conditions of their recruitment and employment, and also understand their rights. It further takes steps to ensure its suppliers refrain from restricting workers' movement, and that migrant workers are not discriminated against, and not retaliated

The company:

- (1) takes steps to ensure migrant workers understand the terms and conditions of their recruitment and employment, and also understand their rights;
- (2) takes steps to ensure its suppliers refrain from restricting workers' movement, including through the retention of passports or other personal documents against workers' will;

Indicator Name	Indicator Description	Indicator Elements
4.4 Migrant Worker Rights (cont'd)	against, when they raise grievances. The company provides evidence of how it works with suppliers to ensure migrant workers' rights are respected.	(3) takes steps to ensure migrant workers are not discriminated against, and not retaliated against, when they raise grievances; and (4) provides evidence of how it works with suppliers to ensure migrant workers' rights are respected.

5.0 Worker Voice

5.1 Communication of Policies	The company takes steps to ensure its human trafficking and forced labor policies and standards are available to supply chain workers in their native languages, and that its human trafficking and forced labor policies and standards are communicated to workers in its supply chain.	The company takes steps to ensure: (1) its policies and standards, which include human trafficking and forced labor, are available in the languages of its suppliers' workers; and (2) its human trafficking and forced labor policies and standards are communicated to workers in its supply chain.
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5.2 Worker Voice	The company works with relevant stakeholders to engage with and educate workers in its supply chain on their labor rights. To ensure scalability and effectiveness, the company takes steps to ensure that there are worker-to-worker education initiatives on labor rights in its supply chain, and it provides evidence of the positive impact of worker engagement in its supply chain.	The company: (1) works with relevant stakeholders to engage with and educate workers in its supply chain on their labor rights; (2) takes steps to ensure that there are worker-to-worker education initiatives on labor rights in its supply chain; (3) provides evidence of the positive impact of worker engagement in its supply chain; and (4) provides at least two examples of worker engagement initiatives covering different supply chain contexts.
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5.3 Freedom of Association	To support collective worker empowerment, the company works with suppliers to improve their practices in relation to freedom of association and collective bargaining, and with local or global trade unions to support freedom of association in its supply chain. Where there are regulatory constraints on freedom of association, the company takes steps to ensure workplace environments in which workers are able to pursue alternative forms of organizing.	The company: (1) describes how it works with suppliers to improve their practices in relation to freedom of association and collective bargaining; (2) works with local or global trade unions to support freedom of association in its supply chain; (3) takes steps to ensure workplace environments in which workers are able to pursue alternative forms of organizing (e.g., worker councils or worker-management dialogues) where there are regulatory
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Indicator Name	Indicator Description	Indicator Elements
5.3 Freedom of Association (cont'd)		constraints on freedom of association; and (4) provides at least two examples covering different supply chain contexts of how it improved freedom of association for supply chain workers.
5.4 Grievance Mechanism	The company takes steps to ensure a formal mechanism to report a grievance to an impartial entity regarding labor conditions in the company's supply chain is available to its suppliers' workers and relevant stakeholders. The company takes steps to ensure that the mechanism is effective across its supply chain.	<p>The company:</p> <ul style="list-style-type: none"> (1) takes steps to ensure a formal mechanism to report a grievance to an impartial entity regarding labor conditions in the company's supply chain is available to its suppliers' workers and relevant stakeholders; (2) takes steps to ensure that the existence of the mechanism is communicated to its suppliers' workers; (3) takes steps to ensure that workers or an independent third-party are involved in the design or performance of the mechanism, to ensure that its suppliers' workers trust the mechanism; (4) discloses data about the practical operation of the mechanism, such as the number of grievances filed, addressed, and resolved, or an evaluation of the effectiveness of the mechanism; and (5) provides evidence that the mechanism is available and used by workers below tier one in its supply chain, or by relevant stakeholders in key supply chain contexts.

6 . 0 M o n i t o r i n g

6.1 Auditing Process	The company audits its suppliers to measure compliance with applicable regulations and with its supply chain standards. The process includes non-scheduled visits, a review of relevant documents, interviews with workers, and visits to associated production facilities and related worker housing. The company also audits suppliers below the first tier.	<p>The company has a supplier audit process that includes:</p> <ul style="list-style-type: none"> (1) non-scheduled visits; (2) a review of relevant documents; (3) interviews with workers; (4) visits to associated production facilities and related worker housing; and (5) supplier audits below the first tier.
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Indicator Name	Indicator Description	Indicator Elements
6.2 Audit Disclosure	The company publicly discloses information on the results of its audits. This includes the percentage of suppliers audited annually, the percentage of unannounced audits, the number or percentage of workers interviewed, information on the qualification of the auditors used, and a summary of findings, including details regarding any violations revealed.	The company discloses: (1) the percentage of suppliers audited annually; (2) the percentage of unannounced audits; (3) the number or percentage of workers interviewed during audits; (4) information on the qualification of the auditors used; and (5) a summary of findings, including details regarding any violations revealed.

7 . 0 R e m e d y

7.1 Corrective Action Plans	The company has a process to create corrective action plans with suppliers found to be in violation of applicable regulations and/or the company's standards, with the goal of improving conditions and achieving compliance. The company's corrective action plans include potential actions taken in case of non-compliance; a means to verify remediation and/or implementation of corrective actions; and potential consequences if corrective actions are not taken.	The company's corrective action plans include: (1) potential actions taken in case of non-compliance, such as stop-work notices, warning letters, supplementary training, and policy revision; (2) a means to verify remediation and/or implementation of corrective actions, such as record review, employee interviews, spot-checks, or other means; (3) potential consequences if corrective actions are not taken; and (4) a summary or an example of its corrective action process in practice.
7.2 Remedy Programs and Response to Allegations	The company has a process to provide remedy to workers in its supply chain in cases of human trafficking and forced labor. If no allegation regarding forced labor in the company's supply chain has been identified, the company discloses examples of outcomes for workers of its remedy process.	A. If no allegation regarding forced labor in the company's supply chain has been identified in the last three years, the company discloses: (1) a process for responding to complaints and/or reported violations of policies and standards; and (2) at least two examples of outcomes for workers of its remedy process in practice, covering different supply chain contexts.

Indicator Name	Indicator Description	Indicator Elements
7.2 Remedy Programs and Response to Allegations (cont'd)	<p>If one or more allegations regarding forced labor in the company's supply chain have been identified, the company discloses a public response to the allegation, and outcomes of the remedy process, including evidence that remedy(ies) are satisfactory to the victims or groups representing the victims.</p>	<p>B.1. If one or more allegations regarding forced labor in the company's supply chain have been identified in the last three years, the company discloses:</p> <ul style="list-style-type: none"> (1) a process for responding to the complaints and/or reported violations of policies and standards; (2) a public response to the allegation, which covers each aspect of each allegation; (3) outcomes of the remedy process in the case of the allegation(s); and (4) evidence that remedy(ies) are satisfactory to the victims or groups representing the victims.
	<p>If one or more allegations regarding forced labor in the company's supply chain have been identified, and the company denies the allegation, the company discloses a public response to the allegation, a description of what actions it would take to prevent and remediate the alleged impacts, and that it engages in a dialogue with the stakeholders reportedly affected in the allegation, or requires its supplier(s) to do so.</p>	<p>B.2. If one or more allegations regarding forced labor in the company's supply chain have been identified in the last three years, and the company denies the allegation, the company discloses:</p> <ul style="list-style-type: none"> (1) a process for responding to the complaints and/or reported violations of policies and standards; (2) a public response to the allegation, which covers each aspect of each allegation; (3) a description of what actions it would take to prevent and remediate the alleged impacts; and (4) that it engages in a dialogue with the stakeholders reportedly affected in the allegation, or requires its supplier(s) to do so.