



PROTECTIONS AGAINST TRAFFICKING IN PERSONS

Sample Food and Beverage Supplier/Subcontractor Self-Assessment

An important part of a systems approach to preventing human trafficking and other supply chain social responsibility issues is to assess current and prospective suppliers for potential risks. This sample self-assessment tool can help identify potential human trafficking risks in how a subcontractor or supplier recruits, selects, and hires workers, the supplier's relationship with labor brokers, and how migrant workers are managed. The answer choices for each question are designed to indicate whether the practice meets typical company or industry Codes of Conduct and applicable legal requirements for the prevention of human trafficking and other social compliance issues. The self-assessment can be used as a supplier screening tool, to develop corrective action plans, or to establish key performance indicators (KPI's) to track ongoing social responsibility performance.

For each question, several potential answers are provided some of which represent good management practices, while others represent risks to social compliance. When evaluating how well a supplier is controlling risk, a company needs to look for the presence or absence of good practices and "at risk" practices. No suggested scoring is provided as the severity of a potential risk will depend on such factors as the region and country where the work is performed, worker nationalities, applicable legal requirements, and customer requirements, among other factors. The evaluation guide provided in Appendix 1 can help guide your review of a self-assessment, as well as offer suggestions for providing feedback to suppliers and subcontractors.

Note: The self-assessment is also an opportunity to collect profile information from suppliers that can be useful in conducting a risk assessment, as is described in [Tool 03: Supply Chain Mapping and Risk Assessment](#). For food and beverage sector suppliers, supplier profile information might include:

- Supplier name
- Supplier headquarters address
- Geographic location of facilities
- Type of product supplied
- Number of workers employed
- Number of workers hired via labor brokers
- Seasonality of production
- Recruiter/Labor Broker (where possible, link labor recruiters to individual workers contracted)

- Name of each recruiter used
- Contact information
- Nationality
- Nationality of workers provided
- License number

PART 1: RECRUITMENT, SELECTION AND HIRING

This section looks at your policies and practices for recruiting, selecting and hiring workers. It includes direct hiring, hiring through labor recruiters, hiring of contract and temporary employees, and guest worker visa programs for companies operating in the U.S.

Note: Please use the "Additional Information" section to explain your answers or to describe a practice that is not among the list of choices.

Q1.1 Which of the following concepts are included in your company's recruitment, selection and hiring policies? (Select all that apply.)

- Non-discrimination
- Workers do not pay recruitment fees
- All workers are provided with detailed contracts of employment
- No underage labor (below the minimum legal working age)
- Equal compensation for men and women doing the same job
- Compliance with legal requirements
- No recruitment, selection, and hiring policies
- Additional information _____

Q1.2 How do you make sure that your recruitment, selection, and hiring policies are followed? (Select all that apply.)

- We use formal recruitment, selection, and hiring procedures.
- Our procedures are specific for each type of employment arrangement, including temporary and seasonal workers.
- We use objective tools and criteria for selecting the best applicants.
- We provide all workers with a written employment agreement (contract) that fully complies with all applicable legal requirements.
- We routinely survey new hires to verify that our policies were followed.
- Additional information _____

Q1.3 Which of the following are included in your job descriptions and vacancy announcements? (Select all that apply.)

- Job functions and responsibilities
- Statement that no recruitment fees will be charged

- Required knowledge and skills
- Personal characteristics, such as gender, marital status, etc.
- Wages and benefits
- Duration of assignment (for temporary and seasonal work)
- Additional Information _____

Q1.4 How does your company recruit, select and hire workers?

- We directly recruit, select, and hire all workers (full time, part time, temporary and seasonal).
- We use legally registered external labor recruiters to recruit and hire workers (you may know “labor recruiters” by terms such as brokers, agents, labor contractors, gangmasters, or crew leaders).
- We use informal external labor recruiters to recruit and hire workers (you may know “labor recruiters” by terms such as brokers, agents, labor contractors, gangmasters, or crew leaders).
- We hire some workers directly and use labor recruiters for other jobs.
- We hire workers through formal host country guest worker programs.
- Additional Information _____

Q1.5 How does your company recruit and hire foreign migrant workers?

- Directly in their home country
- Using a legally registered labor provider in their home (sending) country
- Using an informal labor provider in their home (sending) country
- Through a legally registered labor provider in the receiving country
- Through an informal labor provider in the receiving country
- Additional Information _____

Q1.6 What kind of training does your company provide for company staff responsible for recruitment, selection, and hiring? (Select all that apply.)

- Company policies on recruitment, selection, and hiring
- Interviewing skills
- Competency-based hiring (use of objective job requirements)
- Applicable legal requirements

- Additional Information _____

PART 2: USE OF LABOR RECRUITERS AND EMPLOYMENT AGENCIES

This section evaluates how your company uses labor recruiters. Companies may engage labor recruiters for a range of services, from simply recruiting employees to managing employees on behalf of the company.

Note: Please use the "Additional Information" section to explain your answers or to describe a practice that is not among the list of choices.

Q2.1 How does your company screen your labor recruiters to determine if they can meet social responsibility requirements before you begin using them? (Select all that apply.)

- We perform formal due diligence screenings of prospective labor recruiters to determine if their practices conform to company and legal requirements (Note: Due Diligence includes checking licensing, history of legal violations, management interviews, labor provider internal policies and procedures, etc.).
- We use formal rating and selection criteria based on our performance requirements.
- We verify that the labor recruiters are licensed.
- We do not use a formal screening process.
- Additional Information _____

Q2.2 What formal performance requirements does your company have for your labor recruiters? (Select all that apply.)

- We require the labor provider to agree to comply with our social responsibility performance standards and all legal requirements.
- We require the provider to comply with legal requirements only
- Failure to meet our social responsibility performance requirements can result in contract termination
- We do not have formal contracts with our labor recruiters.
- Additional Information _____

Q2.3 How do you evaluate your labor recruiters' ongoing performance in meeting both social responsibility and applicable legal requirements? (Select all the apply.)

- We measure their performance on a continual basis using key performance indicators (KPIs).
- We conduct regular audits.
- Labor recruiters provide us with regular self-assessments of their compliance status.
- We hold regular business review meetings with labor recruiters to discuss their performance.
- Additional Information _____

Q2.4 Which of the following are included in your labor provider audit process? (Select all that apply.)

- Documented audit procedure and tools
- Auditors are formally trained to conduct labor provider audits
- Gathering information from workers through interviews and/or surveys
- Evaluation of fees and expenses paid by the workers and labor recruiters
- Formal corrective action planning process to remediate identified issues
- Additional Information _____

Q2.5 How do you ensure that labor recruiters correct the issues identified by audits, self-audits, and other evaluations? (Select all that apply.)

- Labor recruiters are required to provide regular improvement action status updates.
- Follow-up audits to verify that corrective actions have been fully implemented.
- Labor recruiters are required to track and report key performance indicators (KPIs) to measure performance improvement.
- Additional Information _____

Q2.6 How do you communicate your staffing requirements (hiring needs) to your labor provider(s)?

- We provide written job descriptions based on job duties and required skills.
- We instruct them on how to evaluate a job candidate's qualifications (job skills and knowledge).
- We provide general guidance on skill requirements, as well as the number and categories of workers needed.
- We only tell them the number and categories of workers needed.
- We tell them the time by which we need the workers.
- Additional Information _____

Q2.7 Do you or your labor recruiters recruit workers from other countries (foreign migrant workers, guest workers, etc.)?

- Yes
- No

Q2.8 Do you or your local (receiving country) labor recruiters work with recruiters or agents in the countries where workers are recruited (sending countries)?

- Yes
- No
- If no, please explain _____

Q2.9 How do you determine that recruiters and agents in sending countries can meet both social responsibility and legal requirements? (Select all that apply.)

- Our company performs formal due diligence of all sending country recruiters and agents. (Note: Due Diligence includes: examination of licensing, history of legal violations, management interviews, review of recruiter/agent internal policies and procedures, etc.)
- Receiving country labor recruiters screen the sending country recruiters and agents.

- Sending country recruiters and agents must provide a valid government-issued license.
- Social responsibility requirements are contained in the contracts with sending country agents.
- Additional Information _____

Q2.10 How do you monitor the social responsibility and legal compliance performance of sending country recruiters and agents? (Select all that apply.)

- Our company performs on-site audits of sending country recruiters and agents.
- Our labor provider(s) perform audits of sending country recruiters and agents.
- We routinely interview or survey a sample of newly arrived migrant workers to verify that sending country recruiters and agents are conforming to legal and company requirements.
- We do not formally monitor the legal compliance performance of sending country recruiters and agents.
- Additional Information _____

Q2.11 How much do workers pay your company or the labor recruiter or agent (in either the receiving or sending country) to get a job with your company? (Select all that apply.)

- Workers are not required to pay fees or deposits of any kind
- Workers pay only what is legally required in their home country
- Workers pay only what is legally required in the receiving country
- Our company policies specify the maximum amount workers are required to pay
- Workers pay what is legally allowable in the sending or receiving country
- Additional Information _____
- I don't know

Q2.12 What types of fees and expenses are foreign workers required to pay? (Select all that apply.)

- Transportation and lodging from the place of recruitment to the sending country departure point

- Transportation to the receiving country (for the job)
- Transportation home upon completion of their contract
- Transportation home for voluntary early contract termination
- Document processing (for example: work permit, visa)
- Job application fee
- Medical examination and/or testing
- Skills testing
- Workers do not pay any recruitment fees or other expenses
- Additional Information _____

Q2.13 How do the sending country recruiters or your local (receiving country) labor recruiters screen job applicants? (Select all that apply.)

- They use objective criteria and tools based on the written job descriptions.
- They use their own judgment to decide which candidates can do the job.
- They choose workers who have been prescreened by a local government labor/jobs office.
- An employee of my company screens applicants identified by the recruiter(s).
- Additional Information _____

Q2.14 Who makes the final selection of which applicants to hire?

- An employee of my company in the sending country (where the worker is from)
- The sending country recruiter or agent
- An employee of my company in the receiving country (where the work will be performed)
- Our local (receiving country) labor provider(s)
- Additional Information _____

Q2.15 How do you verify that foreign migrants can legally work in the receiving country? (Select all that apply.)

- An employee of my company (either in the sending or receiving country) reviews all legally-required documents before the candidate is hired.
- Our local (receiving country) labor provider is responsible for obtaining and verifying the necessary documentation.

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- The sending country recruiter or agent is responsible for obtaining and verifying the necessary documentation.
 - We review documents of a sample of newly hired migrant workers when they arrive for work.
 - Additional Information _____

Q2.16 When are workers provided with an explanation of their job duties and terms and conditions of employment? (Select all that apply.)

- In their home country, before signing the employment contract
- In their home country, after signing the employment contract
- After arrival in the receiving country, before signing the employment contract
- In the receiving country, after signing the employment contract
- Additional Information _____

Q2.17 How does your company ensure that workers understand all the terms and conditions of their employment contract? (Select all that apply.)

- Terms and conditions are explained to them verbally in their native language or a language the worker understands.
- The contract is written in their native language or a language the worker understands.
- Workers are given a copy of the contract written in their native language or a language the worker understands.
- Contract terms and conditions are covered in pre-departure training.
- Contract terms and conditions are covered in arrival training/orientation.
- Additional Information _____

Q2.18 The worker signs an employment contract with:

- Our in-country labor provider.
- Both the recruiter or agent in their home country and our in-country labor provider.
- Both my company and our in-country labor provider.
- My company only.
- Another employer.

- We do not use employment contracts.
- Additional Information _____

Q2.19 What is included in the employment contract? (Select all that apply.)

- Job duties and responsibilities
- Wages (regular and overtime)
- Prohibition against charging recruitment fees
- Benefits (social insurance, sick leave, vacation, etc.)
- Hours of work (including overtime)
- List of legal deductions from wages (food, accommodation, etc.)
- Workplace rules
- Workplace hazards
- Location of work
- Roundtrip transportation arrangements
- Discipline procedure
- Grievance procedure
- Terms and conditions of housing
- Job-related local and national legal requirements
- Our company's employment policies
- Notice period and terms for early contract termination
- Additional Information _____

Q2.20 Can workers cancel their employment contracts before they leave their home country?

- Yes, and with no financial penalty.
- Yes, but they have to pay a cancellation fee.
- No, they must work for the term of their contract.
- Additional Information _____

Q2.21 When are workers given a copy of their employment contract?

- At least five days before departure
- Less than five days before departure
- Upon arrival in the receiving country (location of work)
- Workers are not given copies of their contracts

- Additional Information _____

Q2.22 What kind of training do foreign migrants receive before they leave their home country for work at your company?

- Pre-departure training provided by an employee of our company that covers the contents of their employment contracts, legal requirements, and company policies
- Pre-departure training designed and delivered by the receiving country labor recruiter
- Pre-departure training designed and delivered by the sending country labor agent
- Workers do not receive pre-departure training
- Additional Information

PART 3: MANAGEMENT OF MIGRANT WORKERS

This section examines workplace policies, practices and procedures used to manage migrant workers at your production facility or other worksite, such as farms or warehouses.

Note: Please use the "Additional Information" section to explain your answers or to describe a practice that is not among the list of choices.

Q3.1 Are there migrant workers* at your company? [*Note: this includes both foreign and domestic migrants that are either directly employed by your company or work for a labor provider or agency.]

- Yes
- No

Q3.2 Who is responsible for coordinating and processing migrant worker documentation when they arrive for work?

- An employee of my company
- The labor provider
- Another employer (factory, farm, etc.)
- Additional Information _____

Q3.3 How does your company and/or your labor provider manage migrant worker identity documents (passports, visas, work permits, proof of age, etc.)? (Select all that apply.)

- We keep only photocopies of identity documents and the worker keeps the originals in his or her possession.
- Workers are provided with individual locked storage for their identity documents.
- Workers are required to turn in their documents to the company or the labor provider for safekeeping.
- Workers voluntarily have the company, or the labor provider hold their documents for safekeeping.
- The company or labor provider keeps the documents; however, workers can retrieve them at any time without delay.
- Workers can retrieve their documents when they intend to return to their home country for a visit or when their contract term is over.
- Additional Information _____

Q3.4 What is included in the orientation program for new migrant workers when they arrive for work at your facility? (Select all that apply.)

- Company employment policies and procedures
- Legal rights and responsibilities of workers
- Facilities provided for workers to securely store their passports and other identity documents
- Rights of workers described in our company's social responsibility policy or Code of Conduct
- Worker feedback and communication procedures, including grievance procedures
- Discipline and termination rules and procedures
- Workplace health and safety
- Process for returning home (repatriation)
- Accommodation (housing, dormitory, hostel) rules and procedures
- Ways to report violations of company policies or legal requirements by company staff and other workers
- Ways to report violations of company policies or legal requirements by labor recruiters
- Additional Information _____

Q3.5 How does your company make sure workers understand the information provided in the orientation training program? (Select all that apply.)

- Workers are given a quiz immediately after the session to test their understanding.
- We survey workers a few days or weeks after the session to see how much knowledge they have retained.
- We provide workers with refresher sessions every year.
- We do not measure learning or understanding.
- Additional Information _____

Q3.6 What basic wage are migrant workers paid? (Select all that apply.)

- Legal minimum wage
- Wage defined by a legally-recognized collective bargaining agreement
- Same wage as local workers performing the same work
- If there is no legal minimum wage, migrant workers are paid the prevailing industry wage
- Wage is based on job skills and experience
- Wages that meet basic needs (clothing, food and housing) plus a little discretionary income
- Wages are based on piece work (for example, the number of items produced or harvested)
- Additional Information _____

Q3.7 Migrant workers are paid a wage premium for: (Select all that apply.)

- Overtime work beyond the legally defined number of regular work hours in a day or week
- Work performed on public holidays
- Work performed on the workers' scheduled day off
- Work performed on weekends
- The adverse wage rate regardless of hours worked
- Additional Information _____

Q3.8 Who pays for workers' housing?

- Our company
- Another employer (factory, farm, etc.)
- The worker
- Labor provider

- Housing is not provided or arranged for workers
- Additional Information _____

Q3.9 How does your company ensure compliance with local housing and safety standards? (Select all that apply.)

- The requirement to meet standards is included in labor provider contracts.
- Standards are included in leases/contracts with housing owners/managers.
- Local housing and safety standards are clearly posted at the housing and in company offices.
- My company regularly inspects housing for compliance with standards.
- Our labor provider or third-party housing owner/manager is responsible for performing regular housing inspections and correcting any identified noncompliance.
- There is a mechanism in place for workers to complain about housing conditions without fear of retaliation.
- Additional Information _____

Q3.10 Describe the type of social insurance and other benefits provided to migrant workers. (Select all that apply.)

- The same social insurance and benefits provided to local workers
- Work accident insurance
- Government-required social insurance for disability, unemployment, health care, etc.
- Sick leave
- Vacation (annual leave)
- Maternity leave
- Migrant workers are not legally provided with social insurance or other benefits
- Additional Information _____

Q3.11 How do you ensure that migrant workers understand how their wages are calculated? (Select all that apply.)

- Workers are provided with training on how their pay is calculated.
- Workers are provided with detailed pay slips in their own language or a language they understand.
- Workers are provided with a “key” in their own language that enables them to understand their pay slips.
- There are postings on notice boards that explain how wages are calculated.
- Workers can ask their employer if they have a question.

- Additional Information _____

Q3.12 What kinds of deductions are made from migrant workers' wages? (Select all that apply.)

- Food
- Housing
- Communications (telephone, mail, internet, etc.)
- Transportation to and from the workplace
- Transportation from the sending country
- Return transportation to the sending country
- Recruitment fees
- Visa processing fees
- Fines for breaking rules
- Repayment of loans
- Uniforms
- Tools
- Medical services
- Personal protective equipment (PPE)
- Mandatory savings
- Interest-charged advances for food, housing, communications, etc.
- Government taxes
- There are no deductions from workers' wages
- Additional Information _____

Q3.13 Who pays migrant workers' wages?

- Our local (in-country) labor provider
- My company
- Another employer
- Additional Information _____

Q3.14 How are migrant workers paid? (Select all that apply.)

- Directly in cash
- Directly by company check
- By deposit into the workers' bank accounts
- In cash cards (debit cards)
- Workers are paid a portion of their wages each pay period and the balance at the end of their contract
- Workers are paid in full upon completion of their contract

- Workers are paid in part or in full in non-cash (i.e. in kind)
- Additional Information _____

Q3.15 How many regular work hours do migrant workers work per week?

- 40
- 48
- Less than 40
- Between 40 and 48
- More than 48
- Additional Information _____

Q3.16 How many overtime hours do migrant workers work per week on average?

- 12
- 20
- Less than 12
- Between 12 and 20
- More than 20
- Additional Information _____

Q3.17 Do migrant workers have the right to refuse overtime work without penalty?

- Yes, all overtime work is strictly voluntary.
- No, migrant worker employment contracts call for a certain amount of overtime.
- No, the collective bargaining agreement specifies the amount of overtime.
- No, all workers are required to work overtime as needed to meet our production targets.
- Additional Information _____

Q3.18 Do migrant workers receive at least one day (24 consecutive hours) off every week?

- Yes
- No
- If "No," please explain _____

Q3.19 Does your company have a process for migrant workers to report workplace grievances?

- Yes
- No
- If "No," please explain _____

Q3.20 Which of the following are part of your company's grievance process for migrant workers? (Select all that apply.)

- Anonymous reporting channel (for example, a hot line or email address)
- Confidentiality for the worker reporting the grievance
- Protection for workers against intimidation and retaliation
- Formal procedure for grievance resolution
- Communication of grievance status and resolution to workers
- Staff assigned to receive and handle worker grievances speak the workers' language(s)
- Supervisors and managers are trained on how to handle and resolve worker grievances
- The grievance policy and procedure are communicated to all workers
- A grievance mechanism is available to workers in all worksites along the supply chain
- Workers do not have to report grievances to their supervisor or manager of their direct supervisor
- Suggestion boxes
- Appeals process for grievances not resolved to the satisfaction of workers
- Additional Information _____

Q3.21 Can migrant workers directly report a grievance to your company or a third party without having to go through the labor provider?

- Yes
- No
- If "No," please explain _____

Q3.22 Does your company have policies and procedures for discipline and termination of migrant workers?

- Yes
- No
- If "No," please explain _____

Q3.23 Which of the following criteria are part of your process for migrant worker discipline and termination? (Select all that apply.)

- Communication of workplace rules to all workers
- Descriptions of disciplinary actions for violations of workplace rules
- Prohibition of punitive fine or disciplinary wage deductions
- Communication of the violation to the worker
- Opportunity for the worker to respond to a violation
- Evaluation or investigation of the violation and proposed disciplinary action
- Implementation of progressive discipline (from verbal and written warning to suspension and termination)
- Documentation of disciplinary notices in action in personnel files
- Appeals process for workers
- Additional Information _____

Q3.24 How does your company ensure that supervisors and managers understand your migrant worker discipline and termination policy and procedures? (Select all that apply.)

- All new supervisors and managers receive training on our company's policy and procedures on discipline and termination.
- Supervisors and managers receive refresher training on our policies and procedures on a regular basis.
- Supervisors and managers are evaluated on how well they implement our discipline and termination procedures.
- We do not train our supervisors or managers on discipline and termination.
- Additional Information _____

INTERPRETIVE GUIDANCE FOR SUPPLIER SELF-ASSESSMENTS

1. RECRUITMENT, SELECTION AND HIRING PROCESSES		
Question	Answers with Potential Risk	Interpretive Guidance
<p>Q1.1 Which of the following are included in your company's recruitment, selection and hiring policies?</p>	<p>All of the answer choices are good practices and should be part of a company's hiring policies.</p>	<p><i>The absence of stated company commitments to preventing violation of worker rights in recruitment, selection, and hiring practices presents a risk of human trafficking, discrimination, and child labor, among other issues.</i></p>
<p>Q1.2 How do you make sure that your recruitment, selection, and hiring policies are followed?</p>	<p>All of the available answer choices are good/desirable practices.</p>	<p><i>Companies need to have purely objective methods to select and hire workers. Additionally, companies need some kind of process, such as worker surveys, to monitor the effectiveness of implementation.</i></p>
<p>Q1.3 Which of the following are included in your job descriptions and vacancy announcements?</p>	<p>Potential risk:</p> <ul style="list-style-type: none"> • Personal characteristics, such as gender, marital status, etc. 	<p><i>Listing non-job-related characteristics in job descriptions and vacancy announcements is discriminatory and a violation of most legal and Code of Conduct requirements. Additionally, such criteria can eliminate a significant number of qualified job candidates from consideration which may impact the company's ability to meet its business objectives</i></p>

<p>Q1.4 How does your company recruit, select, and hire workers?</p>	<p>Potential risks:</p> <ul style="list-style-type: none"> • We use external labor recruiters to recruit and hire workers. • We hire some workers directly and use labor recruiters for others. • Use of informal brokers 	<p><i>The use of third-party labor recruiters is a legitimate way for companies with limited internal resources to recruit, select, and hire employees. However, the benefits of outsourcing this function can be offset by the risk of losing control over the hiring process — and of potential issues such as charging recruitment fees and unethical contract terms — unless there is strong oversight of labor recruiters' practices. Informal brokers will be more difficult to monitor and hold accountable to expectations.</i></p>
<p>Q1.5 How do you recruit and hire foreign migrant workers?</p>	<p>Potential risks:</p> <ul style="list-style-type: none"> • Using a labor provider in their home (sending) country • Through a labor provider in the receiving country • Use of informal brokers 	<p><i>As above, the benefits of outsourcing this function can be offset by the risk of losing control over the hiring process — and of potential issues such as charging recruitment fees and unethical contract terms — unless there is strong oversight of labor recruiters' practices, which is particularly difficult for sending country agents and brokers. Informal brokers will be more difficult to monitor and hold accountable to expectations.</i></p>

<p>Q1.6 What kind of training do you provide for company staff responsible for recruitment, selection, and hiring?</p>	<p>Ideally, all of the answer choices should be in place.</p>	<p><i>If individuals with recruitment, selection and hiring responsibilities are not trained on company and legal requirements and how to objectively interview and select candidates for hire, there is a serious risk of using inconsistent or biased selection criteria, resulting in making the wrong hiring decisions or violating company and legal social responsibility requirements.</i></p>
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2. USE OF LABOR RECRUITERS AND EMPLOYMENT AGENCIES

Question	Answers with Potential Risk	Explanation
<p>Q2.1 How do you screen your labor recruiters to determine if they can meet social responsibility requirements before you begin using them?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> We do not use a formal screening process. 	<p><i>Just as you need to know that a potential supplier can meet your requirements for price, quality, and delivery, you must also know that they are capable of and willing to meet social responsibility and legal requirements. This can only be done properly using a formal vetting/screening process to identify gaps in a supplier's management practices.</i></p>

<p>Q2.2 What formal performance requirements does your company have for your labor recruiters?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • We require the provider to comply with legal requirements only. • We do not have formal contracts with our labor recruiters. 	<p><i>If a labor provider is only required to comply with the law, and contracts do not contain explicit social responsibility performance requirements, there is a risk that providers' practices will not meet your Code of Conduct requirements.</i></p> <p><i>Without a formal contract, there is a risk that your labor provider will not understand or feel obligated to adhere to your company's expectations for socially responsible and legal business practices.</i></p>
<p>Q2.3 How do you evaluate your labor recruiters' ongoing performance in meeting both social responsibility and applicable legal requirements?</p>	<p>All of the choices are desirable practices. Suppliers should have at least one of them in place.</p>	<p><i>Screening a labor provider to determine their ability to meet your social responsibility requirements does not guarantee that they will do so over time.</i></p> <p><i>Without a systematic, ongoing performance assessment process you run the serious risk of not being aware of, or not proactively addressing, violations resulting from sub-standard provider practices.</i></p>
<p>Q2.4 Which of the following are included in your labor provider audit process?</p>	<p>All of the listed items are part of an effective labor provider audit process.</p>	<p><i>Audits are an essential part of any supplier performance monitoring program, and without such aspects as records reviews and interviews with management and workers, you are unable to identify performance gaps and establish improvement plans.</i></p>

<p>Q2.5 How do you ensure that labor recruiters correct the issues identified by audits, self-audits, and other evaluations?</p>	<p>All of the listed items are part of an effective labor provider audit process.</p>	<p><i>Without a formal process to track and verify closure of audit nonconformance, there is a significant risk that issues will go unresolved and the provider will continue to violate the law and your company's social responsibility requirements.</i></p>
<p>Q2.6 How do you communicate your staffing requirements (hiring needs) to your labor provider(s)?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • We only tell them the number and categories of workers needed. <p><i>If selected by itself, or in combination with the above answer:</i></p> <ul style="list-style-type: none"> • We tell them the time by which we need the workers. 	<p><i>The risk in only providing the number and general types of workers needed or how soon you need them is that the labor provider may not apply your social responsibility and job performance expectations in the hiring process. This may result in trafficking, discrimination, child labor, and other unintended social responsibility outcomes. You may also be provided workers who are not fit to perform the work needed to achieve your business objectives.</i></p>
<p>Q2.7 Do you or your labor recruiters recruit workers from other countries (foreign migrant workers, guest workers, etc.)?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • Yes 	<p><i>Recruiting foreign migrant workers is a legitimate business strategy, particularly in areas with local labor shortages or where the skill level of the local workforce is inadequate to meet business needs. However, employing foreign migrants typically means that much of the hiring process may be done in other countries by individuals and organizations over which you may have little control or oversight.</i></p>

<p>Q2.8 Do you or your local (receiving country) labor recruiters work with recruiters or agents in the countries where workers are recruited (sending countries)?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • Yes 	<p><i>Secondary labor recruiters or agents in sending countries are often informal businesses that are unlicensed and unregulated. They may or may not understand your company's social responsibility expectations or the legal requirements in their country or yours, which presents the serious risk of human trafficking and other social responsibility nonconformance.</i></p>
<p>Q2.9 How do you determine that recruiters and agents in sending countries can meet both social responsibility and legal requirements?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • Receiving country labor recruiters screen the sending country recruiters and agents <p>In addition, the other listed choices should all be part of the supplier's process for screening sending country agents.</p>	<p><i>Because of the often-informal nature of labor recruiting in sending countries, the absence of a thorough screening of sending country recruiters or delegating the responsibility to your receiving country broker can result in the use of agents that are neither able nor willing to conform to your company social responsibility expectations or the law.</i></p>
<p>Q2.10 How do you monitor the social responsibility and legal compliance performance of sending country recruiters and agents?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • We do not formally monitor the legal compliance performance of sending country recruiters and agents. <p>In addition, the other listed choices should all be part of the supplier's process for monitoring the performance of sending country agents.</p>	<p><i>The recruiters and agents you use in sending countries operate remotely and largely independently. Without monitoring them, you risk illegal or unethical practices going undetected and unaddressed.</i></p>

<p>Q2.11 How much do workers pay your company or either the receiving country or sending country labor recruiter or agent to get a job with your company?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • Workers pay only what is legally required in their home country. • Workers pay only what is legally required in the receiving country. • Our company policies specify the maximum amount workers are required to pay. • Workers pay what is legally allowable in the sending or receiving country. 	<p><i>Foreign migrants are particularly vulnerable to exploitation, especially as they are often charged illegal and/or excessive fees. The U.S. Federal Acquisition Regulation: Ending Trafficking in Persons (FAR) and many company and industry Codes of Conduct now prohibit charging recruitment fees. Without a company policy prohibiting recruitment fees and controls in place to ensure workers do not pay fees, your company faces a serious risk of using debt-bonded labor (a common form of human trafficking).</i></p>
<p>Q2.12 What types of fees and expenses are foreign workers required to pay?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • Transportation to the receiving country (for the job) • Transportation home upon completion of their contract • Document processing (for example, work permit, visa) • Job application fee • Medical examination and/or testing • Skills testing 	<p><i>In addition to recruitment fees, migrant workers may be charged for transportation and other expenses that labor brokers and employers do not call "recruitment fees." These expenses are often excessive and illegal and can put workers at risk of debt bondage if they have to borrow money to pay them. This presents your company with both a reputational and compliance risk.</i></p> <p><i>Your policies and procedures should clearly define the fees and expenses that workers cannot be charged.</i></p>

<p>Q2.13 How do the sending country recruiters or your local (receiving country) labor recruiters screen job applicants?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • They use their own judgment to decide which candidates can do the job. 	<p><i>Without clear stated job requirements and selection criteria, the screening process can be unduly influenced by the biases of the individuals doing the screening.</i></p> <p><i>Selection can also be corrupted when recruiters give preference to job seekers who are willing to pay a bribe.</i></p>
<p>Q2.14 Who makes the final selection of which applicants to hire?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • The sending country recruiter or agent • Our local (receiving country) labor provider(s) 	<p><i>The more steps removed from direct control of the hiring process, the greater the risk that inappropriate or improper selection practices will be used, with the risk of not meeting the law and your company's labor skills and social responsibility requirements.</i></p>
<p>Q2.15 How do you verify that foreign migrants can legally work in the receiving country?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • Our local (receiving country) labor provider is responsible for obtaining and verifying the necessary documentation. • The sending country recruiter or agent is responsible for obtaining and verifying the necessary documentation. 	<p><i>Your company is ultimately responsible for the legal status of migrant workers employed in your operations. Sending country agents may not know the legal requirements in your country. Receiving (in-country) providers may be more concerned with delivering the number of employees your company needs rather than complying with all applicable requirements. To minimize this risk, your company must have a process to ensure the legal status of foreign migrants.</i></p>

<p>Q2.16 When are workers provided with an explanation of the job duties and terms and conditions of employment?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • In their home country, after they sign the employment contract. • After arrival in the receiving country, before they sign the employment contract. • In the receiving country, after signing the employment contract. 	<p><i>If new hires are not provided with a thorough, accurate explanation of the terms and conditions of their employment at your company before they sign the employment contract and before they leave their home country, they may find themselves in a job that they did not accept voluntarily — a form of human trafficking.</i></p> <p><i>In addition, your company may be in violation of both legal and Code of Conduct requirements.</i></p>
<p>Q2.17 How does your company ensure that workers understand all the terms and conditions of their employment contract?</p>	<p>All of the answer choices should be part of the supplier's process for ensuring worker understanding.</p>	<p><i>Workers must fully understand the terms and conditions of the job they are about to accept to ensure that they are making the decision voluntarily.</i></p>

<p>Q2.18 The worker signs an employment contract with _____.</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • Our in-country labor provider. • Both the recruiter or agent in their home country and our in-country labor provider. • Both my company and our in-country labor provider. • Another employer. • We do not use employment contracts. 	<p><i>Employment contracts are an essential element in ensuring respect of worker rights and should be part of any employer's recruitment, selection, and hiring system, regardless of local legal requirements. It is appropriate for workers to sign employment contracts with your in-country labor provider if the labor provider is responsible for providing their wages and benefits and for managing their day-to-day work activities. However, without oversight of this process, there is a risk of noncompliance with legal requirements and your company's social responsibility expectations.</i></p> <p><i>When a worker signs contracts with multiple parties, there is a significant risk that the employment terms and conditions in the two contracts will be different. The receiving country contract terms often do not include what was promised to the employee by the sending country agent.</i></p>
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<p>Q2.19 What is included in the employment contract?</p>	<p>All of the available choices should be included in worker employment contracts.</p>	<p><i>Detailed employment contracts are an essential element in ensuring workers enter into employment voluntarily and that they fully understand their legal rights.</i></p> <p><i>A contract that includes all the answer choices will help ensure compliance with the U.S. Federal Acquisition Regulation: Ending Trafficking in Persons (FAR) and most other legal and Code of Conduct requirements.</i></p>
<p>Q2.20 Can workers cancel their employment contracts before they leave their home country?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • Yes, but they have to pay a cancellation fee. • No, they must work for the term of their contract. 	<p><i>If at any time before a migrant worker leaves their home country they decide to decline the job, they must be free to do so. If migrants are required to pay a cancellation fee (other than cost of passport and visa) or required to fulfill their contract term, this increases the risk of human trafficking.</i></p>
<p>Q2.21 When are workers given a copy of their employment contract?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • Less than five days before departure • Upon arrival in the receiving country (location of work) • Workers are not given copies of their contracts 	<p><i>The U.S. Federal Acquisition Regulation: Ending Trafficking in Persons (FAR) and many company Codes of Conduct require providing workers with their contracts at least five days prior to departure. This allows enough time for workers to make an informed decision about taking the job. Failure to provide contracts at least five days in advance increases the risk of exploitation (involuntariness).</i></p>

<p>Q2.22 What kind of training do foreign migrants receive before they leave their home country for work at your company?</p>	<ul style="list-style-type: none"> • Pre-departure training designed and delivered by the receiving country labor recruiter • Pre-departure training designed and delivered by the sending country labor agent • Workers do not receive pre-departure training 	<p><i>Pre-departure training that covers all the details about the job and contract terms is essential for the migrant worker to make an informed decision about the job before traveling to another country for employment. Without it, there is a risk of the worker entering into a situation of human trafficking.</i></p> <p><i>Additionally, leaving the design and delivery of the training to the discretion of either sending or receiving country agents presents the risk that not all the required information will be presented.</i></p>
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3. MANAGEMENT OF MIGRANT WORKERS		
Question	Answers with Potential Risk	Explanation
<p>Q3.1 Are there migrant workers* at your company?</p> <p>*Note: this includes both foreign and domestic migrants that are either directly employed by your company or work for a labor provider or agency</p>	<p><no red flag answers></p>	<p style="background-color: #cccccc;"></p>

<p>Q3.2 Who is responsible for coordinating and processing migrant worker documentation when they arrive for work?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • The labor provider • Another employer (factory, farm, etc.) 	<p><i>It is appropriate for the labor provider to process migrant worker documentation, especially when the employment agreement is between the labor provider and migrant. Where the worker has another employer (most common in agriculture), that employer may also be the one to process worker documentation. However without oversight, there is a risk that the provider's or other employer's processes may violate your social responsibility expectations or applicable legal requirements.</i></p>
<p>Q3.3 How does your company and/or your labor provider manage migrant worker identify documents (passports, visas, work permits, proof of age, etc.)?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • Workers are required to turn in their documents to the company or the labor provider for safekeeping. • Workers voluntarily have the company or the labor provider to hold their documents for safekeeping. • The company or labor provider keeps the documents; however, workers can retrieve them at any time without delay. • Workers can retrieve their documents when they intend to return to their home country for a visit or when their contract term is over. 	<p><i>Personal identity documents are the property of the worker. Some companies and labor recruiters retain these documents for "safekeeping" or other reasons.</i></p> <p><i>If employees are not in possession of their identity documents, they may not be able to leave the work site, violating their right to freedom of movement and making the company noncompliant with the U.S. Federal Acquisition Regulation: Ending Trafficking in Persons (FAR) and many company and industry codes of conduct.</i></p>

<p>Q3.4 What is included in the orientation program for new migrant workers when they arrive for work at your facility?</p>	<p>All of the answer choices should be included in the orientation program.</p>	<p><i>Orientation training for newly arrived workers is essential to their understanding of their legal rights and responsibilities and company rules and procedures. It is also a legal and typical Code of Conduct requirement.</i></p>
<p>Q3.5 How does the company make sure that workers understood the information provided in the orientation program?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • We do not measure learning or understanding <p>The answer choices are all elements of an effective training impact assessment program</p>	<p><i>Without measuring learning, there is a significant risk that the workers do not adequately understand their rights and responsibilities, impacting both conformance with legal and social responsibility requirements and the company's business success.</i></p>
<p>Q3.6 What basic wage are migrant workers paid?</p>	<p>Each of the listed choices is an acceptable basis for migrant worker wages. However, two choices represent potential risk if managed improperly:</p> <ul style="list-style-type: none"> • In the absence of a legal minimum wage, the supplier must have a formal process to ensure workers are paid no less than the local <i>industry prevailing wages</i> and benefits. • If workers are paid on a <i>piecework</i> basis, there is a risk that wages will fall below the legal minimum if a worker fails to meet the production quota. 	<p><i>All companies must have a process in place to ensure that all migrant workers are paid a fair and legal wage. In the absence of a legal minimum wage, migrants should be paid the same as local workers performing the same job. Without such a process, there is a significant risk that wage payments will not comply with legal and company Code of Conduct requirements.</i></p>

<p>Q3.7 Migrant workers are paid a wage premium for _____.</p>	<p>All of the available answer choices should be part of a supplier's wage system.</p>	<p><i>All workers must be paid a wage premium for overtime hours and work performed on holidays and other non-scheduled workdays. The absence of this policy not only puts your company at risk of social responsibility and legal nonconformance, but worker discontent and resentment as well, which can impact productivity and quality.</i></p>
<p>Q3.8 Who pays for workers' housing?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • Another employer (factory, farm, etc.) • Labor provider • Housing is not provided or arranged for workers 	<p><i>Workers' housing arrangements must be clearly defined in the employment contract. Depending on the type of employment and country of operation, housing must be provided to workers at no cost to them. If workers must pay for housing, they cannot be charged in excess of equivalent local rents.</i></p> <p><i>Failure to clearly describe and monitor payment for worker accommodation can be both a legal noncompliance and a nonconformance with company and industry Codes of Conduct.</i></p>
<p>Q3.9 How does your company ensure compliance with local housing and safety standards?</p>	<p>All of the listed answer choices are appropriate elements of a company's worker housing program.</p>	<p><i>Failure to have formal policies and procedures (e.g. regular audits and inspections) in place to ensure worker housing meets local standards can result in unsafe or unhealthy conditions and can be both a legal noncompliance and Code of Conduct nonconformance.</i></p>

<p>Q3.10 Describe the type of social insurance and other benefits provided to migrant workers?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • Migrant workers are not provided with social insurance or other benefits. 	<p><i>All workers are entitled to the social insurance and other benefits required by law and by customer social responsibility codes. If your compensation and benefits system does not ensure migrant workers are provided with social insurance, such as work accident insurance, and other required benefits, you are at significant risk of noncompliance with requirements. Your company may also face worker discontent and resentment, which can impact productivity and quality.</i></p>
<p>Q3.11 How do you ensure that migrant workers understand how their wages are calculated?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • Workers are free to ask Payroll if they have a question. 	<p><i>Making sure that all workers understand how they are paid so they can verify the accuracy of their compensation is a fundamental legal and social responsibility expectation. This is particularly true for foreign migrants who likely do not speak the local language. There is a significant risk of noncompliance with requirements if you do not provide workers with this information.</i></p>

<p>Q3.12 What kinds of deductions are made from migrant worker wages?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • Transportation to and from the workplace • Transportation from the sending country • Return transportation to the sending country • Interest charged advances for food, housing, communications, etc. 	<p><i>Transportation to the receiving country (where the work is performed) and return transportation upon completion of the employment contract must be paid by the employer. Additionally, transportation to and from the workplace and workers' housing must also be provided where housing is arranged by the employer.</i></p> <p><i>Agricultural workers may be charged for food and water in some contexts.</i></p> <p><i>Requiring workers to pay such costs is noncompliant with both legal and social responsibility requirements.</i></p>
	<ul style="list-style-type: none"> • Recruitment fees • Visa processing fees 	<p><i>Recruitment fees cannot be charged to workers. The U.S. Federal Acquisition Regulation: Ending Trafficking in Persons (FAR) and many company and industry Codes of Conduct prohibit charging recruitment fees to workers.</i></p>
	<ul style="list-style-type: none"> • Fines for breaking rules 	<p><i>Monetary fines for breaking workplace rules are considered disciplinary wage deductions. Systems of compensation and discipline that do not prohibit monetary fines are at risk of noncompliance with legal and social responsibility requirements.</i></p>
	<ul style="list-style-type: none"> • Repayment of loans 	<p><i>Repayment of loans through payroll deductions indicates a high risk of debt bondage among your migrant workers.</i></p>

	<ul style="list-style-type: none"> • Uniforms • Tools • Personal protective equipment 	<p><i>Uniforms, tools, and personal protective equipment are job requirements and must therefore be provided to workers at no cost to them. Charging workers for such items puts workers at risk of being paid less than minimum wage and represents a compliance risk for your company.</i></p>
	<ul style="list-style-type: none"> • Medical services 	<p><i>Migrant workers must be provided with work accident insurance and medical services free of charge for any job-related injuries or illnesses. Failure to do so may be both a legal and Code of Conduct noncompliance.</i></p>
	<ul style="list-style-type: none"> • Mandatory savings 	<p><i>Some companies require migrant workers to have a portion of their salary put in a savings account to provide an incentive to work for the entire contract period or to pay for their transportation home once their contract term is over. Such involuntary withholding of wages represents a risk of human trafficking.</i></p>
	<ul style="list-style-type: none"> • Food • Housing 	<p><i>Although workers may be charged for food and housing if part of the employment agreement, such expenses must be at or below local market prices/rates.</i></p>

<p>Q3.13 Who pays migrant workers' wages?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • Our local (in-country) labor provider • Another employer 	<p><i>It is appropriate for labor recruiters to pay migrant workers' wages, especially when the workers' employment contracts are with the labor provider. In agriculture, wages may also be paid by another farm or processor. However, without oversight, when the compensation process is outsourced it presents a risk of wage underpayment, unlawful deductions, and non-payment of legally-required benefits, among other issues.</i></p>
<p>Q3.14 How are migrant workers paid?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • In cash cards (debit cards) • Workers are paid a portion of their wages each pay period and the balance at the end of their contract • Workers are paid in full upon completion of their contract • Workers are paid in part or in full in non-cash (i.e. in kind) 	<p><i>Failure to pay workers in full presents a serious risk of human trafficking as workers cannot leave their jobs without the financial penalty of lost wages.</i></p> <p><i>The use of debit cards presents the risk of workers receiving less than the minimum wage because of bank fees and other charges whenever the card is used.</i></p> <p><i>In-kind payments are non-transparent and subject to abuse.</i></p>

<p>Q3.15 How many regular work hours do migrant workers work per week?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • More than 40 • More than 48 	<p><i>Most laws and social responsibility codes limit regular working hours to no more than 40 or 48 hours per week. Requiring employees to work more than the legal limit without being paid an overtime wage premium represents a serious noncompliance risk in <u>non-agricultural sectors</u>. In agricultural sectors, overtime hours may be unavoidable due to the seasonal nature of crops and needs of livestock. However, in such cases where overtime is possible or probable, the wage rate for those hours should be agreed upon in advance of employment and workers must be compensated for them.</i></p>
<p>Q3.16 How many overtime hours do migrant workers work per week on average?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • More than 12 • More than 20 	<p><i>Social responsibility codes typically limit a workweek to 60 hours total — including overtime. Some jurisdictions have even more restrictive legal requirements, while others do not limit work hours.</i></p> <p><i>Workers routinely working in excess of 60 hours or the legal limit represents a serious noncompliance risk for the employer and a health and safety risk for workers.</i></p>

<p>Q3.17 Do migrant workers have the right to refuse overtime work without penalty?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • No, all workers are required to work overtime as needed to meet our production targets. 	<p><i>A fundamental principle of social responsibility is that all overtime must be voluntary unless stated otherwise in a collective bargaining agreement.</i></p> <p><i>Involuntary overtime is a serious red flag and could be an indicator of human trafficking; it is a serious violation of social responsibility standards for the employer.</i></p>
<p>Q3.18 Do migrant workers receive at least one day (24 consecutive hours) off every week?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • No 	<p><i>All employees are entitled to at least one day off per week by law and social responsibility codes. Not providing the required day off represents a compliance risk for the company, a health and safety risk for workers, and a potentially adverse impact on both productivity and quality.</i></p>
<p>Q3.19 Does your company have a process for migrant workers to report workplace grievances?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • No 	<p><i>Migrant workers are often subject to unethical practices and mistreatment during recruitment and employment. Without a process for migrants to report abuses, your company runs the risk of being in violation of the law or social responsibility standards without knowing it, and/or not addressing serious issues that impact worker welfare or safety or business reputation.</i></p>
<p>Q3.20 Which of the following are part of your company's grievance process for migrant workers?</p>	<p>All of the available answer choices should be part of any supplier's grievance process.</p>	

<p>Q3.21 Can migrant workers directly report a grievance to your company without having to go through the labor provider?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • No 	<p><i>In many cases, labor recruiters are responsible for violations of migrant worker rights. Requiring migrant workers to report their grievance to the labor provider instead of your company potentially exposes the workers to intimidation and reprisal and could prevent your company from identifying and addressing the source of the abuses.</i></p>
<p>Q3.22 Does your company have policies and procedures for discipline and termination of migrant workers?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • No 	<p><i>Discipline and termination procedures that comply with legal and social responsibility requirements ensure that discipline is applied fairly, humanely, and consistently. The lack of discipline and termination procedures presents the risk of discrimination, inhumane treatment, and intimidation of employees.</i></p>
<p>Q3.23 Which of the following criteria are part of your process for migrant worker discipline and termination?</p>	<p>All of the available answer choices should be included in a supplier's discipline and termination procedures.</p>	
<p>Q3.24 How does your company ensure that supervisors and managers understand your migrant worker discipline and termination policy and procedures?</p>	<p>Potential Risks:</p> <ul style="list-style-type: none"> • We do not train our supervisors or managers on discipline and termination. 	<p><i>Discipline and termination procedures are designed to ensure that discipline is applied consistently, legally, and fairly. When the supervisors and managers responsible for administering discipline are not trained to properly implement the procedures, the company is at serious risk of legal and social noncompliance.</i></p>