

Benchmark Methodology – Information & Communications Technology (ICT)

| Indicator Name | Indicator Description | Indicator Elements |
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| 1.0 Commitment and Governance | | |
| 1.1 Awareness and Commitment | The company publicly demonstrates its awareness of and commitment to addressing human trafficking and forced labor. | The company: (1) has publicly demonstrated its awareness of and commitment to addressing human trafficking and forced labor. |
| 1.2 Supply Chain Standards | The company has supply chain standards that require 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 standards have been approved by a senior executive and are easily accessible on the company’s website. | The company’s supply chain standard: (1) requires suppliers to uphold workers’ fundamental rights and freedoms (those articulated in the ILO 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 reviewed and updated regularly. |
| 1.3 Management and Accountability | The company has established within its managerial structure clear responsibilities and accountability for the implementation of its supply chain policies and standards relevant to human trafficking and forced labor. | The company: (1) has a committee, team, program or officer responsible for the implementation of its supply chain policies and standards relevant to human trafficking and forced labor. |
| 1.4 Training | The company has training programs in place to ensure that relevant decision-makers within the company and in its supply chain are aware of risks related to human trafficking and forced labor and are effectively implementing the company’s policies and standards. | Training programs include: (1) the training of all relevant decision-makers within the company on risks, policies, and standards related to human trafficking and forced labor. (2) the training and capacity building of suppliers on risks, policies, and standards, related to human trafficking and forced labor. |

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| 1.5 Stakeholder Engagement | The company engages with relevant stakeholders on human trafficking and forced labor. This includes engagement with trade unions, local NGOs and policy makers 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: (1) engaged with trade unions, local NGOs and/or policy makers in countries in which its suppliers operate on forced labor and human trafficking. (2) actively participated in one or more multi-stakeholder or industry initiatives focused on forced labor and human trafficking. |

2 . 0 T r a c e a b i l i t y a n d R i s k A s s e s s m e n t

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| 2.1 Traceability and Risk Assessment | The company has processes to trace its supply chain and to assess forced labor risks associated with specific commodities, regions and/or groups. | The company: (1) has a process to trace its supply chain. (2) conducts forced labor risk or impact assessment(s) focused on specific commodities, regions and/or groups. |
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| 2.2 Transparency | The company publicly discloses forced labor risks identified throughout its supply chain, the names and locations of its first-tier suppliers, and some information on suppliers beyond its first tier. | The company discloses: (1) forced labor risks identified throughout its supply chain. (2) the names and locations of its first-tier suppliers. (3) some information on suppliers beyond its first-tier suppliers (i.e. name, location, source country). |
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3 . 0 P u r c h a s i n g P r a c t i c e s

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| 3.1 Purchasing Practices | The company demonstrates awareness of the increased risk of human trafficking and forced labor caused by certain purchasing practices, such as short-term contracts, excessive downward pressure on pricing, and sudden changes of workload, and takes steps to mitigate this risk. | The company: (1) demonstrates awareness that certain types of purchasing practices can increase the risk of human trafficking and forced labor (e.g. such as short-term contracts, excessive downward pressure on pricing, and sudden changes of workload). (2) is taking steps to mitigate the risk of human trafficking and forced labor caused by certain purchasing practices (e.g. such as short-term contracts, excessive downward pressure on pricing, and sudden changes of workload). |
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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, and has a procurement selection process that considers the capacity of suppliers to meet fluctuating demands. | The company: (1) assesses risks of forced labor at potential suppliers prior to entering into any contracts with them. (2) has a procurement selection process that considers the capacity of suppliers to meet fluctuating demands (to reduce risk of undeclared subcontracting). |
| 3.3 Integration into Supplier Contracts | The company integrates supply chain standards addressing forced labor and human trafficking into supplier contracts. | The company: (1) The company integrates supply chain standards addressing forced labor and human trafficking into supplier contracts. |
| 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 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 ensure that their own suppliers implement standards that are in line with the company's supply chain standards addressing forced labor and human trafficking. |
| 4 . 0 R e c r u i t m e n t | | |
| 4.1 Recruitment Approach | The company demonstrates awareness of the risk of exploitation of migrant workers by recruitment agencies and brokers, and has relevant policies in place (e.g. on direct employment). The company also requires suppliers to disclose to them the recruiters that they use. | The company: (1) demonstrates awareness of the risk of exploitation of migrant workers by recruitment agencies and brokers, and commitment to address such risks. (2) has a policy that requires recruitment agencies in its supply chain to uphold workers' rights. (3) has a policy that requires direct employment. (4) requires suppliers to disclose to them the recruiters that they use. |
| 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. In the event that it discovers that fees have been paid, the company ensures that such fees are reimbursed. | The company: (1) requires that no fees be charged during any recruitment processes conducted throughout the supply chain. (2) in the event that it discovers that fees have been paid, ensures that such fees are reimbursed. |

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| 4.3 Recruitment Audits | The company audits recruiters to assess risks of forced labor and human trafficking. | The company: (1) audits recruiters to assess risks of forced labor and human trafficking. |

5 . 0 W o r k e r V o i c e

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| 5.1 Communication of Policies | The company communicates its human trafficking and forced labor policies and standards to supply chain workers in their native languages. | The company: (1) communicates its human trafficking and forced labor policies and standards to workers in its supply chain. (2) makes its policies and standards available in the languages of suppliers' workers. |
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| 5.2 Worker Voice | The company engages with workers outside of the context of the factories in which they work, either directly or in partnership with stakeholders. | The company: (1) has initiatives to engage with workers outside of the context of the factories in which they work, either directly or in partnership with stakeholders. |
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| 5.3 Worker Empowerment | Where there are regulatory constraints on freedom of association, the company encourages suppliers to ensure workplace environments in which workers are able to pursue alternative forms of organizing. | The company: (1) where there are regulatory constraints on freedom of association, encourages suppliers to ensure workplace environments in which workers are able to pursue alternative forms of organizing. |
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| 5.4 Grievance Mechanism | The company has an accessible, formal grievance mechanism that facilitates the impartial reporting by suppliers' workers of workplace grievances and informs workers as to how to access the mechanism. Measures are taken to ensure that the impacted stakeholders trust the mechanism. | The company: (1) has formal procedure that allows suppliers' workers to report a grievance to an impartial entity. (2) demonstrates that the mechanism is made accessible to workers in the supply chain (e.g. its available in workers language). (3) ensures that the existence of the mechanism is proactively communicated to suppliers' workers. (4) takes steps to ensure that impacted stakeholders trust the mechanism (e.g. workers who report a grievance can do so without the fear of penalty, dismissal or reprisal of any kind). |
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6 . 0 M o n i t o r i n g

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| 6.1 Auditing Process | The company audits its suppliers to measure compliance with applicable regulations and with its supply chain standards. The process includes scheduled and non-scheduled visits, a review of relevant documents, and interviews with workers. | The company has an audit process that includes: (1) scheduled and non-scheduled visits. (2) a review of relevant documents. (3) interviews with workers. |
| 6.2 Audit Disclosure | The company publicly discloses information on the results of its audits. This includes the number and percentage of suppliers audited annually, what percentage were unannounced, and information on who carried out the audits. | The company discloses: (1) the percentage of suppliers audited annually. (2) the percentage of unannounced audits. (3) information on who carried out the audits. (4) a summary of findings, including details regarding any violations revealed. |

7 . 0 R e m e d y

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| 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; timelines for remediation; 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. |
| 7.2 Remedy Programs | The company has a process to provide remedy to workers in its supply chain in cases of human trafficking and forced labor. In its public reporting the company provides examples of outcomes of this process. | The company discloses: (1) a process for responding to the complaints and/or reported violations of policies and standards. (2) examples of outcomes of these remedy process. |