

# COFFEE Project



## Self-Assessment Questionnaire for Coffee Traders



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# Self-Assessment Questionnaire for Coffee Traders

## Introduction

This tool is one of 17 tools comprising the Socially Sustainable Sourcing Toolkit (S3T), which was developed as part of Verité’s Cooperation on Fair, Free, Equitable Employment (COFFEE) Project through generous funding from the US Department of Labor’s Bureau of International Labor Affairs (USDOL-ILAB). The S3T was developed in alignment with USDOL’s *Comply Chain* model, with at least one tool created for each of the eight steps of *Comply Chain* (see graphic below). Many of the tools are derived from tools created for the *Responsible Sourcing Tool*, developed by Verité with funding from the U.S. Department of State’s Office to Monitor and Combat Trafficking in Persons (J/TIP). The tools can be used *à la carte*, but it is important that companies have systems and tools in place for each step of *Comply Chain*.

### STEPS OF COMPLY CHAIN AND CORRESPONDING TOOLS



U.S. Department of Labor Comply Chain Model

#### S3T Socially Sustainable Sourcing Toolkit

- STEP 1. Engage Stakeholders and Partners**  
Guidance on Stakeholder Engagement
- STEP 2. Assess Risk and Impacts**  
Risk Evaluation for Action in the Coffee Trade (RE-ACT) Dashboard  
Root Cause Analysis of Labor Violations in the Coffee Sector  
Self-Assessment Questionnaire for Coffee Traders  
Self-Assessment Questionnaire for Coffee Producers  
Self-Assessment Questionnaire for Labor Brokers  
Guidance on Screening and Selection of Labor Brokers
- STEP 3. Develop a Code of Conduct**  
Sample Code of Conduct Provisions  
Sample Social Responsibility Agreements  
Primer on Recruitment-Related Risks in the Latin American Coffee Sector
- STEP 4. Communicate & Train Across Supply Chain**  
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Guidance on Monitoring of Labor Brokers  
Worker Interview Guide Focused on Recruitment and Hiring
- STEP 6. Remediate Violations**  
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- STEP 7. Independent Review**  
Framework for Independent Verification of Ethical Sourcing
- STEP 8. Report on Performance**  
Guide on Public Reporting for Private Sector Stakeholders

## Introduction to the Tool

Self-Assessment Questionnaires (SAQs) are a set of self-administered questions that allow the user of the SAQ to identify potential risks or gaps in their standards, systems, and practices. The purpose of an SAQ is to give the user a space to reflect and introspectively assess themselves and their performance across a range of topics.

This SAQ is geared towards helping coffee traders identify potential labor risks<sup>1</sup> in their operations and to provide them with concrete steps that they can take to address identified risks. The SAQ is an internal tool, **which does not require the sharing of your answers with anyone**, so it is best for users of the SAQ to **answer the questions as fully, honestly, and accurately** as possible so that the recommendations generated most closely meet the user’s needs.

There are many SAQs that seek to evaluate labor risks. The major differences that set this SAQ apart is that: a) it is meant to be exclusively used by traders to evaluate their own risks and no information will be sent to any other parties; b) the decision to utilize the SAQ is made by traders, not by clients; and c) it does not only highlight risks, but provides concrete suggestions for addressing risks and a guide on the sequencing and the utilization of other tools in the Toolkit. The interpretation guide for the SAQ, which includes suggestions and recommendations based on your answers, can be found in Annex 1.

The interpretation guide for the SAQ, which includes suggestions and recommendations based on your answers, can be found in Annex 1. For the purposes of this SAQ, we will be referring to all third parties engaged wholly or in part in the recruitment, selection, hiring, and/or transportation of workers as “labor brokers.”

## Glossary of Terms for the Tool

Term	Definition
<b>Debt Bondage</b>	“Being forced to work to repay a debt and not being able to leave, or being forced to work and not being able to leave because of a debt.” <sup>2</sup> (2017 ILO Report-Global Estimate of Modern Slavery)
<b>Document Retention</b>	An indicator of forced labor, this includes the retention of workers’ identity documents, such as a passport, work document, driver’s license, birth certificate, or others.

<sup>1</sup> For further information on potential labor risks, particularly in the areas of recruitment and hiring, readers may also want to consult *Tool 6- Guidance on identifying risks related to recruitment and hiring*

<sup>2</sup> International Labour Organization (ILO). *Global Estimate of Modern Slavery 2017*  
[https://www.ilo.org/wcmsp5/groups/public/@dgreports/@dcomm/documents/publication/wcms\\_575479.pdf](https://www.ilo.org/wcmsp5/groups/public/@dgreports/@dcomm/documents/publication/wcms_575479.pdf)

Term	Definition
<b>Forced Labor</b>	“All work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.” <sup>3</sup> (ILO Convention No. 29)
<b>Human Trafficking</b>	“The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.” <sup>4</sup> (The Palermo Protocol)
<b>Labor Broker</b>	For the purposes of this Toolkit, a “labor broker” is any person who identifies, recruits, transports, processes paperwork for, places, or receives a worker anywhere between their source community and the worksite. The defining characteristic of a labor broker is not the nature of their relationship to an enterprise (e.g., formal employee vs. subcontractor) but rather their role in facilitating the acquisition and management of labor by said enterprise. It is the above functions that define a labor broker, regardless of other common functions they might play before, during, or after the brokering of labor, such as housing or managing workers.

<sup>3</sup> International Labour Organization (ILO), *Forced Labour Convention, C29*, 28 June 1930, C29, <https://www.refworld.org/docid/3ddb621f2a.html> [accessed 20 December 2018]

<sup>4</sup> UN General Assembly, *Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Transnational Organized Crime*, 15 November 2000, <https://www.refworld.org/docid/4720706c0.html> [accessed 20 December 2018]

Term	Definition
<b>Migrant Worker</b>	The term “migrant” or “migrant worker” refers to a person who has relocated to take employment away from their source community without plans to remain at the new site of residence permanently. A “seasonal migrant worker” is one who relocates from their source community and one or multiple worksites following a preset and cyclical annual schedule. Unless a worker is specified to be an “internal migrant,” the term refers to workers who cross international borders between their source and destination locations. “Shuttle migrants” travel between their home communities and their worksites daily, across international borders.
<b>Immigrant Worker</b>	A worker whose source community is across international borders from their place of work, irrespective of length of stay in the destination. Also see Migrant Worker.
<b>Recruitment Fees</b>	“Any fees or costs incurred in the recruitment process in order for workers to secure employment or placement, regardless of the manner, timing, or location of their imposition or collection.” <sup>5</sup> (Draft definition discussed on November 14-16, 2018 by the ILO’s Tripartite Meeting of Experts on Defining Recruitment Fees and Related Costs)

<sup>5</sup> Draft definition discussed on November 14-16, 2018 by the ILO’s Tripartite Meeting of Experts on Defining Recruitment Fees and Related Costs. [https://www.ilo.org/global/topics/labour-migration/events-training/WCMS\\_632651/lang--en/index.htm](https://www.ilo.org/global/topics/labour-migration/events-training/WCMS_632651/lang--en/index.htm)

## Self-Assessment Questionnaire for Coffee Traders

### Sourcing

<p><b>Q. 1.1</b></p>	<p>Do you have procedures in place to ensure traceability to the farm level (Does your company ask all of your upstream suppliers - traders and farms from which you source - for information about farms on which the coffee is sourced)?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Always. Our contracts require procedures in place and documents that can prove the origin of raw materials or products to the farm level.</li> <li><input type="checkbox"/> Always. Our contracts require that procedures be in place to track the origin of raw materials or products to the farm level, but we do not require documentation.</li> <li><input type="checkbox"/> Sometimes. Procedures and documents are not required, but we can perform traceability on an ad-hoc basis when the company deems it appropriate or when faced with a need for risk management.</li> <li><input type="checkbox"/> Never or almost never. Only in isolated situations, such as, for example, when we are explicitly required to do so for our customer. _____</li> </ul>
<p><b>Q. 1.1.1</b></p>	<p>Do you require any accompanying/supporting documentation for your product traceability?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Yes.</li> <li><input type="checkbox"/> We do not require suppliers to have traceability documentation.</li> </ul>
<p><b>Q. 1.2</b></p>	<p>From where does your company source coffee?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Directly from individual farms.</li> <li><input type="checkbox"/> Non-farm suppliers (traders, mills, cooperatives).</li> <li><input type="checkbox"/> Both.</li> <li><input type="checkbox"/> Other (please describe): _____</li> </ul>
<p><b>Q. 1.3</b></p>	<p>Have you identified of all the suppliers in your supply chain, all the way to the farm level?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Yes</li> <li><input type="checkbox"/> No</li> </ul>
<p><b>Q. 1.4</b></p>	<p>Of the total volume sold last year, what percentage is traceable to the farm level?</p>

Standards and Policies	
<b>Q. 2.1</b>	<p>What standards or Code of Conduct for labor and human rights issues does your organization follow?</p> <p><i>(Select all that apply)</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> We follow the standards of our certification body. (e.g., Rainforest Alliance, Fair Trade, etc.)</li> <li><input type="checkbox"/> We follow our customers' Codes of Conduct.</li> <li><input type="checkbox"/> We have our own Labor and Human Rights Policy or Code of Conduct.</li> <li><input type="checkbox"/> We follow applicable legal requirements on labor and human rights.</li> <li><input type="checkbox"/> Other (please describe): _____</li> </ul>
<b>Q. 2.2</b>	<p>What areas are covered by your Social Responsibility Policy or Code of Conduct?</p> <p><i>(Select all that apply)</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Compliance with Local Labor Law</li> <li><input type="checkbox"/> Forced Labor &amp; Human Trafficking</li> <li><input type="checkbox"/> Child Labor</li> <li><input type="checkbox"/> Discrimination &amp; Equality</li> <li><input type="checkbox"/> Freedom of Association &amp; Collective Bargaining</li> <li><input type="checkbox"/> Harassment and Abuse</li> <li><input type="checkbox"/> Health &amp; Safety</li> <li><input type="checkbox"/> Living Conditions</li> <li><input type="checkbox"/> Grievance Mechanisms</li> <li><input type="checkbox"/> Staff Training and Awareness</li> <li><input type="checkbox"/> Others (please describe): _____</li> <li><input type="checkbox"/> Not Applicable. We do not have an SR Policy or Code of Conduct.</li> </ul>
<b>Q. 2.3</b>	<p>To which of the following does your policy or code apply?</p> <p><i>(Select all that apply)</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Your company</li> <li><input type="checkbox"/> Your company's parent company</li> <li><input type="checkbox"/> Your company's owned and operated facilities and subsidiaries (Tier 1)</li> <li><input type="checkbox"/> All your company's suppliers (Tier 2)</li> <li><input type="checkbox"/> All labor brokers (Tier 3)</li> </ul>

### Supplier Screening

**Q. 3.1**

How do you screen prospective suppliers and business partners for their social responsibility performance?

*(Select all that apply)*

- Third-party audits
- Visits to suppliers
- Self-assessment questionnaires or surveys
- Adverse media scans
- Review of supplier policies
- Informal screening (e.g., word of mouth)
- We do not screen prospective suppliers for social responsibility performance.
- Other. Please describe: \_\_\_\_\_

### Trade Facilitation and Trade Enforcement Act

**Q. 4.1**

Has your company taken specific actions related to the U.S. Trade Facilitation and Trade Enforcement Act (TFTEA) of 2015?

- Yes, please elaborate: \_\_\_\_\_
- No
- We do not know about the TFTEA.

### Management and Accountability

**Q. 5.1**

Has your company designated a senior manager who is responsible for human rights performance in your supply chain?

- Yes
- No (If no, please skip to question 4)

**Q. 5.1.1**

Is this senior manager responsible for policies and action/remediation on labor and human rights issues?

- Yes
- No

**Q. 5.1.1.1**

Does your senior manager regularly evaluate the effectiveness of your company's supply chain due diligence processes?

- Yes
- No

**Q. 5.2**

Does your company have a dedicated budget for human rights due diligence?

- Yes
- No (If no, please skip to next section called "Monitoring")



Management and Accountability	
Q. 5.2.1	<p>Does your budget include dedicated resources to address supply chain labor risks?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>

Monitoring	
Q. 6.1	<p>Does your company conduct internal or external audits of suppliers?</p> <p><input type="checkbox"/> We audit all direct suppliers on a regular basis.</p> <p><input type="checkbox"/> We audit a given percentage or number of our suppliers on a regular basis.</p> <p><input type="checkbox"/> Occasionally, only when we identify some sort of problem with a given supplier.</p> <p><input type="checkbox"/> We rely on audits of producers performed by certification bodies. (e.g., Rainforest Alliance, Fair Trade USA, etc.)</p> <p><input type="checkbox"/> No supplier is audited.</p>
Q. 6.2	<p>Of the total volume sold in the last year, what percentage purchased was certified? _____%</p>
Q. 6.3	<p>In what ways, other than audits, do you monitor the human rights performance of your suppliers? (Select all that apply)</p> <p><input type="checkbox"/> We utilize SAQ's.</p> <p><input type="checkbox"/> We have set KPIs for them to meet.</p> <p><input type="checkbox"/> We have set metrics and reports that all suppliers complete on a regular basis.</p> <p><input type="checkbox"/> We have informal check-ins with our suppliers.</p> <p><input type="checkbox"/> We do media scans for any potential incidents.</p> <p><input type="checkbox"/> We have no other forms of performance monitoring.</p>

Communication and Training	
Q. 7.1	<p>Does your company provide communication and training to your employees and your suppliers on human rights?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No (If selected, please continue to the next section "Next Steps")</p>

Communication and Training	
<b>Q. 7.2</b>	<p>Which of the following trainings do you provide? <i>(Select all that apply)</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Labor and Human Rights issues</li> <li><input type="checkbox"/> How to implement our code of conduct requirements</li> <li><input type="checkbox"/> Our supply chain human rights due diligence process (i.e., how we manage supplier performance to our code of conduct)</li> <li><input type="checkbox"/> Business ethics (e.g., bribery and corruption, whistleblower protection)</li> <li><input type="checkbox"/> Workplace grievance mechanisms</li> <li><input type="checkbox"/> Other (please describe): _____</li> </ul>
<b>Q. 7.3</b>	<p>To whom do you provide these trainings? <i>(Select all that apply)</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Our management</li> <li><input type="checkbox"/> All our employees</li> <li><input type="checkbox"/> Managers of our suppliers and business partners</li> <li><input type="checkbox"/> Employees of our suppliers and business partners</li> <li><input type="checkbox"/> Communities in our sourcing countries</li> <li><input type="checkbox"/> Other (please describe): _____</li> </ul>
<b>Q. 7.4</b>	<p>How do you provide communication and training on labor and human rights to your suppliers? <i>(Select all that apply)</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Information on our webpage</li> <li><input type="checkbox"/> Online training (e-learning)</li> <li><input type="checkbox"/> In-person training provided by our company or a third-party</li> <li><input type="checkbox"/> Training by certification bodies (e.g., Rainforest Alliance, Fair Trade, etc.)</li> <li><input type="checkbox"/> Training and communication from industry associations</li> <li><input type="checkbox"/> Other (please describe): _____</li> </ul>
<b>Q. 7.5</b>	<p>Does this supplier training include company policies and expectations related to labor issues?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Yes</li> <li><input type="checkbox"/> No</li> </ul>

## Next Steps

Please continue to Annex 1, the interpretation guide, which includes recommendations for specific actions based on your responses, including the tools within the S3T Toolkit that may be of help to you.

## References

### International Labor Standards

For this tool and other tools developed by the COFFEE Project, efforts have been made to align with both international and voluntary standards. The International Labor Organization (ILO) is the UN agency that sets internationally recognized labor standards. Because companies must ensure their standards are in compliance with international labor standards, Verité has included a brief description on some of the key international standards on forced labor and human trafficking, child labor, discrimination and equality, freedom of association, wages and hours, health and safety, and recruitment and hiring within the agricultural sector and for migrant workers.

#### Forced Labor and Human Trafficking

##### ***ILO Convention No. 29 on Forced Labor***

Obligates countries to suppress the use of forced or compulsory labor “in all its forms” with exceptions for military service, civic or emergency duties, and as the result of a court conviction (so long as the labor is supervised by a public authority and not hired out to private individuals or companies). Forced or compulsory labor is defined as work or service exacted from any person under the menace of penalty and for which the person has not volunteered.

##### ***ILO Convention No.105 on Abolition of Forced Labor***

Forbids forced labor used “as a means of political coercion” or as punishment for “holding or expressing political views” or for participating in strikes

##### ***The Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, 2000***

One of three protocols to the Convention against Transnational Organized Crime, known as the Palermo Protocols. is a global, legally binding instrument that defines trafficking in persons and is intended to enable international cooperation for investigating and prosecuting trafficking in persons and to protect and assist trafficking victims. It defines human trafficking as:

*the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control*

*over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery, or practices similar to slavery, servitude or the removal of organs.*

## **Child Labor**

### ***ILO Convention No. 138 on Minimum Age***

Sets the minimum age for work at 15 years of age (although countries with insufficiently developed economies and educational facilities can qualify for “exception” status with a minimum working age of 14). The convention permits light work (defined as work that is not likely to be harmful and does not interfere with schooling) for 13- to 15-year-olds.

### ***ILO Convention No. 182 Worst Forms of Child Labor***

Obligates countries to take effective steps towards eliminating the worst forms of child labor (slavery, debt bondage, work in the sex or drug trades, or any other physically or morally harmful work).

## **Equality and Non-Discrimination**

### ***ILO Convention No. 100 on Equal Remuneration***

Establishes the principle of equal remuneration for men and women for work of equal value.

### ***ILO Convention No. 111 on Discrimination***

Forbids any distinction, exclusion, or preference made on the basis of race, color, sex, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation.

## **Freedom of Association and Collective Bargaining**

### ***ILO Convention No. 87 on Freedom of Association and Protection of the Right to Organize***

Establishes the right of workers and employers to join organizations of their own choosing without prior authorization; and the right of organizations to draw up their own rules and constitutions, elect their own representatives, and organize their own affairs without outside intervention. It calls for protection of workers’ organizations from governmental interference and from being dissolved or suspended by administrative authority; and calls for the right to affiliate with international organizations of workers.

### ***ILO Convention No. 98 on the Right to Organize and Collective Bargaining***

Grants workers the right to adequate protection against anti-union acts such as dismissals and against business interference; and encourages countries to take measures to promote collective bargaining.

## **Standards Related to Occupational Safety and Health**

### ***ILO Convention No. 155 on Occupational Safety and Health Convention***

Requires that governments proactively determine hazardous occupations and activities, establish procedures for reporting occupational accidents and diseases, and annually publish statistics. It establishes workers' right to remove themselves from situations in which they reasonably judge themselves to be in "imminent and serious danger" without reprisal.

### ***ILO Chemical Convention (No. 170)***

Requires that employers properly label chemicals and make chemical data sheets available to workers; assess and monitor worker exposure to hazardous chemicals; ensure that worker exposure to chemicals does not present health risks; provide workers with training on chemical-related risks; and make arrangements for emergencies, including the provision of first aid.

## **Standards Related to Labor Recruitment**

### ***ILO Private Employment Agencies Convention (No. 181)***

Defines a private employment agency as "any natural or legal person, independent of the public authorities, which provides one or more of the following labor market services:

- a. services for matching offers of and applications for employment, without the private employment agency becoming a party to the employment relationships which may arise therefrom;
- b. services consisting of employing workers with a view to making them available to a third party, who may be a natural or legal person (referred to below as a "user enterprise") which assigns their tasks and supervises the execution of these tasks;
- c. other services relating to job seeking, determined by the competent authority after consulting the most representative employers and workers organizations, such as the provision of information, that do not set out to match specific offers of and applications for employment."

While recognizing the value of employment agencies to the global economy, the 1997 Convention on private employment agencies emphasizes the need to protect workers from possible abuses at their hands. The Convention prohibits the charging of recruitment fees to workers. It also prohibits employment agencies from engaging any form of discrimination against workers.

### ***ILO General principles and operational guidelines for fair recruitment***

Provides non-binding standards with which various actors should strive to comply, while the guidelines provide practical guidance on specific steps that different types of actors can take to promote equitable recruitment. The principles specifically call on the private sector to strive to respect human rights when recruiting workers, prevent recruitment fees from being charged to workers, and promote the adoption of recruitment standards.

## **Standards Related to Worker Housing**

### ***ILO Workers' Housing Recommendation (No 115.)***

Establishes that it is generally not desirable for employers to provide workers with housing unless necessary, such as when workers are employed in areas far from their homes. In cases in which employers provide worker housing, they are required to protect workers' fundamental rights, especially to freedom of association, and to provide workers with decent housing at a reasonable cost proportionate to their incomes. Employers are prohibited from providing workers with housing as a form of payment for their work.

## **Standards Related to the Agricultural Sector**

### ***ILO Convention No. 184 on Safety and Health in Agriculture***

Obligates employers to provide for the safety and health of temporary, seasonal, and permanent workers (including ensuring that activities and equipment comply with health and safety standards and providing appropriate training and instruction) and requires a national policy on safety and health in agriculture, which includes inspections of agricultural workplaces. The convention gives workers the right to be instructed in health and safety matters and to remove themselves from workplace activities in which they believe there is an imminent and serious risk to health and safety without retaliation. If an employer is required to provide housing to workers, the convention notes that laws governing that housing should meet the minimum accommodation standards. The Safety and Health in Agriculture Code of Practice offers advice on how to implement this convention.

### ***ILO Convention No. 129 on Labour Inspection (Agriculture)***

Requires a system of labor inspection in agricultural undertakings where employees or apprentices work; nations who ratify the convention may also decide to inspect agricultural undertakings where tenants, sharecroppers, members of co-operatives, and/or family members of the operator of the agricultural undertaking work.

### ***ILO Plantations Convention (No. 110) and Protocol (P110)***

Covers provisions for the recruitment, employment, benefits and compensation, and housing conditions of employees on a plantation, defined as "any agricultural undertaking regularly employing hired workers which is situated in the tropical or subtropical regions and which is mainly concerned with the cultivation or production for commercial purposes of coffee, tea, sugarcane, rubber, bananas, cocoa, coconuts, groundnuts, cotton, tobacco, fibers (sisal, jute and hemp), citrus, palm oil, cinchona or pineapple." Requires a licensed recruiter or employer to cover the costs of transporting the worker to the workplace and of repatriation. Limits the timeframe of employment on a plantation (one to three years depending on the nature of the journey to reach the workplace and whether or not the worker is accompanied by family members). Specifies that wages should be governed by national laws, adhere to minimum wage law, and only include deductions proscribed by national law. Requires at least 25 hours of consecutive rest in every seven-day period. Guarantees

employers and employees the right to associate and provides for anti-union discrimination.

***ILO Right of Association (Agriculture) Convention (No. 11)***

Establishes that “the same rights of association and combination” apply to workers in agriculture just as they apply to industrial workers. Nations that ratify the convention must ensure that those rights are secured for agricultural workers and work to remove any provisions that restrict their access to those rights.

***ILO Minimum Wage Fixing Machinery (Agriculture) Convention (No. 99)***

Establishes that ratifying nations will create a system for determining appropriate minimum wages for agricultural workers. The specific minimum amount and method for determining it is up to each ratifying nation and should be determined through a consultative process involving representatives of employers and workers (if such entities exist). If national laws allow, partial payment of minimum wages may be made “in the form of allowances in kind,” as long as this form is “customary or desirable.” Nations that ratify the convention are also required to ensure that the minimum wage rate is being appropriately implemented by providing supervision, education on the wage rate, inspections, and sanctions when necessary.

***ILO Tenants and Share-croppers Recommendation (No. 132)***

Applies to agricultural workers who are not remunerated by a fixed wage, i.e. tenants or those who are remunerated with shares of produce. Seeks to assure that tenants, share-croppers, and other similar categories of workers have access to land, stability, and security. Outlines best practices concerning mutually agreed upon contracts, amount of rent (adjustable to actual harvest yields), minimum share of produce to which sharecroppers are entitled, provision of adequate housing when customary or necessary, and the authorization for tenants and sharecroppers to use land to produce food for themselves and their families.

**Standards Related to Migrant Workers**

***ILO Migration for Employment Convention (No. 97) and Migration for Employment Recommendation (No. 86)***

Regulate the conditions under which labor migration should be carried out. They include a number of guidelines on the protection of migrant workers and establish the duty of governments to support and provide free employment services to migrant workers. They also encourage agreements between countries sending and receiving migrant workers to ensure their protection. Importantly, the Convention establishes that undocumented immigrant workers have the same labor rights as documented migrant workers and citizens. The Convention and Recommendation also include guidelines on the placement, hiring, and conditions of work of migrant workers.

***ILO Migrant Workers (Supplementary Provisions) Convention (No. 143)***

Defines a migrant worker as, “a person who migrates or who has migrated from one country to another with a view to being employed otherwise than on his own

account and includes any person regularly admitted as a migrant worker.” Establishes that the “basic human rights of all migrant workers” should be respected by ratifying nations. Requires ratifying nations to “systematically seek to determine whether there are illegally employed migrant workers on its territory” and whether migrants are subjected to employment conditions that contravene national laws or regulations, or other agreements whether international, multilateral, or bilateral. It also outlines that migrants working legally should not be “regarded as in an illegal or irregular situation” and should be treated without prejudice. Requires ratifying nations to establish a “national policy designed to promote and guarantee...equality of opportunity and treatment” regarding employment and occupation, social security, trade union participation, freedoms and cultural rights for migrant workers and their families.

***ILO Multilateral Framework on Labour Migration: Non-binding principles and guidelines for a rights-based approach to labor migration (2006).***

Includes non-binding, rights-based principles and guidance on labor migration. It seeks to promote and protect migrant workers’ rights, improve regulation of labor migration, and highlight the link between labor migration and development. It includes guidance on promoting employment policies based on social dialogue that promote decent work and protect migrant workers. The framework specifically calls for ethical recruitment practices including the establishment and adherence of recruitment licensing programs, the regulation of recruitment fees, and the provision of remedies for all workers whose rights are violated during the recruitment process.



## Annex I

Interpretation Guide		
Sourcing		
Question No.	Answers with Potential Risks	Interpretation Guide and Best Practices/Recommendations
Q. 1.1	<p>Do you have procedures in place to ensure traceability to the farm level (Does your company ask all of your upstream suppliers - traders and farms from which you source - for information about farms on which the coffee is sourced)?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Always. Our contracts require that procedures be in place to track the origin of raw materials or products to the farm level, but we do not require documentation.</li> <li><input type="checkbox"/> Sometimes. Procedures and documents are not required, but we can perform traceability on an ad-hoc basis when the company deems it appropriate or when faced with a need for risk management.</li> <li><input type="checkbox"/> Never or almost never. Only in isolated situations, such as, for example, when we are explicitly required to do so for our customer.</li> </ul>	<p>While traceability to the farm level does not inherently reduce the risk of labor abuses, it does provide buyers with a knowledge of their supply base and an ability to disseminate their standards and expectations to farms from which they source coffee and to monitor labor conditions on these farms. This can help to prevent issues before they occur and to rapidly respond when suppliers have been implicated in labor violations.</p> <p>For more information about how to prevent and remediate labor risks, you may use <i>Tool 10- Management Systems Framework for Preventing and Remediating Labor Risks</i>.</p> <p>Additionally, <i>Tool 5- Sample Social Responsibility Agreements</i> can help coffee traders establish better relationships with suppliers and communicate expectations, including traceability.</p>

## Interpretation Guide

### Sourcing

Question No.	Answers with Potential Risks	Interpretation Guide and Best Practices/Recommendations
Q. 1.1.1	<p>Do you require any accompanying/supporting documentation for your product traceability?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> We do not require suppliers to have traceability documentation.</li> </ul>	
Q. 1.2	<p>From where does your company source coffee?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Non-farm suppliers (traders, mills, cooperatives).</li> <li><input type="checkbox"/> Both.</li> <li><input type="checkbox"/> Other (please describe)</li> </ul>	<p>Sourcing directly from farms can drastically improve traceability, communication, and monitoring of labor conditions on the farm-level. Sourcing directly from farms can also enable coffee traders to work in partnership with farms to identify, address, and prevent labor risks.</p>
Q. 1.3	<p>Have you identified of all the suppliers in your supply chain, all the way to the farm level?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> No</li> </ul>	<p>For more information on monitoring coffee farms directly, you may refer to <i>Tool 8- Guidelines on Monitoring of Coffee Farms</i>.</p>

Standards and Policies		
Question No.	Answers with Potential Risks	Interpretation Guide and Best Practices/Recommendations
Q. 2.1	<p>What standards or Code of Conduct for labor and human rights issues does your organization follow? <i>(Select all that apply)</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> We follow the standards of our certification body or verification system. (e.g., Rainforest Alliance, Fair Trade, etc.)</li> <li><input type="checkbox"/> We follow our customers' Codes of Conduct.</li> <li><input type="checkbox"/> We have our own Labor and Human Rights Policy or Code of Conduct.</li> <li><input type="checkbox"/> We follow applicable legal requirements on labor and human rights.</li> </ul>	<p>A Social Responsibility Policy or Code of Conduct establishes basic performance expectations for you, your subcontractors, labor brokers, and workers. It is important that your Code of Conduct explicitly prohibit labor violations and set out protections for workers.</p> <p>While all of the optional answers are considered good practices, the most important aspect is the dissemination, implementation, and monitoring of compliance with the standards. Whatever code you choose to follow, it is essential that there are systems in place to ensure that the standards are followed.</p> <p>For more information, respondents may want to refer to <i>Tool 4- Sample Code of Conduct Provisions</i>.</p>
Q. 2.2	<p>What areas are covered by your Social Responsibility Policy or Code of Conduct? <i>(Select all that apply)</i></p> <p>All the responses are considered best practice topics and should ideally be in your Social Responsibility Policy or Code of Conduct.</p>	

<p><b>Q. 2.3</b></p>	<p>To which of the following does your policy or code apply?  <i>(Select all that apply)</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Your company</li> <li><input type="checkbox"/> Your company's parent company</li> <li><input type="checkbox"/> Your company's owned and operated facilities and subsidiaries (Tier 1)</li> <li><input type="checkbox"/> All your company's suppliers (Tier 2)</li> <li><input type="checkbox"/> All labor brokers (Tier 3)</li> </ul>	
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Supplier Screening		
Question No.	Answers with Potential Risks	Interpretation Guide and Best Practices/Recommendations
<p><b>Q. 3.1</b></p>	<p>How do you screen prospective suppliers and business partners for their social responsibility performance?  <i>(Select all that apply)</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Informal screening (e.g., word of mouth)</li> <li><input type="checkbox"/> We do not screen prospective suppliers for social responsibility performance.</li> <li><input type="checkbox"/> Other. (Depending on answers)</li> </ul>	<p>Ideally, your company should carry out a <b>robust screening of all of its suppliers</b>. Your company could use adverse media scans, SAQs, and review the policies of new suppliers. Your company should also encourage continuous improvement and monitor farms in your supply chains in order to ensure that improvements are being made in practice.</p> <p>For more information, please refer to <i>Tool 7-Guidance on Communicating Objectives and Standards Across the Supply Chain</i> and <i>Tool 8-Guidelines on Monitoring of Coffee Farms</i>.</p>

Trade Facilitation and Trade Enforcement Act		
Question No.	Answers with Potential Risks	Interpretation Guide and Best Practices/Recommendations
Q. 4.1	<p>Has your company taken specific actions related to the U.S. Trade Facilitation and Trade Enforcement Act (TFTEA) of 2015?</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> We do not know about the TFTEA.</p>	<p>The 2015 U.S. Trade Facilitation and Trade Enforcement Act (TFTEA) allows U.S. Customs and Border Patrol (CBP) to seize goods produced with forced labor, including forced child labor through a Withhold Release Order (WRO).</p> <p>CBP needs only reasonable suspicion to issue a WRO, and companies must demonstrate concrete evidence that issues have been remediated for WROs to be lifted. For the most accurate information you can access the <a href="#">CBP website here</a>.</p>

Management and Accountability		
Question No.	Answers with Potential Risks	Interpretation Guide and Best Practices/Recommendations
Q. 5.1	<p>Has your company designated a senior manager who is responsible for human rights performance in your supply chain?</p> <p><input type="checkbox"/> No</p>	<p>It is recommended that your company establish a management structure that creates clear management responsibilities for the implementation of human rights and sustainability policies. This includes clear responsibilities for establishing and updating labor-related policies, remediating labor issues, and evaluating the effectiveness of your policies and processes. Without designated ‘owners’ to ensure the implementation of policy requirements, there is risk of lack of follow-through.</p> <p>Ideally, these efforts should be led by a senior manager who not only oversees overall sustainability programming, but also has a dedicated budget for sustainability, including human rights programming, to ensure that adequate resources are assigned to address labor risks.</p>
Q. 5.1.1	<p>Is this senior manager responsible for policies and action/remediation on labor and human rights issues?</p> <p><input type="checkbox"/> No</p>	
Q. 5.1.1.1	<p>Does your senior manager regularly evaluate the effectiveness of your company’s supply chain due diligence processes?</p> <p><input type="checkbox"/> No</p>	

Management and Accountability		
<b>Q. 5.2</b>	Does your company have a dedicated budget for human rights due diligence? <input type="checkbox"/> No	For more information about how to prevent and remediate labor risks, you may use <i>Tool 10- Management Systems Framework for Preventing and Remediating Labor Risks</i> .
<b>Q. 5.2.1</b>	Does your budget include dedicated resources to address supply chain labor risks? <input type="checkbox"/> No	

Monitoring		
Question No.	Answers with Potential Risks	Interpretation Guide and Best Practices/Recommendations
<b>Q. 6.1</b>	Does your company conduct internal or external audits of suppliers? <input type="checkbox"/> We audit a given percentage or number of our suppliers on a regular basis. <input type="checkbox"/> Occasionally, only when we identify some sort of problem with a given supplier. <input type="checkbox"/> We rely on audits of producers performed by certification bodies. (e.g., Rainforest Alliance, Fair Trade USA, etc.) <input type="checkbox"/> No supplier is audited.	No monitoring scheme is infallible. As such, a combination of internal and third-party assessments and other monitoring mechanisms is recommended to identify potential risks throughout the supply chain. It is recommended that your company develop policies and procedures that require regular internal and external third-party audits of all suppliers, including procedures for in-depth assessments and corrective action plans for high-risk suppliers. A combination of approaches can help to proactively detect potential risks before they create legal issues or reputational damage. A combination of SAQs and KPIs for suppliers may be a good way to preliminarily assess high-level issues, and then third party or internal audits can be conducted of farms determined to be of higher risk. This can be complemented by regular media scans of specific suppliers, or supply areas,
<b>Q. 6.2</b>	Of the total volume sold in the last year, what percentage purchased was certified?	

Monitoring		
<p><b>Q. 6.3</b></p>	<p>In what ways, other than audits, do you monitor the human rights performance of your suppliers? (<i>Select all that apply</i>)</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> We have informal check-ins with our suppliers.</li> <li><input type="checkbox"/> We do media scans for any potential incidents.</li> <li><input type="checkbox"/> We have no other forms of performance monitoring.</li> </ul>	<p>that may generate additional information about potential risks. Randomized or routine monitoring or audits can help to avoid tunnel vision, which can lead to blind spots.</p>

Communication and Training		
Question No.	Answers with Potential Risks	Interpretation Guide and Best Practices/Recommendations
<p><b>Q. 7.1</b></p>	<p>Does your company provide communication and training to your employees and your suppliers on human rights?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> No</li> </ul>	<p>Effective communication and training on Code of Conduct standards represents a key building block for the successful adoption of social responsibility practices by all supply chain actors, from coffee growers to traders to roasters to retailers. There is a need for concrete, digestible information on workers' legal rights for coffee growers and for workers themselves. It is recommended that coffee traders provide training to employees, including management, on its human rights and sustainability policies, and, ideally, to the employees of their suppliers and business partners, and to the communities from which they source their coffee as well. If individuals responsible for implementing or complying with requirements are not trained on the necessary processes and procedures to ensure compliance, there is an elevated risk that they will not be able to effectively identify, address, or prevent labor risks.</p>
<p><b>Q. 7.2</b></p>	<p>Which of the following trainings do you provide? (<i>Select all that apply</i>)</p> <p>All of the options given are considered good practice topics of training and are recommended for all organizations.</p>	

Communication and Training		
<p><b>Q. 7.3</b></p>	<p>To whom do you provide these trainings? <i>(Select all that apply)</i></p> <p>All of the options given are considered good practices and delivering trainings to all of these stakeholders is recommended.</p>	<p>For more information, please refer to <i>Tool 7- Guidance on Communicating Objectives and Standards Across the Supply Chain</i>.</p>
<p><b>Q. 7.4</b></p>	<p>How do you provide communication and training on labor and human rights to your suppliers? <i>(Select all that apply)</i></p> <p>All of the options given can be effective methods of communication and training.</p>	<p>Coffee traders should consider the informational needs of stakeholders involved across their supply chains, related to compliance with legal and code of conduct requirements. As such, coffee traders should engage a variety of stakeholders to identify their needs. They should also make their code of conduct requirements public, including by posting them on their websites, providing e-learnings (for those with internet access), and implementing in-person trainings and informational sessions. It is essential that messaging is clear and consistent across communication channels and stakeholder groups to ensure that all actors are working towards common goals with a shared understanding of standards and expectations.</p>
<p><b>Q. 7.5</b></p>	<p>Does this supplier training include company policies and expectations related to labor issues?</p> <p><input type="checkbox"/> No</p>	<p>For more information, please refer to <i>Tool 7- Guidance on Communicating Objectives and Standards Across the Supply Chain</i>.</p>