

Diamond Best Practice Principles

Workbook Companion 2005

Document 3 of 4



A DIAMOND IS FOREVER

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I. PREFACE

This document is the Workbook Companion (the Companion) that is to be used by Sightholders and (as applicable) their contractors and sub-contractors, the De Beers Group (including the Diamond Trading Company) and its partners and the Third Party Verifiers, as a guide to completing the BPP Workbook (the Workbook).

The Companion explains the explicit requirements and performance indicators against which compliance with the Best Practice Principles (*BPPs*) will be assessed, evaluated and reported through the Diamond Best Practice Principles Assurance Programme (BPP Assurance Programme) by means of the Workbook.

The Workbook should be completed in conjunction with the Companion. Please note that this Companion may be updated from time to time, as required.

The Workbook and Companion should be read in conjunction with the Diamond Trading Company Diamond Best Practice Principles Requirements and Assurance Programme Overview, both of which are intended to be legally binding on Sightholders. Failure to comply with their terms will constitute a breach of the Supplier of Choice documentation and will result in appropriate action being taken pursuant to that documentation.

II. BACKGROUND

The Companion explains the approach, process and assessment procedure for the BPP Assessment Programme and the Workbook sets out the requirements and records the results of the assessment process. The Workbook and the Companion are supported by:

1. The Diamond Trading Company Sightholder Policy Statement, that provides the contractual requirement for all Sightholders to comply with the Best Practice Principles;
2. The Diamond Trading Company Diamond Best Practice Principles, that establish the broad requirements for compliance;
3. The Diamond Trading Company BPP Requirements (the Requirements), that set out the specific criteria for compliance;
4. The Diamond Trading Company BPP Overview (the Overview), that describes the process for implementing the *BPPs*.

The same Workbook, Companion and process must be followed whether the Assessment is a self-assessment (known as a First Party Assessment) or made by the Diamond Trading Company's Third Party Verifier (known as a Third Party Verification).

Entities may choose to request the assistance of an independent consultant known as the Second Party Assessor with the only proviso that the Second Party Assessor must not have any affiliation with the independent Third Party Verifier.

Any reference in this Workbook to 'the Company' should be taken to mean the entity that is subject to Assessment, such as the De Beers Group company, the Sightholder or the Sightholder's (sub-) contractor, where applicable. Any reference to 'the Facility' should be taken to mean the specific geographic site owned or controlled or used by the entity that is the subject of the Assessment.

In order to assist companies and facilities the workbook will be phased in gradually. Additional questions will be added in subsequent years to reflect increased compliance requirements and the changing business environment, in order to achieve the goal of continuous improvement.

The supporting documentation, described in the following sections of this document, needed to complete the Workbook must be made available to the Third Party Verifier upon request.

Please note that not all sections/questions will be relevant to each company or facility. In those instances, please disclose the information that is relevant and explain the non-applicability of the question in the comments section.

III. APPROACH

INTRODUCTORY AND PLANNING MEETING INCLUDING SITE VISIT (WHERE FEASIBLE)

It is strongly recommended that, at the start of this process, relevant company personnel hold an introductory meeting to discuss how best to implement the requirements of the BPP Assurance Programme and ensure full understanding of the assessment process itself. It is also recommended that the requirements of the programme are subsequently communicated, and made available, to all workers to ensure a consistent and comprehensive approach throughout the company.

It is also essential to organise a Planning Meeting between the Assessor or Verifier and the company representatives or facility management. The purpose of this meeting is to advise them of the Assessment process, the documentation that needs to be prepared for the Assessment and the plan for carrying out the Assessment.

Given the scope of the BPP Requirements, it is suggested that relevant company personnel attending these meetings include representatives from the company's human resources/personnel, health and safety and management departments, as well as representatives from the workforce.

Where a meeting is not held before the Assessment, documentation should be sent to advise the facility of the aims and processes and to introduce the concept of the Assessment to workers so as to ensure that they understand its aims and can participate fully.

RECOMMENDED AGENDA FOR INTRODUCTORY MEETING:

Assessable entities may find the following suggested agenda a helpful checklist of the key elements of the BPP Assurance Programme that they should cover with their nominated representatives:

- ◆ Introduction of the company's nominated First Party Assessment team members;
- ◆ Introduction to the rationale for, and the objectives and scope of, the Assessment;
- ◆ Description of Assessment process;
- ◆ Methodology to be used – methods of data collection – Inspection, Enquiry and Observation. This should also cover data scope and confidentiality;
- ◆ Plan detailed schedule of site and record inspection, management and worker interviews and Assessment team observations;
- ◆ Preliminary overview of the entire facility including floor plans, kitchens, dormitories, schooling and rest areas, any access restrictions and/or health and safety considerations for the Assessment process.

IV. ASSESSMENT PROCESS

The Assessor or Verifier will use **Inspection, Enquiry and Observation**. This will be the means to collect and corroborate data, in order to complete the Workbook. Sightholders should also find these methods invaluable when conducting their own self or second party Assessments.

INSPECTION

Inspection involves the examination of company records, company policies and, where relevant national or international laws. National and international law documentation can be sourced from the UK Co-ordinating Office of the Third Party Verifier, although companies that are being assessed are expected to have a sound knowledge of relevant national law.

Company records and policies must be held at the Assessable facility.

The purpose of the Assurance Programme is to evidence compliance to the Best Practice Principles. Where this can be achieved by submitting internationally recognised certificates already in existence, this should be done. Facilities being assessed should submit any certification that already exists, such as ISO14001 or SA8000, together with the certification report and details of the Assessor/Verifier that carried out the certification.

For the First Party Assessment, which is submitted to the Third Party Verifier for monitoring, all relevant documentary evidence, other than any certification as mentioned above, should be held at the facility in the event that the Third Party Verifier wishes to inspect it.

During the Third Party Verification, the independent Third Party Verifier will review all relevant social and environmental documents on a sample basis. Single documents, such as accident logs, etc., should be reviewed for a period of at least 12 months leading to the current date.

Where selective numbers of company records need to be reviewed, the following sampling scheme will be used as a guide:

Total number of workers	Sample size
50 and fewer	5
Between 51 and 100	8
Between 101 and 500	12
Between 501 and 1000	20
Multiples of 1000	Extra 20 per 1000

ENQUIRY

Enquiry involves the independent Third Party Verifier seeking information from persons inside or outside the organisation. In the main this will involve **interviews**. Interviews provide important corroborative information, to support the inspection.

The subjects of the interviews are likely to include members of the Assessable Entity's management team or selective representatives in addition to selected workers within the context of each assessment topic.

The specific aims, objectives and attendees for each interview will be itemised under the **Enquiry** heading within each assessment topic.

The independent Third Party Verifier will use the following sampling scheme when identifying the guide number of people to interview:

Total number of workers	Sample size
50 and fewer	5
Between 51 and 100	8
Between 101 and 500	12
Between 501 and 1000	20
Multiples of 1000	Extra 20 per 1000

OBSERVATION

NOTE: Observations are particularly relevant to the Assessment conducted by the Diamond Trading Company's Third Party Verifier.

Observation involves looking at processes being performed by personnel in their day-to-day environment. The following is a list of possible events that Assessable Entities might wish to consider when carrying out their First or Second Party Assessments:

- ◆ Meetings between management and workers;
- ◆ Health and safety inspections;
- ◆ Local Non-Governmental Organisations (NGOs)
- ◆ Other stakeholders as appropriate.

Observation by the independent third party verifier will start at an introductory meeting at the beginning of the site Assessment and will only end when the process of Assessment is complete.

V. ASSESSING A FACILITY

Figure 1 on page 7 illustrates the process for the assessing a facility.

COMPLIANCE RATING 1: COMPLIANCE RECOMMENDATION AND ASSESSMENT OUTCOMES

Each section of the Workbook includes a Compliance Recommendation table. The function of this table is to report the level or degree of compliance, including the number of **Observations**, **Minor Breaches**, **Major Breaches** and **Material Breaches** from that section.

An **Observation** is not a compliance issue if a satisfactory solution is found and the implementation process begun during the course of annual Assessment. Observations can also be listed for the record, to assist the facility towards continuous improvement. Observations will not always need a **Corrective Action Plan**, depending on the nature of the observation.

A **Minor Non-Material Breach** (minor breach) is any non-compliance issue that can be rectified within a reasonable period and that, if managed responsibly, is not deemed by the Assessors/Verifiers to result in significant adverse impact. These breaches of compliance can, nonetheless, sometimes require a **Corrective Action Plan**, depending on the nature of the breach.

A **Major Non-Material Breach** (major breach) is any non-compliance issue that has the potential to result in significant adverse impact but is not deemed a material breach by the Assessor or Verifier due to the circumstances in which it has arisen and its potential to be remedied. Major breaches will be monitored by the Third Party Verifier (at intervals to be determined by the Third Party Verifier in its discretion) in order to ensure that the **Corrective Action Plan** is carried out.

A **Material Breach** is any very serious non-compliance issue that is not explained by any mitigating circumstances and that blatantly and wilfully contravenes the core *BPPs*. For the avoidance of doubt, material breaches include, but are not limited to, the use of child labour, trade in conflict diamonds, non-disclosure of non-natural or treated diamonds and wilful conduct resulting in serious injury or death.

NOTE: If the **Corrective Action Plan** milestones are not adhered to, the Third Party Verifier's satisfaction, the status of the breach will remain active.

COMPLIANCE RATING 2: ASSESSMENT PROCEDURE LEADING TO RECOMMENDATION

The data from Calculation 1 must be collated on the Summary Recommendations sheet in the Assessment Workbook. The final recommendation to the DTC by the Third Party Verifier will be made after **Corrective Action Plans** have been agreed with the facility management.

The **Corrective Action Plans** must be realistic and achievable, with set milestones agreed between the facility management and the Assessors/Verifiers, including, where appropriate, any requirement for re-Assessment. If these milestones are not achieved in the agreed timeframe then the status of the compliance recommendation to the DTC may incur further action.

Corrective Action Plans should always be submitted with an Assessment Workbook, whether the Assessment in question has been conducted by the facility itself as part of a First Party Assessment, or by the Third Party Verifier. If Corrective Action Plans have been submitted by the facility as part of the First Party Assessment, then agreement on these will be reached with the Third Party Verifier during the monitoring stage. This agreement will include the actions and timelines necessary to fulfil the **Corrective Action Plans**.

The Third Party Verifier will make recommendations, in accordance with the criteria stated below.

The number of major breaches and material breaches will dictate the facility's level of compliance with the DTC *BPPs*, in the following way:

Assessment Outcome	Criteria
Compliant	No Major Breaches or Material Breaches, with corrective action plans in place for any Minor Breach.
Under Review	1 to 3 Major Breaches but no Material Breaches
Non-compliant	1 or more Material Breaches or, depending on the circumstances, more than 3 Major Breaches

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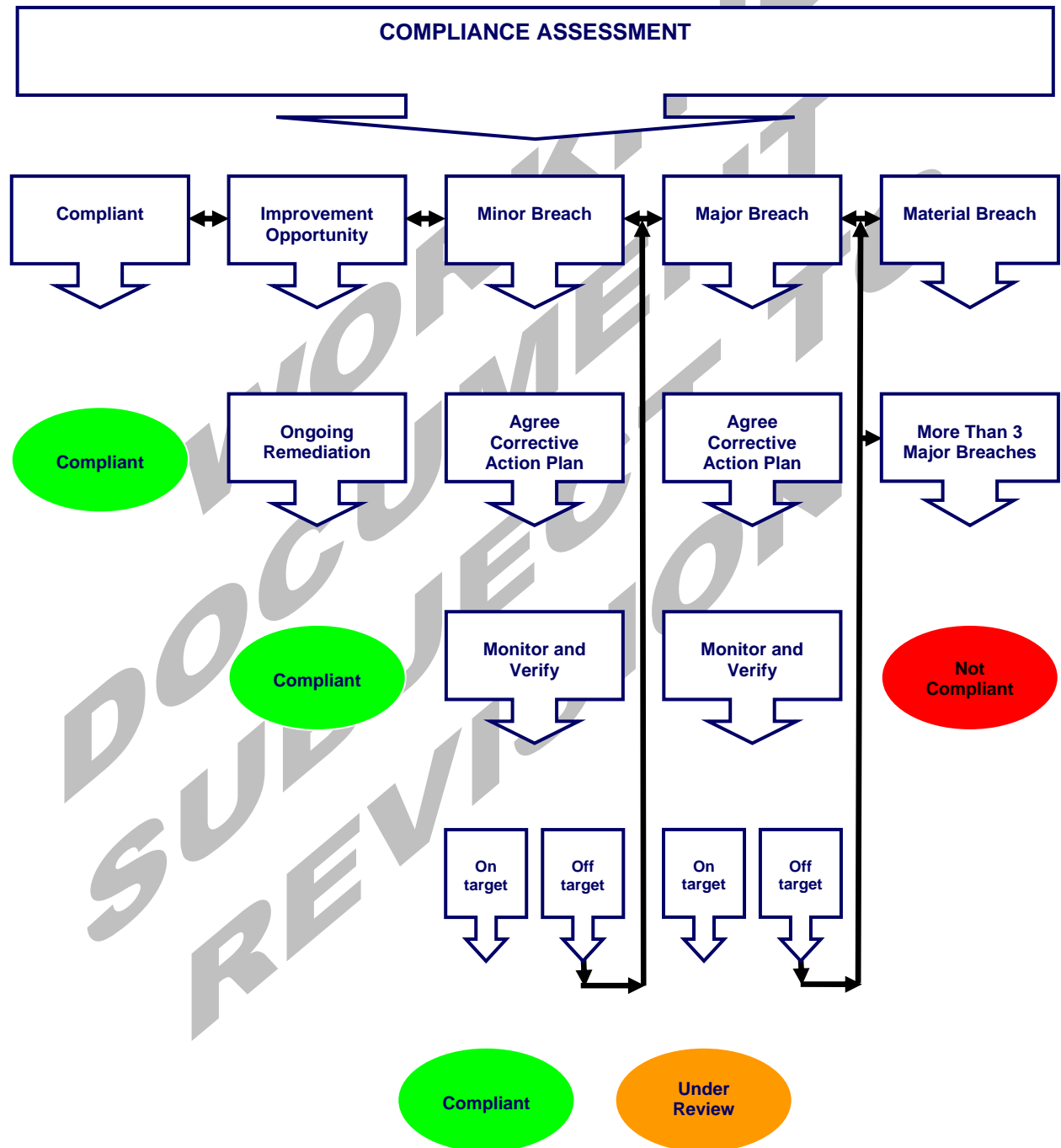
WORKING DOCUMENT - SUBJECT TO REVISION

COMPLIANCE RATING 3: EXIT MEETING

An exit meeting will be organised for the Assessor or Verifier to review the outcome of the Assessment with the facility management. During this meeting, the Assessor or Verifier will be looking to agree the findings with the facility's management team and agree **Corrective Action Plans** to address any breaches identified.

Note that this programme's assessment does not constitute exemption from any other formal, regulated assessment, audit or inspection required by the operation's regional authority.

Figure 1: The DTC BPP Assessment Process



VI. THE ASSESSMENT

1 BUSINESS RESPONSIBILITIES

1.1 ETHICAL STANDARDS

1.1.1 Required Information

To complete this section of the Assessment you will need:

Business Principles

Information on any material convictions/penalties

1.1.2 Inspection

Review 'Business Principles' policies and system-based approaches addressing the issues of financial accounting and auditing across the organisation.

1.1.3 Enquiry

Interview key management and workers concerning the issues of compliance with the law and the degree to which any existing policies and procedures effectively address these issues.

1.2 MONEY LAUNDERING, TERRORISM FINANCING AND OTHER FINANCIAL OFFENCES

1.2.1 Required Information

To complete this section of the Assessment you will need to reference:

All applicable national anti-money laundering legislation

UN Anti-Money Laundering Convention

FATF 40 Recommendations

OECD Guidelines for Multinational Enterprises

Financial audit results

1.2.2 Inspection

Review policies and system-based procedures across the organisation addressing the issues of money laundering, terrorism financing and other financial offences such as bribery or corruption. Review these with reference to all applicable national anti-money laundering legislation.

Where applicable, also review these with reference to the UN Anti-Money Laundering Convention, FATF 40 Recommendations and the OECD Guidelines for Multinational Enterprises.

Verify the company has been / is audited by a properly qualified, independent Auditor to international accounting standards.

1.2.3 Enquiry

Interview key management and workers concerning the issues of financial accounting and auditing, as well as money laundering, terrorism financing and other financial offences, both within and outside the organisation, and the degree to which any existing policies and procedures effectively address these issues.

1.3 KIMBERLEY PROCESS AND SYSTEM OF WARRANTIES

1.3.1 Required Information

To complete this section of the Assessment you will need:

The Essential Guide to Implementing the Kimberley Process

Local Kimberley Process guidelines

Local Kimberley Process authority contact details

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Results from monitoring systems and audits on the Kimberley Process Certification Scheme and World Diamond Council System of Warranties

A sample of company invoices

List of workers involved in the buying and selling of rough diamonds

A copy of the Kimberley Process Certification Scheme communication plan for staff

1.3.2 Inspection

Review the organisation's contracts, certificates, invoices and records of workers involved in the buying and selling of rough diamonds. Verify that:

- a) The company/facility is registered to the local industry authority;
- b) Certification has never been denied within last 12 months;
- c) Workers involved in buying and selling of rough diamonds are registered;
- d) There is a full declaration in the organisation's invoices, in accordance with the WDC's guide to implementing the Kimberley Process;
- e) Review all local government Kimberley Process policy and local industry authority certificates relevant to the organisation within the Assessment period.

Review the organisation's contracts, certificates, invoices and records of workers involved in the buying and selling of polished diamonds and diamond jewellery. Verify that:

- f) There is a full declaration in the organisation's invoices, in accordance with the WDC's System of Warranties;

In addition, verify that:

- g) All relevant workers involved in the buying and/ or selling of rough diamonds, polished diamonds and/ or diamond jewellery have had the rules of the Kimberley Process and the requirements of the World Diamond Council communicated to them.

1.3.3 Enquiry

Contact the local industry authority to verify the above.

Randomly select workers from a list of workers involved in buying and selling of rough diamonds and interview to verify the above.

1.4 DISCLOSURE

1.4.1 Required Information

To complete this section of the Assessment you will need:

A sample of company invoices

List of workers involved in the buying and selling of diamonds

Company policy for selling diamonds in accordance with the *BPPs*

1.4.2 Inspection

Review the organisation's contracts, certificates, invoices and records of workers involved in the buying and selling of diamonds, to verify that correct internal and external procedures have been applied when buying or selling diamonds, and that all treated diamonds, synthetics and/ or simulants have been fully declared.

1.4.3 Enquiry

Randomly select workers from a list of workers involved in buying and selling of diamonds and interview to verify the above.

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WORKING DOCUMENT - SUBJECT TO REVISION

1.5 SUPPLY CHAIN MANAGEMENT / BEST ENDEAVOURS

1.5.1 Required Information

To complete this section of the Assessment you will need:

- Programme/procedures to address company compliance with the *BPPs*
- List of the company's diamond suppliers
- List of the company's diamond industry clients
- List of company's diamond contractors and sub-contractors
- List of workers involved in the buying and selling of diamonds
- A sample of company invoices
- Evidence of best endeavours (letters, minutes from meetings, training programmes, etc., with suppliers and clients)

1.5.2 Inspection

Review the organisation's contracts, certificates, invoices and records of workers involved in the buying and selling of diamonds.

Verify that:

- a) The Sightholder contractors and sub-contractors are identifiable and complying with the *BPPs*;
- b) Best endeavours have been made to ensure that Sightholder diamond industry clients and diamond suppliers are identifiable and have undertaken to comply with the *BPPs*.

1.5.3 Enquiry

Randomly select workers from a list of workers involved in buying and selling of diamonds and interview to verify the above.

2 SOCIAL RESPONSIBILITIES

To complete this chapter (2) of the Assessment you will need:

Dated proof of SA8000 certification (if applicable) and relevant proposals to address any Corrective Action Plans

Note: It is not a requirement of the BPPs that those subscribing have SA8000 certification – while it may make the task of demonstrating compliance easier, it is not obligatory.

2.1 EMPLOYMENT

2.1.1 Required Information

To complete this section of the Assessment, where applicable you will need:

- National laws on employment
- Company human resources policies (including complaints policy)
- List of all workers by employment type and contract
- Employment documentation of randomly selected workers
- One month's full salary/wage records of the same randomly selected workers
- Minutes of any worker council meeting within the Assessment period
- Company freedom of association policy or policy to allow for freedom of association

2.1.2 Inspection

Randomly select a sample of workers from a list of every worker¹ and review their contracts, job description, time cards, payroll and HR records. To verify:

- a) Working hours are properly accounted and regulations are being applied;
- b) All workers, including hourly and piece-rate workers, are paid at least the minimum wage;
- c) Wages paid are consistent throughout documentation;
- d) Wages are calculated correctly from time cards/piece-logs (including overtime calculations);
- e) There are no unreasonable deductions, such as employment brokerage charges paid to a third party, housing or food deductions (unless allowed for by local law);
- f) Overtime is not mandatory and available to all in a non-discriminatory way;
- g) All overtime is correctly administered and paid in accordance with national law;
- h) Rest days are taken.

Review strategy and management policies and processes in place for workforce consultation and collaborative management. Review the minutes of any meetings of worker representative bodies' or other management/workforce logs or journals.

2.1.3 Enquiry

Randomly select a sample of workers from a list of every worker and interview to verify a)–k) above in addition to verifying the report checklist and compliance observations.

¹¹ The Assessor or Verifier also needs to ensure that potentially vulnerable groups (lowest paid, female workers, etc.) are covered and interviewed by appropriate Assessors or Verifiers (e.g. female Assessors or Verifiers for female workers). Random selection of individuals for interview should take place within each of these potentially vulnerable groups.

2.1.4 Observation

Consider whether what is observed matches First Party Assessment documentation and Third Party interview findings.

2.2 HEALTH AND SAFETY

2.2.1 Required Information

To complete this section of the Assessment you will need:

Copy of formal agreement on health and safety at work with recognised worker representative bodies

Company Health and Safety policies and procedures

Health and safety reports

Accident and other health & safety logs

Health and safety training log

2.2.2 Inspection

Review (when applicable) health and safety:

- a) All supporting documentation;
- b) Training and awareness programmes;
- c) Assessment reports;
- d) Accident logs.

Also review health and safety certificates, permits and insurance policies including any relevant documentation and correspondence with government and regulatory bodies with authority over health and safety matters.

2.2.3 Enquiry

Interview health and safety management team. Also, interview random samples of workers to determine effectiveness of the implementation of health and safety practices.

Are workers trained in safe handling and disposal of potentially hazardous material?

Are workers empowered, without fear of recrimination, to reporting health and safety or other issues within the facility?

Is the nature and frequency of accidents/injuries below nationally acceptable levels?

Do all workers know where all emergency equipment is and are they trained to use it?

Are workers physically comfortable in the work environment?

Do workers feel safe in the facility?

Are the workers aware of when to use and trained how to use protective equipment made available to them?

2.2.4 Observation

Health and safety should be assessed throughout the facilities operated by the management of the company or their agents. This includes all work and storage areas, including kitchens and food-preparation areas and rest areas, dormitories, toilets and washing facilities, classrooms and training facilities and any area to which workers have access.

Observe all areas of the facility with regard to fitness for purpose and safe/clean operating conditions with adequate safety and emergency equipment and facilities.

2.3 NON-DISCRIMINATION AND DISCIPLINARY PROCEDURES

2.3.1 Required Information

To complete this section of the Assessment you will need:

- Company policy on preventing all forms of discrimination in operations
- Non-retaliation policy
- Description of confidential worker grievance system
- List of all workers

2.3.2 Inspection

Review strategy and management policies, processes and programmes in place for the proactive and remedial management of discrimination and equal opportunities in the workplace.

Randomly select a sample of workers from a complete list of workers.

Verify that there is no discrimination in the hiring process and employment practices, including pay scales and benefits, promotion, training, discipline, termination or retirement on the basis of gender, race, religion, nationality, social or ethnic origin, sexual orientation, political persuasion or disability.

2.3.3 Enquiry

Randomly select a sample of workers from a list of every worker and interview them to establish if there are any complaints from workers with respect to discrimination or disciplinary procedures.

It is important that some level of targeting is used to ensure that 'vulnerable' parties are included in this process or to follow up specific concerns generated through the Assessment.

2.3.4 Observation

Consider whether what is observed matches First Party Assessment documentation and, if relevant, Third Party interview findings.

2.4 CHILD LABOUR

2.4.1 Required Information

To complete this section of the Assessment you will need:

- Company policy on preventing child labour
- Description of procedures to address child labour

2.4.2 Inspection

Review management policy and procedural and programme documentation relating to child labour in the workplace. In addition, review worker contracts, job descriptions, time cards, payrolls and human resources records to verify report checklist and compliance observations below.

2.4.3 Enquiry

Interview both management representatives and randomly selected workers to clarify and verify company policy on child labour. Interviews should also determine the effective implementation of this policy through procedures and programmes.

2.4.4 Observation

Observe the workforce to see if child workers can be identified. If children are identified through observation, inspection or enquiry, they should be interviewed to verify whether there is evidence of child labour transition or remediation being applied. In such situations, children should not be employed during school hours and they should not be allowed to work for more than 10 hours per day. These hours should include schooling and travel time. There should also be support for educational development and means to ensure that no child is exposed to hazardous, unsafe and/ or unhealthy situations

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WORKING DOCUMENT - SUBJECT TO REVISION

2.5 FORCED LABOUR

2.5.1 Required Information

To complete this section of the Assessment you will need:

Description of procedures and programmes

Human resources records of randomly selected workers

2.5.2 Inspection

Review management policy and procedural and programme documentation relating to forced labour in the workplace, including training of security guards. In addition, review human resources records to verify compliance observations below.

Any worker hostels should also be inspected to determine freedom of movement of those residing in these.

2.5.3 Enquiry

Interview both management representatives and randomly selected workers to clarify and verify company policy on forced labour. Such interviews should also determine whether this policy has been effectively implemented through the provision and application of appropriate procedures and support programmes.

In addition, it should be determined whether any important documents of workers are retained by the company.

2.5.4 Observation

Observe the workforce to see if you can identify any forced or bonded workers. If the Assessor or Verifier suspects forced or bonded labour following observation, inspection or enquiry, this should be verified through interviews with individuals concerned. Steps should be taken to ensure such individuals are able to speak freely and will not be subject to disciplinary actions post-Assessment. This may include private or anonymous interviews, disguising of sources by interviewing multiple individuals and wider enquiry/interview into freedom of exit from facility, holidays, visiting rights, etc.

2.6 HUMAN RIGHTS

2.6.1 Required Information

To complete this section of the Assessment you will need:

Human rights policy and/or procedure documents

Human resources records, including training records, of randomly selected workers

2.6.2 Inspection

Review human rights policy, guideline and procedure documents. Also, review human resources and training records to verify the nature of any worker human rights training, including human rights training for security guards.

2.6.3 Enquiry

Randomly select a sample of workers from a list of every worker and interview them to establish if there are any complaints from workers with respect to harassment and/ or abuse.

It is important that some level of targeting is used to ensure that 'vulnerable' parties are included in this process or to follow up specific concerns generated through the Assessment.

2.6.4 Observation

Consider whether what is observed matches First Party Assessment documentation and Third Party interview findings.

3 ENVIRONMENTAL RESPONSIBILITIES

Please note that this section is particularly applicable to exploration and mining operations and may not always be entirely applicable to operations further downstream.

To complete this chapter (3) of the Assessment you will need:

Dated proof of ISO14001 certification (if applicable) and relevant proposals to address any Corrective Action Plans

Note: It is not a requirement of the BPPs that those subscribing have ISO14001 certification – while it may make the task of demonstrating compliance easier, it is not obligatory.

3.1 BEST ENVIRONMENTAL PRACTICE AND REGULATORY FRAMEWORK

3.1.1 Required Information

To complete this section of the Assessment you will need:

Dated proof of ISO14001 certification (if applicable)

Policy on environment (including pollution prevention)

Catalogue of significant environmental aspects, as informed by ISO14001 and the Global Reporting Initiative

Environmental management programmes, statements and further environmental management systems documentation

Reports of previous non-compliances and corrective actions

Procedures for environmental risk management

3.1.2 Inspection

Review policies, regulatory framework, procedures and practices addressing the issues of production, environment, biodiversity, energy, waste, effluent and emissions across the organisation.

3.1.3 Enquiry

Interview key management workers concerning the issues of production, environment, biodiversity, energy, waste, effluent and emissions across the organisation and the degree to which any existing policies, regulation and practices effectively address these issues.

3.1.4 Observation

Interview findings should be validated through continued observation, of both the status of the entity and of worker activities, during the Assessment. The Assessor or Verifier should consider to what extent observations match the First Party Assessment documentation and Third Party findings where appropriate.