OFFICE AUDIT

SUSTAINABILITY DUE DILIGENCE

[SUPPLIER AB]

[day/month/year]

|  |  |
| --- | --- |
|  |  |

|  |  |
| --- | --- |
| INFORMATION ABOUT SUPPLIER | |
| **Supplier** | Name |
| **Contact person** | Name, email address |
| **Address** | Complete address incl. country if other than Sweden |
|  |  |
| Information about CONTRACTOR AND contractING ORGANISATION | |
| **Contractor** | If other than the contracting organisation whose supplier is monitored (e.g. if it is part of Hållbarhetskollen or the regions’ joint monitoring) |
| **Contact person** | Name, email address |
| **Contracting organisation** | Contracting organisation whose supplier is monitored |
|  |  |
| Information about audit | |
| **Contract** | Complete name of contract |
| **Method** | Desk audit incl. document review  Office audit incl. document review & interviews  Other: |
| **Date** | Day/month/year |
| **Sample products** | Summarise the selection briefly. You’ll find a detailed table below. |
| **Responsible for assessment** | Name, title, contracting organisation/consultancy |
| **Purpose** | The audit aims to ensure compliance with the terms for sustainability due diligence in the supplier’s own operations and in the supply chain. This is done by reviewing policies, processes and the application of these based on sample products. |
| **Criteria** | Paste or attach the terms the supplier is audited against. |

|  |  |
| --- | --- |
| SUMMARY | |
| The audit was conducted in cooperation with [Supplier], which provided the requested information to the best of their ability.  [Description of Supplier's general work, including whether policies and processes are mainly in place or whether there are major shortcomings in Supplier's due diligence, possibly divided into own operations and the supply chain.]  [Deviations have been found for the following process requirements:  1. Integrate commitments into policies and management systems  2. Identify and assess adverse impacts  3. Prevent and mitigate adverse impacts Supplier causes or contributes to  4. Prevent and mitigate adverse impacts linked to Supplier's operations  5. Monitor the measures to prevent and mitigate adverse impacts  6. Enable complaints  7. Provide remediation  8. Enable audits  No deviations from the terms have been found.] | |
| **Number of deviations** | [1-8] |
| **Number of improvement suggestions** | [1-8] |
| **Proposed action** | No action require  Corrective action plan is established and followed-up through a [digital] follow-up audit [in the office]  Corrective action plan is established and followed-up through a desk audit  Factory audit (based on identified actual or potential adverse impact)  Other: |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **COMPLIANCE WITH PROCESS REQUIREMENTS (AUDIT)** | | **Supplier meets the process requirement** | **Supplier does not meet the process requirement** | **Risk for zero tolerance deviation has been found** |
| 1. | INTEGRATE COMMITMENTS INTO POLICIES AND MANAGEMENT SYSTEMS | ☐ | ☐ |  |
| 2. | IDENTIFY AND ASSESS ADVERSE IMPACTS | ☐ | ☐ | ☐ |
| 3. | PREVENT AND MITIGATE ADVERSE IMPACTS SUPPLIER CAUSES OR CONTRIBUTES TO | ☐ | ☐ |  |
| 4. | PREVENT AND MITIGATE ADVERSE IMPACTS LINKED TO SUPPLIER'S OPERATIONS | ☐ | ☐ |  |
| 5. | MONITOR THE MEASURES TO PREVENT AND MITIGATE ADVERSE IMPACTS | ☐ | ☐ |  |
| 6. | ENABLE COMPLAINTS | ☐ | ☐ |  |
| 7. | PROVIDE REMEDIATION | ☐ | ☐ |  |
| 8. | ENABLE AUDITS | ☐ | ☐ |  |

**COMPANY DESCRIPTION**

|  |  |
| --- | --- |
| **INFORMATION** | **DESCRIPTION** |
| **Business description** |  |
| **Geographic location** |  |
| **Possible group affiliation** |  |
| **Number of employees** |  |
| **Revenue** |  |
| **Balance sheet total** |  |
| **Stock exchange listing** | If yes, state stock exchange |
| **Gender distribution of board** |  |
| **Certifications and certificates** | ☐ ISO 9001 quality management system  ☐ ISO 14001 environmental management system  ☐ ISO FR2000 management system for quality, environment, work environment, fire protection and competence supply  ☐ Svensk Miljöbas  ☐ EMAS (EU Eco-Management and Audit Scheme)  ☐ ISO 20400 sustainable procurement (works based on the principles)  ☐ ISO 26000 organisations' social responsibility (works based on the principles)  ☐ ISO 37001 management system for bribes  ☐ ISO45001 management system for work environment  ☐ SA 8000 social responsibility  ☐ Other certificate:  ☐ Organisation/initiative (e.g. Ethical Trading Initiative/amfori BSCI): |
| **Number of articles/services, number of customers, customer base, distribution of turnover private/public, which/number of articles/services contracting organisation purchases** |  |
| **Number of suppliers, significant suppliers, distribution of suppliers by country/region** |  |
| **Other information** | For example if similar reviews have been conducted recently (and on behalf of whom) or if the re-audit has been limited in any way |

**SAMPLE PRODUCTS**

The application of policies and processes has been examined on the basis of the following products:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Code** | **Product number** | **Product name** | **Brand owner** | **Manufacturer** | **Manufacturing country** |
| A | Code or similar | Name, e.g. ”Kulpenna MARVY RB-7 blå” | Name of brand owner, e.g. BIC | Name and address of manufacturer | Manufacturing country |
| B |  |  |  |  |  |
| C |  |  |  |  |  |
| D |  |  |  |  |  |
| E |  |  |  |  |  |

**SEARCH ENGINE CHECK OF SUPPLIER**

|  |  |
| --- | --- |
| **KEYWORD** | **COMMENT** |
| Supplier (incl. website) |  |
| + mänskliga rättigheter / human rights |  |
| + tvångsarbete / forced labour |  |
| + barnarbete / child labour |  |
| + arbetares rättigheter / workers’ rights |  |
| + hälsa och säkerhet / health & safety |  |
| + miljö / environment |  |
| + korruption / corruption |  |
| Search for supplier at <https://www.business-humanrights.org/en/> |  |

**SEARCH ENGINE CHECK OF MANUFACTURER/SUB-SUPPLIER**

|  |  |
| --- | --- |
| **KEYWORD** | **COMMENT** |
| Manufacturer (incl. website) |  |
| + mänskliga rättigheter / human rights |  |
| + tvångsarbete / forced labour |  |
| + barnarbete / child labour |  |
| + arbetares rättigheter / workers’ rights |  |
| + hälsa och säkerhet / health & safety |  |
| + miljö / environment |  |
| + korruption / corruption |  |
| Search for manufacturer at <https://www.business-humanrights.org/en/> |  |

**INTERVIEWED OR INQUIRED PERSONS**

The following people were interviewed or inquired in connection with the audit:

|  |  |
| --- | --- |
| **NAME** | **TITLE/FUNCTION** |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |

**DOCUMENT REVIEW**

The following documents were reviewed in connection with the audit:

|  |  |  |
| --- | --- | --- |
| **NO** | **DOCUMENT** | **COMMENT** |
| 1 | Name of document /  alternatively collection name | The document's content, possible signature, dating |
| 2 |  |  |
| 3 |  |  |
| 4 |  |  |
| 5 |  |  |

**AUDIT RESULTS**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **NO.** | **PROCESS REQUIREMENT** | **According to requirement** | **Deviation** | **Improvement suggestion** |
| **1.** | **INTEGRATE COMMITMENTS INTO POLICIES AND MANAGEMENT SYSTEMS** |  |  |  |
| Supplier shall integrate the commitments into policies and management systems by:   1. ensuring that relevant policies, established at the highest management level, are adopted or revised to comply with the commitments; 2. publishing the policies; 3. ensuring that the board takes the commitments into account when making decisions; 4. appointing a responsible person in a management position to ensure compliance with the commitments; 5. assigning responsibility for the implementation of the policies to employees whose decisions are most likely to increase or decrease the risks of adverse impacts; 6. communicating the policies to affected rights-holders in its own operations. | | | | |
|  | | | | |
| **Processes** | | | | |
| ***Own operations***  *Briefly state what processes exist to meet the requirement.*  ***Supply chain***  *Briefly state what processes exist to meet the requirement.* | | | | |
| **Audit assessment** | | | | |
| *[Supplier meets the requirement/Supplier partially meets the requirement/Supplier does not meet the requirement.]* | | | | |
| **Deviation** | | | | |
| *Summarise what causes Supplier to deviate from the requirement, i.e. write one deviation per process requirement. Copy the deviation to the corrective action plan. Delete the section if no deviation has been identified.* | | | | |
| **Improvement suggestion** | | | | |
| *Specify how the processes can be improved. Please refer to the National Agency for Public Procurement’s guidance for sustainability due diligence. Copy the improvement suggestion to the corrective action plan. Delete the section if no improvement suggestion has been identified.* | | | | |
| **Reviewed documents** | | | | |
| *Briefly state which documents (****numbers and names*** *from the document review table) that have been reviewed.* | | | | |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **NO.** | **PROCESS REQUIREMENT** | **According to requirement** | **Deviation** | **Improvement suggestion** | **Risk for zero tolerance deviation** |
| **2.** | **IDENTIFY AND ASSESS ADVERSE IMPACTS** |  |  |  |  |
| Supplier shall identify and assess actual and potential adverse impacts by:   1. mapping the supply chains of significant suppliers; 2. regularly examining the risks of adverse impacts in its own operations and in the supply chains of significant suppliers with focus on geographical risks, sector risks and product risks [including minerals from conflict-affected and high-risk areas[[1]](#footnote-1)] and with the support of the information gathered through the grievance mechanism in clause 2.6; 3. consulting with rights-holders affected by its own operations, or their representatives, and by retrieving information from credible and independent sources if it is not possible to consult with rights-holders, or their representatives, in the supply chains of significant suppliers; 4. paying special attention to adverse impact on individuals from groups and populations that are at heightened risk of vulnerability or marginalisation and adverse impact on environmental and human rights defenders; 5. prioritising the most significant risks based on likelihood and severity. | | | | | |

|  |
| --- |
| **Sample check** |
| *Briefly state how Supplier has applied the requirement in its operations based on the sample products. Use the* ***letter codes*** *in the sample table above.*  *Indicate if Supplier or auditor has identified a risk for a zero tolerance deviation.* |
| **Processes** |
| ***Own operations***  *Briefly state what processes exist to meet the requirement.*  ***Supply chain***  *Briefly state what processes exist to meet the requirement.* |
| **Audit assessment** |
| *[Supplier meets the requirement/Supplier partially meets the requirement/Supplier does not meet the requirement.]* |
| **Deviation** |
| *Summarise what causes Supplier to deviate from the requirement, i.e. write one deviation per process requirement. Copy the deviation to the corrective action plan. Delete the section if no deviation has been identified.* |
| **Improvement suggestion** |
| *Specify how the processes can be improved. Please refer to the National Agency for Public Procurement’s guidance for sustainability due diligence. Copy the improvement suggestion to the corrective action plan. Delete the section if no improvement suggestion has been identified.* |
| **Reviewed documents** |
| *Briefly state which documents (****numbers and names*** *from the document review table) that have been reviewed.* |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **NO.** | **PROCESS REQUIREMENT** | **According to requirement** | **Deviation** | **Improvement suggestion** |
| **3.** | **PREVENT AND MITIGATE ADVERSE IMPACTS SUPPLIER CAUSES OR CONTRIBUTES TO** |  |  |  |
| 2.3 Supplier shall prevent and mitigate actual and potential adverse impacts that Supplier causes[[2]](#footnote-2) or contributes to[[3]](#footnote-3), by:   1. ceasing activities that cause or contribute to adverse impact in its own operations or in the supply chains of significant suppliers; 2. establishing corrective action plans in consultation with affected rights-holders or their representatives, with a particular focus on the most significant risks identified, in order to prevent and mitigate future adverse impacts; 3. [establishing a mitigation plan to limit global warming in alignment with the 1.5°C target]; 4. ensuring that purchasing methods do not make it more difficult for suppliers to comply with the commitments. | | | | |
|  | | | | |
| **Sample check** | | | | |
| *Briefly state how Supplier has applied the requirement in its operations based on the sample products. Use the* ***letter codes*** *in the sample table above.* | | | | |
| **Processes** | | | | |
| ***Own operations and supply chain***  *Briefly state what processes exist to meet the requirement.* | | | | |
| **Audit assessment** | | | | |
| *[Supplier meets the requirement/Supplier partially meets the requirement/Supplier does not meet the requirement.]* | | | | |
| **Deviation** | | | | |
| *Summarise what causes Supplier to deviate from the requirement, i.e. write one deviation per process requirement. Copy the deviation to the corrective action plan. Delete the section if no deviation has been identified.* | | | | |
| **Improvement suggestion** | | | | |
| *Specify how the processes can be improved. Please refer to the National Agency for Public Procurement’s guidance for sustainability due diligence. Copy the improvement suggestion to the corrective action plan. Delete the section if no improvement suggestion has been identified.* | | | | |
| **Reviewed documents** | | | | |
| *Briefly state which documents (****numbers and names*** *from the document review table) that have been reviewed.* | | | | |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **NO.** | **PROCESS REQUIREMENT** | **According to requirement** | **Deviation** | **Improvement suggestion** |
| **4.** | **PREVENT AND MITIGATE ADVERSE IMPACTS LINKED TO SUPPLIER'S OPERATIONS** |  |  |  |
| Supplier shall use its leverage to prevent and mitigate actual and potential adverse impacts linked to[[4]](#footnote-4) Supplier's operations, by:   1. assessing significant suppliers based on the commitments, with a particular focus on the most significant risks identified; 2. establishing corrective action plans before concluding agreements with significant suppliers, with a particular focus on the most significant risks identified, in order to prevent and mitigate future adverse impacts; 3. forwarding the commitments (clause 1) and the ensuring of compliance (clause 2) in writing to significant suppliers; 4. requiring significant suppliers to account for their supply chains [at least in accordance with the supply chain traceability requirement (clause 4)/as far as possible]] [including the chains for tin, tungsten, tantalum and gold (3TG), cobalt and mica to smelters/refineries]; 5. ensuring the possibility of temporarily suspending a contractual relationship while preventive and mitigating measures are pursued, and the possibility of terminating a contractual relationship. | | | | |
|  | | | | |
| **Sample check** | | | | |
| *Briefly state how Supplier has applied the requirement in its operations based on the sample products. Use the* ***letter codes*** *in the sample table above.* | | | | |
| **Processes** | | | | |
| ***Supply chain***  *Briefly state what processes exist to meet the requirement.* | | | | |
| **Audit assessment** | | | | |
| *[Supplier meets the requirement/Supplier partially meets the requirement/Supplier does not meet the requirement.]* | | | | |
| **Deviation** | | | | |
| *Summarise what causes Supplier to deviate from the requirement, i.e. write one deviation per process requirement. Copy the deviation to the corrective action plan. Delete the section if no deviation has been identified.* | | | | |
| **Improvement suggestion** | | | | |
| *Specify how the processes can be improved. Please refer to the National Agency for Public Procurement’s guidance for sustainability due diligence. Copy the improvement suggestion to the corrective action plan. Delete the section if no improvement suggestion has been identified.* | | | | |
| **Reviewed documents** | | | | |
| *Briefly state which documents (****numbers and names*** *from the document review table) that have been reviewed.* | | | | |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **NO.** | **PROCESS REQUIREMENT** | **According to requirement** | **Deviation** | **Improvement suggestion** |
| **5.** | **MONITOR THE MEASURES TO PREVENT AND MITIGATE ADVERSE IMPACTS** |  |  |  |
| Supplier shall regularly monitor the measures to prevent and mitigate actual and potential adverse impacts by:   1. following-up established corrective action plans and address deviations; 2. consulting with rights-holders affected by its own operations, or their representatives, and to the extent possible with rights-holders in the supply chains of significant suppliers, or their representatives; 3. paying special attention to adverse impact on individuals from groups and populations that are at heightened risk of vulnerability or marginalisation and adverse impact on environmental and human rights defenders; 4. have a special focus on the most significant risks identified. | | | | |
|  | | | | |
| **Sample check** | | | | |
| *Briefly state how Supplier has applied the requirement in its operations based on the sample products. Use the* ***letter codes*** *in the sample table above.* | | | | |
| **Processes** | | | | |
| ***Own operations***  *Briefly state what processes exist to meet the requirement.*  ***Supply chain***  *Briefly state what processes exist to meet the requirement.* | | | | |
| **Audit assessment** | | | | |
| *[Supplier meets the requirement/Supplier partially meets the requirement/Supplier does not meet the requirement.]* | | | | |
| **Deviation** | | | | |
| *Summarise what causes Supplier to deviate from the requirement, i.e. write one deviation per process requirement. Copy the deviation to the corrective action plan. Delete the section if no deviation has been identified.* | | | | |
| **Improvement suggestion** | | | | |
| *Specify how the processes can be improved. Please refer to the National Agency for Public Procurement’s guidance for sustainability due diligence. Copy the improvement suggestion to the corrective action plan. Delete the section if no improvement suggestion has been identified.* | | | | |
| **Reviewed documents** | | | | |
| *Briefly state which documents (****numbers and names*** *from the document review table) that have been reviewed.* | | | | |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **NO.** | **PROCESS REQUIREMENT** | **According to requirement** | **Deviation** | **Improvement suggestion** |
| **6.** | **ENABLE COMPLAINTS** |  |  |  |
| Supplier shall enable rights-holders, their representatives and civil society organisations to submit complaints if they have legitimate concerns about actual or potential adverse impacts in Supplier's operations or in the supply chain. | | | | |
|  | | | | |
| **Processes** | | | | |
| ***Own operations***  *Briefly state what processes exist to meet the requirement.*  ***Supply chain***  *Briefly state what processes exist to meet the requirement.* | | | | |
| **Audit assessment** | | | | |
| *[Supplier meets the requirement/Supplier partially meets the requirement/Supplier does not meet the requirement.]* | | | | |
| **Deviation** | | | | |
| *Summarise what causes Supplier to deviate from the requirement, i.e. write one deviation per process requirement. Copy the deviation to the corrective action plan. Delete the section if no deviation has been identified.* | | | | |
| **Improvement suggestion** | | | | |
| *Specify how the processes can be improved. Please refer to the National Agency for Public Procurement’s guidance for sustainability due diligence. Copy the improvement suggestion to the corrective action plan. Delete the section if no improvement suggestion has been identified.* | | | | |
| **Reviewed documents** | | | | |
| *Briefly state which documents (****numbers and names*** *from the document review table) that have been reviewed.* | | | | |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **NO.** | **PROCESS REQUIREMENT** | **According to requirement** | **Deviation** | **Improvement suggestion** |
| **7.** | **PROVIDE REMEDIATION** |  |  |  |
| Supplier shall, alone or together with others, provide for remediation if Supplier has caused or contributed to actual adverse impact, by:   1. in so far it is possible restoring affected rights-holders to the situation they would be in had the adverse impact not occurred and enabling remediation that is proportionate to the significance and scale of the adverse impact; 2. consulting with affected rights-holders or their representatives on appropriate forms of remedy; 3. assessing whether those who have submitted complaints are satisfied with the process and its outcome. | | | | |
|  | | | | |
| **Sample check** | | | | |
| *Briefly state how Supplier has applied the requirement in its operations based on the sample products. Use the* ***letter codes*** *in the sample table above.* | | | | |
| **Processes** | | | | |
| ***Own operations and supply chain***  *Briefly state what processes exist to meet the requirement.* | | | | |
| **Audit assessment** | | | | |
| *[Supplier meets the requirement/Supplier partially meets the requirement/Supplier does not meet the requirement.]* | | | | |
| **Deviation** | | | | |
| *Summarise what causes Supplier to deviate from the requirement, i.e. write one deviation per process requirement. Copy the deviation to the corrective action plan. Delete the section if no deviation has been identified.* | | | | |
| **Improvement suggestion** | | | | |
| *Specify how the processes can be improved. Please refer to the National Agency for Public Procurement’s guidance for sustainability due diligence. Copy the improvement suggestion to the corrective action plan. Delete the section if no improvement suggestion has been identified.* | | | | |
| **Reviewed documents** | | | | |
| *Briefly state which documents (****numbers and names*** *from the document review table) that have been reviewed.* | | | | |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **NO.** | **PROCESS REQUIREMENT** | **According to requirement** | **Deviation** | **Improvement suggestion** |
| **8.** | **ENABLE AUDITS** |  |  |  |
| Supplier shall, within [four (4)] weeks from [the contracting organisation's] request, enable [the contracting organisation] to, on its own or through a representative, carry out audits in Supplier's operations. Supplier shall also enable [the contracting organisation] to, on its own or through a representative, carry out audits of Supplier's possible suppliers. Supplier and possible suppliers shall, in connection with audits, provide the information that [the contracting organisation] requests. | | | | |
|  | | | | |
| **Sample check** | | | | |
| *Briefly state how Supplier has applied the requirement in its operations based on the sample products. Use the* ***letter codes*** *in the sample table above.* | | | | |
| **Processes** | | | | |
| ***Own operations***  *Briefly state what processes exist to meet the requirement.*  ***Supply chain***  *Briefly state what processes exist to meet the requirement.* | | | | |
| **Audit assessment** | | | | |
| *[Supplier meets the requirement/Supplier partially meets the requirement/Supplier does not meet the requirement.]* | | | | |
| **Deviation** | | | | |
| *Summarise what causes Supplier to deviate from the requirement, i.e. write one deviation per process requirement. Copy the deviation to the corrective action plan. Delete the section if no deviation has been identified.* | | | | |
| **Improvement suggestion** | | | | |
| *Specify how the processes can be improved. Please refer to the National Agency for Public Procurement’s guidance for sustainability due diligence. Copy the improvement suggestion to the corrective action plan. Delete the section if no improvement suggestion has been identified.* | | | | |
| **Reviewed documents** | | | | |
| *Briefly state which documents (****numbers and names*** *from the document review table) that have been reviewed.* | | | | |

**OPINION**

[Description of Supplier's general work, including whether policies and processes are mainly in place or whether there are major shortcomings in Supplier's due diligence, possibly divided into own operations and the supply chain.]

[Deviations have been found for the following process requirements:

1. Integrate commitments into policies and management systems

2. Identify and assess adverse impacts

3. Prevent and mitigate adverse impacts Supplier causes or contributes to

4. Prevent and mitigate adverse impacts linked to Supplier's operations

5. Monitor the measures to prevent and mitigate adverse impacts

6. Enable complaints

7. Provide remediation

8. Enable audits

No deviations from the terms have been found.]

[[Contracting organisation] is recommended to follow-up the deviations through a follow-up audit/desk audit in [X] months.]

**Place and date:**

**Auditor's signature:**

**Name clarification:**

**CORRECTIVE ACTION PLAN [SUPPLIER AB]**

**Date:** *(when the corrective action plan was established)*

**For deviation management conducted: [date]**

| **No.** | Deviation  ***To be filled in by the person responsible for assessment*** | Process requirement  ***To be filled in by the person responsible for assessment*** | Possible improvement suggestion  ***To be filled in by the person responsible for assessment*** | Proposed action  ***To be filled in by supplier*** | Timeframe  ***To be filled in by supplier*** | Responsible person  ***To be filled in by supplier*** | Approval of proposed action  ***To be filled in by the person responsible for assessment*** |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1 | Paste the deviation from the assessment above | Paste the process requirement | Paste possible improvement suggestion | How supplier intends to correct the deviation.  In order for the deviation to be corrected in a sustainable way, the root cause must be identified. | When the deviation will have been corrected, at the latest | The person at the supplier who is responsible for the implementation of the action. | Comment on whether the proposed action is approved. If it is not, supplementation of the proposed action must be requested. |
| 2 |  |  |  |  |  |  |  |

1. Conflict-affected and high-risk areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Armed conflict may take a variety of forms – it can be of an international character and involve two or more states or of a non-international character, such as wars of liberation, insurgencies or civil wars. High-risk areas include areas of political instability and repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterised by widespread human rights abuses and violations of national or international law. [↑](#footnote-ref-1)
2. Supplier "causes" an adverse impact if Supplier's activities on their own are sufficient to result in the adverse impact. Supplier is most likely to cause an adverse impact in or through its own operations. [↑](#footnote-ref-2)
3. Supplier "contributes to" an adverse impact if its activities, in combination with the activities of other entities, cause the adverse impact, or if Supplier's activities cause, facilitate or incentivise another entity to cause an adverse impact. Contribution must be substantial, meaning the responsibility is not actualized for minor or trivial contributions. Contribution can occur in or through both Supplier’s own operations and in a supplier's operation. [↑](#footnote-ref-3)
4. Supplier is ”linked to” an adverse impact caused by a supplier or sub-supplier, regardless of where in the supply chain it occurs. “Linkage” is defined by the relationship between Supplier’s products, services or operations and the adverse impact. “Linked to” is not the same as direct contractual relationships. [↑](#footnote-ref-4)