SSCI Benchmarking Report

The Consumer Goods FORUM

Sustainable Supply Chain Initiative

Contents

1. Introduction

This report serves as a comprehensive summary of the SSCI benchmarking process. It provides clarity to the process by outlining the methodology, key milestones, findings from the desktop review and office visit, and any corrective actions taken by the scheme. It includes recommendations to the SSCI Steering Committee, which evaluates the scheme's alignment with the established SSCI criteria. This process reflects the SSCI's commitment to credible, rigorous benchmarking that builds trust and accountability across the consumer goods industry.

2. Executive Summary & Recommendations to the SSCI Steering Committee

Scheme Owner:	amfori
Scheme Name:	amfori-BSCI
SSCI Scope:	i) Processing & Manufacturing, ii) Primary Production
Application Date:	6 March 2024
Office Visit Date:	8-9 July 2024
Benchmark Leader:	Yogendra Chaudhry
SSCI Representative:	Luiza Reguse, SSCI Senior Manager

2.1. Brief description of the scheme

SSCI Benchmark Leader conducted the benchmarking assessment for the amfori BSCI ("Business Social Compliance Initiative") system developed and maintained by amfori. The program is designed to support companies of all sizes and across sectors in improving social and environmental performance in their supply chains, through a structured risk-based approach to responsible sourcing and audit/monitoring.

amfori BSCI is structured to assist members and their suppliers in mapping supply-chain risk, conducting audits, tracking corrective actions, and driving continuous improvement. The system is aligned with internationally recognized frameworks, including the OECD Guidelines for

Multinational Enterprises, the UN Guiding Principles on Business and Human Rights (UN GPs), and conventions of the International Labor Organization (ILO).

For the purposes of this assessment, two scopes have been considered:

1. Manufacturing & Processing: covering industrial/processing operations including factories, production lines, and associated workplaces; and
2. Primary Production: covering raw material/field operations, agricultural, farming, or extraction sites, where the production stage is at the source of supply chains.

The amfori BSCI system thus applies across both scopes: it includes audit tools and guidance for large farms, small-holders, and non-agricultural production sites.

Audits under the scheme comprise a full audit (with all 13 Performance Areas) conducted on a two-year cycle, plus follow-up audits when required. For example, an amfori audit consists of 81 questions rated “Yes/No/Partial/Not applicable”.

The 13 Performance Areas (PAs) form the backbone of the system, covering:

- Social Management & Workplace Relations (PA 1–4)
- Employee Well-being & Fair Practices (PA 5–7)
- Protection of Vulnerable Workers (PA 8–11)
- Ethical Practices including Environment & Business Behavior (PA 12–13)

The amfori scheme provides an established, multi-tier, global methodology to assess and improve social compliance both in manufacturing/processing and in primary production contexts. In this benchmark exercise, the scheme was evaluated for its alignment with the Sustainable Supply Chain Initiative (SSCI) requirements across both scopes

2.2. Key milestones during the benchmark process

2.2.1. Desktop Review

The benchmarking process commenced with a comprehensive desktop review of all documentation submitted by amfori in support of the BSCI Scheme across both scopes: i) Manufacturing & Processing and, ii) Primary Production. The objective of this stage was to evaluate the structure, governance, implementation framework, audit methodology, and overall alignment of the amfori BSCI system with the requirements set out in the SSCI Benchmarking Criteria. The desktop exercise was conducted using ITC’s Synergy Tool. SSCI had conducted a mapping exercise against the ITC’s Standards Map self-assessment by checking all SSCI requirements against the governance and social criteria outlined in the ITC tool.

The desktop review included an examination of the following:

- amfori BSCI System Manual (2022 update): all parts, including governance structure, monitoring approach, audit protocol, performance areas, and due-diligence methodology.
- amfori BSCI Code of Conduct and Reference Documents, including relevant ILO conventions, policy guidelines, and implementation tools.
- Audit Integrity Programme documentation, covering monitoring partner acceptance, auditor qualification processes, audit quality programme, sanctions, and oversight mechanisms.
- Supporting SOPs, guidance documents, MEMOs, and monitoring tools, including audit report frameworks, combined audit procedures, calibration guidance, integrity protocols, and grievance mechanisms where available.
- Publicly available information on the amfori website, including high-level descriptions of the scheme, governance structure, stakeholder engagement, and member obligations.

The desktop review allowed for an initial assessment of the scheme's alignment with SSCI requirements. Several areas demonstrated strong alignment, particularly in relation to due diligence, supply-chain mapping, auditor qualification, and core social criteria. However, the review also identified a number of documentation gaps, ambiguities, and areas where requirements were implemented in practice but not clearly articulated in publicly available documents or formal SOPs. These included procedures for appeals and complaints, liability coverage, system revision processes, report review protocols, risk-based sampling methodology, and certain social performance requirements specific to the Primary Production scope.

The findings from the desktop review formed the basis for the subsequent office visit evaluation, during which the implementation, maturity, and practical application of these processes were further assessed. Identified documentation gaps from the desktop review were also communicated to amfori in preparation for the corrective action phase

2.2.2. Office Visit

Following the desktop review, an on-site office visit was conducted at amfori's headquarters to verify the implementation, governance, and operational practices of the amfori BSCI system. The purpose of the office visit was to assess how the documented policies and procedures are applied in practice, evaluate the robustness of the scheme's oversight mechanisms, and confirm the existence and effective functioning of the processes required under the SSCI criteria.

During the office visit, detailed discussions and evidence reviews were carried out with key amfori personnel responsible for system governance, monitoring partner oversight, auditor qualification, social programme development, and audit-quality assurance. The visit focused on:

- Governance and Integrity Systems: Verification of roles, responsibilities, workflow structures, and decision-making processes associated with the amfori BSCI governance model, including the monitoring partner (MP) acceptance process, the assurance partner (AP) oversight, and internal committees involved in system updates and guidance development.
- Operationalization of System Requirements: Review of practical implementation of system elements such as the audit protocol, calibration meetings, integrity procedures, system revision cycles, grievance mechanisms, and monitoring activities, including OSR, SMO audits, local office audits, witness audits, and duplicate audits.
- Evidence of Implementation: Examination of internal SOPs, training records, audit tools, data-management processes, system-revision documentation, internal communication mechanisms, and files related to integrity cases, complaint handling, and audit-quality monitoring.

The office visit confirmed that amfori BSCI has a well-established organizational structure and significant operational maturity across most functional areas, particularly in monitoring partner oversight, auditor management, and ongoing quality-assurance activities. Several SSCI requirements were demonstrated to be implemented in practice during operational walkthroughs and interviews, even in cases where the supporting documentation was not yet finalized or publicly available.

However, the office visit also identified several gaps and areas for improvement, primarily relating to:

- The absence of publicly available appeals and complaints procedures.
- Limited or unavailable documentation regarding liability coverage, system revision processes, and report-review protocols.
- Gaps in explicit requirements related to risk-based sampling, root-cause analysis, and certain Primary Production specific social protections (e.g., pesticide exposure, separation of accommodation facilities, protection of pregnant/breastfeeding workers).

These findings were communicated to amfori at the conclusion of the visit, and the organization demonstrated full cooperation and willingness to address the identified gaps. The outcome of the office visit informed the development of the corrective action plan and served as the basis for evaluating the adequacy of subsequent corrective actions submitted by amfori.

2.2.3. Corrective Actions

Following the desktop review and office visit, a series of corrective actions (CAs) were requested from amfori to address the gaps identified against the SSCI Scheme Governance and Social Criteria requirements. amfori demonstrated a high level of responsiveness and collaboration throughout this stage, submitting additional documents, implementing procedural updates, and developing new requirements to strengthen alignment with the SSCI criteria for both scopes under assessment: Manufacturing & Processing and Primary Production.

The corrective actions addressed several key areas:

- Appeals and Complaints Mechanisms (A1.05):
  amfori developed and publicly disclosed an updated external grievance mechanism, including the amfori Resolve Channel and associated SOPs, ensuring stakeholders have clear access to complaint and appeal procedures. The documentation is now available online, fulfilling SSCI transparency requirements.

- Liability Coverage (A1.03):
  amfori submitted insurance policies and legal documentation demonstrating adequate arrangements to cover liabilities arising from its operations. The corrective action satisfactorily addressed the requirement.

- System Revision Procedures & Documentation (A5-series & B7.01):
  amfori finalized and shared the SOP on amfori BSCI System Revision (2024) and supporting documentation outlining development, approval, and revision cycles, including stakeholder involvement. Public disclosure was also completed.

- Technical Review of Audit Reports (B5.04):
  amfori introduced a revised Report Review SOP, formalizing requirements for impartial technical reviewers and strengthening the internal quality control process.

- Root-Cause Analysis & Corrective Action Development (B6.02, B6.03):
  To align with the SSCI requirements, amfori committed to making the Continuous Improvement Tool, which includes a mandatory root-cause analysis component, which is compulsory across the scheme. This enhancement is included in the 2025 work plan.

- Risk-Based Sampling & Minimum Sample Size (B5.03 & B5.01):
  amfori developed and submitted the Multi-Tier Food Audit Guidance documents for members, business partners, and monitoring partners. These introduce a risk-based sampling methodology aligned with SSCI criteria, including the minimum sample size calculation (square root of total sites). Requirements for auditor-driven site selection based on risk assessment were also added.

- Primary Production Social Requirements (PA 7, 11, 13 related SSCI criteria):
  To address social-protection gaps including medical examinations for pesticide-exposed workers (8.08), protection of pregnant/breastfeeding workers (8.06), fraudulent recruitment safeguards (3.10), and separation of accommodation facilities from production areas (9.06),

amfori issued a consolidated MEMO_SSCI_Benchmarking_System Updates.
MEMOs serve as binding interim requirements until the next manual revision cycle. Their issuance follows internal governance processes and includes acknowledgement and sign-off by auditors and monitoring partners.

Across all findings, amfori provided sufficient and verifiable evidence of corrective actions or commitments scheduled for implementation in the upcoming revision cycle. All submitted corrective actions were reviewed for adequacy and found to meet the intent of the relevant SSCI criteria. Where implementation timelines extend into the next year, verification will take place during the next Monitoring & Continuous Alignment (MoCA) review.

Overall, the corrective action phase demonstrated amfori's strong commitment to continuous improvement, transparency, and alignment with SSCI requirements. The Scheme addressed all identified gaps through documented updates, new procedural requirements, governance enhancements, and interim MEMOs issued through formal channels.

2.3. Main changes made to the Scheme following the benchmarking assessment

As a result of the SSCI benchmarking assessment, amfori implemented a series of meaningful modifications and system enhancements across governance, documentation, audit methodology, and social-performance requirements. These updates strengthened alignment with SSCI criteria for both scopes: i) Manufacturing & Processing and ii) Primary Production, and demonstrated a clear commitment to continuous improvement and transparency. The main changes introduced by amfori include the following:

1. Strengthening Transparency Through Public Disclosure

amfori developed and publicly released key governance documents that were previously internal. This includes:

- A newly drafted External Grievance Mechanism and appeals/complaints procedure, now available through the *amfori Resolve Channel*.
- Public disclosure of the amfori BSCI System Revision SOP, detailing processes for periodic revision, stakeholder participation, and approval mechanisms.

These changes enhance accessibility and visibility of the scheme's governance processes.

2. Enhanced Liability Coverage Documentation

amfori formalized its liability arrangements by securing and presenting:

- Updated organizational liability insurance,
- Director and officer liability coverage, and
- Documentation demonstrating internal legal review.

This ensures compliance with SSCI requirements regarding adequate arrangements for liabilities arising from scheme operations.

3. Introduction and Finalization of New SOPs and Governance Tools

A suite of new procedural documents was created or updated following the assessment:

- Report Review SOP, establishing clear expectations for technical review of audit reports.
- System Revision SOP, defining how updates to the scheme are governed, approved, and communicated.
- Data Management Policy, supporting transparency and consistency in information governance.

These documents form an enhanced governance framework that more clearly demonstrates amfori's alignment with SSCI's integrity and management-system requirements.

4. Methodological Improvements to Audit Sampling

To address SSCI requirements on risk-based sampling and minimum sample size, amfori introduced:

- A new risk-based sampling methodology, assigning responsibility to auditors for site selection using defined risk criteria.
- Alignment with SSCI's minimum sample size calculation, using the square-root sampling approach.
- Issuance of Multi-Tier Food Audit Guidance for members, business partners, and monitoring partners to operationalize the revised methodology.

These updates mark a significant enhancement in the audit design, particularly for multi-site and multi-tier supply chains.

5. Strengthening Corrective-Action and Root-Cause Analysis Requirements

amfori committed to making its Continuous Improvement Tool mandatory across the scheme. This tool includes a structured root-cause analysis component, which will bring the amfori system into full alignment with SSCI's requirements for corrective-action planning.

6. Introduction of New Social Requirements for Primary Production

Several new requirements were formally introduced through a consolidated MEMO, covering:

- Mandatory medical examinations for workers exposed to pesticides or hazardous substances.
- Prohibition on pregnant and breastfeeding workers performing pesticide-related or hazardous work.
- Requirements addressing fraudulent and corrupt recruitment practices, enhancing worker protection within recruitment supply chains.
- A clear requirement that worker accommodation must be physically separated from production and storage facilities.

These updates ensure full alignment with SSCI's sector-specific expectations for primary production systems.

7. Formalization of Interim Requirements Through MEMOs

amfori utilized the MEMO governance process to introduce immediate, enforceable requirements while awaiting full integration into the next manual revision. This approach demonstrates organizational responsiveness and ensures no delay in the implementation of critical protections.

Verification of the implementation of all changes will be conducted during the next MoCA cycle.

2.4. Final recommendation

Based on the comprehensive benchmarking process including the desktop review, the on-site office visit, and the subsequent evaluation of corrective actions submitted by amfori, it is concluded that the amfori BSCI Scheme has demonstrated strong overall alignment with the SSCI requirements for both scopes assessed: Manufacturing & Processing and Primary Production.

amfori has shown transparency, cooperation, and commitment throughout the benchmarking process. All identified gaps were addressed through appropriate corrective actions, including the development of new SOPs, issuance of enforceable MEMOs, improved public disclosure, revisions to audit methodologies, and enhancements to worker-protection requirements within the Primary Production scope. In all cases, the corrective actions were reviewed and found to adequately meet the intent of the SSCI criteria.

A small number of corrective actions, specifically those requiring integration into system revisions or full rollout through the 2025 workplan, will require verification during the next Monitoring & Continuous Alignment (MoCA) cycle. This approach is consistent with the practice for schemes undergoing ongoing system updates and does not affect the overall outcome of the current assessment.

Final Recommendation:
Based on the evidence reviewed and the corrective actions implemented, it is recommended that the amfori BSCI Scheme be:

<u>Recognised by the SSCI Benchmarking Process</u>

for both scopes under review. The scheme has established the required governance structures, operational processes, and due diligence mechanisms to ensure credible and responsible social compliance monitoring across its global supply chain network.

amfori's proactive engagement and timely improvements reflect its commitment to continuous improvement and alignment with the SSCI requirements and the international best practices.

3. Appendix

3.1. List of findings: Desktop Review

The findings from the desktop review can be provided upon demand.

3.2. Office Visit

Part	SSCI Criteria	Finding against SSCI Requirement (Partial or Non-alignment)	Proposed Corrective Action for amfori	Corrective Action Implemented by amfori	Benchmark Leader Recommendation
Part II: Scheme Management	A1.05	SSCI requires that the Scheme Owners maintain a publicly available appeals and complaints resolution procedure and require the same from their auditing bodies (Monitoring Partners of Amfori) and the accreditation bodies (Assurance Partner for Amfori). While Amfori maintains some internal documentation associated with these procedures, these documents were not found to be publicly available for their relevant stakeholders. A similar requirement for the Assurance Partner could not be verified.	Draft SOP on appeal and complaints procedures to be disclosed on our website. This will include: -Procedures concerning grievances against amfori staff -External Grievance Mechanism, intended to handle and resolve grievances against amfori's activities and / or services Assess documentation disclosed by our Monitoring + Assurance partners and require disclosure when necessary.	20241210_EGM,WB,crisis cases - Management Document External Grievance Form SSCI benchmarking Grievance handling mechanism Link to amfori Resolve Channel: https://www.amfori.org/amfori-resolve-channel/	The proposed CA is approved. The procedure is publicly available at the link provided by the SO, along with a mechanism for the resolution of complaints and appeals.
Part II: Scheme Management	A1.03	SSCI criteria require that the Scheme Owners have adequate arrangements to cover liabilities arising from its operations. No such procedures or relevant insurance policies maintained by Amfori could be verified during the Office Visit	Adequate arrangements to cover liabilities arising from our operations to be created. 1) Legal review of insurance coverage against liability claims 2) Implementing a liability insurance policy	Following insurance policies attached: Insurance policy liability Amendment insurance liability Insurance policy liability directors	The proposed CA is approved. The liability insurance policy documents provided by the SO provide evidence of arrangements to cover the liabilities
Part II: Scheme Management	A5.06 A5.02 A5.03 A5.04 A5.05 B7.01	Amfori demonstrated that the corresponding SSCI requirements exist and are implemented but the relevant documentation and procedures associated with those requirements were not available (or publicly available where applicable) during the office visit	Complete SOP on System Revision (to be signed by amfori president). Development, approval and revision procedures to be included, as well as participation of technical experts and stakeholders.	SOP amfori BSCI System Revision 2024 System Revision_SSCI SOP (supporting PPT presentation which explains the details regarding the revision process) Link to procedure on website: https://www.amfori.org/news/how-the-amfori-bsci-system-is-revised/ amfori Data Management Policy	The proposed CA is approved. The approved SOP/procedures will be verified at the next MoCA along with the evidence of implementation.
Part II: Scheme Management	B5.04	Requirements related to a thorough technical review of audit reports by impartial and technically capable reviewers are not addressed through explicit Amfori procedures.	Write guidance document (or SOP) to summarize amfori requirements for our monitoring partners. Re-write SOP that we already have on report review.	Document attached: Report Review_SOP final	The proposed CA is approved. The approved SOP/procedures (Report Review SOP) will be verified at the next MoCA, along with the evidence of implementation.
Part II: Scheme Management	B6.02 B6.03	SSCI criteria require that the auditees conduct a root-cause analysis and propose corrective actions for all non-conformities. However, Amfori audits do not explicitly require a root-cause analysis for the non-conformities. Instead, the auditees are required to propose actions for continuous improvement (corrective actions only) against the identified non-conformities.	Making Continuous Improvement tool on the amfori platform mandatory (root cause section is already included in the tool) - 2025 roadmap, to be discussed with leadership team, to be included in amfori BSCI workplan for next year.	FIN CI Methodology 2025 Concept (Internal only)	The proposed CA is approved. The approved SOP/procedures (CI Methodology Full) will be verified at the next MoCA along with the evidence of implementation.
Part II: Scheme Management	B5.03	SSCI criteria provide a sampling methodology for the calculation of a minimum number of sites to be audited. This ensures an adequate number of sites are audited when there are a large number of sites under the audit scope. However, Amfori requirements limit the audit to a maximum of 10 sites.	Create a new sample methodology according to the minimum sample size as required by SSCI: square root of the total number of registered sites to be audited. To be included in the 2025 roadmap	amfori Multi-Tier Food Audit Guidance for Members amfori Multi-Tier Food Audit Guidance for Business Partners amfori Multi-Tier Food Audit Guidance for Monitoring Partners	The proposed CA is approved. Implementation of new procedures will be verified at the next MoCA.
Part II: Scheme Management	B5.01	The SSCI establishes rules for a risk-based sampling programme, including a minimum sample size. There are no equivalent and explicit requirements at Amfori related to the selection of sample sites for auditing.	New requirement to be drafted for auditors to be the ones responsible for selecting which sites need to be audited (in case of multi-tier audits). Selection is to be based on risk assessment. Guidelines for how to conduct this risk assessment to be drafted (+communication/training). To be included in 2025 roadmap	amfori Multi-Tier Food Audit Guidance for Members amfori Multi-Tier Food Audit Guidance for Business Partners amfori Multi-Tier Food Audit Guidance for Monitoring Partners	The proposed CA is approved. Implementation of new procedures will be verified at the next MoCA.

Part III: Social Criteria	8.08	SSCI criteria require a medical examination for all workers who handle or come in regular contact with pesticides or hazardous substances in accordance with the applicable legal requirements. Amfori does not have equivalent or similar requirements	Implement new BSCI requirement concerning appropriate medical examination for all workers who come into regular contact with identified pesticides or hazardous substances (+ reference to national legal requirements) Write a MEMO to issue a written requirement on question 7.7. Include this topic in the comprehensive MEMO. MEMOs are developed by consensus within the Social Team, involving key stakeholders from various meetings such as Steering Committee, Auditing Working Group, and Social Team Meetings. Once the document is finalized, it becomes an enforceable requirement, with auditors and relevant entities being required to acknowledge receipt and sign off on the MEMO. The process includes the tracking of responses and managing non-compliance through the Audit Integrity Programme. MEMOs are valid until the content is integrated into the BSCI System Manual during the next revision period. Therefore, the MEMOs serve as interim guidance until a formal revision process takes place.	Memo_SSCI_Benchmarking_System Updates	The proposed CA is accepted and approved. MEMO_SSCI_Benchmarking_System Updates is accepted as the new requirements introduced through this memo aligns with the SSCI requirements. The implementation will be verified during MoCA
Part III: Social Criteria	8.06	SSCI criteria require that pregnant or breastfeeding workers are not obliged to work using pesticides or hazardous substances. Amfori does not have equivalent or similar requirements	SSCI criteria require that pregnant or breastfeeding workers are not obliged to work using pesticides or hazardous substances. Requirement to be specified in a MEMO. Reference to PA 7.5. MEMOs are developed by consensus within the Social Team, involving key stakeholders from various meetings such as Steering Committee, Auditing Working Group, and Social Team Meetings. Once the document is finalized, it becomes an enforceable requirement, with auditors and relevant entities being required to acknowledge receipt and sign off on the MEMO. The process includes the tracking of responses and managing non-compliance through the Audit Integrity Programme. MEMOs are valid until the content is integrated into the BSCI System Manual during the next revision period. Therefore, the MEMOs serve as interim guidance until a formal revision process takes place.	Memo_SSCI_Benchmarking_System Updates	The proposed CA is accepted and approved. MEMO_SSCI_Benchmarking_System Updates is accepted as the new requirements introduced through this memo align with the SSCI requirements. The implementation will be verified during MoCA
Part III: Social Criteria	3.1	SSCI criteria provide a number of requirements for worker protection when employment agencies are used by a facility. Amfori requirements align with most of the requirements set by the SSCI criteria. However, the prevention of fraudulent and corrupt recruiting practices is not explicitly covered by the Amfori requirements	MEMO on PA 13.1 including requirement regarding fraudulent or corrupt recruitment practices. As for the 2 findings above, implementation of requirement will need time because new findings will be raised (BPs need to prepare policies etc). We need to inform BPs and members about this. MEMOs are developed by consensus within the Social Team, involving key stakeholders from various meetings such as Steering Committee, Auditing Working Group, and Social Team Meetings. Once the document is finalized, it becomes an enforceable requirement, with auditors and relevant entities being required to acknowledge receipt and sign off on the MEMO. The process includes the tracking of responses and managing non-compliance through the Audit Integrity Programme. MEMOs are valid until the content is integrated into the BSCI System Manual during the next revision period. Therefore, the MEMOs serve as interim guidance until a formal revision process takes place.	Memo_SSCI_Benchmarking_System Updates	The proposed CA is accepted and approved. MEMO_SSCI_Benchmarking_System Updates are accepted as the new requirements introduced through this memo align with the SSCI requirements. The implementation will be verified during MoCA
Part III: Social Criteria	9.06	SSCI requires that when accommodation facilities are provided or mandated, they are located separately from production and storage facilities. Amfori has corresponding requirements for the protection of workers where accommodation facilities are provided. However, it does not explicitly require that these facilities be located separately from the production or storage facilities	MEMO on PA 11.3 regarding requirement on accommodation facilities, which need to be located separately from production or storage facilities. To be communicated to BPs as well. MEMOs are developed by consensus within the Social Team, involving key stakeholders from various meetings such as Steering Committee, Auditing Working Group, and Social Team Meetings. Once the document is finalized, it becomes an enforceable requirement, with auditors and relevant entities being required to acknowledge receipt and sign off on the MEMO. The process includes the tracking of responses and managing non-compliance through the Audit Integrity Programme. MEMOs are valid until the content is integrated Into the BSCI System Manual during the next revision period. Therefore, the MEMOs serve as interim guidance until a formal revision process takes place.	Memo_SSCI_Benchmarking_System Updates	The proposed CA is accepted and approved. MEMO_SSCI_Benchmarking_System Updates is accepted as the new requirements introduced through this memo align with the SSCI requirements. The implementation will be verified during MoCA