

CGF Human Rights Coalition – Working to End Forced Labour [INITIAL DRAFT FOR CONSULTATION] Palm Oil Roadmap

Introduction

The **CGF Human Rights Coalition- Working to End Forced Labour (HRC)** is comprised of committed member companies working to advance our [Forced Labour Resolution](#) and its Priority Industry Principles (PIPs) in alignment with the UN Guiding Principles on Business and Human Rights in our own operations and supply chains. The Priority Industry Principles were developed to highlight the three key standards the industry must adopt to respect the rights of workers: **that all workers should have freedom of movement, no worker should pay for a job, and no worker should be indebted or coerced to work.**

Overview

The [International Labour Organization](#) (ILO) defines forced labour as situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities. This includes forced child labour, forced migrant labour and human trafficking. The ILO estimates that today more than 25 million people are in forced labour, including 16 million in the private sector, which includes domestic work, construction or agriculture.

This is an unacceptable situation that the consumer goods industry firmly intends to fight, both through its ground-breaking 2016 Board-approved Resolution on Forced Labour and through the continued support of the post-2015 development agenda and the UN Sustainable Development Goals. Forced labour has for so many years plagued global supply chains and is considered the most salient, yet often hidden issue faced by the industry. Freedom from forced labour is key to achieving decent working conditions across the consumer goods industry and worldwide.

It is one of the most profitable global crimes and a problem of this magnitude cannot be solved by one person, company or industry acting alone, therefore we will drive individual and collective action in our businesses and supply chains to:

- Implement Human Rights Due Diligence (HRDD) Systems
- Support Responsible Recruitment markets
- Support a focused movement with all relevant stakeholders to jointly expedite the elimination of forced labour

More information can be found: www.tcgfsocial.com

Why Palm Oil?

Palm oil and palm kernel oil are found worldwide in many consumer and industrial products, including food and beverages, personal care and beauty products, bioenergy and fuel, animal feed, pharmaceuticals, industrial activities, and the food service industry¹. The food industry is the biggest user of palm oil accounting for about 72% of the worldwide usage and is used in about 60% of the products sold in supermarkets². Indonesia and Malaysia are the most important palm oil producing countries, with a combined production of 86% of the worldwide palm oil production, where 4.5 million earn their living directly from the industry, and many millions more are indirectly dependent upon palm oil production for their livelihoods.³

Environmental concerns related to palm oil production emerged in the early 2000s and have been the main focus of industry's efforts ever since. More recently, data on forced labour risks and occurrences in the palm oil sector have become more readily available. In 2018, the CGF commissioned [a report by the Fair Labor Association](#) to look at the extent of this complex issue, as well as the role of the consumer goods industry in driving change and eradicating forced labour, focusing on Indonesia and Malaysia⁴. The report **highlighted indicators of forced labour associated with the production of palm oil**, including debt bondage, passport retention, recruitment fees, and restricted worker movement — abuses addressed by our **Priority Industry Principles**.

The HRC's efforts around palm oil are also strengthened by the agenda of CGF's coalitions:

- the [Forest Positive Coalition](#), working to address deforestation and create forest positive futures. Its dedicated commodity working group on palm oil forms the other half of CGF Palm Oil Roadmap.
- the [Sustainable Supply Chain Initiative \(SSCI\)](#) building trust in sustainability standards and certification programmes through benchmarking, against a set of industry requirements set by our member companies for recognition. Certification still remains a key tool for assessing good social and environmental practices in global supply chains including palm oil, and therefore remains a valuable means for strengthening existing approaches.

Together, these three Coalitions comprehensively approach the issue of palm oil to address the forced labour issues, environmental and supply chain management concerns which make it a high-risk commodity.

¹ Assessing Forced Labor Risks in the Palm Oil Sector in Indonesia & Malaysia, A research report by the Fair Labor Association for The Consumer Goods Forum, November 2018
https://www.theconsumergoodsforum.com/wp-content/uploads/2018/11/201811-CGF-FLA-Palm-Oil-Report-Malaysia-and-Indonesia_web.pdf

² https://www.ilo.org/wcmsp5/groups/public/---ed_dialogue/---lab_admin/documents/publication/wcms_636615.pdf

³ What you need to know about palm oil <https://www.conservation.org/blog/what-you-need-to-know-about-palm-oil-in-5-charts>

⁴ Countries Where Palm Oil is Reportedly Produced with Forced Labor and/or Child Labor <https://www.verite.org/project/palm-oil-3/>

Our Theory of Change







To advance the Human Rights agenda in the palm oil sector, there is a need for a systemic approach which allows for businesses and their suppliers to identify, prevent and address their potential human rights impacts. Only by adopting human rights due diligence (HRDD) systems can companies embed in their practices the identification, management and prevention of human rights risks. Establishing and deploying HRDD approaches at each step of the supply chain will support businesses in driving change sustainably.

We believe that making robust human rights due diligence systems the norm in the palm oil sector can drive improved conditions for workers and sustained benefits over time. We're deploying a tailored approach to HRDD in palm oil across the value chain, with a focus on forced labour risks, to show what's possible and scale what works across the palm oil industry and beyond.

Detailed information can be found in the following table:

Issue	<ul style="list-style-type: none"> Forced labour remains difficult to detect and measure, which means that traditional assessment methods do not necessarily capture the full extent of the problem thus hindering both business decision making and governmental policies. Current efforts to address forced labour are mixed and patchy. This gap in data on the true scale of forced labour risks, and the lack of robust approaches to tackling the problem, inevitably leads to weak and untargeted mitigation efforts⁵.
Our ambition	<p>We seek to:</p> <ul style="list-style-type: none"> Reduce the risks of forced labour across the palm oil sector together with all relevant supply chain actors by supporting them to build their own capabilities to monitor, address and prevent forced labour issues in their own operations and extended supply chain. Demonstrate positive impact through the systemic implementation of forced labour focused Human Rights Due Diligence (HRDD) as a foundational approach to transforming the palm oil industry. <p>As we work to develop our approaches and specific engagement on forced labour issues upstream, we will update the ambition.</p>

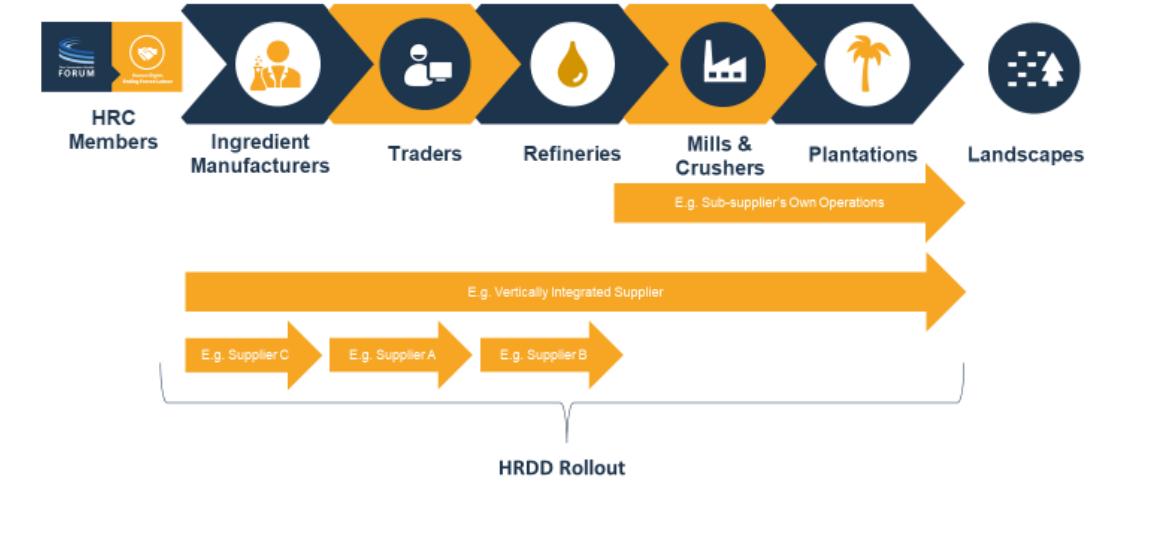
⁵ <https://www.cfr.org/blog/modern-slavery-research-methods-enabling-data-driven-decisions>

<p>Our Foundational Approach to addressing Forced Labour: HRDD</p>	<p>Target endemic issues with systemic changes: Forced labour-focused Human Rights Due Diligence (HRDD) system</p> <p>Human Rights Due Diligence (HRDD)⁶ is recognised as a credible and critical approach to identifying, addressing and managing adverse human rights impacts on people, the environment and society through the implementation of robust management systems. It consists of the processes that aid business to become aware of the actual and potential human rights risks and impacts associated with their business i.e. for the workers in its operations, supply chains and the services it uses. This process enables them to prioritise and manage the areas of greatest risk and leverage. These steps are:</p> <div><div></div><div></div><div></div><div></div><div></div><div></div></div> <table><tr><td>Policy Commitment & Governance</td><td>Assess HR potential & actual impacts</td><td>Integrate & Act in order to Prevent & Mitigate</td><td>Track the effectiveness of responses</td><td>Report</td><td>Remedy</td></tr></table> <p>Deploying a HRDD system should allow us to have more visibility of and work on interconnected human rights risks.</p> <p>While there are many human rights risks, forced labour has been identified as one of the most salient human rights risks faced by our industry and across multiple sectors in line with our 2016 Social Resolution on Forced Labour, and where we have currently focused our work. As a prioritised commodity widely shared by our member companies, with identified risks of forced labour, we will therefore tailor our HRDD framework to specifically detect risks and cases of forced labour in the palm oil sector and to provide a consistent and targeted approach at industry level.</p> <p>Land rights and forced labour are both critical issues that go hand-in-hand. Upholding the human rights of communities who live in and/or make their living in forest ecosystems is essential to creating a forest positive future. That is why working with the Forest Positive Coalition is critical to the HRC’s approach. The CGF has led lengthy discussions on the topic of land rights, which are still ongoing. We hope with this stakeholder consultation, we will receive detailed feedback on this topic and others, such as human rights defenders, in order to better understand the constructive ways the CGF can contribute to addressing these issues.</p>	Policy Commitment & Governance	Assess HR potential & actual impacts	Integrate & Act in order to Prevent & Mitigate	Track the effectiveness of responses	Report	Remedy
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⁶ HRDD, according to the UN Guiding Principles, is “an ongoing risk management process ... in order to identify, prevent, mitigate and account for how [a company] addresses its adverse human rights impacts. It includes four key steps: assessing actual and potential human rights impacts; integrating and acting on the findings; tracking responses; and communicating about how impacts are addressed.”

	Furthermore, HRDD is increasingly moving up the regulatory and governmental agendas be it via National Action Plans or enshrined into law such as the French Duty of Vigilance law (2017) and emerging legislative proposals at the EU level. Therefore, the Coalition aims to be closely aligned with the regulatory developments.
Geographical scope	<p>Malaysia has been selected as the focus country for the initial rollout of the HRDD approach. The rationale is two-fold:</p> <ul style="list-style-type: none"> • Malaysia is one of the largest palm oil-producing countries with a strong presence of migrant workers. • The prevalence of forced labour risks and issues is high, especially among migrant workers who are often subject to abuses of recruitment in both origin and destination country and abusive employment practices.⁷
Scope	<p>The deployment of HRDD focused on forced labour will cover a representative sample of workplaces across an entire palm oil value chain among:</p> <ul style="list-style-type: none"> • <u>tier 1 suppliers' own operations</u> • <u>upstream suppliers' own operations</u> <p>We will initially collaborate with a representative sample of suppliers across the palm oil value chain, which will include both HRC members' direct suppliers, and their extended supply chain (upstream suppliers) to apply the HRDD approach. We will be working together with suppliers to provide tools, guidance and training, so that together we can create a working model which can be scaled up across the whole industry.</p>

⁷ Assessing Forced Labor Risks in the Palm Oil Sector in Indonesia & Malaysia, A research report by the Fair Labor Association for The Consumer Goods Forum, November 2018
https://www.theconsumergoodsforum.com/wp-content/uploads/2018/11/201811-CGF-FLA-Palm-Oil-Report-Malaysia-and-Indonesia_web.pdf

	<div data-bbox="616 255 1809 928"> <h3>ROADMAP: SCOPE</h3>  <p>The diagram illustrates the scope of the HRDD rollout across the palm oil supply chain. It starts with HRC Members, followed by Ingredient Manufacturers, Traders, Refineries, Mills & Crushers, Plantations, and finally Landscapes. Below this main flow, three horizontal arrows represent different rollout models: 'E.g. Sub-supplier's Own Operations' (covering Mills & Crushers to Landscapes), 'E.g. Vertically Integrated Supplier' (covering Ingredient Manufacturers to Landscapes), and 'E.g. Supplier C', 'E.g. Supplier A', and 'E.g. Supplier B' (covering Ingredient Manufacturers to Mills & Crushers). A bracket at the bottom of these arrows is labeled 'HRDD Rollout'.</p> </div> <p>Working with a representative group of suppliers will allow us, as an industry, to:</p> <ul style="list-style-type: none"> • Demonstrate the effectiveness of HRDD across the entire supply chain • Scale up HRDD adoption across all suppliers and geographies. • Address and mitigate forced labour issues in the palm oil sector and beyond.
<p>Action Plan</p>	<p>The members of the HRC will be working with a representative sample of suppliers to:</p> <ol style="list-style-type: none"> 1) Develop and effectively deploy, by 2023, their own Human Rights Due Diligence approach focused on forced labour risks throughout their own operations and supply chain. We will work with our suppliers, share and develop models and good practice, provide training information and opportunities, involve third party experts, leverage existing initiatives or programmes, in order to increase collective

	<p>awareness and understanding of forced labour risks and effective preventive and mitigation strategies via the implementation of HRDD – within their own operations and throughout their extended supply chains.</p> <p>In order to ensure a complete coverage of the supply chain, CGF HRC members commit to go through the same process and deploy, in their own operations, a forced labour focused HRDD approach (as per the model developed by the CGF HRC Own Operations Working Group).</p> <p>2) Upstream Suppliers: Issue specific focus on the ground In addition to the deployment of the HRDD approach, we will collaborate on the ground on key issues identified together with suppliers to develop effective prevention and remediation. This may include, but is not limited to, collectively increasing the demand for ethical recruitment as part of the HRC commitment to support responsible recruitment markets using the leverage of our own operations and collective engagement in selected geographies / commodities by 2025. This will be further refined together with suppliers.</p> <p>3) Government Advocacy In line with the approach developed at Human Rights Coalition level, and in alignment with the Forest Positive Coalition's Palm Oil Working Group, we will engage relevant stakeholders to enable the adoption and enforcement of measures with governments to eliminate forced labour within the palm oil sector.</p>
Expected Impact	<p>The intention is to demonstrate that HRDD implementation can help reduce forced labour risks across the industry and drive positive and sustainable change for workers by:</p> <ul style="list-style-type: none"> • increasing suppliers' awareness of forced labour risks • helping suppliers tackle root causes and prevent reoccurrence <p>helping suppliers identify appropriate solutions and incorporate lessons learned into remediation activities and broader operational changes.</p> <p>It also makes good business sense for suppliers by:</p> <ul style="list-style-type: none"> • allowing for better data and transparency of supply chains • increase supplier performance due to e.g. reduced staff turnover, improved productivity, improved recruitment and training <p>enhances reputation and credibility, thereby improving market access⁸</p>

⁸ ETI : Human Rights Due Diligence <https://www.ethicaltrade.org/issues/human-rights-due-diligence>

Key definitions:

Human Rights Due Diligence (HRDD) <i>(UN Guiding Principles Reporting Framework definition)</i>	“an ongoing risk management process...in order to identify, prevent, mitigate and account for how [a company] addresses its adverse human rights impacts. It includes four key steps: assessing actual and potential human rights impacts; integrating and acting on the findings; tracking responses; and communicating about how impacts are addressed.”
Human rights issues/risks <i>(UN Guiding Principles Reporting Framework definition)</i>	Human rights risks refer to the potential adverse impacts that a company can have on the enjoyment of human rights .
Priority Industry Principles (PIPs) <i>(CGF definition)</i>	<p>While certain employment and recruitment practices may not initially appear problematic, in aggregate or combined with other forms of leverage, they can result in forced labour, particularly among vulnerable workers. The principles that have been identified by members of The Consumer Goods Forum cover three of the most problematic, yet often common employment practices across the world that can lead to cases of forced labour. We will take active measures to apply these Principles across our global value chains and own operations, to cases where such practices may lead to forced labour.</p> <p>The Priority Industry Principles (PIPs) state that:</p> <ul style="list-style-type: none"> • Every worker should have freedom of movement; • No worker should pay for a job; • No worker should be indebted or coerced to work. <p>Please see the full text of the PIPs and the guidance document: https://www.theconsumergoodsforum.com/wp-content/uploads/2018/05/Guidance-on-the-Priority-Industry-Principles.pdf</p>
Own Operations <i>(CGF definition)</i>	Defined as the company itself, the entities it owns, the entities in which it holds a majority of voting shares and the facilities it manages. Contractors, sub-contractors or agencies supplying a company with labour or services in facilities that that company directly manages should also implement similar employment practices so as to mitigate the risks of forced labour. This definition applies to suppliers’ palm oil business operations only (plantations, mills, refineries etc.).
Addressing Forced Labour for workers in “Own Operations” and	For the purposes of identifying and addressing forced labour risks to workers within own operations, the definition of “worker” should include any labour employed directly by the member company and should include any third-party labour engaged by contractors or labour agencies for the performance of regular and ongoing work in own operations. Coalition

<p>with extended supply chain/upstream suppliers <i>(CGF definition)</i></p>	<p>members should disclose the specific scope of third-party workers included in their commitments, assessments, reporting and other HRDD actions.</p> <p>e.g.</p> <ul style="list-style-type: none"> • Outsourced temporary or seasonal workers • Workers maintaining and repairing critical infrastructure (e.g. janitor, electricians, plumbers) • Construction workers • Merchandising sellers <p>Note: these identified workers are not intended to be the authoritative or exhaustive list of “worker”.</p>
<p>1st Importers <i>(CGF Palm Oil Sourcing Guidelines)</i></p>	<p>Means those companies who import, process, supply, and/or use substantial volumes of palm oil for food and consumer goods markets. The term is not prescriptive and may be extended to other companies deemed to be material to retailers and consumer goods companies’ palm oil supply chains.</p>

Outline of Human Rights Due Diligence Approach focused on Forced Labour in Own Operations of Selected Palm Oil Suppliers

In order to deliver our ambition, we have established a three (3) stages of maturity framework that will be equally applicable for the Coalition members in Own Operations and their direct suppliers. The intention is to apply the similar overarching framework for HRC Palm Oil direct suppliers and their extended supply chains. The following table aims to define a set of minimum requirements companies should strive to achieve at each of the 3 stages of maturity. The requirements are cumulative from stage 1 to 3.

1. **Launched:** Initial, basic steps towards human rights due diligence addressing forced labour risks in own operations are in place and provide a foundation for future programme growth.
2. **Established:** A functional human rights due diligence programme addressing forced labour risks for own operations is in place and is actively deployed for prioritised locations.
3. **Leadership:** A human rights due diligence programme for forced labour risks in own operations is in place for all locations and delivering outcomes for vulnerable workers.

Whilst the steps below are numbered, this does not infer that this is the chronological order of the steps. HRDD is not a linear process; many of these steps must be taken in parallel, and the process is dynamic and self-reinforcing.

HRDD steps	1. Launched	2. Established <i>in addition to Launched</i>	3. Leadership <i>in addition to Established</i>
1. Policy Commitment and governance	<p>1.a. There is a publicly available commitment against forced labour aligned with the Priority Industry Principles (PIPs) stating: <i>Every Worker should have freedom of movement / No Worker should pay for a job / No Worker should be indebted or coerced to work</i></p> <p>1.b. Governance and management systems are developed to be conducive of the commitment against forced labour.</p>	<p>1.a. There is a publicly available Human Rights Policy that refers to the PIPs and the UNGPs, or other internationally recognised instrument pertaining to forced labour risks.</p> <p>1.b. Governance and management systems are established to be conducive of the commitment against forced labour relating to direct labour in own operations and begins to expand to any third-party labour engaged by contractors, sub-contractors or labour agencies for the performance of ongoing, work in own operations.</p> <p>Management responsibility related to addressing forced labour risks is clearly defined including risks associated with recruitment, covering direct and third-party labour.</p>	<p>1.a. The Board or equivalent of the Company is assigned official responsibility for the monitoring of the Human Rights Policy.</p> <p>1.b. Governance and management systems are established to be conducive of the commitment against forced labour relating to direct labour in own operations and have expanded/ are already in place to any third-party labour engaged by contractors, sub-contractors or labour agencies for the performance of ongoing work in own operations.</p>

HRDD steps	1. Launched	2. Established <i>in addition to Launched</i>	3. Leadership <i>in addition to Established</i>
		1.c. With the governance and management system in place: <ul style="list-style-type: none"> communicate the commitment internally. train relevant staff on the forced labour commitment (e.g. Human Resources, production team, systems operator, workers etc.) 	
	Collaborative Action as a Coalition for Step [1]		
	[OVERARCHING ACTIONS]- [STAKEHOLDER CONSULTATION - WE WELCOME YOUR INPUT FOR SUITABLE COLLABORATIVE ACTIONS] Agree on a template of policy commitment (including common elements to include) Agree on common elements to include in the governance/management systems to meet the Step #1 <ul style="list-style-type: none"> Partner with relevant organisations that have existing tools/approaches to provide supplier training opportunities on setting up the appropriate governance and management system conducive to the commitment against forced labour. Create a repository of tools for each step of the HRDD (from how to set up a policy commitment and appropriate governance to have a certain extent of oversight on forced labour risks to how to remedy) Develop additional supplier support guidelines, where necessary, without duplicating any existing tools/approaches. 		
	Potential Outputs / KPIs [1]		
	[STAKEHOLDER CONSULTATION - WE WELCOME YOUR INPUT FOR SUITABLE METRICS/KPIS]		

HRDD steps	1. Launched	2. Established <i>in addition to Launched</i>	3. Leadership <i>in addition to Established</i>
2. Assess Human Rights potential and actual impacts	2.a. A process to identify forced labour risks and other human rights risks in own operations is being developed .	2.a. The human rights risks in own operations are identified .	
	2.b. Assessment processes and tools (e.g. risk evaluation, audits, etc.) are being developed . Their scope includes forced labour related risks (including passport retention, recruitment fees, any form of coercion).	2.b. Forced labour assessment processes and tools are actively and regularly conducted in prioritised own operations globally , including direct and third-party labour. At a minimum, assessments must identify potential risks related to forced labour (including passport retention, recruitment fees, any form of coercion).	2.b. Forced labour assessment processes and tools are actively and regularly conducted covering full scope of own operations globally (including areas such as warehouses and logistics sites and all offices, etc.) including direct and third-party labour. Companies may deploy different processes and tools in particular parts of their own operations, depending upon risk.
	Collaborative Action as a Coalition for Step [2] [OVERARCHING ACTIONS] - [STAKEHOLDER CONSULTATION - WE WELCOME YOUR INPUT FOR SUITABLE COLLABORATIVE ACTIONS] Agree on a set of baselines on assessment processes/tools Agree on a risk assessment questionnaire/types of questions <ul style="list-style-type: none"> Convene meetings/ events with the representative sample of suppliers attended by key relevant partners to share/exchange good practice on the companies' risk assessment processes and tools that focus on tracking human rights risks, particularly forced labour risks. Convene meetings/ events with relevant organisations with experience/tools on setting up assessment process/tools to detect human rights and forced labour risks and invite the representative sample of suppliers. 		

HRDD steps	1. Launched	2. Established <i>in addition to Launched</i>	3. Leadership <i>in addition to Established</i>
	<ul style="list-style-type: none">Offer suppliers a one-stop contact (via CGF HRC Core Group or WGs) for any advice/recommendations needed in setting up or refining assessment processes/tools.		
	Potential Outputs/KPIs [2]		
	[STAKEHOLDER CONSULTATION- WE WELCOME YOUR INPUT FOR SUITABLE METRICS/KPIS]		
3. Integrate and Act in order to prevent and mitigate	3.b. A grievance mechanism that is guided by the UNGPs, for direct labour is being developed.	3.a. Immediate steps are taken to mitigate forced labour issues relating to direct labour identified through the assessment processes and grievance mechanisms, including through training and education.	
		3.b As identified through the assessment processes and established grievance mechanisms, necessary actions are taken, with relevant contractors, sub-contractors or labour agencies for them to mitigate forced labour issues relating to their direct labour working regularly on own prioritised sites.	3.b Grievance mechanisms are extended to third-party labour working regularly on own sites either through own or the contractors', sub-contractors' or labour agencies' mechanism. As identified through the assessment processes and established grievance mechanisms, necessary actions are taken, with relevant contractors, sub-contractors or labour agencies for them to mitigate forced labour risks relating to their direct labour working regularly on all own operation sites.
Collaboration Action as a Coalition for Step [3]			

HRDD steps	1. Launched	2. Established <i>in addition to Launched</i>	3. Leadership <i>in addition to Established</i>
	[OVERARCHING ACTIONS] - [STAKEHOLDER CONSULTATION - WE WELCOME YOUR INPUT FOR SUITABLE COLLABORATIVE ACTIONS] Provide guidance on relevant grievance mechanisms/ approaches for suppliers to use <ul style="list-style-type: none"> As part of the regular supplier training events, engage suppliers and their recruitment agencies/ labour providers with whom they work in palm oil sector and beyond, e.g. on the PIPs, on role and responsibility to lead responsible recruitment – in collaboration with key organisations such as AIM-Progress, IHRB, RBA, IOM, ILO etc. Development of collective guidance to set up training curriculum for workers (plantation workers, workers working at the mills or refineries (incl. migrant worker)) to ensure their understanding about forced labour risks – key to ensure the effectiveness of grievance mechanism and verification process. <ul style="list-style-type: none"> Workers have access to PIPs (translated and visual) with training and feedback/surveys to demonstrate workers understand their rights. Engagement with key local stakeholders/organisations on these trainings or communication strategy. Develop an industry's guidance on a grievance mechanism for Coalition members outlining key expectations (e.g. elements, main processes to include, reporting process) 		
	Potential Outputs/KPIs [3]		
	[STAKEHOLDER CONSULTATION- WE WELCOME YOUR INPUT FOR SUITABLE METRICS/KPIS]		
4. Track the effectiveness of responses	4. Awareness raising and training activities regarding forced labour risks, including number of workers, labour agencies, contractors or sub-contractors reached are being recorded.	4. Outputs relating to forced labour risks are monitored (including an appropriate internal reporting mechanism) and impact tracked over time : e.g. compliance status, action plan implementation.	4. Outcomes relating to forced labour risks are monitored and impact tracked over time : e.g. reduction in number of grievances received by facility; reduction in recruitment fees paid by workers, if any, etc.
	Collaborative Action as a Coalition for Step [4]		

HRDD steps	1. Launched	2. Established <i>in addition to Launched</i>	3. Leadership <i>in addition to Established</i>
	[OVERARCHING ACTIONS]- [STAKEHOLDER CONSULTATION - WE WELCOME YOUR INPUT FOR SUITABLE COLLABORATIVE ACTIONS]		
	Agree on relevant organisations for awareness-raising/training activities		
	Agree on output elements to be monitored (e.g. compliance status, action plan implementation)		
	Agree on outcome elements to be monitored (e.g. reduction in number of grievances received/recruitment fees paid by workers)		
	<ul style="list-style-type: none">• Partner with key relevant organisations to have joint trainings between Coalition member companies’ relevant officers and relevant officers of the representative sample of suppliers (e.g. Procurement/Supply Chain/Corporate Responsibility/Sustainability managers and senior managers) on forced labour risks• Encourage the representative sample of suppliers to cascade the trainings and/or hold additional trainings for their internal functions relevant for the Procurement/Supply Chain/Corporate Responsibility/Sustainability domains.• Partner with relevant organisations and the representative sample of suppliers to hold regular best practice webinar regarding monitoring and internal reporting mechanisms on forced labour risks/issues.		
	Potential Outputs/KPIs [4]		
	[STAKEHOLDER CONSULTATION- WE WELCOME YOUR INPUT FOR SUITABLE METRICS/KPIS]		
5. Report	5. There is annual public reporting about the Company’s approach to forced labour and future implementation plans (e.g. as a stand-alone exercise, as part of the sustainability reporting,	5. There is annual public reporting about the Company’s approach to addressing forced labour through HRDD.	5. Annual public reporting includes: issues related to forced labour found in company’s own operations identified through HRDD, the mitigation steps taken and outcomes.

HRDD steps	1. Launched	2. Established <i>in addition to Launched</i>	3. Leadership <i>in addition to Established</i>
	modern slavery statements etc.)		
	Collaborative Action as a Coalition for Step [5]		
	[OVERARCHING ACTIONS] - [STAKEHOLDER CONSULTATION - WE WELCOME YOUR INPUT FOR SUITABLE COLLABORATIVE ACTIONS]		
	Agree on elements or challenges identified to be included in public reporting on the Company’s approach to forced labour and future implementation plans <ul style="list-style-type: none">Advocate for public reporting about the supplier’s approach to forced labour and future implementation plansHold webinar(s) with the representative sample of suppliers with the CGF, moderated by relevant 3rd party organisation on sharing good practice on annual reporting on human rights due diligence (e.g. risk identification on forced labour, reporting on preventive/mitigation actions)		
	Potential Outputs/KPIs [5]		
[STAKEHOLDER CONSULTATION- WE WELCOME YOUR INPUT FOR SUITABLE METRICS/KPIS]			
6. Remedy	6. Effective remediation measures for forced labour impacts are being explored, including through collaborative actions.	6. Remediation processes are in place for addressing forced labour in own prioritised operations . Necessary actions are taken, with relevant contractors or labour agencies for them to address forced labour relating to their direct labour working regularly on own prioritised sites .	6. Remediation processes are in place for addressing forced labour for all own operations . Necessary actions are taken, with relevant suppliers, on a risk basis, to enable them to address forced labour relating to direct labour working regularly on all own operations’ sites.

HRDD steps	1. Launched	2. Established <i>in addition to Launched</i>	3. Leadership <i>in addition to Established</i>
	Collaborative Action as a Coalition for Step [6]		
	<p>[OVERARCHING ACTIONS]- [STAKEHOLDER CONSULTATION - WE WELCOME YOUR INPUT FOR SUITABLE COLLABORATIVE ACTIONS]</p> <p>Agree on remediation processes to be considered as relevant as an industry group</p> <p>Agree on various remediation issues (e.g. recruitment fees repayment)</p> <ul style="list-style-type: none"> • Provide insight into a potential common positioning on remediation process (incl. expectations on remediation policy for suppliers, how the process and verification should look like). • Collaborate with other coalition members to develop a collective remediation process (incl. requirement to have a remediation policy in place for suppliers, how the process and verification should look like). 		

Impact Measurement

Engage suppliers to provide feedback or participate in periodic assessments/surveys via industry platforms including CGF, POTC, NDPE on key issues or progress e.g. to monitor reduction in prevalence of indicators of forced labour.

Members should report on their own progress towards no exploitation commitments, notably on forced labour commitments using mechanisms such as POTC, AFI and others as relevant.