

APPENDIX 9.1 SAMPLE QUESTIONNAIRE FOR PRESCREENING OF CONTRACTORS

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The following third-party company prequalification questionnaire¹ is a reference and should be tailored to the sector and risk level of the project.

Relevant PS	Issue	Request Information
PS1	Assessment and management of environmental and social risks and impacts	
		Please provide a copy of the company's environmental, social, and health and safety policies.
		Please provide information on both: 1. The company's corporate ESMS 2. The project ESMS that the company would typically implement at the site
		Please provide details of any accreditations such as ISO 14001/OSHAS 18001, held by the company, and/or alignment with ISO 26000, GRI, United Nations Global Compact, World Business Council for Sustainable Development, and/or other social responsibility standards/guidelines/ formal initiatives.
		Please provide a typical organization chart that shows how safety and health, environmental, social (including stakeholder engagement and grievances), and labor issues are managed at the site level, including management and monitoring of subcontractors and their performance.
		Please provide appropriate E&S metrics for the past three calendar years, including spills, releases to the environment, number of environmental fines or regulatory administrative processes, number of registered stakeholder grievances (disaggregated by gender), and number of registered labor grievances (disaggregated by gender).
	Subcontractors	Please provide detailed information on how the company selects and manages its subcontractors (local or other), particularly in determining whether they have systems in place to follow the necessary environmental, social, and health and safety requirements of the project.
	Subcontractors	Please provide information on how the company monitors subcontractors' environmental, social, and health and safety compliance and performance.
		Please confirm that the company has read and understood the ESIA, with particular attention to the commitments register and the ESHS management plans for the project.
	Supply Chain	The client requires that goods and services are procured locally, as far as possible, when available at equivalent quality and price. Please demonstrate how the company might achieve this, illustrating with examples from other projects if appropriate.
PS2	Labor and working conditions	
		Please provide a copy of the company's safety policy.
		Please provide a representative copy of a Health and Safety Site Management Plan.
		Please provide appropriate health and safety metrics for the past three calendar years, including (i) worked hours for the period, (ii) total recordable fatalities, (iii) total recordable injury frequency rate, and (iv)

¹ GOOD PRACTICE NOTE: Managing Contractors' Environmental and Social Performance by IFC

Relevant PS	Issue	Request Information
		total recordable disease frequency rate (based, for example, on ICMM definitions).
		Please describe in detail how the company trains for and implements safe working practices among its workforce.
		Please describe how the company plans to safeguard the health and safety of its workers while on site. What are the anticipated OHS risks and how will they be addressed?
		Please provide a copy of the company's HR policies and grievance mechanism, and describe how these will be communicated to all workers on-site.
		Please provide details on how the company will comply with national labor and employment law.
		Please provide details how the company will manage equal opportunities and nondiscrimination, sexual harassment issues, migrant labor, and retrenchment among its workforce.
		Please describe how the above issues will be managed by the company at the subcontractor level, including monitoring and reporting systems.
		The client requires that as much local labor as possible be used during the construction phase. Please describe how the company would approach this to avoid importing third country nationals or expatriate labor, as far as possible, and to leave a useful legacy of skills in the area. (It is acknowledged that a proportion of skilled labor will have to be brought in to fulfill project needs.)
		The client requires that contractors have cognizance of the minimum standards for worker facilities at the site, including sanitation, access to drinking water, and accommodation set out in the IFC and EBRD Guidance Note, Workers Accommodation, Processes and Standards, and International Labour Organization requirements. Please describe how the company will incorporate these requirements into the project.
PS3	Resource efficiency and pollution prevention	
		Please describe how the company typically manages solid waste, both hazardous and non-hazardous, generated by its activities at a construction site, including reduce, reuse, and recycle initiatives.
		Please describe how the company typically manages wastewater (for example, in camps, process) generated by its activities at a construction site, including reduce, reuse, and recycle initiatives.
		Please describe how the company typically manages storm water flow generated by its activities at a construction site.
		Please describe how the company typically manages the transportation and storage of hazardous substances and materials at the company's sites.
		Please describe how the company typically manages soil removal and storage (for later reuse).
		Please describe how the company typically manages the control of erosion and sedimentation at the company's sites.
		Please describe how the company typically manages air quality at its sites.
		Please describe how the company typically manages nuisance noise at its sites.

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		Please provide examples of environmental monitoring programs that the company has carried out on other jobs.
		Please describe how the company typically manages and uses fresh water at the company's sites.
		Please describe how energy efficiency is typically built into the company's activities.
		Please describe how greenhouse gas emissions will be accounted for and reported.
		Please describe other resource efficiency practices at the company's sites.
PS4	Community health, safety, and security	
		Please describe how the company prepares for emergencies at its sites, including those that may affect nearby communities, such as an explosion or accident or a spill or release into a local water course.
		Please describe how the company trains for and implements good driving practices among its workforce to avoid or minimize impacts to the communities.
		Please provide a code of conduct describing expectations for the behaviour of direct and subcontract employees when outside the work site and in the host community. The code of conduct should include specific provisions to prevent SEA and GBV.
		Please provide details of how the company typically manages community engagement and community relations to respect the client's existing relationship with communities and contributes to this.
		Please provide details of the company's physical and personnel security measures and how security is typically implemented at its sites.
		Please provide details of the company's policy for the adequate management of security measures and protection of human rights of local communities.
PS6	Biodiversity conservation and sustainable management of living natural resources	
		The client has several requirements relating to the conservation of biological diversity (biodiversity) including terrestrial and aquatic ecosystems. Please describe any previous projects that the company has undertaken where this was also a significant issue and how the company contributed to this effort.
		If the company has not been involved in projects where biodiversity has been a significant issue, please describe how the company would plan to address and support the client regarding the conservation of biodiversity for this project.
PS8	Cultural heritage	
		Please describe how the company typically addresses the finding of archaeological or cultural heritage items during execution of its work.
NA	Corporate social responsibility	
		The client has requirements relating to social responsibility for this project. Please provide examples of social responsibility initiatives that the company has contributed to at other sites or projects, and suggest ways that the company might contribute to this project, in discussion and coordination with the client.

APPENDIX 9.2 THIRD-PARTY COMPANY CONTRACT REQUIREMENTS

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Vista should ensure their contracts include general and/or project-specific requirements for the following topics, as applicable according to the third-party company services nature:

- i. Development and adoption of an E&S management program or system or commitment to adhere to, adopt, and implement Vista's ESMS framework, as necessary for the third-party company involvement in the project.
- ii. Number and qualifications of E&S personnel required to be on staff and on-site—including those responsible for HR; worker health and safety; worker grievances; environmental management; community health; safety and security; worker accommodation; site security; and emergency response.
- iii. The nature, risks, and complexity of the project / service; the scope of work of the service being contracted; the development and implementation of specific Vista approved E&S management plans; and associated documentation as required by the ESIA/Environmental and Social Management Plan, will include, at a minimum, implementation plans for occupational health and safety, emergency response, hazardous materials management, and site restoration, among others. The contract should list the plans the third-party company is to develop for client approval and the plans that may have been prepared by the Vista for third-party company implementation.
- iv. Explicit commitment to compliance with the project commitments as captured in the commitment register; conditions of approval; environmental design criteria; management plans; ESAP and national law; and acquisition of all required permits, licenses, consents, and approvals prior to undertaking the activities being permitted or otherwise approved.
- v. Specific reference to IFC PSs, EHS Guidelines (general and relevant sector specific), and other guidance as appropriate (for example, IFC and European Bank for Reconstruction and Development (EBRD) Guidance on Worker Accommodation).
- vi. Adherence to the Vista code of conduct.
- vii. Adherence to the Vista security forces management plan, if applicable.
- viii. Induction and training programs for E&S and other personnel, including training on applicable HR policy provisions, grievance mechanisms, health and safety, code of conduct including training on the provisions intended to combat GBV and SEA, materials management, and environmental protection.
- ix. Monitoring of E&S performance by contractor workers and subcontractors and client's role in this.
- x. Any monitoring of environmental parameters (such as noise, air emissions and air quality, water flows and quality, waste generation and management) that contractors may be required to carry out.
- xi. Implementation of a grievance mechanism for workers (including subcontract workers) either through a grievance mechanism implemented and managed by the contractors or through extending the grievance mechanism of the client to the workforce of the contractor. In both cases, clear reporting on grievances and how they are addressed between contractor and client is required. The grievance mechanism should ensure proper handling of GBV-related grievances, including but not limited to sexual harassment.
- xii. Assurance that the client's grievance mechanism for external stakeholders¹⁵ is either adopted by all contractors or there is clear communication to stakeholders on how to address grievances related to the activities of the contractors, including both works on the project site(s) and in any ancillary facilities and infrastructure. The community-level grievance mechanism should ensure proper handling of grievances arising from GBV or SEA.

- xiii. Other requirements of the client's stakeholder engagement program that are to be supported by the contractor. This should be integrated with the client stakeholder engagement program to ensure consistency.
- xiv. Creation and maintenance of records on E&S performance.
- xv. The environmental conditions under which the contractor will be allowed to demobilize and leave the site, including conditions of site restoration and requirements for handling personnel retrenchment, particularly those involving local workers.
- xvi. Penalties and/or incentives for E&S performance of contractors and subcontractors.
- xvii. Reporting requirements, including reporting on E&S performance.
- xviii. Clear contract statement that the contractor is responsible for the E&S performance of subcontractors and suppliers.
- xix. Contract statement that on the contractor's failure to meet the E&S requirements in such a way as to prevent significant impacts to workers, local communities and/or individuals, and/or environmental resources, and on the contractor's failure to correct such deficiencies upon receiving proper notice, the client has the right to appoint and pay another party to repair damages or otherwise remedy the impacts and reduce payment to the contractor in the amount paid to the third party.
- xx. As noted previously, mitigation measures to control E&S impacts during construction work to be considered as part of the works themselves, not measures that are needed in addition to the main works. The bill of quantities shall include adequate costs and timelines for expenditure to effectively implement the commitments related to E&S performance. The bill of quantities should define milestone and final payments for completion or partial completion of work, to include satisfactory performance of related E&S requirements. If a contract includes incentives for timely completion of work, it should also include corresponding penalties for failure to implement required mitigation measures.

APPENDIX 9.3 SELF AUDIT GUIDANCE REFERENCE

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This auditing guidance provides a comprehensive overview of the steps that an auditor would take to assess various aspects of your business. You should review this auditing guidance to gain insight into the types of issues and questions that auditors consider. This will broaden your view of potential risk areas and elements of the ESMS beyond those that you may have targeted in your initial risk assessment.

A. PREPARATION	
	Collect audit and inspection reports on the company's environmental and labor performance for the previous two years.
	Collect corrective action plans generated from previous audits or inspections and review the status of each action item that was agreed upon. Are they all closed out? Focus your review on open items and the underlying factors that prevent you from completing the corrective action plan.
	Ascertain the general level of PPE use on the organization. Ensure that auditors wear the same PPE as employees are required to wear: head, hearing, eye, skin protection, protective boots, clothing, etc. Do not allow any auditor to enter work areas without the clothing/gear required for the operations activity and that employees are required to wear.
	Obtain site plans for all the relevant operational areas. Ensure auditing team has a working knowledge of the operations to be evaluated.
	Research and refer to current local environmental and labor laws and regulations. Basic labor code issues: (i) regular weekly work hours, (ii) labor contract provisions, (iii) rest periods, lunch, etc., (iv) overtime requirements, limits and exceptions, (v) hour averaging and banking hours, (vi) minimum wage, (vii) social system payment liability, (viii) annual leave, (ix) laws to protect disadvantaged workers, (x) severance pay. Basic environmental code issues: (i) wastewater, (ii) storm water, (iii) spill prevention and response, (iv) construction/demolition/remodeling, (v) hazardous materials, (vi) hazardous waste, (vii) toxic chemical release, (viii) air emissions, (ix) solid waste.
	Review regulatory permit(s) conditions and specific requirements along with most recent review and corrective action reports.
	Review certification(s) audit reports (e.g. ISO 14001, OSHAS 18001, BSCI or SA8000) for nonconformance, mandatory remedial actions, recommendations, etc. Summarize status of items (open or closed).
	Review any government inspection reports, third-party audit reports, etc.
	Review the stakeholder engagement plan and records of grievances by external stakeholders. Pay attention to: emergency preparedness and response capability to include the community if necessary; use of chemicals and accidental releases of hazardous materials affecting community, e.g. dyes and chlorine; discharges of wastewater or other wastes to areas affecting local communities; exacerbation of flooding; limits of water availability use and physical access; diminution of quality of life due to the operation.
	Pay special attention in observation/document review/interviews to issues identified in previous reports.
	Research and understand the national and local context of labor union rights and activity, local environmental groups and community activist organizations.
	Schedule sufficient time to conduct the scope of the audit. Announce the availability of confidential meeting schedules with employees; schedule, arrange and conduct while protecting employee confidentiality.

B. INTRODUCTORY MEETING WITH MANAGEMENT

	Meet with the senior management and department managers before conducting audit activities to review ESMS issues and the purpose of the audit.
	Share an agenda and itinerary for the meeting with senior management and local supervisors.
	With department managers, review the prior audit reports and performance to date in meeting corrective actions.
	Discuss non-retaliation against cooperating workers; inform management that future audits will include reviews of the continued employment of workers interviewed.

C. OPERATIONAL WALK-THROUGH

	Conduct operational walk-through following production processes. Refer to previous relevant physical walk-through assessments of the facility; determine if all previous nonconformance/action items are closed out - if not, why not?
	Minimize the number of managers and supervisors that accompany you on the walk-through. One or two escorts of non-supervisory staff based on knowledge/responsibilities are usually sufficient.
	During the walk-through, be aware of your body language and the message this sends to workers; ensure that you are equipped with/wearing the same PPE required of employees.
	Take note of all things observed that require attention: <ol style="list-style-type: none">1. Water used indiscriminately for watering as well as washing and cleaning2. Water wastages/inefficiencies3. Energy wastage4. Evidence of spillages5. Dry cleanup and collection of organic solids6. Harborage or other unorganized storage of materials7. Wastes and discards8. Workplace availability of data on hazards or banned or restricted chemicals in use (MSDS/ICSC)9. Movement of materials: hand trucks, forklifts, etc. Are the passageways and transit routes clearly marked; is color-coding used for non-pedestrian movement?10. Obvious hazards for heads, hearing, sight, life and limb: workplace hazards attenuated; employee awareness?11. PPE used as prescribed, available, replaced at no cost; employee awareness12. Are employees able to explain jobs and responsibilities?13. Evidence of QA team activity
	Verify that fire exits in buildings (e.g. storage or maintenance areas, administrative buildings, etc.) exist and open on demand; no means to prevent exit; panic bars in good working order; clear egress once exit opened; emergency exits clearly marked; nearest exits clearly marked; hose cabinets equipped with hoses, nozzles, etc.; prohibited areas clearly marked; electrical cabinets closed and sealed; lockout/tag-out procedures and tools (tags, locks, warning labels and signs) clearly available near electrical cabinets; first aid cabinets and equipment; emergency lighting; emergency preparedness and evacuation plans in place; and that employees are trained on using these.
	Ask an employee to show you how to get out, assuming that there is now a fire; follow the employee; ask another to tell/show you what happens if he/she was just injured.
	Indoor working conditions should be verified for adequacy if there is potential for risks such as heat, light, noise and dust. Use measuring devices to determine air quality, noise level, and temperature.
	Following the walk around, conduct a walk-through of the dormitory facilities, canteens, washrooms and changing rooms (if relevant). Note the condition and adequacy of these areas.

	Suggest best practice to supervisors and managers during the walk-through; ensure that the suggestion is filtered by processes/operations practicalities.
	Give sufficient attention to all ESMS elements during the operation/dormitory walk-through. Knowledge of procedures, training using the procedures, awareness of complaints management and resolution procedure, employment rights, HR policy and provisions, etc.
	Pay special attention to areas identified in previous corrective action requests. Focus on open non-conformances from previous audits: why did they occur? Elucidate the underlying cause and make an effort to diagnose and prescribe preventive and ameliorative measures. The individual who is responsible for the item is not as important as why it occurred and how the company can prevent non-conformances and unplanned events in the future.

D. INTERVIEWING WORKERS

	Select at least 5 percent of workers, max. 100 workers. Conduct individual and group interviews for balanced response.
	Select workers who are representative of the workforce population (gender, race, age, religion, functional departments, etc.).
	If the factory has contracted or migrant workers, make sure to include them as well.
	Do not allow supervisors or managers to influence selection of workers for interviews or the interviews.
	Conduct on-site interviews in areas that protect worker confidentiality and where the worker would feel comfortable. Make sure supervisors or managers are not in or near the space where the interviews are conducted. Keep them away from the selection and interview process.
	Conduct interviews early in the audit to allow for follow-up.
	Make sure to tell the workers that everything they say is confidential and that management has been warned against retaliation.
	Be sensitive to cultural and gender issues.
	Plan for an average of fifteen minutes per interview; however, use common sense in terminating interviews that are becoming nonproductive and extending interviews with people who are candid or openly addressing critical issues.
	Formulate questions prior to the interviews to make sure you cover all specific areas of the ESMS review through the aggregated interviews. Always ask employees how processes may be improved, water use reduced, energy saved, waste reduced, etc.
	If you plan to take notes, ask the workers if it is OK and clearly explain reason for taking notes. Try to minimize note taking as much as possible during the interview. Finish writing your notes immediately after the interview, so you have accurate documentation.
	Have your worker representatives recommend a preferred approach to building rapport with workers.
	Ask workers specifically about follow up on previous corrective action plans. What non-conformances remain open; what issues presented through the complaints management and resolution mechanism remain open?
	Make sure your questions address the following: LABOR ISSUES <ul style="list-style-type: none"> ■ Do workers know about and understand company's policies related to labor and working conditions?

- Do workers understand their rights under the law related to freedom of association and collective bargaining?
- Do workers understand how their wages are calculated for base time, performance and overtime?
- Are workers aware of any dismissal, transfer, demotion or other punitive action against workers due to their exercising their rights under either their contracts or local or national law?
- Ask workers about the status of trade unions, worker committees or other worker groups and whether there is management interference.
- Ask questions to determine conformance to discrimination and sexual harassment policies.
- Do workers understand the company's grievance mechanism, and do they feel it is operational and free from retaliation?

OCCUPATIONAL HEALTH AND SAFETY ISSUES

- Do workers feel safe and protected in their jobs? For example, are they provided with PPE that is appropriate and works? Is their physical environment free of hazards? Are they expected to reduce physical hazards or are engineering controls in place? Are there job hazards assessments done routinely and when the processes or materials change? Have issues submitted through the complaints management and resolution mechanism been addressed?
- Do they feel there is adequate safety equipment, such as extinguishers/hydrants and first aid kits? Are there sufficient safety drills if an emergency, such as a fire, typhoon, flood or windstorm, were to occur and necessitate an evacuation from buildings? Witness the emergency mock drills and make note of shortcomings; ask an employee to pretend he/she has just been injured and explain what to do next.
- Are they instructed and trained on these risks at regular intervals?
- Have any workers been involved in accidents at the facility and, if so, what happened afterwards?
- Is the environment comfortable to work in, in terms of temperature, exposure to heat and sun?
- Do they feel that chemicals, waste and other substances are stored or disposed of safely and appropriately at the facility? Is there sufficient access to Material Safety Data Sheets (MSDSs) and/or International Chemical Safety Cards (ICSCs) and appropriate training in their use? What is the management's response to any expressed issues through the complaint management and resolution mechanism?

If the organization employs contract workers, make sure to ask questions that address possible violations and areas of abuse. Do you feel different from a permanent employee? Why?

Conduct some worker interviews off-site if possible.

E. INTERVIEWING AFFECTED COMMUNITIES AND OTHER STAKEHOLDERS

The stakeholder mapping exercises and stakeholder consultation meetings should help identify the relevant population that is affected by the facility and its activities.

	<p>Select a sample of individuals that represent the views of this affected community. This group may include members of the public as well as NGOs, campaign groups, trade unions, local businesses and government authorities. If possible, target NGOs that are industry-specific. Seek out former employees if possible, but filter out disgruntled former employees or those with a personal agenda against the company.</p>
	<p>Gauge awareness of the grievance mechanism. Has it been tested? Does it work? Does the company utilize it in practice or ignore it? Is it taken seriously?</p>
	<p>Be sure to include representatives from indigenous or marginalized groups in these interviews.</p>
	<p>Make sure your questions address the following:</p> <ul style="list-style-type: none"> ■ How have the facility's operations affected the physical environment (air, water, land) near them? ■ Has this resulted in either air, land or water contamination? ■ Has wildlife been affected by the facility's activities? ■ Has the facility's business impacted local livelihoods or access to traditional hunting/fishing/breeding/religious/other grounds due to natural habitat conversion? ■ Have any health risks or deterioration to well-being been associated with the facility from exposure to toxic chemicals, from air emissions or noise pollution? Note any neighbors or employees who have become ill or have ill children. ■ Have any contagious or vector-borne diseases been on the rise due to an influx of workers in the area or increase in local vectors (e.g. mosquitos, flies)? Is the community aware of an increase in the rat/mouse or other vermin population? ■ Have these affected groups had any clashes with security hired at the facility? ■ Have any of these groups been approached or invited by the company running the facility to discuss their concerns at meetings? Have any of their grievances been addressed or investigated? Has the company followed up on questions?

F. ON-SITE DOCUMENT REVIEW

	<p>LABOR ISSUES:</p> <p>Make sure you review the relevant documents for the following areas:</p> <ol style="list-style-type: none"> 1. Human resources: Management-worker committee meeting minutes, memos and letters, budgets related to implementing labor policy, training material, logs and curricula or written communications to workers that address all issues, training records and instructor qualifications. 2. Working conditions: Contracts for all workers; policies and procedures related to wages, benefits, hours and leave; evidence of communication and training on wage calculation; personnel files; time cards; payroll records and pay stubs (selected without management interference); criteria used to set performance pay bonuses; and employment and termination records. 3. Are employees' payment methods secured? Can employees opt to have payments deposited into an account? Are employees paid in cash at the facility (which can lead to significant risks during their commute)? 4. Collective bargaining: Collective bargaining policy, agreement and documentation (such as minutes and records of collective bargaining sessions). 5. Discrimination: Discrimination policy; related procedures; documentation handling discrimination issues; diversity training and attendance log; hiring, promotion and termination records; gender demographics in facility at worker and manager levels. 6. Retrenchment: Policies and procedures for workforce reduction, severance and transition; documentation of prior workforce reductions; minutes of management meetings and communications to workers on this issue.
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	<ol style="list-style-type: none"> 7. Complaint management and resolution mechanism: Documented procedure, communications, records and logs of grievance handling. 8. Child labor: Procedure for age verification, documentation of apprentice program, birth and medical records and school records of workers. 9. Forced labor: Employment contracts (as well as for those workers hired through recruitment agencies), payroll records, timesheets and wage deduction, worker passports and IDs. 10. Health and safety: Accident and medical treatment logs, equipment safety logs, logs of fire and safety drills, health and safety risk analyses, government health inspection reports, safety certificates and training curriculum and logs, and evidence of changes to all of this when company processes, methods, chemicals, materials are changed, reordered, etc.
	<p>Select files and/or records at random to generate a representative sample of the workforce population and functional distribution in the factory. Seek some files to corroborate interviews conducted earlier.</p>
	<p>Balance your time and effort investigating all areas of labor standards at work. Document review is particularly critical for wages, working hours, health and safety, use of sub-contractors, hiring and termination.</p>
	<p>If the operation employs contract workers, address potential areas of abuse in the document review. Specifically review the contract with the workers.</p>
	<p>Identify all significant incidences of non-conformance in preparation for your management meeting.</p>
	<p>ENVIRONMENTAL AND OHS ISSUES:</p> <p>Make sure you review the relevant documents for the following areas:</p> <ol style="list-style-type: none"> 1. Emergency response and preparedness: Examine the facility's emergency response procedures and accident reports, as well as documents indicating that workers have been trained on these issues. 2. Environmental management: Examine any company environmental policies and environmental management system policies and reports, including sustainability reports, energy consumption records, guidelines and monitoring, resource use and waste generation. Note the status of previously identified non-conformances. 3. Insurance: Identify documents that indicate legal permits have been obtained, insurance policies are in place and the relevant legal authorities notified of the facility's activities. 4. Technical: Documents on production processes, and storage, purchase and maintenance of facility equipment. Availability of MSDS/ICSCs and employee training and orientation to the specific risk posed by materials in use; response to submissions through the complaint management and resolution mechanism. 5. Waste disposal: Policies, procedures and guidelines on elimination and recycling of waste emissions and effluents to air, water and land, including monitoring of the quantity and quality, treatment and disposal of all waste, including wastewater and solid waste; are employees/area supervisors queried for opinions on improvements? 6. Hazardous material: Inventory of chemicals and toxicology sheets (MSDS/ICSCs from ILO/WHO/EU/UNEP, etc.). Avoid total reliance upon manufacturer's statements. Does procurement mandate furnishing such materials (MSDS/ICSC)? 7. Health and safety: Check for the existence of logs of accident and fatality rates and monitoring of these statistics; health and safety guidelines or handbooks for workers; job hazard analyses and engineering corrections to eliminate hazards at the source, as opposed to requiring employees to mitigate environmental hazards; provision of appropriate PPE that cover actual, defined technical, physical, biological and chemical hazards in the workplace; records of OHS Committee meetings, training, Tool Box safety meetings, etc. 8. Work environment: Look for guidelines, reports, logs and "ecomaps" of the facility work environment that monitor emissions of dust, odors, sources of noise and vibrations and worker exposure to heat and cold. LEL meters and audible and visual alarms are mandatory wherever there may be accumulations of dust or ambient dust.

G. CLOSING MEETING WITH MANAGEMENT

	Conduct a closing meeting with senior management and department managers.
	Present your preliminary findings with particular emphasis on the positives as well as areas for improvement and why. All new and previously existing non-conformances must be addressed. Seek clarification on any findings or issues raised during the audit.
	Work with the department managers and supervisors on a corrective action plan that details specific actions to be taken and timelines for their completion.
	Go over any outstanding corrective action requests from previous audit reports.
	Make sure senior management signs off on the corrective action plan.

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		Please provide details on how the company will comply with national labor and employment law.
		Please provide details how the company will manage equal opportunities and nondiscrimination, sexual harassment issues, migrant labor, and retrenchment among its workforce.
		Please describe how the above issues will be managed by the company at the subcontractor level, including monitoring and reporting systems.
		The client requires that as much local labor as possible be used during the construction phase. Please describe how the company would approach this to avoid importing third country nationals or expatriate labor, as far as possible, and to leave a useful legacy of skills in the area. (It is acknowledged that a proportion of skilled labor will have to be brought in to fulfill project needs.)
		The client requires that contractors have cognizance of the minimum standards for worker facilities at the site, including sanitation, access to drinking water, and accommodation set out in the IFC and EBRD Guidance Note, Workers Accommodation, Processes and Standards, and International Labour Organization requirements. Please describe how the company will incorporate these requirements into the project.
PS3	Resource efficiency and pollution prevention	
		Please describe how the company typically manages solid waste, both hazardous and non-hazardous, generated by its activities at a construction site, including reduce, reuse, and recycle initiatives.
		Please describe how the company typically manages wastewater (for example, in camps, process) generated by its activities at a construction site, including reduce, reuse, and recycle initiatives.
		Please describe how the company typically manages storm water flow generated by its activities at a construction site.
		Please describe how the company typically manages the transportation and storage of hazardous substances and materials at the company's sites.
		Please describe how the company typically manages soil removal and storage (for later reuse).
		Please describe how the company typically manages the control of erosion and sedimentation at the company's sites.
		Please describe how the company typically manages air quality at its sites.
		Please describe how the company typically manages nuisance noise at its sites.
		Please provide examples of environmental monitoring programs that the company has carried out on other jobs.

		Please describe how the company typically manages and uses fresh water at the company's sites.
		Please describe how energy efficiency is typically built into the company's activities.
		Please describe how greenhouse gas emissions will be accounted for and reported.
		Please describe other resource efficiency practices at the company's sites.
PS4	Community health, safety, and security	
		Please describe how the company prepares for emergencies at its sites, including those that may affect nearby communities, such as an explosion or accident or a spill or release into a local water course.
		Please describe how the company trains for and implements good driving practices among its workforce to avoid or minimize impacts to the communities.
		Please provide a code of conduct describing expectations for the behaviour of direct and subcontract employees when outside the work site and in the host community. The code of conduct should include specific provisions to prevent SEA and GBV.
		Please provide details of how the company typically manages community engagement and community relations to respect the client's existing relationship with communities and contributes to this.
		Please provide details of the company's physical and personnel security measures and how security is typically implemented at its sites.
		Please provide details of the company's policy for the adequate management of security measures and protection of human rights of local communities.
PS6	Biodiversity conservation and sustainable management of living natural resources	
		The client has several requirements relating to the conservation of biological diversity (biodiversity) including terrestrial and aquatic ecosystems. Please describe any previous projects that the company has undertaken where this was also a significant issue and how the company contributed to this effort.
		If the company has not been involved in projects where biodiversity has been a significant issue, please describe how the company would plan to address and support the client regarding the conservation of biodiversity for this project.
PS8	Cultural heritage	
		Please describe how the company typically addresses the finding of archaeological or cultural heritage items during execution of its work.
NA	Corporate social responsibility	
		The client has requirements relating to social responsibility for this project. Please provide examples of social responsibility initiatives that the company has contributed to at other sites or projects, and suggest ways that the company might contribute to this project, in discussion and coordination with the client.

APPENDIX 9.4 THIRD-PARTY COMPANY CONTRACT REQUIREMENTS

Vista should ensure their contracts include general and/or project-specific requirements for the following topics, as applicable according the third-party company services nature:

- i. Development and adoption of an E&S management program or system or commitment to adhere to, adopt, and implement Vista's ESMS framework, as necessary for the third-party company involvement in the project.
- ii. Number and qualifications of E&S personnel required to be on staff and on-site—including those responsible for HR; worker health and safety; worker grievances; environmental management; community health; safety and security; worker accommodation; site security; and emergency response.
- iii. The nature, risks, and complexity of the project / service; the scope of work of the service being contracted; the development and implementation of specific Vista approved E&S management plans; and associated documentation as required by the ESIA/Environmental and Social Management Plan, will include, at a minimum, implementation plans for occupational health and safety, emergency response, hazardous materials management, and site restoration, among others. The contract should list the plans the third-party company is to develop for client approval and the plans that may have been prepared by the Vista for third-party company implementation.
- iv. Explicit commitment to compliance with the project commitments as captured in the commitment register; conditions of approval; environmental design criteria; management plans; ESAP and national law; and acquisition of all required permits, licenses, consents, and approvals prior to undertaking the activities being permitted or otherwise approved.
- v. Specific reference to IFC PSs, EHS Guidelines (general and relevant sector specific), and other guidance as appropriate (for example, IFC and European Bank for Reconstruction and Development (EBRD) Guidance on Worker Accommodation).
- vi. Adherence to the Vista code of conduct.
- vii. Adherence to the Vista security forces management plan, if applicable.
- viii. Induction and training programs for E&S and other personnel, including training on applicable HR policy provisions, grievance mechanisms, health and safety, code of conduct including training on the provisions intended to combat GBV and SEA, materials management, and environmental protection.
- ix. Monitoring of E&S performance by contractor workers and subcontractors and client's role in this.
- x. Any monitoring of environmental parameters (such as noise, air emissions and air quality, water flows and quality, waste generation and management) that contractors may be required to carry out.
- xi. Implementation of a grievance mechanism for workers (including subcontract workers) either through a grievance mechanism implemented and managed by the contractors or through extending the grievance mechanism of the client to the workforce of the contractor. In both cases, clear reporting on grievances and how they are addressed between contractor and client is required. The grievance mechanism should ensure proper handling of GBV-related grievances, including but not limited to sexual harassment.
- xii. Assurance that the client's grievance mechanism for external stakeholders¹⁵ is either adopted by all contractors or there is clear communication to stakeholders on how to address grievances related to the activities of the contractors, including both works on the project site(s) and in any ancillary facilities and infrastructure. The community-level grievance mechanism should ensure proper handling of grievances arising from GBV or SEA.

- xiii. Other requirements of the client's stakeholder engagement program that are to be supported by the contractor. This should be integrated with the client stakeholder engagement program to ensure consistency.
- xiv. Creation and maintenance of records on E&S performance.
- xv. The environmental conditions under which the contractor will be allowed to demobilize and leave the site, including conditions of site restoration and requirements for handling personnel retrenchment, particularly those involving local workers.
- xvi. Penalties and/or incentives for E&S performance of contractors and subcontractors.
- xvii. Reporting requirements, including reporting on E&S performance.
- xviii. Clear contract statement that the contractor is responsible for the E&S performance of subcontractors and suppliers.
- xix. Contract statement that on the contractor's failure to meet the E&S requirements in such a way as to prevent significant impacts to workers, local communities and/or individuals, and/or environmental resources, and on the contractor's failure to correct such deficiencies upon receiving proper notice, the client has the right to appoint and pay another party to repair damages or otherwise remedy the impacts and reduce payment to the contractor in the amount paid to the third party.
- xx. As noted previously, mitigation measures to control E&S impacts during construction work to be considered as part of the works themselves, not measures that are needed in addition to the main works. The bill of quantities shall include adequate costs and timelines for expenditure to effectively implement the commitments related to E&S performance. The bill of quantities should define milestone and final payments for completion or partial completion of work, to include satisfactory performance of related E&S requirements. If a contract includes incentives for timely completion of work, it should also include corresponding penalties for failure to implement required mitigation measures.

APPENDIX 9.5 SELF AUDIT GUIDANCE REFERENCE

This auditing guidance provides a comprehensive overview of the steps that an auditor would take to assess various aspects of your business. You should review this auditing guidance to gain insight into the types of issues and questions that auditors consider. This will broaden your view of potential risk areas and elements of the ESMS beyond those that you may have targeted in your initial risk assessment.

A. PREPARATION	
	Collect audit and inspection reports on the company's environmental and labor performance for the previous two years.
	Collect corrective action plans generated from previous audits or inspections and review the status of each action item that was agreed upon. Are they all closed out? Focus your review on open items and the underlying factors that prevent you from completing the corrective action plan.
	Ascertain the general level of PPE use on the organization. Ensure that auditors wear the same PPE as employees are required to wear: head, hearing, eye, skin protection, protective boots, clothing, etc. Do not allow any auditor to enter work areas without the clothing/gear required for the operations activity and that employees are required to wear.
	Obtain site plans for all the relevant operational areas. Ensure auditing team has a working knowledge of the operations to be evaluated.
	Research and refer to current local environmental and labor laws and regulations. Basic labor code issues: (i) regular weekly work hours, (ii) labor contract provisions, (iii) rest periods, lunch, etc., (iv) overtime requirements, limits and exceptions, (v) hour averaging and banking hours, (vi) minimum wage, (vii) social system payment liability, (viii) annual leave, (ix) laws to protect disadvantaged workers, (x) severance pay. Basic environmental code issues: (i) wastewater, (ii) storm water, (iii) spill prevention and response, (iv) construction/demolition/remodeling, (v) hazardous materials, (vi) hazardous waste, (vii) toxic chemical release, (viii) air emissions, (ix) solid waste.
	Review regulatory permit(s) conditions and specific requirements along with most recent review and corrective action reports.
	Review certification(s) audit reports (e.g. ISO 14001, OSHAS 18001, BSCI or SA8000) for nonconformance, mandatory remedial actions, recommendations, etc. Summarize status of items (open or closed).
	Review any government inspection reports, third-party audit reports, etc.
	Review the stakeholder engagement plan and records of grievances by external stakeholders. Pay attention to: emergency preparedness and response capability to include the community if necessary; use of chemicals and accidental releases of hazardous materials affecting community, e.g. dyes and chlorine; discharges of wastewater or other wastes to areas affecting local communities; exacerbation of flooding; limits of water availability use and physical access; diminution of quality of life due to the operation.
	Pay special attention in observation/document review/interviews to issues identified in previous reports.
	Research and understand the national and local context of labor union rights and activity, local environmental groups and community activist organizations.
	Schedule sufficient time to conduct the scope of the audit. Announce the availability of confidential meeting schedules with employees; schedule, arrange and conduct while protecting employee confidentiality.

B. INTRODUCTORY MEETING WITH MANAGEMENT

	Meet with the senior management and department managers before conducting audit activities to review ESMS issues and the purpose of the audit.
	Share an agenda and itinerary for the meeting with senior management and local supervisors.
	With department managers, review the prior audit reports and performance to date in meeting corrective actions.
	Discuss non-retaliation against cooperating workers; inform management that future audits will include reviews of the continued employment of workers interviewed.

C. OPERATIONAL WALK-THROUGH

	Conduct operational walk-through following production processes. Refer to previous relevant physical walk-through assessments of the facility; determine if all previous nonconformance/action items are closed out - if not, why not?
	Minimize the number of managers and supervisors that accompany you on the walk-through. One or two escorts of non-supervisory staff based on knowledge/responsibilities are usually sufficient.
	During the walk-through, be aware of your body language and the message this sends to workers; ensure that you are equipped with/wearing the same PPE required of employees.
	Take note of all things observed that require attention: <ol style="list-style-type: none">1. Water used indiscriminately for watering as well as washing and cleaning2. Water wastages/inefficiencies3. Energy wastage4. Evidence of spillages5. Dry cleanup and collection of organic solids6. Harborage or other unorganized storage of materials7. Wastes and discards8. Workplace availability of data on hazards or banned or restricted chemicals in use (MSDS/ICSC)9. Movement of materials: hand trucks, forklifts, etc. Are the passageways and transit routes clearly marked; is color-coding used for non-pedestrian movement?10. Obvious hazards for heads, hearing, sight, life and limb: workplace hazards attenuated; employee awareness?11. PPE used as prescribed, available, replaced at no cost; employee awareness12. Are employees able to explain jobs and responsibilities?13. Evidence of QA team activity
	Verify that fire exits in buildings (e.g. storage or maintenance areas, administrative buildings, etc.) exist and open on demand; no means to prevent exit; panic bars in good working order; clear egress once exit opened; emergency exits clearly marked; nearest exits clearly marked; hose cabinets equipped with hoses, nozzles, etc.; prohibited areas clearly marked; electrical cabinets closed and sealed; lockout/tag-out procedures and tools (tags, locks, warning labels and signs) clearly available near electrical cabinets; first aid cabinets and equipment; emergency lighting; emergency preparedness and evacuation plans in place; and that employees are trained on using these.
	Ask an employee to show you how to get out, assuming that there is now a fire; follow the employee; ask another to tell/show you what happens if he/she was just injured.
	Indoor working conditions should be verified for adequacy if there is potential for risks such as heat, light, noise and dust. Use measuring devices to determine air quality, noise level, and temperature.
	Following the walk around, conduct a walk-through of the dormitory facilities, canteens, washrooms and changing rooms (if relevant). Note the condition and adequacy of these areas.

	Suggest best practice to supervisors and managers during the walk-through; ensure that the suggestion is filtered by processes/operations practicalities.
	Give sufficient attention to all ESMS elements during the operation/dormitory walk-through. Knowledge of procedures, training using the procedures, awareness of complaints management and resolution procedure, employment rights, HR policy and provisions, etc.
	Pay special attention to areas identified in previous corrective action requests. Focus on open non-conformances from previous audits: why did they occur? Elucidate the underlying cause and make an effort to diagnose and prescribe preventive and ameliorative measures. The individual who is responsible for the item is not as important as why it occurred and how the company can prevent non-conformances and unplanned events in the future.

D. INTERVIEWING WORKERS

	Select at least 5 percent of workers, max. 100 workers. Conduct individual and group interviews for balanced response.
	Select workers who are representative of the workforce population (gender, race, age, religion, functional departments, etc.).
	If the factory has contracted or migrant workers, make sure to include them as well.
	Do not allow supervisors or managers to influence selection of workers for interviews or the interviews.
	Conduct on-site interviews in areas that protect worker confidentiality and where the worker would feel comfortable. Make sure supervisors or managers are not in or near the space where the interviews are conducted. Keep them away from the selection and interview process.
	Conduct interviews early in the audit to allow for follow-up.
	Make sure to tell the workers that everything they say is confidential and that management has been warned against retaliation.
	Be sensitive to cultural and gender issues.
	Plan for an average of fifteen minutes per interview; however, use common sense in terminating interviews that are becoming nonproductive and extending interviews with people who are candid or openly addressing critical issues.
	Formulate questions prior to the interviews to make sure you cover all specific areas of the ESMS review through the aggregated interviews. Always ask employees how processes may be improved, water use reduced, energy saved, waste reduced, etc.
	If you plan to take notes, ask the workers if it is OK and clearly explain reason for taking notes. Try to minimize note taking as much as possible during the interview. Finish writing your notes immediately after the interview, so you have accurate documentation.
	Have your worker representatives recommend a preferred approach to building rapport with workers.
	Ask workers specifically about follow up on previous corrective action plans. What non-conformances remain open; what issues presented through the complaints management and resolution mechanism remain open?
	<p>Make sure your questions address the following:</p> <p>LABOR ISSUES</p> <ul style="list-style-type: none"> ■ Do workers know about and understand company's policies related to labor and working conditions?

- Do workers understand their rights under the law related to freedom of association and collective bargaining?
- Do workers understand how their wages are calculated for base time, performance and overtime?
- Are workers aware of any dismissal, transfer, demotion or other punitive action against workers due to their exercising their rights under either their contracts or local or national law?
- Ask workers about the status of trade unions, worker committees or other worker groups and whether there is management interference.
- Ask questions to determine conformance to discrimination and sexual harassment policies.
- Do workers understand the company's grievance mechanism, and do they feel it is operational and free from retaliation?

OCCUPATIONAL HEALTH AND SAFETY ISSUES

- Do workers feel safe and protected in their jobs? For example, are they provided with PPE that is appropriate and works? Is their physical environment free of hazards? Are they expected to reduce physical hazards or are engineering controls in place? Are there job hazards assessments done routinely and when the processes or materials change? Have issues submitted through the complaints management and resolution mechanism been addressed?
- Do they feel there is adequate safety equipment, such as extinguishers/hydrants and first aid kits? Are there sufficient safety drills if an emergency, such as a fire, typhoon, flood or windstorm, were to occur and necessitate an evacuation from buildings? Witness the emergency mock drills and make note of shortcomings; ask an employee to pretend he/she has just been injured and explain what to do next.
- Are they instructed and trained on these risks at regular intervals?
- Have any workers been involved in accidents at the facility and, if so, what happened afterwards?
- Is the environment comfortable to work in, in terms of temperature, exposure to heat and sun?
- Do they feel that chemicals, waste and other substances are stored or disposed of safely and appropriately at the facility? Is there sufficient access to Material Safety Data Sheets (MSDSs) and/or International Chemical Safety Cards (ICSCs) and appropriate training in their use? What is the management's response to any expressed issues through the complaint management and resolution mechanism?

If the organization employs contract workers, make sure to ask questions that address possible violations and areas of abuse. Do you feel different from a permanent employee? Why?

Conduct some worker interviews off-site if possible.

E. INTERVIEWING AFFECTED COMMUNITIES AND OTHER STAKEHOLDERS

The stakeholder mapping exercises and stakeholder consultation meetings should help identify the relevant population that is affected by the facility and its activities.

	<p>Select a sample of individuals that represent the views of this affected community. This group may include members of the public as well as NGOs, campaign groups, trade unions, local businesses and government authorities. If possible, target NGOs that are industry-specific. Seek out former employees if possible, but filter out disgruntled former employees or those with a personal agenda against the company.</p>
	<p>Gauge awareness of the grievance mechanism. Has it been tested? Does it work? Does the company utilize it in practice or ignore it? Is it taken seriously?</p>
	<p>Be sure to include representatives from indigenous or marginalized groups in these interviews.</p>
	<p>Make sure your questions address the following:</p> <ul style="list-style-type: none"> ■ How have the facility's operations affected the physical environment (air, water, land) near them? ■ Has this resulted in either air, land or water contamination? ■ Has wildlife been affected by the facility's activities? ■ Has the facility's business impacted local livelihoods or access to traditional hunting/fishing/breeding/religious/other grounds due to natural habitat conversion? ■ Have any health risks or deterioration to well-being been associated with the facility from exposure to toxic chemicals, from air emissions or noise pollution? Note any neighbors or employees who have become ill or have ill children. ■ Have any contagious or vector-borne diseases been on the rise due to an influx of workers in the area or increase in local vectors (e.g. mosquitos, flies)? Is the community aware of an increase in the rat/mouse or other vermin population? ■ Have these affected groups had any clashes with security hired at the facility? ■ Have any of these groups been approached or invited by the company running the facility to discuss their concerns at meetings? Have any of their grievances been addressed or investigated? Has the company followed up on questions?

F. ON-SITE DOCUMENT REVIEW

	<p>LABOR ISSUES:</p> <p>Make sure you review the relevant documents for the following areas:</p> <ol style="list-style-type: none"> 1. Human resources: Management-worker committee meeting minutes, memos and letters, budgets related to implementing labor policy, training material, logs and curricula or written communications to workers that address all issues, training records and instructor qualifications. 2. Working conditions: Contracts for all workers; policies and procedures related to wages, benefits, hours and leave; evidence of communication and training on wage calculation; personnel files; time cards; payroll records and pay stubs (selected without management interference); criteria used to set performance pay bonuses; and employment and termination records. 3. Are employees' payment methods secured? Can employees opt to have payments deposited into an account? Are employees paid in cash at the facility (which can lead to significant risks during their commute)? 4. Collective bargaining: Collective bargaining policy, agreement and documentation (such as minutes and records of collective bargaining sessions). 5. Discrimination: Discrimination policy; related procedures; documentation handling discrimination issues; diversity training and attendance log; hiring, promotion and termination records; gender demographics in facility at worker and manager levels. 6. Retrenchment: Policies and procedures for workforce reduction, severance and transition; documentation of prior workforce reductions; minutes of management meetings and communications to workers on this issue.
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	<ol style="list-style-type: none"> 7. Complaint management and resolution mechanism: Documented procedure, communications, records and logs of grievance handling. 8. Child labor: Procedure for age verification, documentation of apprentice program, birth and medical records and school records of workers. 9. Forced labor: Employment contracts (as well as for those workers hired through recruitment agencies), payroll records, timesheets and wage deduction, worker passports and IDs. 10. Health and safety: Accident and medical treatment logs, equipment safety logs, logs of fire and safety drills, health and safety risk analyses, government health inspection reports, safety certificates and training curriculum and logs, and evidence of changes to all of this when company processes, methods, chemicals, materials are changed, reordered, etc.
	<p>Select files and/or records at random to generate a representative sample of the workforce population and functional distribution in the factory. Seek some files to corroborate interviews conducted earlier.</p>
	<p>Balance your time and effort investigating all areas of labor standards at work. Document review is particularly critical for wages, working hours, health and safety, use of sub-contractors, hiring and termination.</p>
	<p>If the operation employs contract workers, address potential areas of abuse in the document review. Specifically review the contract with the workers.</p>
	<p>Identify all significant incidences of non-conformance in preparation for your management meeting.</p>
	<p>ENVIRONMENTAL AND OHS ISSUES:</p> <p>Make sure you review the relevant documents for the following areas:</p> <ol style="list-style-type: none"> 1. Emergency response and preparedness: Examine the facility's emergency response procedures and accident reports, as well as documents indicating that workers have been trained on these issues. 2. Environmental management: Examine any company environmental policies and environmental management system policies and reports, including sustainability reports, energy consumption records, guidelines and monitoring, resource use and waste generation. Note the status of previously identified non-conformances. 3. Insurance: Identify documents that indicate legal permits have been obtained, insurance policies are in place and the relevant legal authorities notified of the facility's activities. 4. Technical: Documents on production processes, and storage, purchase and maintenance of facility equipment. Availability of MSDS/ICSCs and employee training and orientation to the specific risk posed by materials in use; response to submissions through the complaint management and resolution mechanism. 5. Waste disposal: Policies, procedures and guidelines on elimination and recycling of waste emissions and effluents to air, water and land, including monitoring of the quantity and quality, treatment and disposal of all waste, including wastewater and solid waste; are employees/area supervisors queried for opinions on improvements? 6. Hazardous material: Inventory of chemicals and toxicology sheets (MSDS/ICSCs from ILO/WHO/EU/UNEP, etc.). Avoid total reliance upon manufacturer's statements. Does procurement mandate furnishing such materials (MSDS/ICSC)? 7. Health and safety: Check for the existence of logs of accident and fatality rates and monitoring of these statistics; health and safety guidelines or handbooks for workers; job hazard analyses and engineering corrections to eliminate hazards at the source, as opposed to requiring employees to mitigate environmental hazards; provision of appropriate PPE that cover actual, defined technical, physical, biological and chemical hazards in the workplace; records of OHS Committee meetings, training, Tool Box safety meetings, etc. 8. Work environment: Look for guidelines, reports, logs and "ecomaps" of the facility work environment that monitor emissions of dust, odors, sources of noise and vibrations and worker exposure to heat and cold. LEL meters and audible and visual alarms are mandatory wherever there may be accumulations of dust or ambient dust.

G. CLOSING MEETING WITH MANAGEMENT

	Conduct a closing meeting with senior management and department managers.
	Present your preliminary findings with particular emphasis on the positives as well as areas for improvement and why. All new and previously existing non-conformances must be addressed. Seek clarification on any findings or issues raised during the audit.
	Work with the department managers and supervisors on a corrective action plan that details specific actions to be taken and timelines for their completion.
	Go over any outstanding corrective action requests from previous audit reports.
	Make sure senior management signs off on the corrective action plan.

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