Creating a Holistic Social Responsibility Supply Chain Risk Management Program

Presented by: Courtney Foster Supply Chain Solutions Manager -EMEA



Agenda

- Introduction to BSI Supply Chain Solutions
- Importance of understanding Social Responsibility risks
 - Brand Protection
 - Customer driven importance
- Review government legislation relevant to Social Responsibility practices
 - UK Modern Slavery Act
 - EU Conflict Minerals initiative
 - Anti-Bribery legistlation
- Understanding a best practice approach to mitigate ethical risks in supply chains
 - Country risk
 - Supplier-specific risks
 - Auditing practices and reporting



Who is BSI?



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22/06/2015

Welcome to BSI – Over 100 Years of Innovation

- 1901 World's first National Standards Body
- 1947 Founding member of International Standards Organization (ISO)
- BSI issues over 2,000 standards each year
- Carry out 150,000 assessments each year in over 160 countries

BSI Supply Chain Solutions

- Over 20 years experience assessing global supply chain threats
- Provider of Supply Chain Intelligence to global government and to commercial clients
- Proprietary Risk Modelling relating to supplier compliance and assessment management
- On-site Auditing in 150+ countries annually







A truly global brand and network – trusted and recognized





3 regional hubs in

UK, US and Hong Kong

Certifying and verifying global suppliers

Stimulating international trade

Defining Social Responsibility

Why is it so important?



What is Corporate Social Responsibility?

United Nations definition:

"Corporate Social Responsibility is a management concept whereby companies integrate social and environmental concerns in their business operations and interactions with their stakeholders."

Key CSR issues: environmental management, eco-efficiency, responsible sourcing, stakeholder engagement, labour standards and working conditions, employee and community relations, social equity, gender balance, human rights, good governance, and anti-corruption measures.



Your **REPUTATION** is your **Brown**

of Executives say a strong corporate brand is just as important as strong product brand

of a company's market value is attributable to its brand reputation

of consumers avoid buying a product if they don't like or trust the company behind the product

Source Weber Shandwick 2012 The Company behind the Brand: In Reputation We Trust



Why is Corporate Social Responsibility Important?

PWC has found that 88% of millennials choose employers based on strong CSR values, and 86% would consider leaving if the companies' CSR values no longer met their expectations.

CSR is responsible for more than 40% of a company's reputation

340 million fewer liters of water used in denim production.

30% said that they expect to increase the amount of goods and services they buy from socially-responsible companies.

Source: H&M CSR Report 2013 PWC Whitepaper 2013 Forbes consumer survey 2013





Source: Reputation Intelligence Winter 2013

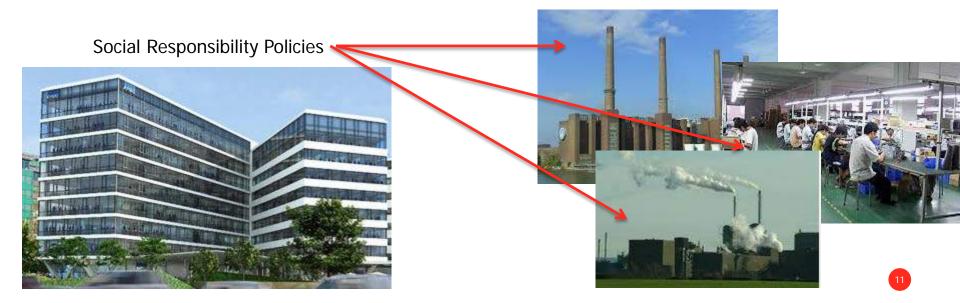


External Suppliers are a Part of Your Business

Take corporate social responsibility policies externally

Many companies implement social responsibility management systems to encourage an ethical workplace at their own internal sites.

It is important to then take these ethical practices and push them outwards to your supplier base. Your suppliers are absolutely critical points for your business



CSR Risk Management

- Business Ethics
- Conflict Minerals
- Waste Management
- Environmental, Health and Safety
- Human Rights
- Labour Standards
- Wage Rights
- Working Conditions





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Government legislation drivers to assessing Social Responsibility supply chain risks



22/06/2015

European Union – Conflict Minerals Legislation

European Union's legislative body has adopted a draft law to ensure conflict minerals are not part of corporations supply chains.

Requirements:

- importers must certify their supply chains are free from minerals produced in conflict zones.
- European companies perform due diligence to ensure that any of the four minerals tin, tantalum, tungsten, or gold used in their products did not contribute to a military conflict.

Next steps:

- The legislation will now be negotiated by the European Commission, the EU's executive body, before becoming actual law.
- It remains to be seen if the Commission will grant its approval for the legislation, as the body had previously recommended making the certification measures voluntary.

Magnitude:

- If approved, the law would impact as many as 880,000 companies and about 20 refinery or "smelting" facilities.
- The proposal covers the same minerals as the U.S. Dodd-Frank legislation but applies to mining operations worldwide, rather than just countries in Central Africa.





Conflict minerals Trade Flows from Central Africa region





Top Global Exporters - Gold

Country	2013 Exports (Tonne
1. Australia	204,973
2. Romania	150,678
3. Russia	117,346
4. Turkey	62,356
5. Dodd-Frank countries	38,711

Top Global Exporters - Tin, Tantalum, and Tur Country 2013 Exports (To		
1. South Africa	400,645	
2. Australia	82,289	
3. Indonesia	49,395	
4. Ukraine	35,641	
12. Dodd-Frank countries	9,578	

MEXICO

Mineral: Iron Ore Industries: Construction Issue: Armed group control of mineral trade Groups: Mexican drug cartels

Human Rights Concern: Rights violations by cartels, including extrajudicial killings and human trafficking; poor health and safety concerns in iron ore mines

COLOMBIA

Mineral: Tungsten

Industries: Automotive and Aerospace; Construction; Electronics

Issue: Armed group control of mineral trade Groups: Revolutionary Armed Forces of Colombia (FARC)

Human Rights Concern: Illegal charging of indigenous miners; poor health and safety conditions in often illegal mines

VENEZUELA

Mineral: Columbite-Tantalite (Coltan)
Industries: Electronics

Issue: Armed group control of illicit mineral smuggling routes

Groups: Armed Venezuelan/Colombian smuggling networks

Human Rights Concern: Extortion of miners; poor health and safety conditions in unregulated mines

DRC + SURROUNDING COUNTRIES

Minerals: Tantalum, Tungsten, Tin, Gold Industries: Electronics; Food and Beverage; Automotive and Aerospace; Apparel; Construction Issue: Armed groups exploiting extraction and trade of minerals in Central Africa Groups: M23, other rebel groups including those receiving support from regional governments Human Rights Concern: Extortion of miners; forced mining of indigenous peoples; poor health and safety conditions in mines



UK Modern Slavery Act

Part 6 Section 54 – Transparency in the Supply Chain United Kingdom passed into law a monumental progress step towards eradicating slavery and force labour in supply chains.

Requirements:

 Commercial organisations must prepare a slavery and human trafficking statement for each financial year

 Statement has to outline steps org has taken to ensure no slavery in supply chain or in any part of business OR statement has to say that the organisation has taken no steps to ensure a process is in place

Statement can include:

- Corporate organisational structure and supply chain
- Corporate polices related to human trafficking
- Due diligence process related to slavery/human trafficking
- Determine the parts of the business where a risk of slavery exists
- Steps that make sure these high risk areas have been assessed and managed that risk
- Level of effectiveness of due diligence process to ensure no slavery
 - Measured against Key Performance Indicators
- Training for staff related to slavery/human trafficking
- Must have high level executive staff sign off



UK Modern Slavery Act

Part 6 Section 54 – Transparency in the Supply Chain

Magnitude

- Applies to any commercial organisation that provides goods or services in the UK
- There is an annual turnover threshold that is intended to set which commercial organisations will be required to report
 - Still not stated what this turnover threshold is
- Statement must be published on corporate website and in a prominent location

Penalties and Repercussions

- Duties can be imposed by Secretary of State and bring organisation to civil proceeding court if failure to comply with legislation
- Corporate brand will be tarnished
- Lack of consumer trust



Anti-Bribery Regulatory Requirements

UK Legislation – Bribery Act 2010

US Legislation – Foreign Corrupt Practices Act – FCPA

*Key – applies to all suppliers who do business with UK and US companies

The principal way in which companies can approach bribery risks which could be present in a supply chain is by employing the types of anti-bribery procedures:

- risk-based due diligence
- the use of anti-bribery terms and conditions

It is suggested that these processes are used in the relationship with their contractual counterparty (direct supplier), and by requesting that counterparty to adopt a similar approach with the next party in the chain.

Magnitude: Very strict penalties for bribery in the US, UK and elsewhere – requirements are pushed to suppliers



"Stress Test"

Your CEO is at a Shareholder meetings together with stakeholders, media and NGO's and is going to be asked some questions following some recent supply chain issues which have put a number of Governance, Risk & Compliance issues under the spotlight

Do you have the answers?

- How many suppliers do you have?
- 2. How many are direct vs. indirect?
- 3. Do you actively verify the living profiles of your suppliers?
- 4. Have you conducted risk assessments of all your suppliers?
- 5. How many have you physically visited?
 - What are the issues and where?
 - b. What improvements have you made?
- 6. Does your supply chain adhere to your corporate values?
- 7. Can you tell your supply chain story?

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What Does Good Look Like?

- Ensures Corporate values are aligned with Supply Chain, R & D, Procurement, Risk and Compliance. Avoid opposing forces.
- 2. Keep an active database of living and approved supplier profiles
- Be in a position to articulate, explain and tell your supply chain story:
- 4. C What are the issues and where?
- 5. A Improvements made or plans to be made?
- 6. c How your supply chain aligns with corporate value? measure if they adhere to corporate values
- 7. Measures, monitors and improves the performance of suppliers and supports those that adhere to corporate values

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Managing Corporate Social Responsibility Compliance in Your Supply Chain

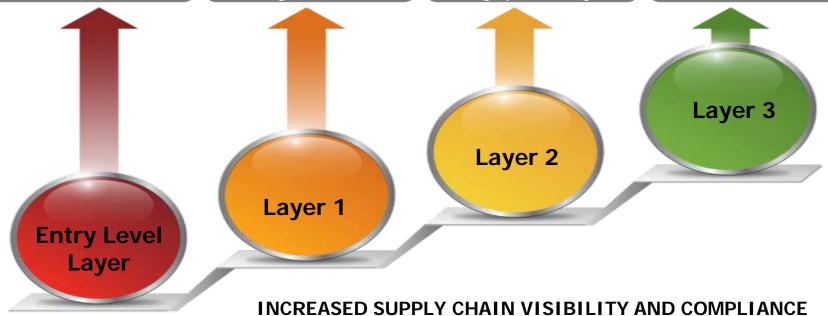


Progression Towards Maximum Compliance

- Manual Supplier Self-Assessments
- No Geographic Risk Intelligence

- Manual Supplier Self-Assessments
- Supply Chain Geographic Risk Intelligence

- Automated Software for Supplier Self-Assessments
- Supply Chain Geographic Intelligence
- Risk Methodology for On-site Audits
- Corrective And Preventative Action Plans

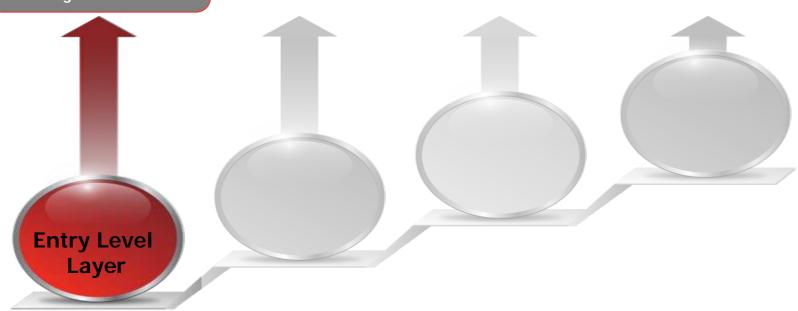




SUPPLIER PERFORMANCE

Entry Level Layer

- Manual Supplier Self-Assessments
- No Geographic Risk Intelligence





Questionnaire Development

Objectives and Criteria Goals of Questionnaire

- Social Responsibility
- Business Continuity
- Code of Conduct
- Quality

Questionnaire Functionality Needs

- Attachments needed?
- Additional supporting text needed?
- Weight of questions
- Question scored in risk calculation?

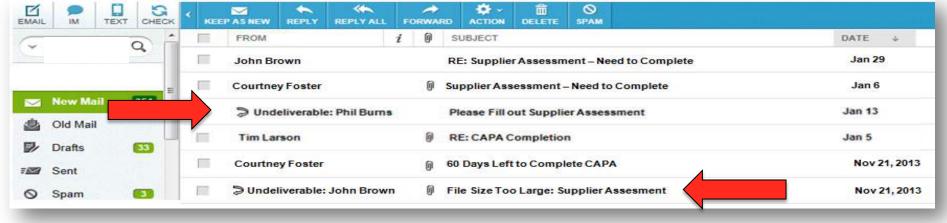
	Α	В	С	D	E	F	G
1	Question Category	Question	Rqeuired or Recommedation?	Include NA?	Scored?	Insert Additional Supporting Text	Attachment
2	Business Partner Requirements	Do you have written verification processes in place for the selection of business partners, manufacturers, product suppliers and vendors?	Required	N	Υ		
3	Business Partner Requirements	Do your business partners participate in any Government Customs' Supply Chain Security programs? If yes, do you collect any documentation to verify their certification to these programs?	Required	N	Y		
4	Business Partner Requirements	Do you have a documented risk assessment process in place to review your business partners in your supply chain?	Recommendation	N	Υ		
5	Container Security	Do you have a process in place which protects container integrity against unauthorized access (i.e. stored in a secured area)?	Required	N	Y		
6	Container Security	Do you have documented procedures in place to verify and maintain the physical container integrity prior to and at the point of stuffing?	Recommendation	N	Υ		
7	Container Security	Does your container physical integrity inspection include verifying the reliability of locking mechanisms on container doors?	Required	N	Y		
8	Container Security	Do you have designated employees assigned to distribute container seals?	Recommendation	N	Υ		
9	Container Inspection	Do you ensure that high security seals (ISO/PAS 17712 compliant) are affixed to all outbound containers?	Required	N	Y		
10	Container Inspection	Do you have written procedures in place to indicate how seals are to be controlled and affixed to loaded containers?	Required	N	Y		
11	Container Inspection	Do your procedures include how to recognize and deal with compromised seals/containers? Do you have procedures in place for reporting	Required	N	Υ		
12	Container Inspection	unauthorized entry into your container storage areas?	Required	N	Υ		
13	Physical Access Controls	Do you have procedures in place to prevent unauthorized access into the facility?	Required	N	Υ		



Sending Assessments from Personal Email

- Large attachments needed to be sent and received
- Digging through archives for supplier responses
- Inability to have multiple internal representatives send assessments
- Mass communication limitations

- Read receipts difficult to obtain for emails
- Tracking change requests for new supplier email points of contact
- Follow-up emails required- reminders not customized based on status
- Multiple points of contact for supplier





Excel Spreadsheet Tracking Completed Assessments

- Inability to understand where different suppliers are in completion process
- More difficult to filter suppliers based on region, division, product type, SAP number
- Tagging suppliers to specific buyers/agents more difficult
- Hard to track number of reminders, date sent, and the wording of the different emails

	D20 ▼ (=	f _x					
	Α	В	С	D	E	F	G
1	Business Partner Name	Country	Questionnaire Assigned	Status	Original Date sent	# of Reminders	Date Last Reminder Sent
2	Abuja Rubber Industries	Malaysia	Manufacturer	Questionnaire Sent	12/8/2014	5	1/14/2015
3	Asia Outdoor Apparel	China	Manufacturer	Questionnaire Sent	9/28/2013	1	8/29/2016
4	Barcelona Manufacturing	Spain	Manufacturer	Questionnaire Sent	4/12/2014	7	1/14/2015
5	Beijing Electronics	China	Highway Carrier	Questionnaire Sent	9/17/2013	2	1/14/2015
6	Beijing Manufacturing	China	Manufacturer	Questionnaire Sent	1/1/2014	1	1/14/2015
7	Best Highway Carriers	United States of America	Manufacturer	Questionnaire Sent	1/26/2015	1	š
8	Birmingham Manufacturing	United Kingdom	Rail Carrier	Questionnaire Sent	12/9/2013	1	1/14/2015
9	Bogota Specialty Components	Colombia	Manufacturer	Uncertain	8/29/2013	10	1/27/2012
10	Bratislava Rail	United States of America	Manufacturer	Refused	7/17/2013	1	8/30/2013
11	British Columbia Plastics	Canada	Manufacturer	Corrective Action	1/27/2012	2	11/12/2012
12	Brussels Electronics	Belgium	Highway Carrier	Corrective Action	7/2/2013	5	1/21/2014
13	Brussels Specialty Machinery	Belgium	Manufacturer	Questionnaire Sent	1/27/2012	2	1/27/2012
14	Brussels Trucking	Belgium	Sea Carrier	Questionnaire Sent	2/7/2012	1	3
15	Buenos Aires Textiles	Argentina	Manufacturer	Questionnaire Sent	10/1/2012	3	1/27/2012
16	Busan Ocean Lines	South Korea	Highway Carrier	Certified	10/18/2013	3	?
17	Calgary Lumber	Canada	Manufacturer	Refused	11/26/2012	3	?
18	Canadian Container Shipping	Canada	Highway Carrier	Uncertain	1/14/2014	2	?



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Traditional Risk Assessment Approach



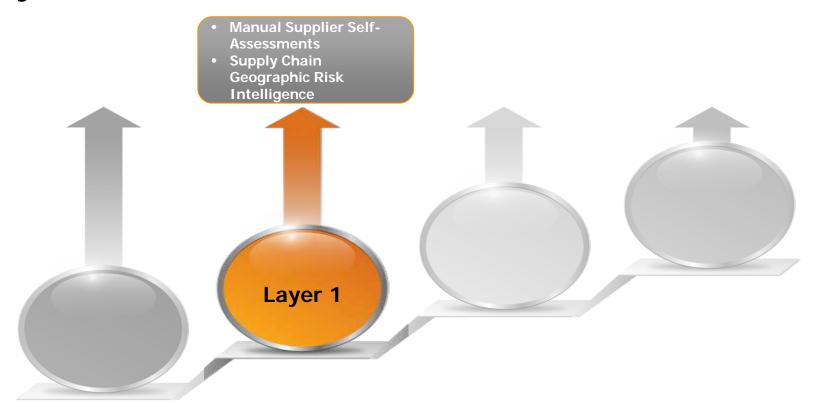
- Assume suppliers are EQUAL risk based on their compliance scores from a simple checklist
- Single-focused self-assessments sent out manually from own email
- No geographic risk incorporated
- No automation
- Unsystematic, single-foc 2014ed audits



Unsystematic, Single-Focused On-Site Audits



Layer 1





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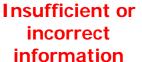
Analyzing the Geographic Threats to Supply Chains— The Minimum Approach

Government Tracking & Alert Websites 🔫









- This generic threat information gives an inaccurate assessment for issues related to supply chain
- Much of it is not applicable to supply chain threats
- This information does not assess threats in context to other threats in other areas.
- The information is dated and does not provide active monitoring for a changing world

You cannot look at traditional Travel Security or Political Stability risk and apply it to supply chain threats





Supply Chain Geographic Risk Intelligence



Generic Geographic Risk

Travel Security
Guarded Risk

Political Stability
Guarded Risk









Supply Chain Specific Geographic Risk

> Human Rights High Risk

Working Conditions
Severe Risk

Child Labor Severe Risk

Environment Elevated Risk



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Country Risk Overview

- Procurement comes to Supply Chain divisions to inquire about country risks in emerging markets and new business ventures
 - If you're only assessing current source countries, no analysis readily available
- Manual analysis of country risk prevents the ability to view country risks in a context of a regional view

Country	Number of Suppliers	BSI Human Rights Risk Rating
ARGENTINA	5	3
AUSTRALIA	4	1
AUSTRIA	FUTURE	??
CHILE	1	1
CHINA	52	5
COLOMBIA	6	3
CZECH REPUBLIC	FUTURE	??
DENMARK	8	1
FRANCE	18	1
IRELAND	FUTURE	??
MEXICO	12	3
RUSSIA	6	4
SWITZERLAND	FUTURE	??
UNITED KINGDOM	10	1
UNITED STATES	45	1



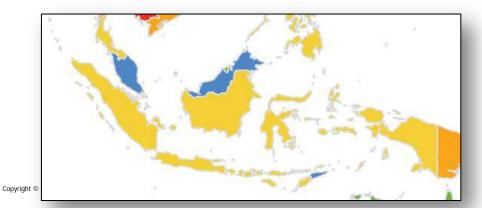
Country Risk Identification – Case study in Indonesia

Last month, Minister of Manpower in Indonesia has set a goal of eliminating child labour by the year 2022.

- did not specify any new programs designed to help reduce the prevalence of child labour
- stated that the ministry would be working with employers and unions to end the practice.

BSI Analysis: Indonesia suffers from an Elevated threat of child labour, with an estimated seven percent of five to 14 year olds performing some form of work in the country. Child labour is most prevalent in the agricultural sector, with the palm oil industry being notably problematic. Poverty among many Indonesian families is one of the primary causes leading children to prematurely enter the workforce.

Another government program - the Child Labour Elimination Program - removes child workers from their workplaces while providing remedial education, counselling, and financial assistance to help these children reenter the education system. Needs more funding to be effective and to contribute to 2022 goal





Case Study: Threats to Working Conditions in Cambodia



- Working Conditions in Cambodia are rated as High.
- Manufacturing in Cambodia presents its own risks to social responsibility
 - First half of 2014- over 7,000 workrelated injuries were reported, with over 50 deaths.
 - Law states 48 work week, with no excessive overtime. However, workers in industries such as garment are subject to excessive overtime hours with no government enforcement
 - Minimum wage in Cambodia is one of the lowest in SE Asia region comparing to other neighboring countries

Case Study: Forced Labour in Vietnam

BSI rates Vietnam a **Severe**risk for Human Rights
Violations



As production has shifted away from commonly known areas of Human Rights violations (i.e Bangladesh)the uptick of production in Vietnam has been noticed

Unique scenario of forced labour in Vietnam- most of the instances come from government-run drug detention centres.

- Individuals in these centres are forced to work for little or no pay as a form of punishment or rehabilitation.
- These centres can be found in most major industrial cities in Vietnam
- Whilst the law in Vietnam prohibits the use of forced labour, there is a lack of deterrentlevel punishments for violations.
 - Sweat shop owners can be fined, very rarely is there ever jail time served for the discovery of forced labour camps.

Incorporation of Supply Chain Geographic Risk Intelligence into Assessments



Supplier Name	Country	Compliance Score- Overall	Geographic Risk – Human Rights	Risk Factor – Annual Value of Spend	Overall Risk Score
Taipei Machines	Taiwan	70%	Elevated	Tier 1	3
Manila Parts	Philippines	70%	Low	Tier 2	2
British Electronics	England	90%	High	Tier 2	2

Manual Generation of Supplier Risk Reports

Many due diligence programs require "evidence of implementation" to show exactly how you approach the supplier risk assessment process.

- Problems manually compiling all of the information gathered on a single supplier
- Formatting of manual reports can be time-consuming
- Number of reports that need to be generated can be overwhelming
- May have to compile many reports on a daily basis if assessments are completed regularly

BUSINESS PARTNER FULL REPORT for CHENNAI PARTS

VALID FROM Oct 01, 2012 - Dec 08, 2014

Business Information

Business Type: Importer

Years in Business: >10 years

Number of Employees: 0-50

Do you export goods from this operation on behalf of Abuja Rubber? Yes

Who arranges for transportation? Chennai Parts

ISO Seals Applied? No

Annual Import Weight (Kilos) 25,000

Commodities Shipped: Electronics

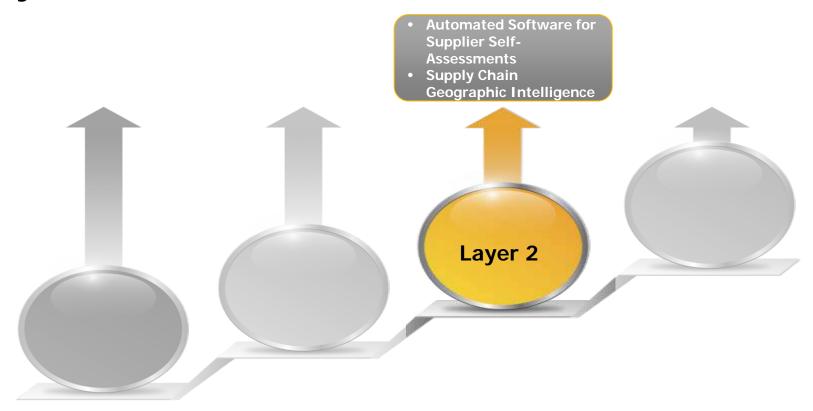
Overall Indicator Considering all business

partner's risk variables to include the questionnaire score, country threat level, mode of transportation, supply chain design, and cargo handling practices, supply chain risk rating for shipments from Abuja Rubber Industries

Considering the overall threat to the supply chain in India, including the threat of cargo theft and cargo tam pering, we rate India as Severe.



Layer 2





Automated Business Partner Risk Assessment Process

Corporate Social Responsibility Geographic Risk Intelligence

Risk Assessment Compliance

Industry-Specific Risks

Variables
Specific to Your
Business
Relationship
with the
Business Partner





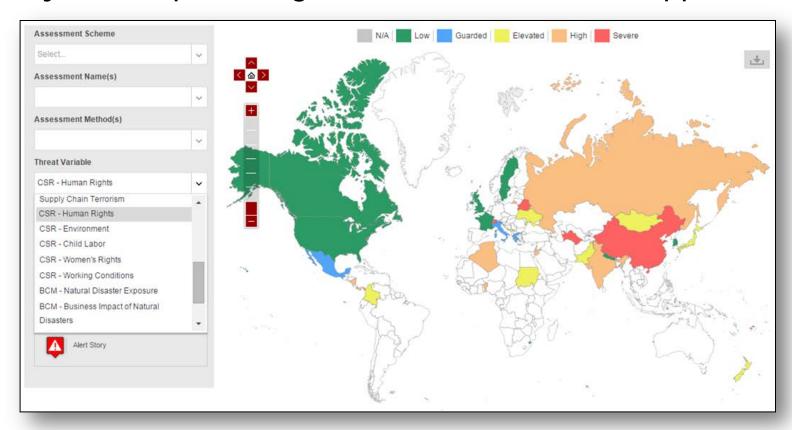
Macro and Micro Views of Risk - all levels within organisation





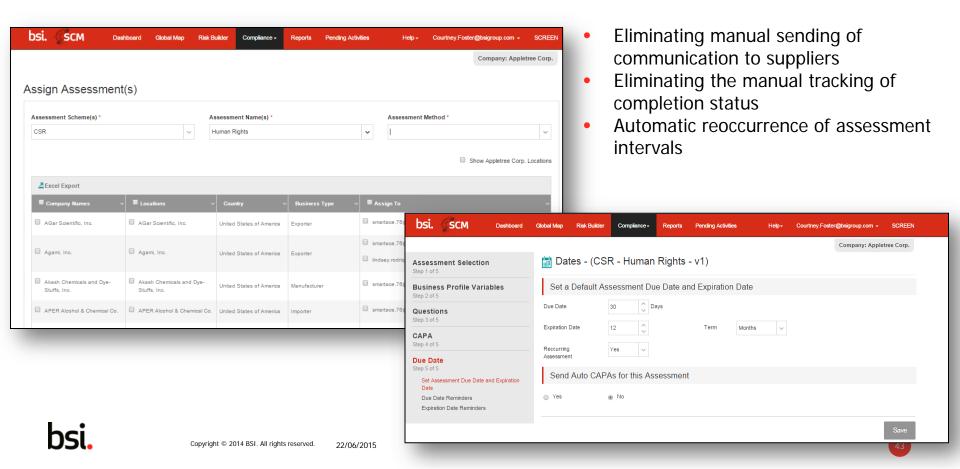
ASSESSMENT INFORMATION CSR - Environmental Health & Safety Risk Index for Assessment completed on March 04, 2015: Elevated Compliance By Category Smegero Seattes Assessment Industrial Hughers and Emissions. Using and Eating Constitute Report Compliance Score: #56 % (Mar-15) GEOGRAPHIC RISK OVERVIEW SCREEN Decoraptic Rosi Elements included for RI Country Variables: CSR - Human Rights, CSR - Environment, Political Stability The overall threat to human rights in India is High. Child and force labor occur relatively frequently in the country despite the existence of laws banning both practices. The government does not effectively enforce health and safety laws, allowing poor working conditions to proliferate throughout the country. Women and minority, ethnic, and religious proves frequently face economic discrimination, and conviction is endertic. The country's government is known to restrict assembly on occasion, and journalists have faced government constraints. highlighting the infringement upon civil liberies in India. An ineffective judicial system and corruption have vesifianed the rule of law The overall threat to the environment in India is Severe, India suffers from high levels of both air poliution produced: primarily by the transportation and industrial sectors and the burning of correctic sease. Water collution is also a serious problem in the country, posing major risks to human health in both urban and rural areas. Increased economic output and subsequent energy consumption has significantly increased carbon dioxide emissions in India in over the past two decades, and continued high usage of non-reressible energy sources highlights the potential for continued environmental concerns in the country in the coming years. The threat to political stability in India is Elevabed, India is a relatively stable parliamentary democracy, and with a population of over one billion. It is the world's largest democratic. Democratic districtions in India are well entrenched, and pluralism and dwill liberties are delebrated. Nonetheless, effective governance is limited by corruption and weak coalition governments that must cater to regional demands. A SSESSMENT RESPONSES Overall Compliance Tools: 66 % Outs Dots: 3/3/3/164 Manufactory Log Change in that are introd in your famility contampation a secretary contampant area? Additional Francisco. All there as the street in separate brian anti-secting process in no constraint importance have due from Arrandoment Charment Storings jug. Mandatory. Are the products which are produced inyour facility FREE of lead, mercury, cadmium, CPCs (Chloroficonscarbon), or fame. stadans, rearing the they do no include the materials lated above.

Identify and Map Out High Risk Areas of Global Supplier Base

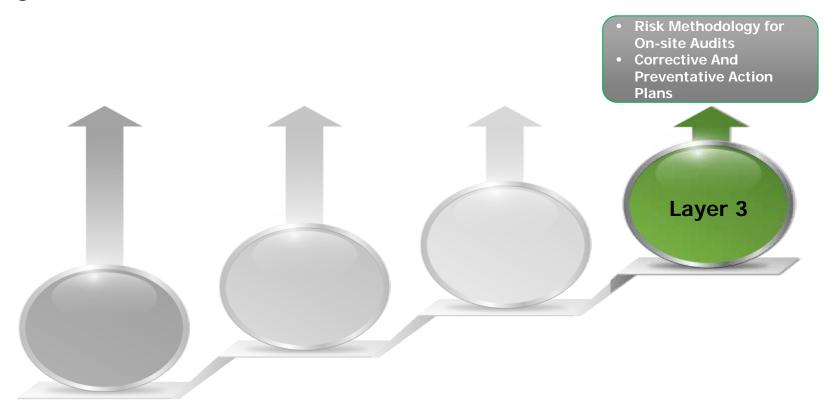




Automation of Communication and Continuous Monitoring

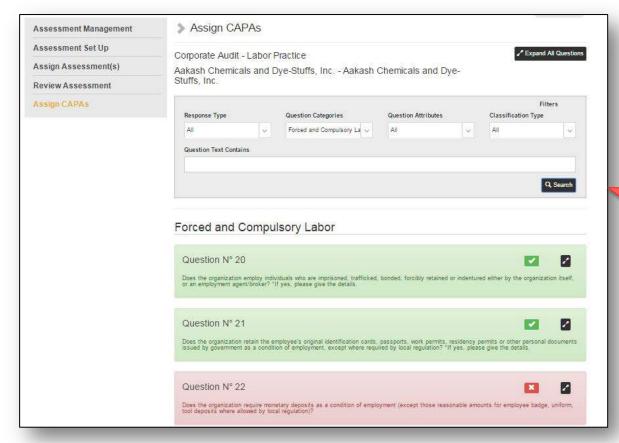


Layer 3





Identifying and Correcting Weaknesses - Corrective And Preventative Action (CAPA)

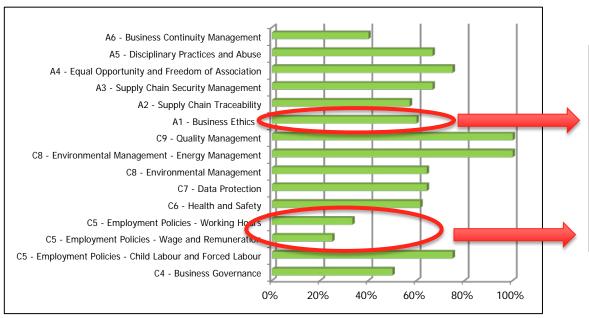


The CAPA process is designed to identify and correct weaknesses from a completed assessment report

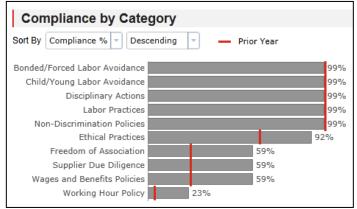
in risk assessment methodology is forgetting CAPA step

Analysing and Reviewing Self-Assessment Results

Social/Ethical weaknesses identified

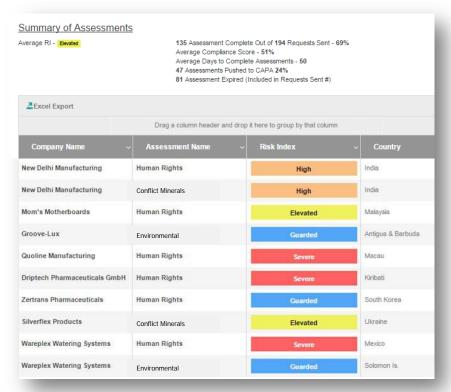


Deep Dive audit for Social/Ethical issues





Risk-Based Methodology Behind On-Site Audit Decisions

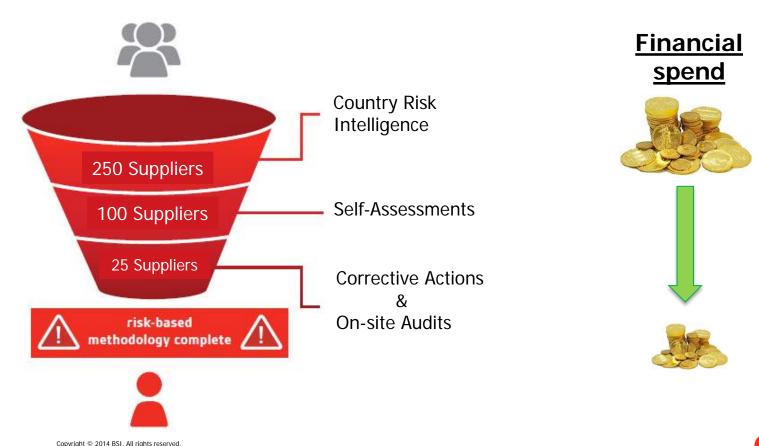




See highest-risk business partners and make informed decisions about where to perform on-site audits



Refine Audit Strategy Using Risk-Based Methodology





Progression Towards Maximum Compliance

- Manual Supplier Self-Assessments
- No Geographic Risk Intelligence

- Manual Supplier Self-Assessments
- Supply Chain Geographic Risk Intelligence

- Automated Software for Supplier Self-Assessments
- Supply Chain Geographic Intelligence
- Risk Methodology for On-site Audits
- Corrective And Preventative Action Plans

