

# Agriculture Program Overview and Principles of Fair Labor and Responsible Sourcing for Agriculture Supply Chains

**The FLA maintains Principles of Fair Labor and Responsible Sourcing for Agricultural Supply Chains** (Principles) to uphold and protect workers' rights. These fair labor principles are rooted in international labor standards and draw from internationally accepted guidelines for businesses<sup>1</sup>.

The Principles provide foundational and operational guidance for companies to apply in their workplace labor standards management systems in upstream supply chains. Companies develop stronger workplace labor compliance programs in their upstream supply chains by aligning with the FLA Principles. For example, companies demonstrate their obligation to recognize and respect labor rights and account for the impact they have on workers and their communities.

When a company participates in the FLA, its leadership makes a commitment to the Principles and agrees to uphold the FLA Workplace Code of Conduct in the upstream supply chain at the farm level and to protect the most vulnerable workers.

A Participating Company<sup>2</sup> is assessed regularly against the FLA Principles. The performance of a Participating Company that commits to and implements the principles and shows progress overtime is evaluated and publicly communicated by the FLA.

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1 Including the United Nations Guiding Principles for Business and Human Rights (UNGP), the OECD-FAO Guidance for Responsible Agricultural Supply Chains, and the USDA Guidelines for Eliminating Child Labor and Forced Labor from Agricultural Supply Chains.

2 Participating Company represents, companies, retailers, and suppliers who are participating in the FLA Agriculture Program.

## Agriculture Program Goal

The goal of the FLA's Agriculture Program is for the Participating Company to commit to the FLA's Principles of Fair Labor and Responsible Sourcing in their headquarters-level systems and to adopt, embed and implement them in the commodities and countries in scope under the FLA agriculture program.

The FLA will measure the performance of the workplace labor compliance programs of

Participating Companies at the headquarters and verify the implementation of the Principles for the commodities and countries in scope.

This verification will build on FLA's Independent External Assessment (IEA) work focused at the farm-level that verifies the working conditions against the FLA's Workplace Code of Conduct<sup>3</sup>.

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3 Based on the ILO Core Conventions.

## Participation Criteria & Scope of Implementation

A Company, Retailer, or Supplier that desires to participate in the Fair Labor Association Agriculture Program shall submit to the Association an application. All companies will join the FLA at the Parent Company level<sup>4</sup>.

For companies with agricultural supply chains, to prioritize from the vast number of commodities; the FLA will work with each company to define the scope of implementation. The FLA will define the scope in terms of commodities, based on assessment of risk. The FLA will verify the company's risk assessment process to ensure that the high-risk commodities and countries are brought under FLA's scope. While the independence of the FLA remains paramount, it is clear that mutual agreement between the FLA and the Participating Company regarding the scope is a prerequisite to successful implementation.

If a Company sources only one high-risk commodity, irrespective of the number of countries from where it is sourced, the supply chain of that commodity will be under FLA's scope.

If a Company sources multiple high-risk commodities, FLA staff will present a plan to the FLA Board of Directors at the time of presenting the Company's application indicating which commodities are included in the scope of implementation.

Over time, additional high-risk commodities will be added to the Participating Company's scope of implementation with the FLA.

<sup>4</sup> The FLA requires a formal, legal entity to join as a Participating Company. If a brand within a company exists mainly for marketing purposes and is not a separate legal entity, the applicable parent company shall join the FLA. If within a company there is a separate legal subsidiary of the parent company, that legal subsidiary may be able to join, pursuant to the decision by the FLA Board of Directors.

## Scope of Verification

The FLA will verify the implementation of the Principles at the headquarters level for the commodities in scope. "Headquarters" systems refer to head-quarters level governing structures that are centrally managed for the commodity in scope. For some principles, "headquarters" will be the company's physical global headquarters. In the case of multi-national companies, for some principles, "headquarters" may be a designated regional

office to which the workplace labor compliance program management is delegated by the global headquarters.

Scope of verification at the regional level will be articulated in terms of countries for the commodities in scope. The countries targeted for the FLA verification will be chosen based on a risk assessment approach approved or undertaken by the FLA. The FLA will use its

efforts efficiently to prioritize verification of the country level program and farm-level working conditions in high-risk countries. Verification in low-risk countries may look different<sup>5</sup>. For low-risk countries, the Participating Company is required to implement its workplace labor compliance program activities, maintaining alignment with the FLA standards.

The FLA's verification process at the farm level is articulated in the FLA's IEA Procedures for Agricultural Supply Chains.

Verification of programs for multiple commodities and countries can occur simultaneously.

<sup>5</sup> The Agriculture Committee shall define the nature of verification to be undertaken in low-risk countries.

## Principles Overview

Participating Companies with agricultural supply chains are expected to implement the Principles for the commodities in scope. The Principles are continuous-improvement goals for Participating Company to work toward and, through successful implementation, to demonstrate leadership.

Each of the 10 principles is accompanied by numbered benchmarks – 36 benchmarks in total – that explain key activities associated with successfully applying that principle. The Participating Company may ensure the implementation of a principle benchmark either directly or indirectly through

collaboration with business partners and/or other stakeholders.

Each benchmark is then followed by key performance indicators (KPI) – 74 KPIs – that demonstrate that a principle is being applied. The KPIs are marked to be verified by the FLA either at the headquarters level and/or the country level, depending on the nature of the KPI and the company's supply chain. The FLA will verify the KPIs to determine if the Participating Company is meeting that principle.

Refer to FLA Definitions to describe terms used in this document.

## THE PRINCIPLES

### PRINCIPLE 1A: Top Management Commitment & Workplace Labor Standards

Participating Company is committed to accountability and transparency through established workplace standards.

### PRINCIPLE 1B: Risk Assessment and Traceability

Participating Company uses risk assessment to prioritize its workplace labor compliance program implementation and progressively increase supply chain traceability.

### PRINCIPLE 2: Responsible Sourcing and Procurement

Participating Company aligns its sourcing/procurement practices with commitment to workplace labor standards.

### PRINCIPLE 3: Company Staff Training

Participating Company identifies and ensures that the specific personnel responsible for implementing labor standards (at head office and in the regions) are trained and are aware of the labor standards criteria.

### PRINCIPLE 4: Business Partner Training and Implementation

Participating Company obtains commitment, and drives business partner awareness of labor standards.

### PRINCIPLE 5: Monitoring

Participating Company conducts labor standards compliance monitoring at the farm level.

### PRINCIPLE 6: Functioning Grievance Mechanisms

Participating Company ensures workers, farmers, and their family members (where applicable) have access to functioning grievance mechanisms, which include multiple reporting channels of which at least one is confidential.

### PRINCIPLE 7: Collection and Management of Compliance Information

Participating Company collects, manages and analyzes labor standards compliance information.

### PRINCIPLE 8: Timely & Preventative Remediation

Participating Company works with business partners to remediate in a timely and preventative manner.

### PRINCIPLE 9: Consultation with Civil Society

Participating Company identifies, researches and engages with relevant local and international labor non-governmental organizations, trade unions and other civil society institutions.

### PRINCIPLE 10: Verification Requirements

Participating Company meets FLA verification and program requirements.

**PRINCIPLE 1A: TOP MANAGEMENT COMMITMENT & WORKPLACE LABOR STANDARDS<sup>6</sup>**

Participating Company is committed to accountability and transparency through established workplace standards.

**BENCHMARK 1A.1:** Participating Company leadership formally commits to practices to uphold workplace standards, and to integrate these commitments into company business practices.

KPI	VERIFICATION
KPI a) Demonstrated internal commitment from the top management (e.g. CEO/Owner/ Business Unit Lead), as well as resource allocation from top management, to uphold and integrate workplace labor standards into business practices and ensure that lobbying and advocacy activities align with and support the standards in the FLA Code of Conduct	HQ
KPI b) Demonstrated public commitment and transparency from the company in implementing workplace labor standards	HQ
KPI c) Demonstrated commitment to engage with civil society organizations which includes organizations representing workers	HQ
KPI d) The upmost levels of the governance structure have clear roles and responsibilities for ensuring that the company is implementing and upholding workplace labor standards	HQ

**BENCHMARK 1A.2:** Participating Company establishes and articulates clear, written workplace standards for its upstream supply chain that meet or exceed those embodied in the FLA Workplace Code of Conduct.

KPI	VERIFICATION
KPI a) Participating Company has written workplace labor standards	HQ and Country
KPI b) Labor standards meet the FLA Workplace Code of Conduct	HQ and Country

<sup>6</sup> This is a minimum requirement to start the performance evaluation process. Principle 1A top management commitment requirements are across all commodities with FLA's verification focusing on commodities in scope.

**PRINCIPLE 1B: RISK ASSESSMENT AND TRACEABILITY**

Participating Company uses risk assessment to prioritize its workplace labor compliance program implementation and progressively increase supply chain traceability.

**BENCHMARK 1B.1:** Participating Company conducts risk assessment and prioritization that informs the workplace labor compliance program.

KPI	VERIFICATION
KPI a) Evidence that company conducts risk assessments to prioritize key commodities, countries per commodity, and salient labor rights issues	HQ

<b>BENCHMARK 1B.2: Participating Company progressively establishes supply chain traceability.</b>	
<b>KPI</b>	<b>VERIFICATION</b>
KPI a) Evidence that company establishes progressive timebound commitment to reach full supply chain traceability and reports on the progress <sup>7</sup>	HQ and Country
KPI b) Evidence that the company discloses its sourcing profile <sup>8</sup> publicly for in scope commodity/ies	HQ
<b>BENCHMARK 1B.3: Participating Company develops an implementation plan.</b>	
<b>KPI</b>	<b>VERIFICATION</b>
KPI a) Evidence that company has a progressive implementation plan in accordance with risk assessment, salient labor rights issues, and evolving supply chain traceability	HQ and Country
KPI b) Evidence of allocated resources to support its workplace labor compliance program implementation	HQ and Country

7 For the commodity/ies in scope

8 Refer to Annex 2: FLA Guidelines on Supply Chain Transparency - Sourcing Profiles Disclosure

## PRINCIPLE 2: RESPONSIBLE SOURCING AND PROCUREMENT

Participating Company aligns its sourcing/procurement practices with commitment to workplace labor standards.

**BENCHMARK 2.1: Participating Company has written policies and procedures for sourcing/procurement that facilitate collaboration across the internal departments and with business partners to uphold its workplace labor standards at farms.**

<b>KPI</b>	<b>VERIFICATION</b>
KPI a) Evidence of a written responsible sourcing/ procurement policy that considers supply chain models and characteristics, risk assessment and traceability. The policy should include aspects such as: <ul style="list-style-type: none"> <li>• Payment terms and conditions</li> <li>• Payment schedule</li> <li>• Articulate any incentives or premiums offered</li> <li>• Support for farmer income and fair compensation for workers</li> <li>• Engagement with business partners to understand the impact of procurement practices on farmers and workers</li> </ul>	HQ
KPI b) Evidence of written procedures that stipulates the implementation of the policy	HQ

**BENCHMARK 2.2: Participating Company implements its responsible sourcing/procurement policy and procedures.**

<b>KPI</b>	<b>VERIFICATION</b>
KPI a) Evidence that company staff from relevant departments is periodically trained on the procurement/sourcing policies and procedures	HQ

KPI b) Evidence that company staff upholds the responsible sourcing/procurement policies and procedures through all terms and conditions defined in its sourcing/procurement agreements	Country
<b>BENCHMARK 2.3: Participating Company holds relevant staff and its business partners accountable for the implementation of the responsible sourcing/procurement policies and procedures.</b>	
<b>KPI</b>	<b>VERIFICATION</b>
KPI a) Written records that senior management reviews and assesses the impacts of its sourcing/procurement practices and the performance of staff responsible for implementing responsible sourcing/procurement practices	HQ
KPI b) Evidence that company periodically seeks feedback through dialogues with business partners, without fear of retaliation, to understand the impact (positive or negative) of its sourcing/ procurement practices on the farmers and workers	Country
KPI c) Evidence of improvements in the sourcing/procurement practices based on senior management review of internal, cross-discipline dialogue, impact on the ground, and dialogue and engagement with business partners	Country
<b>BENCHMARK 2.4: Participating Company selects its business partner based on a pre-sourcing evaluation and has a supplier evaluation system.</b>	
<b>KPI</b>	<b>VERIFICATION</b>
KPI a) Evidence of a pre-sourcing and ongoing supplier evaluation system, which includes assessment of a business partner’s commitment to workplace labor standards and cascading the requirements upstream	HQ or Country
KPI b) Evidence of steps taken by the company to motivate its business partner to implement responsible sourcing/procurement practices	Country

**PRINCIPLE 3: COMPANY STAFF TRAINING**

Participating Company identifies and ensures that the specific personnel responsible for implementing labor standards (at head office and in the regions) are trained and are aware of the labor standards criteria.

**BENCHMARK 3.1: Participating Company identifies the person(s) responsible for administering and implementing its workplace labor compliance program.**

<b>KPI</b>	<b>VERIFICATION</b>
KPI a) Company organizational chart designating title, name and contact information of responsible individual(s)	HQ and Country
KPI b) Job description(s) or other equivalent to demonstrate relevant responsibilities for implementing labor standards	HQ and Country
KPI c) Evidence of a process in place to determine the ongoing personnel needs of the labor compliance program	HQ or Country

**BENCHMARK 3.2: Participating Company ensures training of all staff managing responsible sourcing/procurement and implementation of labor standards.**

KPI	VERIFICATION
KPI a) Evidence for providing appropriate training or other professional development covering all areas of the FLA workplace Code of Conduct and Principles, the integration of standards into business practices, and awareness on the consequences of planning and sourcing/procurement practices on working conditions	HQ or Country
KPI b) Evidence for company's training program encompassing the training evaluation, feedback incorporation and training improvements	HQ or Country
KPI c) Evidence that company measures awareness and knowledge gained	HQ or Country

**PRINCIPLE 4: BUSINESS PARTNER TRAINING AND IMPLEMENTATION**

Participating Company obtains commitment, and drives business partner awareness of labor standards.

**BENCHMARK 4.1: Participating Company formally conveys its labor standards to its business partners and verifies that the information is cascaded upstream.**

KPI	VERIFICATION
KPI a) Evidence that company formally conveys its labor standards to all business partners and receives documented acknowledgment and commitment to uphold and cascade them	HQ and Country
KPI b) Evidence that company requires its business partners to submit information annually on how the requirements on labor standards are cascaded upstream	HQ or Country

**BENCHMARK 4.2: Participating Company obtains agreement from business partners to facilitate periodic assessments at the farms, including those organized by the FLA, and to actively contribute to consequent remediation.**

KPI	VERIFICATION
KPI a) Evidence that company formally conveys its requirements for its business partners to facilitate assessments and remediation and receives documented acknowledgment and commitment from them	HQ or Country

**BENCHMARK 4.3: Participating Company conditions future business with business partners upon continuous improvement of labor conditions at farms.**

KPI	VERIFICATION
KPI a) Policy on the use of labor conditions information (at farms) in the evaluation of business partners	HQ or Country
KPI b) Demonstrated examples of using labor condition information in its business partner evaluations	HQ or Country
KPI c) Evidence that company takes actions in order to both encourage improvement and deter violations of labor standards, including through its sourcing/procurement practices	HQ or Country



**BENCHMARK 4.4:** Participating Company ensures that labor standards are accessible in the upstream supply chain, in written or illustrative format and relevant languages.

KPI	VERIFICATION
KPI a) Evidence that company verifies that labor standards are available in appropriate written or illustrative forms and relevant languages to ensure the access for intermediaries, farmers and workers	HQ or Country

**BENCHMARK 4.5:** Participating Company ensures that farmers and workers are trained on labor standards at appropriate intervals.

KPI	VERIFICATION
KPI a) Evidence that labor standards awareness-building activities and trainings are taking place for farmers, workers and family members (where applicable) <ul style="list-style-type: none"> <li>• For farmers engaged for long term, once every two years</li> <li>• For workers engaged for long term, once every year</li> <li>• For farmers and workers engaged in seasonal work, every season</li> </ul>	Country
KPI b) Training feedback demonstrating effectiveness and that participants gained knowledge	Country

### PRINCIPLE 5: MONITORING

Participating Company conducts labor standards compliance monitoring at the farm level.

**BENCHMARK 5.1:** Participating Company monitors an appropriate sampling of farms regularly to assess compliance with labor standards.

KPI	VERIFICATION
KPI a) Company implements a farm-selection process and a monitoring plan in accordance the risk assessment, goals, traceability and available resources	HQ or Country
KPI b) Documented progress to increase (or the evidence of the increase in) the number or scope of farms monitored for labor standards over time	Country

**BENCHMARK 5.2:** Participating Company ensures that the monitoring program in scope is aligned with FLA workplace labor standards.

KPI	VERIFICATION
KPI a) Evidence that company's monitoring protocols and tools include all FLA workplace standards?	HQ or Country

9 [https://www.fairlabor.org/sites/default/files/fla\\_agriculture\\_coc\\_and\\_benchmarks\\_october2015\\_feb2021.pdf](https://www.fairlabor.org/sites/default/files/fla_agriculture_coc_and_benchmarks_october2015_feb2021.pdf)

<p>KPI b) Evidence that company's monitoring protocols and monitoring guidance specifies monitoring activities which include, but are not limited to:</p> <ul style="list-style-type: none"> <li>(a) worker interviews including off site interviews (were needed),</li> <li>(b) consultation with unions, worker representative structures, CSOs, and relevant local group (where relevant),</li> <li>(c) management/farmer interviews,</li> <li>(d) community profiling to determine social norms and root causes,</li> <li>(e) documentation review,</li> <li>(f) visual inspection and</li> <li>(g) inspection of occupational safety and health records</li> </ul>	<p>HQ or Country</p>
<p>KPI c) Evidence that company collects information which includes but is not limited to:</p> <ul style="list-style-type: none"> <li>(a) awareness of farmers and workers on labor standards</li> <li>(b) quality and comprehensiveness of labor standards trainings, and remediation,</li> <li>(c) functionality of grievance mechanisms,</li> <li>(d) recognition and effectiveness of the Collective Bargaining Agreement (where applicable),</li> <li>(e) root cause analysis of violations and gaps, and</li> <li>(f) traceability status and progress</li> </ul>	<p>HQ or Country</p>

**PRINCIPLE 6: FUNCTIONING GRIEVANCE MECHANISMS**

Participating Company ensures workers, farmers, and their family members (where applicable) have access to functioning grievance mechanisms, which include multiple reporting channels of which at least one is confidential.

**BENCHMARK 6.1: Participating Company ensures functioning grievance mechanism in the supply chain.**

KPI	VERIFICATION
<p>KPI a) Evidence that company facilitates grievance mechanism(s) for the farmers and workers (in cooperation with the employer of the workers) and that such mechanism(s) are:</p> <ul style="list-style-type: none"> <li>• <b>legitimate</b> that workers trust and without penalty for using it, and offers at least one confidential channel,</li> <li>• <b>accessible</b> to workers by being free of cost and in appropriate language,</li> <li>• <b>predictable</b> providing a clear and known procedure for the workers,</li> <li>• <b>transparent</b> keeping parties informed about the progress,</li> <li>• <b>equitable</b> so that workers have reasonable access to information, and advise,</li> <li>• <b>rights compatible</b> that ensure outcomes accord with internationally recognized human rights,</li> <li>• <b>source of continuous learning and</b></li> <li>• <b>based on engagement and dialogue</b></li> </ul>	<p>HQ or Country</p>
<p>KPI b) In countries where child labor is a systemic issue, evidence that company facilitates a child-friendly grievance mechanism, that is safe, effective, child-sensitive, and easily accessible to all child laborers</p>	<p>Country</p>
<p>KPI c) Evidence that company measures the effectiveness of the grievance mechanism(s) in its supply chain</p>	<p>Country</p>

**BENCHMARK 6.2:** Where local mechanisms are not functioning, Participating Company provides alternative channels for farmers and workers to contact the Company directly and confidentially.

KPI	VERIFICATION
KPI a) Evidence that the company provides alternative grievance channels, if applicable, and there is a documented process to follow up on grievances submitted through such channels	HQ or Country
KPI b) Company reports the received grievances and the redressal process in its supply chain to the FLA on an annual basis	Country

**BENCHMARK 6.3:** Participating Company ensures that training and communication on grievance mechanism cover all farmers and workers.

KPI	VERIFICATION
KPI a) Evidence that company facilitates awareness building for farmers and workers on available grievance mechanisms and grievance redressal process <ul style="list-style-type: none"> <li>• For farmers engaged for long term, once every two years</li> <li>• For workers engaged for long term, once every year</li> <li>• For farmers and workers engaged in seasonal work, every season</li> </ul>	Country
KPI b) Training feedback that demonstrate effectiveness of knowledge gained by participants	Country

**PRINCIPLE 7: COLLECTION AND MANAGEMENT OF COMPLIANCE INFORMATION**

Participating Company collects, manages and analyzes labor standards compliance information.

**BENCHMARK 7.1:** Participating Company facilitates access to a complete and accurate list and profile of all suppliers, where upstream transparency has been established.

KPI	VERIFICATION
KPI a) Company ensures a complete and accurate list and profile of business partners/ supply chain actors, including location, and contact information	HQ or Country
KPI b) Company maintains and/or has access to monitoring results. This may include but is not limited to worker information, known representative structures (if any), previously known disputes, accidents, non-compliances, root causes and remedial actions taken	Country

**BENCHMARK 7.2:** Participating Company analyzes systemic issues and trends in noncompliance findings.

KPI	VERIFICATION
KPI a) Documented analysis of systemic issues and trends	Country
KPI b) Evidence that data analysis identifies and tracks repeating forms of noncompliance as well as those that most negatively impact workers and performs gender disaggregated analysis	Country
KPI c) Evidence that data analysis informs improvements to company labor compliance program to mitigate negative impacts	HQ or Country

**PRINCIPLE 8: TIMELY AND PREVENTATIVE REMEDIATION**

Participating Company works with business partners to remediate in a timely and preventative manner.

**BENCHMARK 8.1:** Participating Company provides regular follow-up and oversight to business partners implementing the corrective actions following assessments.

KPI	VERIFICATION
KPI a) Evidence that company supports the remediation process at the country level and has a documented process of follow up at a higher level as determined by the headquarters	HQ and Country
KPI b) Where appropriate, evidence of consultation with civil society organizations (including worker representative structures and organizations) on remediation	Country
KPI c) Documented collaborative process of developing remediation plans	Country

**BENCHMARK 8.2:** Participating Company works with the business partners to determine the root causes and take action to reduce future risks.

KPI	VERIFICATION
KPI a) Documented collaborative process of root cause analysis	HQ or Country
KPI b) Evidence of root-cause analysis and implementation of actions to address the root causes to prevent future risks	Country
KPI c) The company should supplement remediation efforts by engaging with appropriate stakeholders to address systemic issues and find solutions in a way that is consistent with the FLA standards	Country

**BENCHMARK 8.3:** Participating Company records and tracks the progress and effectiveness of remediation.

KPI	VERIFICATION
KPI a) Evidence that corrective actions are tracked to completion	Country
KPI b) Documented process to determine effectiveness of remediation plans	Country

**PRINCIPLE 9: CONSULTATION WITH CIVIL SOCIETY**

Participating Company identifies, researches and engages with relevant local and international labor non-governmental organizations, trade unions and other civil society institutions.

**BENCHMARK 9.1:** Participating Company develops a civil society organization (CSO) outreach strategy that reflects the risk assessment and salient human rights issues.

KPI	VERIFICATION
KPI a) A mapping of stakeholders and a strategic plan for local and international CSO outreach engagement, taking into account the high-risk areas and salient human rights issues. This will include trade unions active in the supply chains (at the farm level) where the companies are operating	HQ and Country

**BENCHMARK 9.2:** Participating Company develops and maintains links with relevant CSOs to gain understanding of labor issues.

KPI	VERIFICATION
KPI a) Evidence of efforts to engage with CSOs in all high risk countries. Efforts to engage the CSOs could include but is not limited to: <ul style="list-style-type: none"> <li>• Research and Assessments</li> <li>• Information sharing and seeking advise</li> <li>• Advocacy and policy reforms where social protection are lacking</li> <li>• Consultation during monitoring</li> <li>• Others</li> </ul>	HQ or Country

**BENCHMARK 9.3:** Participating Company strategizes with CSOs and knowledgeable local sources in the design and implementation of the workplace labor compliance programs.

KPI	VERIFICATION
KPI a) Documented evidence of meaningful engagement with relevant CSOs including trade unions, where applicable in the design and implementation of workplace labor standards compliance strategies. Types of engagements could include: <ul style="list-style-type: none"> <li>• Feedback on remedial strategies</li> <li>• Training and capacity building</li> <li>• Worker Communication Channels</li> </ul>	HQ and Country

**BENCHMARK 9.4:** Participating Company consults with business partners’ management and legally constituted unions or worker representative structures to gain an understanding of relevant relationships.

KPI	VERIFICATION
KPI a) A procedure for relevant staff/assessor use in gaining an understanding of union structures, specifically within its sourcing region, and demonstration implementation (where they are present)	HQ
KPI b) Evidence of consultation with all relevant parties regarding specific, existing relationships between business partners’ management and any legally constituted unions or worker representative structures (where they are present)	Country

**PRINCIPLE 10: VERIFICATION REQUIREMENTS**

Participating Company meets FLA verification and program requirements.

**BENCHMARK 10.1:** Participating Company maintains standard operating procedures related to FLA affiliation.

KPI	VERIFICATION
KPI a) Standard Operating Procedures related to FLA affiliation	HQ

**BENCHMARK 10.2:** Participating Company participates in FLA due diligence activities, including assessments at the farms, local offices, and company headquarters, as applicable.

KPI	VERIFICATION
KPI a) Participation in applicable FLA due diligence activities	HQ
KPI b) IEM corrective action plans and remediation updates submitted within the timeframe designated in the IEA Procedures for the Agriculture Sector	Country

**BENCHMARK 10.3:** Participating Company provides information on fulfillment of Principles of Fair Labor and Responsible Sourcing.

KPI	VERIFICATION
KPI a) Timely provision of information regarding company's internal management systems tools, protocols, and other documents required for verification	HQ and Country

**BENCHMARK 10.4:** Participating Company maintains a complete and accurate company profile with the FLA.

KPI	VERIFICATION
KPI a) Profile updated within the past year	HQ
KPI b) Evidence that company discloses its sourcing profile publicly and provides the complete farm list to the FLA for monitoring purposes	Country

**BENCHMARK 10.5:** Participating Company responds to FLA requests for documentation, contracts, information, and clarification in a timely manner.

KPI	VERIFICATION
KPI a) Frequency that company appeared on a FLA staff report for failure to meet Principles	HQ or Country
KPI b) Company representative contribution to the FLA by attending and/or hosting an FLA Board meeting or participating actively on a Working Groups and/or Committees, webinars, panels, and other events hosted by the FLA	HQ

**BENCHMARK 10.6:** Participating Company pays annual dues and applicable fees on schedule.

KPI	VERIFICATION
KPI a) Company pays dues and assessment fees in full and on a timely basis	HQ and Country