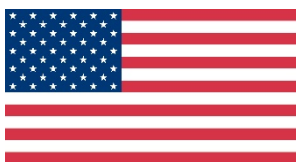


Sample Code of Conduct Provisions



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Sample Code of Conduct Provisions

Introduction

This tool is one of 17 tools comprising the Socially Sustainable Sourcing Toolkit (S3T), which was developed as part of Verité’s Cooperation on Fair, Free, Equitable Employment (COFFEE) Project through generous funding from the US Department of Labor’s Bureau of International Labor Affairs (USDOL-ILAB). The S3T was developed in alignment with USDOL’s *Comply Chain* model, with at least one tool created for each of the eight steps of *Comply Chain* (see graphic below). Many of the tools are derived from tools created for the *Responsible Sourcing Tool*, developed by Verité with funding from the U.S. Department of State’s Office to Monitor and Combat Trafficking in Persons (J/TIP). The tools can be used *à la carte*, but it is important that companies have systems and tools in place for each step of *Comply Chain*.

STEPS OF COMPLY CHAIN AND CORRESPONDING TOOLS

S3T Socially Sustainable Sourcing Toolkit



U.S. Department of Labor Comply Chain Model

- STEP 1. Engage Stakeholders and Partners**
Guidance on Stakeholder Engagement
- STEP 2. Assess Risk and Impacts**
Risk Evaluation for Action in the Coffee Trade (RE-ACT) Dashboard
Root Cause Analysis of Labor Violations in the Coffee Sector
Self-Assessment Questionnaire for Coffee Traders
Self-Assessment Questionnaire for Coffee Producers
Self-Assessment Questionnaire for Labor Brokers
Guidance on Screening and Selection of Labor Brokers
- STEP 3. Develop a Code of Conduct**
Sample Code of Conduct Provisions
Sample Social Responsibility Agreements
Primer on Recruitment-Related Risks in the Latin American Coffee Sector
- STEP 4. Communicate & Train Across Supply Chain**
Guidance on Communicating Objectives and Standards Across the Supply Chain
- STEP 5. Monitor Compliance**
Guidelines on Monitoring of Coffee Farms
Guidance on Monitoring of Labor Brokers
Worker Interview Guide Focused on Recruitment and Hiring
- STEP 6. Remediate Violations**
Management Systems Framework for Preventing and Remediating Labor Risks
- STEP 7. Independent Review**
Framework for Independent Verification of Ethical Sourcing
- STEP 8. Report on Performance**
Guide on Public Reporting for Private Sector Stakeholders

Introduction to the Tool

A code of conduct is an important formal statement of a company's values, commitments and expectations of its direct business partners, including what is required of these business partners or suppliers in managing human rights risks in their supply chains. We are offering the sample provisions below to coffee roasters, traders, and producers to support them in developing or strengthening their own policies or formal Codes of Conduct.

Companies that are in the beginning phases of developing codes of conduct are free to adopt these standards wholesale. For those that already have detailed standards, this tool can be used to benchmark their policies, as well as disseminated to suppliers to help them improve their own policies and bring them into alignment with international standards and your own code of conduct. It should be noted that these sample clauses only pertain to worker rights considerations and do not include a variety of other social, environmental, and ethical standards that should also be included in a comprehensive code of conduct.

The sample code provisions address factors that contribute to labor risks and have been developed based on a review of international labor standards and effective practices of leading businesses. Codes of conduct should require compliance with local laws, and country-specific compliance requirements should be detailed in the terms and conditions of contracts with subcontractors, suppliers, and agents.

Companies should work to cascade and enforce their Code of Conduct throughout each tier of their supply chain. This is particularly important in the coffee sector, because the risk of labor abuses increases in lower tiers of the supply chain.

Model Code of Conduct Provisions

Forced Labor and Human Trafficking

Code Standard

The company shall prohibit forced labor and trafficking in persons in all its operations and in those of its suppliers, labor intermediaries, and agents of the global supply chain. Workers on coffee farms shall not be subject to any form of forced, compulsory, bonded, indentured, or prison labor.

All work must be voluntary, and workers must be free to quit and leave their jobs at any time without penalty upon giving reasonable notice. Workers (or their families) shall not be threatened in any way, real or perceived, to compel them to take a job or prevent them from voluntarily ending their employment.

Auditable Standards

Debt Bondage

Workers shall not be forced to work to repay a debt, whether related to recruitment fees, salary advances, debts incurred to employer- or labor broker-owned stores located on farms, or other types of debts.

Workers shall not be compelled to purchase essential goods or services from their employer or labor broker.¹ When access to independently operated stores or services is not possible, employers shall ensure that goods are provided at fair and reasonable prices (not to exceed the fair market price), and that workers are provided with written receipts that detail the cost of each item.

If workers purchase goods on credit, they shall be provided with written records of the amount owed, and the cost of goods purchased shall not be deducted directly from workers' salary or wages.

Interest rates and repayment terms for advances, loans, and credit purchases must not exceed those available from local banks and:

- A worker's total outstanding balance must not exceed 50 percent of one-month's base wages.
- Monthly payments must not exceed ten percent of one-month's base wages.
- Loan terms must not exceed six months or extend beyond the duration of a worker's employment contract, whichever is shortest.
- Loan advances and credit accounts can only be provided with the full, prior, and free consent of workers.

Workers shall not be prohibited from quitting their jobs, punished or threatened with punishment, blacklisted, or reported to authorities for failing to pay back a debt.

Confiscation of Personal Identity Documents and Cellular Phones

Workers shall have a secure place to store their identification documents and other valuables, including cellular phones, and shall have access to them at all times, including while working.

Neither the employer nor labor brokers shall under any circumstances confiscate, destroy, retain, or deny workers access to their identity or immigration documents — including personal identification documents, documents needed to claim benefits, work permits, and travel documents — or cellular phones.

¹ For the purposes of this tool, the term "labor broker" will be used to refer broadly to any third-party — whether an individual or agency — involved in the recruitment, hiring, and/or supervision of workers, including but not limited to village-level agents, labor recruiters, labor contractors, labor intermediaries, employment agencies, outsourcing agencies, and crew leaders not directly employed by farms.

Deposits and Deductions

Neither the employer nor its intermediaries shall ask workers to make monetary deposits, pay bonds, or have part of their wages withheld in exchange for an offer of employment or to maintain employment.

Deposit schemes, forced savings, or mandatory deductions from wages to buy goods or services are prohibited.

Freedom of Movement and Personal Freedom

Neither the employer nor labor brokers or security guards shall limit the freedom of movement of workers during recruitment, transportation, or employment. Workers shall not be subjected to unwarranted surveillance at the worksite or worker housing.

The employer shall not require staff to live in employer-provided or arranged housing unless required by law. Neither the employer, labor brokers, or security shall physically confine workers at the worksite or housing, or require workers to gain permission to leave these areas.

Outside of working hours, neither the employer nor labor brokers shall control the movement of workers, nor shall they restrict their activities or relationships during their free time, including interactions with labor unions, government agencies, or civil society organizations.

The use of threats of any kind or physical violence to limit these freedoms is strictly prohibited.

Recruitment and Hiring

Labor Brokers and Third-Party Labor Providers

When employers determine that it is necessary to use labor brokers, they must ensure that:

- Employers have a signed contract with recruiters that obligates them to abide by national law, international standards, and company codes of conduct.
- The labor brokers operate in accordance with the laws of the countries of origin and destination of immigrant workers.
- The labor brokers are registered and authorized by the competent authority in the receiving and/or countries of the migrants (including the outsourcing agents).
- The labor brokers operate ethically at all stages of the recruitment and selection process for workers and does not engage in deceptive or fraudulent recruitment practices that put workers at risk of forced labor and other forms of labor exploitation.

Recruitment Fees and Transportation Costs

Workers shall not be charged recruitment fees, either directly or indirectly, or in whole or in part. This includes the following:

- The employer shall cover all expenses charged by its intermediaries for interviewing, evaluating, selecting, recruiting, and placing workers. These expenses shall not be transferred to the worker directly or indirectly (through fees charged by labor brokers, deductions from workers' wages, or reduced wages).
- Training expenses shall be covered by the employer at all times. Workers shall not be required to cover the cost of training as a requirement for obtaining a job.
- The employer shall assume the costs for processing official documents related to work and employment visas, or reimburse these expenses if a worker has to initially cover them.
- Employers shall cover the cost of transportation from workers' communities or countries of origin to the farm, as well as the cost of return transportation. Similarly, employers shall cover the cost of transportation between worker housing and the place of employment.

Labor brokers, both in countries of origin and employment, involved in the recruitment, selection, hiring, and management of workers shall be contractually bound to comply with this policy on the prohibition of worker-paid recruitment fees. This policy shall be clearly communicated to workers in a language they understand at the beginning of the recruitment process.

Labor Contracts

Whether workers are hired directly or through labor brokers, it is essential that they be provided with thorough, accurate information about the nature and conditions of work during the recruitment and hiring process.

Written employment contracts shall be provided to workers in a language they understand (including indigenous languages that may be spoken in certain Latin American countries). Workers who are not able to understand the contents of their written contracts shall be provided with detailed verbal descriptions of the contents of their contracts in languages they can understand. Such agreements must be documented for auditability, such as in the employer's management system.

Workers' contracts should include, at a minimum, the following information:

- the start and end date of the employment contract;
- the type of work and tasks the worker is expected to carry out;
- the full name of their employer;
- the location of the workplace;
- a description of workers' legal rights and responsibilities;
- wages and benefits, including the rate and frequency of payment;

- working hours and overtime premiums;
- daily rest breaks;
- weekly rest day(s);
- sick leave and annual leave;
- legally required deductions from wages;
- a description of worker accommodation and associated costs, if relevant; and
- any occupational health risks to which workers will be exposed.

Internal and international migrant workers should receive a copy of their employment contract in their native language at least five days before departing their home communities. People with difficulties understanding a written contract must be provided with a detailed verbal explanation of the terms and conditions of the contract at this time.

The practice of contract substitution or use of supplemental agreements by the employer to replace an original contract or any of its provisions with a new contract or terms that are less favorable to the worker is strictly prohibited.

Workers have the right to voluntarily terminate their employment contract without penalty at any time upon giving reasonable notice. Workers have the right to resign and leave their places of work at any time.

Employers shall be required to cover all transportation costs back to workers' communities of origin regardless of the reason for termination of the employment relationship.

Child Labor

Code Standard

Child labor shall be strictly prohibited. Child labor refers to work by any person under the age of 15, under the legal age for completion of compulsory education, or under the legal minimum age for employment according to national law, whichever is higher (excluding light work on family farms that does not harm development, negatively impact school attendance, and that is within limited hours).

Juvenile laborers between the minimum age for child labor and 18 shall only engage in legally permissible work that complies with restrictions on hours of work, school attendance, and activities that do not present a danger to their health, safety, or morals. In all cases, juvenile laborers shall be prohibited from working overtime or at night and must be registered, paid directly, and paid at least the minimum wage.

Auditable Standards

No worker under the age of 18 shall work in tasks that are hazardous to their physical, emotional, intellectual, or moral development. Tasks that shall be explicitly prohibited for all minors under the age of 18 include:

- the handling or application of pesticides and herbicides, and working in areas that have been recently fumigated;
- working with sharp instruments, such as machetes, scythes, chainsaws, and pruning shears;
- operating hazardous machinery, such as mechanical harvesters, electric scythes, chainsaws;
- prolonged exposure to noise exceeding 85 dBA or vibration hazards;
- lifting or carrying heavy loads, such as sacks of coffee (the ILO recommends additional protective measures for all male workers transporting loads above 55 kilograms and sets substantially lower weight limits for women and children);
- working at heights, such as when climbing ladders is necessary to harvest certain coffee varieties or in coffee processing facilities;
- collecting, preparing, or distributing manure, which may contain parasites or other microorganisms;
- working in areas with dangerous animals (i.e., venomous snakes, areas with high rates of mosquito-borne illnesses);
- exposure to extreme weather, cold, heat, or sunlight without shade;
- working at night or during the early morning hours; and
- working during the school day, for minors under the maximum age for obligatory education.

The company shall clearly define and communicate its child labor policies and procedures to all personnel.

Discrimination and Equality

Code Standard

Workers shall not be subject to any form of unequal treatment or discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnic or national origin, disability, pregnancy, religion, political affiliation, union affiliation, protected genetic information, or marital status during recruitment, hiring, or employment, including in determining wages, promotions, bonuses, and access to benefits and training.

Auditable Standards

- Workers shall be provided reasonable accommodation for religious practices.
- Workers and job applicants shall not be subjected to medical examinations or physical examinations that may be used in a discriminatory manner (including pregnancy tests). Medical examinations and testing shall only be administered where required by law or to support objective job performance requirements.

- All working people, regardless of their nationality or legal status, shall be treated fairly and equitably. Immigrants shall enjoy working conditions no less favorable than those available to nationals of the worksite host country.
- All women engaged in coffee production and auxiliary tasks (such as cooking, cleaning, and childcare), including those who are employed part time, shall be directly hired and paid by farms, and shall be paid the same rates as men who perform similar tasks.

The company shall clearly define and communicate its Discrimination and Equality policies and procedures to all personnel.

Freedom of Association and Collective Bargaining

Code Standard

Employers and labor brokers are required to respect the right of all workers to form and join unions, workers' organizations, and labor committees, among other types of organizations of their choosing, and to bargain collectively for wages and other conditions of employment.

Workers shall have the right to freely choose union leaders through secret ballot elections and employers shall not interfere in union operations or engage in discriminatory practices or retaliation against workers for participating in union activities.

Auditable Standards

- Workers shall be permitted to form and join organizations of their own choosing without prior authorization.
- Worker organizations shall be allowed to draw up their own rules and constitutions, elect their own representatives, and organize their own affairs without any employer intervention.
- Workers shall be compensated at their regular rate during the time they carry out their official duties as worker representatives.
- Workers shall not face any type of discrimination or reprisal for forming or participating in unions or for engaging in collective bargaining or strikes.
- Employers shall engage in good faith collective bargaining with unions representing workers employed on their farms.
- Workers and their representatives shall be able to communicate openly and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, retaliation, intimidation, harassment, or violence.
- The company shall clearly define and communicate to all workers its Freedom of Association policies and procedures.

Harassment and Abuse

Code Standard

The workplace shall be free from any form of cruel or inhumane treatment. Workers shall not be subjected to physical, verbal, mental, or sexual harassment or abuse. The deprivation of food, water, or sleep; transfers to dangerous or undesirable tasks; or dismissal, blacklisting, or denunciation to authorities may not be used as a threat or form of punishment against workers.

Auditable Standards

- The use or threat of physical or sexual violence, harassment, and intimidation against a worker, their family, or associates is strictly prohibited.
- Workers, managers, and labor brokers shall receive training on sexual harassment.
- Anonymous channels for reporting incidents of sexual harassment shall be established and individuals who report sexual harassment shall not be subjected to any form of reprisal. Anyone found to engage in sexual harassment shall be subjected to appropriate disciplinary measures.
- Disciplinary measures shall not include any inhumane treatment.
- Workers shall not be charged fines, including for arriving late for work beyond the value of the time missed, making errors, or loss or damage of tools or equipment.
- Deductions from workers' wages, reductions of benefits, or compulsory work may not be used as disciplinary measures.
- The employer shall clearly define and communicate its disciplinary measures and procedures to all workers.

Worker Grievances

Code Standard

The company shall ensure that there is a confidential and effective grievance mechanism to ensure that any worker can file a complaint without being subjected to any type of retaliation.

Auditable Standards

- Coffee farms should set up grievance mechanisms that are easy to use and understand and are appropriate for workers' level of literacy, language fluency, and technology access.
- Mechanisms shall be available in workers' native languages, including indigenous languages.
- The mechanism shall allow workers to confidentially report grievances to individuals other than their supervisors or labor brokers.
- The mechanism must include a procedure for management to follow-up on reported grievances that is communicated to workers, a system to remediate

issues reported, and an appeals process in the case that workers are not satisfied with the resolution.

- Workers should be encouraged to share their concerns about working conditions and health and safety at work and to report hazardous conditions to management and/or government authorities without being subjected to any form of reprisal.
- Workers who report grievances shall not be subjected to any form of penalty, dismissal, discrimination, harassment, or reprisal of any kind.

Wages and Payment

Code Standard

All workers shall be paid at least the legal minimum wage for all regular working hours, regardless of the wage system (for example, payment by piece, production, task, hour, or month).

Overtime work and work on public holidays and rest days shall be compensated at the legally established premium rate.

All workers shall be provided with all legally mandated benefits, including social insurance and leave.

Auditable Standards

- Workers who are paid by piece or task shall not be paid less than the legally established minimum wage for their work during regular working hours, regardless of production.
- All workers, including family member who help with production, shall each be paid directly for their work and may not be paid less than the minimum wage for the hours worked. All working people shall retain full and complete control over their earnings.
- Payments shall be made directly to workers in regular intervals (as established by law) and never less often than bimonthly.
- Payment of wages — in whole or in part — shall not be delayed, deferred, or withheld (including until the end of the harvest season or the end of a worker's contract).
- If a worker chooses to leave their employment at any time, the worker shall be immediately provided with all outstanding wages due to them.
- Payment in the form of vouchers, coupons, or promissory notes is prohibited.
- Workers who are paid in cash shall have access to a safe place to store their cash to which they have unrestricted access.
- Workers who are paid by direct deposit must have access to their debit cards, as well as transportation to withdraw their money. Workers paid by check shall be provided with transportation to cash their checks.
- Only deductions authorized by applicable laws shall be allowed and, if made, shall only be taken with the full consent and understanding of workers.

Information shall be provided to workers at the time of hiring about all legal deductions.

- Workers shall be provided with pay slips that itemize earnings, hours worked, and deductions. When necessary, verbal explanations of earnings and deductions shall be provided in a language workers can understand.

Hours of Work

Code Standard

The total number of hours worked per week, including overtime, shall not exceed limits set by applicable laws, and in no case shall they surpass 60 hours per week, including overtime.

All overtime work shall be voluntary, and workers who elect to work overtime shall be paid legally mandated overtime rates.

Auditable Standards

- Workers who are paid a piece rate shall never have to work in excess of legal working hours in order to earn the minimum wage.
- All overtime hours shall be paid at the legally established premium rates, regardless of whether workers are paid by piece, task, hour, or month.
- Overtime shall always be voluntary. No one shall be forced to work overtime under the threat of any penalty (such as denying the opportunity to work overtime in the future, dismissal, or reporting to the authorities). No person shall be forced to work overtime as a disciplinary measure or for not meeting production quotas.
- The imposition of penalties for failing to meet production targets shall be prohibited.
- The employer shall clearly define and communicate its working hours policies and procedures to all workers.

Health and Safety

Code Standard

The employer shall identify workplace safety and health hazards and establish procedures and controls to minimize worker exposure to hazards.

Workers shall be provided with adequate information and training on occupational health and safety in a language workers can understand, including all the identified risks to which workers are exposed in the workplace (mechanical, electrical, chemical and fire, and physical hazards) and the necessary precautions and protective measures.

Auditable Standards

- Employers that offer workers housing shall provide them with safe and hygienic housing conditions, in accordance with prevailing industry standards and legal requirements.
- Accidents and incidents shall be prevented through the identification, evaluation, and prevention of workplace hazards.
- Worker exposure to chemical, biological, and physical agents will be routinely evaluated and controlled to prevent occupational disease.
- Workers shall not be exposed to pesticides, fungicides, or herbicides categorized as “extremely hazardous” (Class Ia) or “highly hazardous” (Class Ib) by the World Health Organization (WHO), including handling or applying these agrochemicals or working in areas in which they have been applied.
- Emergency preparedness and response plans shall be established to address possible emergency situations.
- Health and safety-related information shall be clearly posted in a place that is visible and accessible to workers.
- Health and safety training shall be provided to all individuals prior to the start of work and regularly during the period of employment, including training specific to hazardous tasks assigned to workers.
- Workers shall be permitted to remove themselves from conditions that they deem hazardous without fear of reprisal.
- Suitable personal protective equipment (PPE) shall be provided to all workers free of charge, including hats, overalls, and boots.
- Workers engaged in hazardous tasks shall be provided with the following task-appropriate PPE free of charge:
 - *respiratory protection*: organic vapor respirators and/or dust masks for preparation and application of pesticides, herbicides, and other agrochemicals;
 - *hearing protection*: earplugs/earmuffs for machinery operators on coffee farms and all workers in coffee processing plants;
 - *eye and face protection*: glasses/mesh face shields (machinery operators);
 - *hand protection*: leather gloves (machinery operators on coffee farms and all workers in coffee processing plants);
 - *head protection*: hard hats (machinery operators on coffee farms and all workers in coffee processing plants and warehouses);
 - *protective clothing*: cut-resistant aprons or chainsaw chaps (if possible, for machinery operators on coffee farms); and
 - *safety footwear*: steel-toed boots (for machinery operators on coffee farms).
- Workers shall be required to use PPE when carrying out hazardous activities, including when:
 - preparing and applying agrochemicals;
 - pruning and stumping (workers who operate machetes, chainsaws, scythes, and pruning shears);
 - weeding (chemical and mechanical);

- processing (work with depulper motors and related machinery, particularly if equipment is not well-maintained and covered); and
 - working in warehouses (risks related to falling coffee sacks, working at heights, and agrochemicals)
- Workers shall not be fined or unfairly punished for failing to utilize PPE or for damaging or losing PPE.
- Appropriate first aid and subsequent medical treatment, including transport to medical facilities and coverage of medical expenses and medications, shall be provided to workers who suffer from workplace injuries or illnesses.
- Workers who have suffered workplace injuries or illnesses shall be provided with paid time off during the recovery period and shall be returned to their original job assignments upon return, or assigned to less strenuous but equally remunerated assignments if medically necessary.
- All workplace accidents, injuries, illnesses, and fatalities must be reported to appropriate authorities.

COVID-19-Specific Health and Safety Measures

- Appropriate social distancing protocols — 2 meters/6.5 feet at a minimum — shall be established in worker transport and in all locations and situations in which workers labor, eat, sleep, and congregate, including in the fields, and at weighing stations, canteens, worker accommodation, and bathrooms. If needed, work shifts should be adjusted to facilitate safe distancing while working. To the extent possible, establish shaded, well-ventilated spaces for workers to rest, eat, and congregate outdoors.
- Newly-arrived workers shall be quarantined upon arrival for a minimum of 14 days and while experiencing any COVID-19-related symptoms. During the quarantine period, workers shall be paid at least the minimum wage and allowed to freely exit the farm at any time if they would like to leave the job.
- Proper sanitation measures shall be implemented, and handwashing stations shall be provided in all common areas accessed by workers, including, but not limited to, weighing stations, canteens, worker accommodation, and bathrooms.
- Workers shall be provided with instructions on proper sanitation measures.
- Workers shall be provided with necessary PPE to protect them from infection and the spread of the virus, including face masks and gloves. Workers shall be required to wear face masks in all indoor areas and when working in proximity to one another outdoors (within 2 meters).
- Proper monitoring measures shall be established for all workers (including of temperatures and symptoms). Free COVID-19 diagnostic testing shall be made available for workers who believe that they may have the virus.
- Workers who contract the coronavirus while on the farm shall be provided with free medical care, paid medical leave, and any other benefits associated with occupational illnesses and diseases.

Living Conditions

Code Standards

Employer-provided or arranged worker accommodation, and food storage, preparation, and dining areas, shall be clean, safe, hygienic, and in compliance with applicable country and international standards.

If provided by the employer, worker housing shall be provided with freely accessible potable water, hygienic washing and toilet facilities, adequate light, heat and ventilation, and food storage and preparation facilities.

Worker housing shall have adequate emergency exits, alarms, and fire suppression equipment.

Workers shall be provided with adequate personal space and privacy, and individual lockable compartments for storing personal items and valuables.

Auditable Standards

- In the event that employers provide workers with food as a benefit of employment or in accordance with local law, it must include an adequate amount of balanced food that meets their nutritional needs.
- Each individual (including workers and their family members) shall be provided with at least 1.5 square meters of personal space.
- Each worker shall be provided with their own bed. Beds shall not be assigned by shift.
- Workers housed by their employers shall have access to toilets, showers, and kitchens equipped with running water and safe and hygienic conditions.
- Workers shall not be charged for housing in violation of local laws or in excess of local equivalent rentals.
- Employers shall proactively identify and address risks to workers' health and safety in housing units, including through maintenance, evacuation drills, and provision of fire alarms, fire extinguishers, and first aid kits.

Staff Training and Awareness

Workers shall be made aware of their rights and responsibilities at the time of hiring, as well as the terms and conditions of their employment contract, the provisions of the code of conduct, and all applicable laws and regulations.

Workers must receive trainings on company rules and procedures upon arrival at the worksite, as well as on complaint and grievance mechanisms, living arrangements (if provided or provided by the company), and working conditions, including

occupational hazards and necessary preventive measures to guarantee worker safety.

Next Steps

If you have not done so already, stakeholder engagement is an essential process in developing a code of conduct (see *Guidance on stakeholder engagement*). These provisions should also be embedded in your contracts and in any social responsibility agreements with your suppliers and labor brokers (see *Sample social responsibility agreements*). It is essential that the standards contained in your code of conduct be communicated to all actors in company supply chains, from traders to farms, to service providers and labor brokers (see *Guidance on communicating objectives and standards across the supply chain*). Once your suppliers are aware of the standards, and preferably trained on how to comply with your requirements, you may monitor compliance with the standards using the *Guidelines on monitoring for certifiers and monitors* and *Self-assessment questionnaires for coffee traders, producers, and labor brokers*, and the *Management systems framework for preventing and remediating labor risks* tool could improve these efforts by generating operation structures that support the company's business performance with sound ethical sourcing practices. Finally, you may also report on how you and your suppliers are working to ensure compliance with these standards using the *Guide on public reporting for private sector stakeholders*.