



# **Guidelines: Apparel Industry Response to Violence and Harassment in the Workplace**

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Addressing Gender Based Violence and Harassment in  
Textile, Clothing and Footwear Manufacturing Industry

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# Abbreviations

<b>BFC</b>	Better Factories Cambodia
<b>CARE</b>	Cooperative for Assistance and Relief Everywhere
<b>GBV</b>	Gender-Based Violence
<b>GBVH</b>	Gender-Based Violence and Harassment
<b>ILO</b>	International Labour Organization
<b>KPIs</b>	Key Performance Indicators
<b>LGBTQI+</b>	Lesbian, Gay, Bisexual, Transgender, Queer and Intersex
<b>UN</b>	United Nation
<b>ILO</b>	International Labour Organization
<b>#Metoo movement</b>	A social movement started in 2017 to encourage victims of sexual abuse and sexual harassment to speak out against their aggressors.
<b>SDGs</b>	Sustainable Development Goals
<b>SOPs</b>	Standard Operating Procedure
<b>UN</b>	United Nation

# Acknowledgement

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# Introduction

Preventing gender-based violence and harassment (GBVH) in the World of Work has never been of greater importance. The United Nations (UN) Guiding Principles on Business and Human Rights and the adoption of the Violence and Harassment Convention 2019 (No. 190) by the International Labour Organization (ILO) are part of global efforts to address this issue. Businesses are challenged to do more by global social movements such as the #Metoo movement, which has thrown a light into sexual harassment within industries globally. Legislative efforts to address modern slavery in supply chains are now in force in the United Kingdom and Australia, further focusing business attention. Across supply chains, companies are grappling with questions on how to respond effectively across their operations. The apparel industry is no different.

Effective responses are critical. The impact of violence and harassment on individual health and well-being is significant, - for those experiencing it

and those witnessing it. Violence and harassment have serious business implications, with impacts on productivity, employee turnover and absenteeism, business and industry reputation and has the potential to result in financial loss through legal actions. There are clear incentives for addressing this issue in the world of work.

Yet, across the supply chain, there is a lack of cohesion or agreement on response. There is limited mutual agreement and/or understanding regarding good approaches, there are different expectations from different businesses and brands across the supply chain, and there is minimal understanding of the impact of buying practices on downstream suppliers. Effectively addressing gender-based violence and harassment needs time, resources, and expertise within individual businesses. There is a need for guidance and collaboration on approaches and systems to effectively address GBVH in the apparel supply chain.

# 1.1 Intended audience

These model guidelines to address GBVH in the apparel supply chain were developed by CARE International and Better Work in response to the needs of the apparel industry for expert support in preventing and responding to GBVH. The guidelines enable industry-wide action in addressing GBVH across the apparel and footwear supply chain and ensure that stakeholders align and standardize a clear transparent approach to preventing and responding to GBVH.

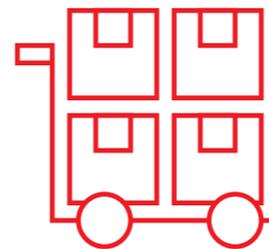
They are designed to be used in internal and external operations by key businesses to address practices in-house and external relationships across the supply chain.

These are designed for use by stakeholders including but not limited

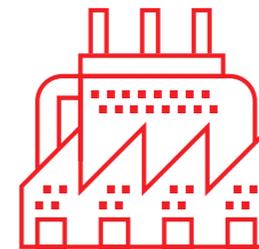
to buyers, vendors (including manufacturing groups), agents, suppliers (including sub-contractors) and licensees. Recognizing the complex relationships and diverse set of actors in the supply chain, CARE International and Better Work advise companies to adapt the set of guidelines as needed and apply the core principles.

These guidelines should be seen as part of business obligations to respect human rights and to mitigate risks of GBVH, in line with the UN Guiding Principles on Business and Human Rights. In addition, these guidelines support businesses in enhancing gender equality outcomes as per the Sustainable Development Goals (SDGs), which place the responsibility on all actors to ensure that gender equality (SDG 5) and decent work (SDG 8) are achieved.

## Internal and external operations by key businesses



Suppliers including sub contractors



Vendors including manufacturing groups



Licensees



Agents



Buyers

# 1.2 Definitions and Scope

A crucial pre-condition for addressing GBVH is a clear understanding of what gender-based violence and harassment in the world of work means. This section provides definitions to guide businesses in the apparel supply chain in identifying, preventing, and responding to GBVH. It also covers scope of application for the world of work to ensure businesses are aware of their responsibilities.

## Organisational Leadership

### Violence and Harassment

The ILO Convention on Violence and Harassment (C190) provides the following definitions:

- i. “Violence and harassment” in the world of work refers to a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual, or economic harm, and includes gender-based violence and harassment.
- ii. “Gender-based violence and harassment” is violence and harassment that is directed at persons because of their sex or gender or affecting persons of a particular sex or gender disproportionately and includes sexual harassment.

GBVH is inclusive of any act that is perpetrated against a person’s will and is based on gender norms and unequal power relationships. It encompasses threats of violence and coercion. It can be physical, emotional, psychological, or sexual in nature, and can take the form of a denial of resources or access to services. It inflicts harm on all people.

GBVH is grounded in sexist and homophobic attitudes and behaviors, which are reinforced by gender inequality in society, including unequal gender norms and discrimination against women, and most commonly impacts women and members of lesbian, gay, bisexual, transgender, queer and intersex (LGBTQI+) communities.

Individuals may experience GBVH from a co-worker, supervisor, employer, or their intimate partner.

Examples include:

- Gender-based harassment
- Sexual harassment
- Gender-based violence (GBV)
- Domestic violence

### Definition of Sexual Harassment

“Sexual harassment” is a form of sex discrimination that encompasses a wide range of physical, verbal, and non-verbal behaviours and practices of a sexual nature including displays of pictures objectifying individuals, disparaging remarks about individuals based on their gender or sex, jokes, unwanted sexual advances, comments, physical contact, or sexual assault.

Anyone can be a target or perpetrator of sexual harassment, regardless of their gender or sexual orientation or ability but most sexual harassment is perpetrated by men against women. Sexual harassment can also occur between people of the same gender. Sexual harassment is a manifestation of power relationships and often occurs in unequal relationships in the workplace, including between women and men.

While in some cases individuals may make sexual comments or personal advances without intending harm or not thinking it is harassment, such action can be unwanted, unwelcome, and uninvited and make a

person feel humiliated, intimidated or offended and constitute harassment. The intention of the person engaging in the behaviour does not prevent it from being sexual harassment.

Sexual harassment in the workplace can be categorized in two ways: **quid pro quo** or **hostile working environment**:

- **Quid pro quo sexual harassment** occurs when a worker is asked for a sexual favour, whereby, a worker’s decision to submit to or reject the request is the basis for a decision about a worker’s job or to provide a job benefit, including but not limited to pay rises, promotions, or continued employment.
- **Hostile work environment** consists of any conduct that create an intimidating, hostile, or humiliating work environment covering a range of behaviour including sex-based comments, disparaging remarks about the sex or gender of the victim, innuendos, and sexually suggestive or explicit materials.

While a single incident constitutes sexual harassment, oftentimes, sexual harassment involves repeated behaviours.

### Scope of application

Gender based violence and harassment in the world of work covers situations occurring

in the course of, and/or arising out of, and linked with work including but not limited to:

- Physical workspace
- Places where workers are paid, take rest breaks and meals
- Commute to and from work
- Work-related events, social activities, travel, and training
- Interactions with clients, contractors, service, and trade staff
- Communications through information and communication technologies, and,
- Employer-provided accommodations.

Under these guidelines, workers include employees defined by national law and practice, persons working irrespective of their contractual status (i.e. part-time workers, workers who have terminated their contracts), trainees, and job applicants. It includes security guards, canteen employees, third parties that work in and around business sites. Employers are also included as potential targets of GBVH. These guidelines also focus on non-employees such as contractors, clients, or individuals who may be present in the workplace and may be a target or a perpetrator of GBVH.

# 2

# Principles

There are seven core principles that should be applied in implementing these guidelines and all responses to GBVH. These principles are designed to ensure that any engagement with victims, survivors, or complainants of gender-based violence and harassment will:



**1. Maintain Confidentiality** - the identity and identifying information will be kept confidential and private unless otherwise voluntarily agreed;



**2. Ensure Consent** - the individual's informed consent is voluntarily obtained before any action is taken and can be withdrawn at any time without negative repercussions



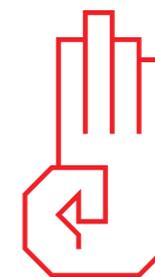
**3. Do no harm** - take appropriate measures to secure immediate safety and refrain from actions which may result in future harm including in training and communications;



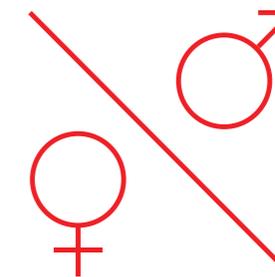
**4. Adopt a victim and survivor-centred approach** - recognizing that the rights, needs and wishes of victims, survivors, or complainants are to be placed at the centre of action and for these individuals or groups to be treated with dignity and respect;



**5. Ensure equal treatment** - refraining from discriminating on the basis of gender, sexual orientation or sexual identity, age, ethnicity, ability, migrant status, contractual status, marital status, education status, literacy or language status, or other characteristic



**6. Advance policy and future interventions** - drawing from the findings and lessons from cases of GBVH to raise awareness and to inform future preventive and response measures; and,



**7. Work towards gender equality and inclusion** - in addition to undertaking practical measures to prevent and respond to GBVH, measures will contribute to an environment of gender equality and inclusion for all.



3

# Guidelines

The guidelines recognise that prevention and response to violence is the **obligation of all businesses** across the supply chain, both in their internal practices and externally in their dealings with other parts of the supply chain. The guidelines and accompanying guidance are intended to support internal and external responses to prevent and respond to GBVH.

The guidelines draw from global evidence of what works to prevent and respond to GBVH and cover five aspects of the workplace. Each guideline is broken down into these five essential areas for action to prevent and respond to GBVH throughout the supply chain:



Figure 1: Workplace aspects in preventing and responding to GBVH

- **Organisational Leadership** - Commit to the prevention of and response to GBVH as a leadership priority, be accountable to the commitment and monitor action.
- **Workplace Policies** - Protect employees and workers throughout the supply chain with supportive policies, which seek to prevent GBVH and provide effective remedy.
- **Workplace Systems** - Protect and be accountable to employees and workers throughout the supply chain through workplace systems, which are accessible, effective, and gender sensitive in preventing and responding to GBVH.
- **Workplace Norms and Practices** - Drive culture change in the world of work and across the supply chain to address and change norms, practices and systems that contribute to GBVH.
- **Workplace Training** - Deliver targeted training support and capacity-building to encourage early intervention and prevention in workplaces and the supply chain, and addresses the root causes of gender inequality and GBVH.

This document contains five guidelines related to the following areas in the apparel supply chain.

1. Human Resource Management
2. Procurement, Purchasing, and Sourcing
3. Supply Chain Management
4. Client and Customer Management
5. Subsidiary Management

Guideline	Function
<b>1. Human Resource Management</b>	This guideline relates to the internal human resource management of any business within the apparel supply chain. It is designed to be used by organisations to check human resource systems, procedures, and support for preventing and responding to GBVH.
<b>2. Procurement, Buyers and Purchasing</b>	This guideline relates to the procurement, purchasing, and sourcing practices of a company in the apparel supply chain. It recognises that these practices can have downstream impacts on suppliers and the workplace environment including the prevalence of GBVH, and there is a responsibility for upstream businesses to consider these impacts of their procurement, purchasing, and sourcing practices.
<b>3. Supply Chain Management</b>	This guideline relates to the supply chain management practices used to engage the conduct of downstream businesses including but not limited to vendors, suppliers/factories and sub-contractors. The guideline goes beyond statements of principles to provide operational guidance on how to undertake supply chain management that effectively supports prevention of and response to GBVH. It refers to internal and external policy and practice within brands and agents. It includes requirements to monitor the implementation of SOP 1 by suppliers and subcontractors.

#### 4. Client and Customer Management

This guideline is primarily designed to be used by organisations in managing clients or customers whose engagement may have an impact on operations. This may include factories or vendors managing brand clients as well as licensor and licensee relations. It is included to demonstrate the mutual responsibility of businesses in the supply chain in efforts to prevent and respond to GBVH.

#### 5. Subsidiary Management

This guideline is designed to support companies with subsidiary sites which are geographically dispersed. This includes factories with multiple locations as well as vendors with subsidiary operations. The SOP is designed to ensure harmonisation between head office and local sites and ensure that the obligations of the entity are equally understood and met at all locations.

These guidelines are supported by , which provide more detail for businesses in the supply chain on how to implement the guidelines.

1. Policy Implementation Guide
2. Grievance Mechanisms Implementation Guide
3. Referral Implementation Guide
4. Measurement Implementation Guide
5. Risk Assessment Implementation Guide
6. Responding to Disclosures Implementation Guide

#### 7. Training Implementation Guide

#### 8. Zero Tolerance Implementation Guide

##### *Prevention and Response a continuum*

In preventing and responding to gender-based violence and harassment in the apparel industry, it is important to understand that most measures can have both a protective and responsive result regarding GBVH. For example, while a policy seeks to outline workplace responses to GBVH, the existence of the policy can be preventative in its deterring effect on would-be perpetrators.

The guidelines recognise that GBVH takes place within a broader context of gender inequality. All actors in the world of work can address gender inequality in many ways. These guidelines are designed to address the specific issue of GBVH in the world of work, which is recognised as a form of discrimination in that individuals, predominantly women, are targeted because of their sex or gender.





4

# Implementing Guidelines across the Supply Chain

The obligation and responsibility to address GBVH is held by each stakeholder in the apparel supply chain in relation to their own operations as well as the operations of their business partners. The recommendations provided here apply to all actors in the supply chain. These guidelines recognise that manufacturing supply chains are complex, for these guidelines to be developed CARE and Better Work have made assumptions about the supply chain model in operation (Figure 2).

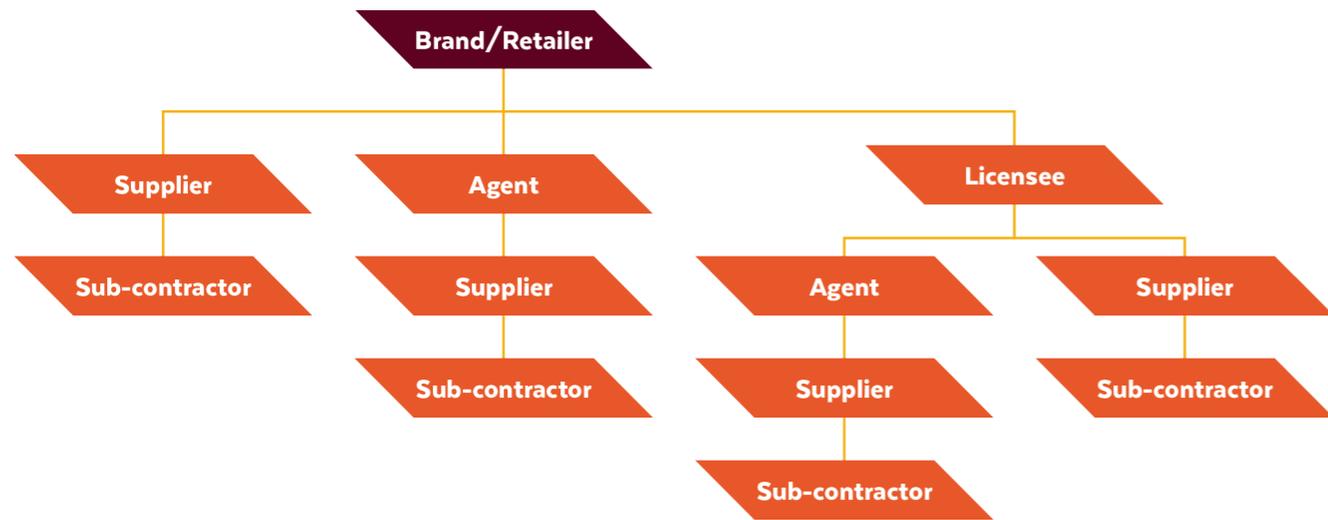


Figure 2: Representation of the apparel supply chain. Source: Better Work





# Using and implementing the Guidelines

The guidelines are designed to be implemented by all businesses in the apparel supply chain to effectively prevent and respond to gender-based violence and harassment. Implementation of the guidelines is likely to require an organisational action plan, which considers how internal systems need to be reviewed, adapted, and improved. A sample template to support an implementation plan is provided in Annex 1. Governments, unions, and civil society can use these guidelines to guide engagement with actors in the supply chain about standards and expectations for workplace responses to GBVH.

## Guideline 1: Human Resource Management

Guideline 1: This guideline relates to the internal human resource management of any business within the apparel supply chain. It is designed to be used by organisations to check human resource systems, procedures, and support for preventing and responding to GBVH.

### Organisational Leadership

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|-----|---|
| 1.1 | Senior leadership are accountable for performance against key performance indicators (KPIs) for prevention and remediation of GBVH.   |
| 1.2 | Senior leadership are vocal and visible in preventing and responding to GBVH through: <ul style="list-style-type: none"><li>· Making a formal commitment to action in the workplace;</li><li>· Launching, resourcing, and supporting GBVH policies, procedures, training, and awareness campaigns; and,</li><li>· ‘Walking the talk’ by modelling positive bystander action within the workplace.</li></ul> |
| 1.3 | Senior leadership has GBVH prevention and response as a standing agenda item (workplace policies, reports received informally and formally, training and culture change initiatives).   |
| 1.4 | Results of risk assessments (see SOP 1, 3.7) are acted upon by senior leaders, including having responses resourced and visible and vocal leadership engagement on responses and mitigation measures.   |

### Workplace Policies

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| 2.1 | A workplace GBVH policy, aligned with international labour standards, local law, and/or code of conduct, is in operation and is regularly socialised within the workplace. Refer Policy Implementation Guide for more detail. |
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| 2.2 | Workplace GBVH policy is linked to other policies, particularly, human resource policies, occupational health and safety, social dialogue, and workplace discrimination so that these policies reinforce one another. |
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### Workplace Systems

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|-----|---|
| 3.1 | The workplace has accessible, effective, fair, gender-responsive, and safe operational-level grievance mechanisms to remediate cases of GBVH (refer to the <b>Implementation Guide on Grievance Systems</b> ).  |
| 3.2 | A representative committee or taskforce, with clearly defined roles and responsibilities, oversees the workplace commitment to preventing and responding to GBVH, and reports to senior leadership on the commitment (refer SOP 1.2).   |
| 3.3 | All complainants, victims, witnesses, and whistle-blowers are protected against victimisation or retaliation for reporting incidents of GBVH and receive access to support, services and, where appropriate, remedy following reporting (refer to the <b>Referral Implementation Guide</b> ). |
| 3.4 | Human resources systems incorporate GBVH into recruitment, retention, promotion, appraisal and exit processes. Tracking of case data occurs and the data collected is reviewed on a periodic basis to identify areas of improvement (refer to the <b>Measurement Implementation Guide</b> ).  |
| 3.5 | Risk assessments and due diligence processes incorporate GBVH and appropriate response and mitigation strategies are identified and implemented. Also refer to SOP1, 1.4 and the <b>Risk Assessment Implementation Guide</b> .  |
| 3.6 | Perpetrators of GBVH are held accountable through counselling, sanctions, and/or legal action to prevent reoccurrence of behaviours.  |
| 3.7 | Social dialogue systems are maintained with workers and their representatives on the effectiveness of measures (policy, systems, and training etc.) to prevent and respond to GBVH  |

## Workplace Norms and Practices

- 4.1** Regular communication in the workplace ensures awareness of:
- A commitment to gender equal, inclusive, respectful, and safe workplaces;
  - Policy and complaints mechanism;
  - Roles and responsibilities in preventing and responding to GBVH; and,
  - Updates on changes to policy.
- 4.2** Workplace training and communications highlight the role cultural, social, and workplace norms on gender play in perpetuating GBVH and promote positive norms including bystander intervention (see the **Training Implementation Guide**).
- 4.3** Monitoring of perceptions of workplace norms occurs (see **Measurement Implementation Guide**).
- 4.4** Workplace incentives, management structures and leadership styles are aligned and designed to reduce GBVH.
- 4.5** Social dialogue practices across the workplace, including with civil society and unions, encourage reporting of risks and incidents as well as accountability to commitments.

## Workplace Training

- 5.1** Committee members and responsible staff in handling complaints are appropriately trained on gender equality and inclusion and in receiving, responding to, and investigating complaints (refer to **Responding to Disclosure Implementation Guide**).
- 5.2** High quality gender equality, inclusion and GBVH prevention training to all employees and contractors is undertaken and monitored, and records kept of attendance and changes in knowledge and understanding (refer to **Training Implementation Guide**).

## Guideline 2: Procurement, Purchasing, & Sourcing

### Guideline 2 Procurement, Purchasing, & Sourcing:

This guideline relates to the procurement, purchasing, and sourcing practices of a company in the apparel supply chain. It recognises that these practices can have downstream impacts on suppliers and the workplace environment including the prevalence of GBVH, and there is a responsibility for upstream businesses to consider these impacts of their procurement, purchasing, and sourcing practices.

### Organisational Leadership

- 1.1** Senior leaders publically launch and support procurement, purchasing, and sourcing policies, which promote gender equality and inclusion, and minimise and manage GBVH risks in the supply chain.
- 1.2** Results of risk assessments on the supply chain (see SOP 2, 3.4) are acted upon by senior leaders, with mitigation and management measures adequately resourced and given high profile.
- 1.3** There is visible and high-level accountability for procurement practices and their impact on GBVH in the supply chain.

### Workplace Policies

- 2.1** Sustainable procurement and purchasing policies are in place and contain specific requirements regarding practices linked to GBVH prevalence in the supply chain including but not limited to: lead times; policies for alterations to designs; pressures to reduce costs; and procurement, purchasing, and sourcing standards.
- 2.2** Contracts with suppliers stipulate requirements to meet standards on GBVH such as SOP 1.

**2.3** Policy requirements for suppliers' link with GBVH requirements including a commitment to gender equality and inclusion, grievance mechanisms, occupational health and safety, risk management, and social dialogue and freedom of association.

#### Workplace Systems

**3.1** Monthly internal monitoring of deviations from and/or adherence to procurement, purchasing, and sourcing policies through self-reporting.

**3.2** Internal incentive structures reinforce procurement and purchasing policy objectives (refer SOP 2, 2.1). Internal incentive structures discourage shifts away from policy changes and decisions that increase risks of GBVH in the supply chain.

**3.3** Grievance/complaint mechanisms are made available to report purchasing practices that are not in line with sustainable procurement, purchasing, and sourcing policies.

**3.4** Risk assessment is conducted of supply chain in procurement decisions and their effect on prevalence of GBVH throughout the supply chain.

#### Workplace Norms and Practices

**4.1** Employees receive communication about responsible purchasing and sourcing practices, their business case, and the role they play in gender equality outcomes downstream in the supply chain.

**4.2** Norms and practices, in relation to procurement, purchasing, and sourcing practices, are monitored through agent, supplier, and vendor surveys, which provide feedback on buyer performance.

#### Workplace Training

**5.1** Staff with procurement, purchasing, and sourcing responsibilities are trained in the supply chain impacts of practices including impacts on gender equality and GBVH risks. Training is supported by communications materials to keep these considerations centred in sourcing decisions.

## Guideline 3: Supply Chain Management

Guideline 3 Supply Chain Management: This guideline relates to the supply chain management practices used to engage the conduct of downstream businesses including but not limited to vendors, suppliers/factories and sub-contractors. The guideline goes beyond statements of principles to provide operational guidance on how to undertake supply chain management that effectively supports prevention of and response to GBVH. It refers to internal and external policy and practice within brands and agents. It includes requirements to monitor the implementation of SOP 1 by suppliers and subcontractors.

#### Organisational Leadership

**1.1** Senior leaders publically launch and support supply chain management practices that support the promotion of gender equality and inclusion as well as the prevention, reduction, and response to GBVH.

**1.2** There is visible and high-level accountability for supply chain management practices.

#### Workplace Policies

**2.1** Supply chain management policies in relation to GBVH prioritise supplier development and remediation in implementation of SOP 1 and institutionalise GBVH in risk management practices.

**2.2** Policies contain clear guidance for suppliers that covers the standards set out in SOP and:

- Definitions of GBVH including sexual harassment;
- Expectations of suppliers in relation to GBVH prevention and response;
- Agent, brand, and/or licensor response to cases of GBVH being identified;
- Access to remedy for complaints received; and,
- Supplier incentives and penalties for adherence/non-adherence to the expectations.

2.3	Supply chain management policies cover the responsibilities of staff in relation to receiving and responding to complaints including self-care for staff who may directly receive complaints and have a clear approach for addressing worker vulnerability, particularly risks based on their gender and other identities, when making a complaint (e.g., fear of job loss, physical safety, retaliation, and victimisation).
2.4	Where supply chain managers receive complaints directly, these are addressed in partnership with suppliers, workers and their representatives, including through social dialogue to create stronger capacity of suppliers to deal with complaints.
2.5	Zero tolerance policies focus on inaction in response to complaints rather than presence of GBVH to encourage suppliers to act and encourage victims and survivors to report ( <b>Refer to Zero Tolerance Implementation Guide</b> ).
<b>Workplace Systems</b>	
3.1	Monitoring system exists with suppliers in the supply chain for tracking cases, their responses and remediation outcomes.
3.2	Incentives towards suppliers are structured to support policy adherence. As a result, prevention and response to GBVH is incentivised. Policies and systems avoid creating adverse incentive systems that punish suppliers for transparency about GBVH cases (refer SOP 3, 2.5).
<b>Workplace Norms and Practices</b>	
4.1	All employees share a common understanding of policies on GBVH and supply chain management.
4.2	Norms and practices of brand/vendor supply chain management teams are monitored through vendor and supplier surveys.
4.3	Agents, suppliers, and/or vendors receive communication about supply chain management policies and are sensitised on the avenues for complaints.

4.4

Agents, suppliers, and/or vendors are actively supported to adopt best practices in prevention and remediation of GBVH:

- Communicating clearly in an accessible way;
- Guiding suppliers in developing and strengthening workplace policies, grievance mechanisms, and referral systems through capacity-building and coaching (refer SOP 1);
- Promoting gender equality and inclusion; and,
- Promoting an open reporting culture along the supply chain by avoiding the penalization of suppliers for sharing the number of incidents of GBVH and rewarding effective and gender-responsive remediation of cases (refer **Zero Tolerance Implementation Guide**)

#### Workplace Training

5.1

Staff with supply chain responsibilities are trained on gender equality and inclusion and in GBVH prevention and remediation. This training includes gender norms, power relations, what GBVH is, how to identify it, how to work with suppliers to prevent and respond to GBVH, responding to disclosures and working with victims and survivors, and self-care strategies.

## Guideline 4: Client and Customer Management

Guideline 4 Client/Customer Management: This guideline is primarily designed to be used by organisations in managing clients or customers whose engagement may have an impact on operations. This may include factories or vendors managing brand clients as well as licensor and licensee relations. It is included to demonstrate the mutual responsibility of businesses in the supply chain in efforts to prevent and respond to GBVH.

### Organisational Leadership

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| 1.1 | Share with (existing and potential) clients/customers organisation's commitment to gender equality and preventing and responding to GBVH including sharing objectives and policies, procurement, and supply chain management approaches as relevant. |
| 1.2 | Leadership prioritises clients who share values on gender equality and inclusion.  |
| 1.3 | Leadership seek to prevent GBVH and respond to GBVH, which is perpetrated by clients and/or customers in the world of work.  |

### Workplace Policies

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| 2.1 | Suppliers communicate expectations for supply chain management with clients to ensure that they adhere to practices that support the prevention of and response to GBVH (as outlined in SOP 1). |
| 2.2 | Clients are expected to support workplace policies in relation to procurement, purchasing, and sourcing practices (SOP 2) and supply chain management (SOP 3).                                  |

### Workplace Systems

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| 3.1 | Contracts are modelled around procurement, purchasing, and sourcing standards that support implementation of GBVH policies and systems and the promotion of gender equality and inclusion. |
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| 3.2 | Clients are informed and aware of workplace policies and processes related to GBVH and agree to adhere to them in any investigation of behaviour that may breach these policies. |
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### Workplace Norms and Practices

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| 4.1 | Contracting processes enable customers, such as suppliers to raise concerns with their clients around procurement, purchasing, and sourcing practices that impact the ability to meet GBVH standards (see SOP 2, 2.1). |
| 4.2 | Influence and engage clients on gender equality and inclusion and the preventive measures on GBVH through sharing best practices and promoting the adoption of SOP standards.  |

### Workplace Training

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| 5.1 | Staff are trained in negotiating on contracts regarding procurement, purchasing, and sourcing practices to better support policies that promote gender equality and proactively prevents and responds to GBVH. |
| 5.2 | Staff are made aware of clients/customers obligations to gender equality and inclusion, GBVH policy, and supported to report GBVH conduct by clients/customers that breaches these policies.                   |

## Guideline 5: Subsidiary Management

Guideline 5 Subsidiary Management: This guideline is designed to support companies with subsidiary sites which are geographically dispersed. This includes factories with multiple locations as well as vendors with subsidiary operations. The guideline is designed to ensure harmonisation between head office and local sites and ensure that the obligations of the entity are equally understood and met at all locations.

### Organisational Leadership

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| 1.1 | Senior leaders, and other managers, publically promote gender equality and inclusion and launch and support GBVH prevention, procurement and purchasing policies, which minimise/reduce/do no harm to head office and all subsidiary operations. |
| 1.2 | Senior leadership has initiatives on gender equality and inclusion, and GBVH prevention and response across individual sites as a standing agenda item.  |
| 1.3 | GBVH complaints and resolution across SOPS 1-3 for individual sites and across all operations is a standing agenda item for senior leadership and management meetings at head office and subsidiary level.                                       |

### Workplace Policies

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| 2.1 | Policies developed at head office (in accordance with SOP 1) are devolved and implemented in each subsidiary operation by local management teams.  |
| 2.2 | Zero tolerance policies focus on inaction in response to complaints rather than presence of GBVH to encourage sites to act and encourage victims and survivors to report (Refer to <b>Zero Tolerance Implementation Guide</b> ). |

### Workplace Systems

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| 3.1 | Implementation of policies on GBVH are monitored through reporting from subsidiary to head office on a regular basis and include middle and senior managers. |
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| 3.2 | Individual subsidiary sites are incentivised to support policy adherence including through ensuring on-site as well as group/HQ level grievance channels.  |
| 3.3 | Data on GBVH complaints, and their resolution, are maintained across sites, with oversight by local management, and verified by head office through leadership and management meetings (Refer SOP 5, 1.2). |

### Workplace Norms and Practices

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| 4.1 | Head office communications to workers in all sites are shared regularly and in a timely fashion. Communication to workers about GBVH is provided by head office and individual subsidiary sites. |
| 4.2 | Communication to employees at subsidiary sites about GBVH is provided by head office and individual subsidiary sites.  |
| 4.3 | Communications to suppliers and vendors about the policy occurs at subsidiary sites with grievance/complaints mechanisms made available.   |

### Workplace Training

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| 5.1 | A harmonised workplace training program on gender equality and inclusion and the prevention and response to GBVH is developed and implemented at all sites such that training obligations (SOP 5, 5.2) are met.                      |
| 5.2 | Staff with relevant responsibilities in all subsidiary sites are trained in accordance with the relevant SOPs on GBVH, procurement and purchasing and supply chain management, survivor centred approaches and self-care strategies. |

Guideline	Theme	Action Ref # (from SOP)	Target/Objective/ Goal	Deadline		Actions to deliver	Lead/Responsible
<b>Human Resource Management</b>	Organisational Leadership				<b>Human Resource Management</b>	Organisational Leadership	
	Workplace Policies					Workplace Policies	
	Workplace Systems					Workplace Systems	
	Workplace Norms and Practices					Workplace Norms and Practices	
	Workplace Training					Workplace Training	
<b>Procurement, Buyers and Purchasing</b>	Organisational Leadership				<b>Procurement, Buyers and Purchasing</b>	Organisational Leadership	
	Workplace Policies					Workplace Policies	
	Workplace Systems					Workplace Systems	
	Workplace Norms and Practices					Workplace Norms and Practices	
	Workplace Training					Workplace Training	
<b>Supply Chain Management</b>	Organisational Leadership				<b>Supply Chain Management</b>	Organisational Leadership	
	Workplace Policies					Workplace Policies	
	Workplace Systems					Workplace Systems	
	Workplace Norms and Practices					Workplace Norms and Practices	
	Workplace Training					Workplace Training	

Guideline	Theme	Action Ref # (from SOP)	Target/Objective/ Goal	Deadline		Actions to deliver	Lead/Responsible
<b>Client and Customer Management</b>	Organisational Leadership				<b>Client and Customer Management</b>	Organisational Leadership	
	Workplace Policies					Workplace Policies	
	Workplace Systems					Workplace Systems	
	Workplace Norms and Practices					Workplace Norms and Practices	
	Workplace Training					Workplace Training	
<b>Subsidiary Management</b>	Organisational Leadership				<b>Subsidiary Management</b>	Organisational Leadership	
	Workplace Policies					Workplace Policies	
	Workplace Systems					Workplace Systems	
	Workplace Norms and Practices					Workplace Norms and Practices	
	Workplace Training					Workplace Training	