Agenda Day 2

09.30 am	**Social Module: key requirements and expectations**
11.30 am	*Break*
11.50 am	Social Module continues
12.30 pm	*Lunch*
2.00 pm	Governance Module: key requirements and expectations
3.30 pm	*Break*
3.50 pm	Governance Module continues
5.00 pm	*End Day 2*

Social Module

1. Permits & Licenses
2. Age of Workers
3. Compulsory Labour
4. Discrimination
5. Corporate Social Responsibility
6. Staff Development & Representation
7. Wages & Benefits
8. Worker Health & Safety
9. Working Hours

9 sections covering:

Social compliance and wages, health & safety and benefits

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SM1. Permits and Licenses

- **The SLF Audit Standard examines the operating permits of all three ESG pillars**

- **The social licenses and permits involve worker / facility permits – shifts permitted, number of employees allowed, etc**

SM2. Age of Workers

- ILO Conventions
- No child labour.
- For young workers, how do you protect them?

- If there is child labour a remidation policy must be enacted within 6 months so that the child can go to school. The company pays the family what the child would earn.

HR Management System

Verification of age must be demonstrated

ID – Passport – Birth Certificate

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SM3. Compulsory Labour

HR Management System

Policy / Procedure

Interviews and visual audit

- ILO Conventions
- No compulsory / slave labour.
- Freedom of movement
- No endebtedness / payment through work
- No retaining of passports or legal documents.

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SM4. Discrimination

- ILO Conventions
- No discrimination:
  - Race
  - Age
  - Sex
  - Marital Status
  - Religion
  - Gender
  - Disability
  - Ethnicity
  - Class / social standing

HR Management System

Policy / Procedure

Interviews /Evidence of diversity

Interviews

- Interviews are conducted with workers selected at random

- Usual ratio is approx. 1 for every 10 employees

- If a large facility, then group interview sessions will be conducted

- If 50 or less, then individual sessions are held

- Interviews are confidential but any patterns of response or concerns will be flagged within the report.

SM5. Corporate Social Responsibility

- A register of how a facility interacts with the people and local communities is analysed – aspects

- The aspects are then evaluated to see if they positively or negatively impact those communities

- Also known as a risk assessment

SM5. Systems and Analysis

The information obtained from a social impacts and aspects register is translated into a social master plan:

- Scope
- Policy
- Objectives
- Procedures to meet those Objectives
- Monitoring
- Review
- Continuous Improvement

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FSS5.1
Date: 12.07.21

1. Scope

1.1   The SLF *Corporate Social Responsibility Standard and Benchmark* specifies the definitions of corporate social responsibility and looks at key areas including social aspects and impacts, health and wellbeing of personnel, community social projects, systems to support social responsibility monitoring and improvement.

1.2   Providing a working environment that promotes decent work, growth and development is an integral part of operating a responsible business.

1.3   The SLF *Corporate Social Responsibility Standard and Benchmark* is intended to ensure that SLF certified facilities are aware of their social responsibilities and are actively working to improve the social impact of their operations.

2. Normative references

2.1   The following references are useful in the understanding of this document and are provided for further guidance. In the case of dispute these references will form the core of the evidence in support of the Standard and Benchmarks used here:

ILO Corporate Social Responsibility: an overview of principles and practices, 2004[1]

UN Global Compact: Social Sustainability[2]

UN Guiding Principles on Business and Human Rights[3]

3. Terms and definitions

SM5. PDCA Model

Plan

- Establish environmental objectives and processes necessary to deliver results in line with the Aspects and Impacts (risk assessment)

Do

- Implement the processes outlined in the plan
- Allocate adequate resources and manpower

Check

- Monitor and measure the results of the processes against the plan
- Include commitments, objectives, operating criteria
- Report the results

Act

- Take action according to the results in order to continually improve
- Re-evaluate the plan and continue the cycle

Break

20 minutes

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5.00 pm	*End Day 2*

Exercise

What do you consider to be the priority social risks in your facility?

What do you consider to be:
    1. the easy to implement changes that could have immediate benefits?
    2. the medium-term changes that require a little time to implement?
    3. the long-term changes that require strategic planning?

SM6. Staff Representation and Development

- All workers are entitled to some form of representation and freedom of association, i.e. union, worker committee, collective bargaining

- All employees are entitled to proper training and development opportunities to enable them to do their job successful

- All employees should be able to make a complaint or grievance without fear of reprisal

- Skills matrixes for different roles
- Succession planning criteria
- Training programmes
- Robust complaints policy and procedure that is accessible to all personnel
- Freedom of representation policy and procedures
- Clear policies and procedures for disciplinary matters that allow for effective representation

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SM6. Staff Representation and Development

- Facilities will benefit from having plans in place to improve the knowledge and skills of their workforce

- Formal and informal training
    - Job specific skills
    - ESG training
    - Health and safety training, including emergency situations
    - Professional development
    - Literacy, numeracy, information, record keeping, and understanding how a business works

SM7. Wages and Benefits

Does the company pay a sufficient rate of pay to meet the basic living wage needed for the area where the facility is located and meeting national or local legislation if applicable?

SLF refer to the Anker Methodology as the most widely recognised measurement method available and also adopted for use by the Global Living Wage Coalition (GLWC) and SA8000.

SM7. Wages and Benefits

The Anker Methodology consists of two main elements:

1. Estimates the cost of a basic but decent lifestyle for workers and their families

2. Determines if the estimated living wage (calculated as per 1. above) is being paid to the workers.

Overview of the Anker living wage methodology
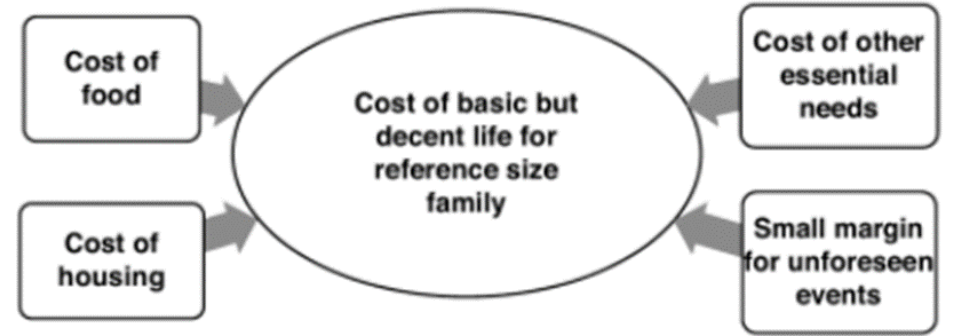
Figure 2.1   Cost of a basic but decent life for a family

Figure 2.2   From cost of basic but decent life to net living wage

Figure 2.3   From net living wage to gross living wage

SM7. Wages and Benefits

Key components of wages and benefits

- Basic Remuneration
- Bonuses
- Other benefits:
  - Healthcare
  - Maternity/Paternity
  - Compassionate leave
  - Sick leave
  - Subsidised Canteen
  - Free travel
  - Pension

SM8. Worker Health & Safety

The SLF Worker Health and Safety Standard and Benchmark is intended to ensure that all workers at an SLF certified facility are safe and are not exposed to risks from:

- Machinery
- Hazardous chemistry
- Unsafe working environments that could give exposure to workplace accidents or illness.

Workers shall also be provided with appropriate rest areas, safe water for drinking and sanitation, PPE as required and safe accommodation if applicable.

SM8. Worker Health & Safety

Workplace Assessments should be conducted as part of the Master Social Plan.

Understanding where improvements could be made

Ensuring PPE is not just provided but is actually worn

The right information and tools for the job are required

Protect workers with adequate breaks and a dedicated rest area.

A physical inspection as well as interviews will be conducted

SM9. Working Hours

ILO Conventions and the Working Time Directive specify that no more than 48 hours a week should be worked (including overtime), except in occasional need of an organisation.

Any overtime worked should be exceptional and not a standard part of the work contract.

- Working hours should be specified in a contract
- Holiday entitlement should be specified and given.
- Evidence of timesheets / clocking in statements should tally with wage slips and wage paid to workers
- A physical inspection as well as interviews will be conducted

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Lunch

90 minutes

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Governance Module

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1. Permits & License

2. Ethical Business Practice

3. Animal Welfare Practices

4. Traceability & Procurement

5. Housekeeping

6. Best Available Techniques

7. Process Control & Quality

8. Chemical Control

9. Restricted Substances

10. Occupational Health & Safety

11. PR & Communications

11 sections covering:

Ethical Business, Traceability, Chemicals and OHS

GM1. Permits and Licenses

- The SLF Audit Standard examines the operating permits of all three ESG pillars

- The governance licenses and permits involve business licences, company registration, tax requirements, etc

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GOVERNANCE MODULE

GM1   Permits, Licences, Statutory

GM1.1   Are there operating permits required by local or national authorities?

Permits and licences are the official documents, issued by a government agency or body, that detail permissions for a company to conduct particular business activities within that government body's jurisdiction. The licenses and permits that are required in order to operate your business will depend largely upon where you are located and the nature of your business.

In consideration of corporate responsibility, SLF would typically expect an organisation to have statutory licences and permits (translated into English) related to:

- Operational permissions (detailing what the company is allowed or not allowed to do).
- Storage or transportation
- Fire permits
- Boiler permits
- High pressure vessel permits
- Permission to use and handle hazardous chemicals
- Health and safety / major accident permits
- Workers permits
- Personal data
- Statutory

The above list is not exhaustive.

It is the company's responsibility to know what permit and licencing requirements there are, and the auditor will require proof of all applicable licences and permits during your audit.

See note below about Legal Compliance Register

GM1.2   Are the operating related permits listed on the company legal/compliance register (LCR)?

A Legal Compliance Register is a form of document that details all the application legislative requirements that a company needs to ensure they are compliant with, according to the business activities carried out. This important resource will enable you to fulfil EM1.1 by ensuring that all your permits and licences are logged in a central record.

The register should include:

	Responsible Person in organisation	Permit / Licence held on file YES/NO

- Delete as appropriate

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GM2. Ethical Business Practice

Integrity and Ethics should form part of any sustainable organisation.

Business should be a win-win and there should not be disadvantage placed on others (outside of normal market competition).

- General Ethics and Values of the company
- Disclosure and transparency of records and documentation
- No Bribery, extortion and corruption
- Protecting Consumer Interests
- Ensuring fair market competition by not participating in any anti-competition activities
- Ensuring taxation compliance

GM2. Ethical Business Practice

2. Normative references

2.1 The following references are useful in the understanding of this document and are provided for further guidance. In the case of dispute these references will form the core of the evidence in support of the Standard and Benchmarks used here:

OECD Guidelines for Multinational Enterprises, 2011[1]

OECD Due Diligence Guidance for Responsible Business Conduct[2]

OECD Due Diligence for Responsible Supply Chains in the Garment and Footwear Sector[3]

UN Guiding Principles on Business and Human Rights[4]

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[1] OECD Guidelines for Multinational Enterprises, 2011 https://www.oecd.org/daf/inv/mne/48004323.pdf

[2] OECD Due Diligence for Responsible Business Conduct http://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf

[3] OECD Due Diligence for Responsible Supply Chains in the Garment and Footwear Sector https://www.oecd-ilibrary.org/docserver/9789264290587-en.pdf?expires=1625766417&id=id&accname=guest&checksum=FF130CDB67B72270210C340ECB3718A2

[4] UN Guiding Principles on Business and Human Rights https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf

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GM3. Animal Welfare

- Animal welfare in the value chain policy

- Working with a one back, one forward approach to provenance of good animal welfare

- A life worth living – the 5 freedoms

- The SLF standard is concerned with awareness of the connection to the raw material source of living animals and that they are not mistreated or exploited.

GM3. Animal Welfare

Five Freedoms	Related Provisions
1. Freedom from thirst, hunger and malnutrition	By ready access to a diet to maintain full health and vigour
2. Freedom from discomfort and exposure	By providing a suitable environment including shelter and a comfortable resting area
3. Freedom from pain, injury and disease	By prevention or rapid diagnosis and treatment
4. Freedom from fear and distress	By providing conditions and treatment which avoid mental suffering
5. Freedom to express normal behaviour	By providing sufficient space, proper facilities and company of the animal's own kind

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GM4 Traceability and Procurement

▶ Do you have a procurement policy?

▶ Thinking about the good practice of the upstream suppliers is as relevant and what you do in your part of the value chain.

▶ The standard will expect you to have a list of your suppliers and customers and to see how you interact with them to ensure good practice.

What does Traceability and Transparency really mean?

Traceability is defined as "the ability to identify and trace the history, distribution, location and application of products, parts and materials, to ensure the reliability of sustainability claims, in the areas of human rights, labour (including health and safety), the environment and anti-corruption". [1]

Transparency is defined as "relevant information being made available for all elements of the value chain in a harmonized way, which allows for common understanding, accessibility, clarity and comparison". [2]

Transparency vs. Disclosure

1 United Nations Global Compact Office, A Guide to Traceability A Practical Approach to Advance Sustainability in Global Supply Chains (New York, 2014). Available at: https://d306pr3pise04h.cloudfront.net/docs/issues_doc%2Fsupply_chain%2FTraceability%2FGuide_to_Traceability.pdf

2 European Commission, A Background Analysis on Transparency and Traceability in the Garment Value Chain (2017) https://ec.europa.eu/international-partnerships/system/files/european_commission_study_on_background_analysis_on_transparency_and_traceability_in_the_garment_value_chain.pdf

Benefits of Traceability

Improving supply chain integrity:

- Helping to ensure that materials are sourced ethically and that all links in the value chain adhere to standards
- Enabling data driven decision making for ethics, efficiency and cost-effectiveness
- Enabling consumer confidence through origin of material

Sustainability and Ethical Business Practice:

- Ability to track and measure environmental impact (water, energy, waste, transportation, etc)
- Animal Welfare assurance for ethical sourcing
- Enhanced post-consumer responsibility for recycling and waste options

Enhancing Consumer Trust and Brand Value:

- Helping consumers to make informed purchasing decisions
- Brand differentiation on demonstration of environmental, social and governance positioning.

Meeting Regulatory and Compliance Expectations:

- Ability to align with increasing regulations around ESG, ensuring compliance to avoid penalties and reputational damage
- Allowing for enhanced supply chain due diligence for stakeholders, investors and society.

Negative Global Impacts of traceability and other regulatory requirements
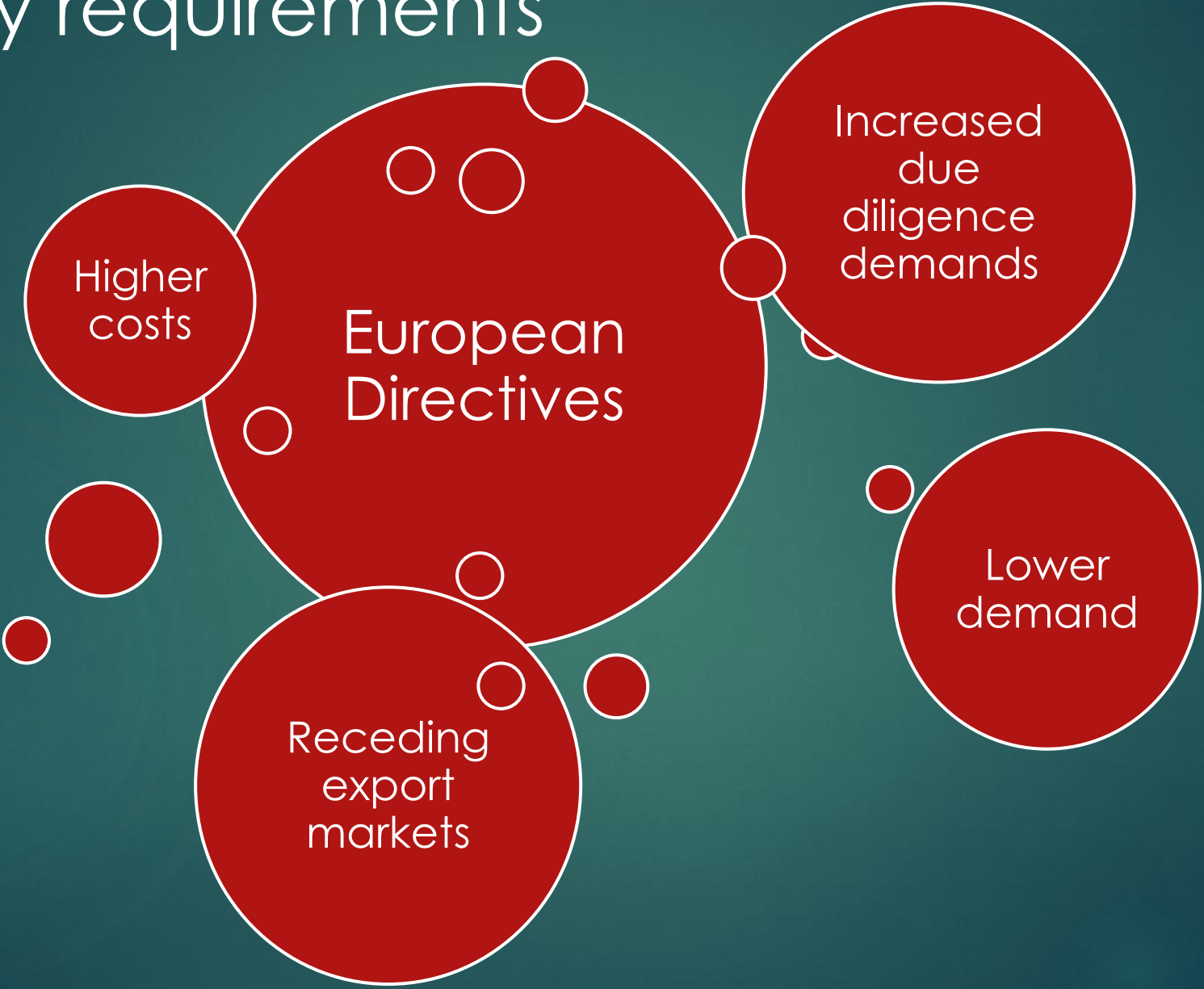
Higher costs

European Directives

Increased due diligence demands

Lower demand

Receding export markets

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Positive Global Impacts of traceability and other regulatory requirements

Higher sales

European Directives

Increased competitive advantage

Increased demand

Increasing export markets

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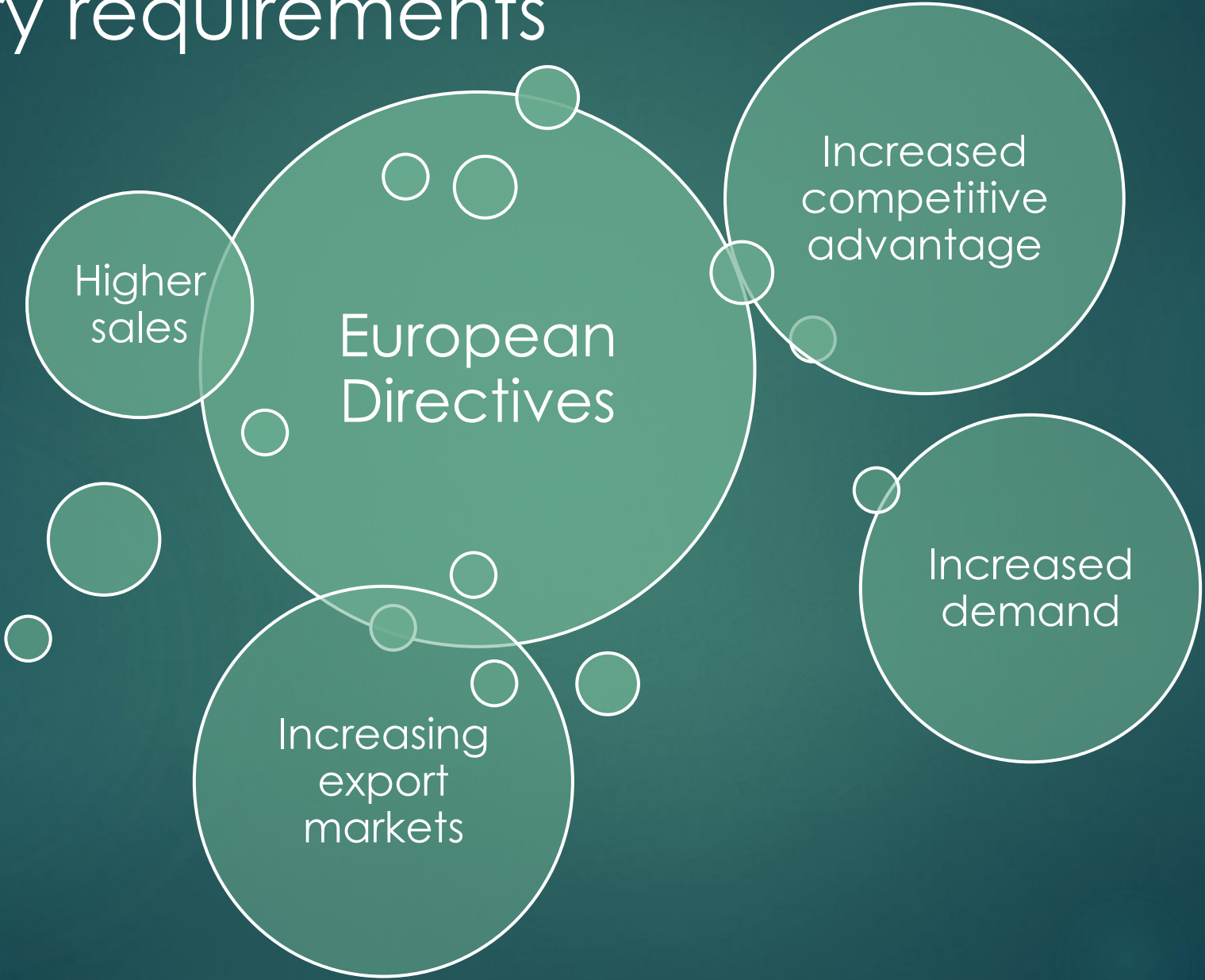
GM4 Traceability and Procurement

KEY TRACEABILITY DATA - (MINIMUM TRACEABILITY INFORMATION (MANUAL OR ELECTRONIC) RELATED TO THE OBJECT OF THE TRACEABILITY

TYPES OF DATA / DOCUMENTATION - TO PROVIDE EVIDENCE OF THE TRACEABILITY SYSTEM (DATA THAT CAN BE RECORDED, MANAGED AND VERIFIED)
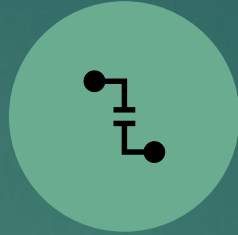
SYSTEM OBJECTIVES – THROUGH LINKED AND SYSTEMATIC TRANSACTIONAL DATA HAVING THE ABILITY TO TRACE THE FLOW OF MOVEMENT THROUGH THE VALUE CHAIN

PROCEDURES – HOW COMPANIES ARE EXPECTED TO BE ABLE TO PRESENT THE SYSTEM FOR VERIFICATION

ENSURE EQUIVALENCY WITH LEATHER MANUFACTURING TRACEABILITY CERTIFICATION SCHEMES

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GM4 Traceability

Traceability

Traceability Level	% of Material
Level1 Regional/Hide Collectors	
Level2 Group of slaughterhouses/processors	
Level3 Integrated or exclusive slaughterhouses	26
Level4 Integrated or exclusive slaughterhouses with physical marking	23.62
Level5 Integrated or exclusive slaughterhouses with physical marking and ERP	
Level6 Direct Farm Traceability	
Level7 Indirect Farm Traceability	
Level8 Birth Farm Traceability with full lifecycle passport	

Traceability

Status: Passed

BASIS OF ASSESSMENT: Successful completion of an LWG audit, withgold rated certification awarded. Valid until 29th June 2026.

100% of Montebellos incoming material is traceable to country of supplier
26% of that material has documented traceability back to the slaughterhouse
23.62% of that material has documented traceability back to the slaughterhouse with physical marking of the hides/skins.

Certification evidence provided.

NEXT STEPS: To maintain this status, Conceria Montebello will require a re-audit on or before 29th June 2026, with LWG or an alternative certification company of equivalent standard.

GM5. Housekeeping

- Clear accessways with good signposting
- Designated areas for production materials
- Cleanliness – regular cleaning routines and cleaning equipment in ready availability
- Organised spaces leads to better productivity
- Guarding and handrails to safeguard working areas
- Safe machinery spaces – well positioned for lighting, work positioning, etc
- Storage areas and administrative areas clearly separate from production areas
- Spill control
- Adequate lighting and climate control

How you look after your facility is a window to how you look after your process and material.

The first impression is vital

Ensuring a well maintained facility will provide benefits:
- Employees will take more pride in their workplace
- Less risk of hazards
- Everything in its place gives better efficiency

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GM6. Best Available Techniques

- Best available techniques or not entailing excessive cost (BATNEEC)
- Best practicable environmental options
- SLF aligned with UNIDO BATNEEC/BPEO (
- Mass balance and materials flows
- Chemical alternatives

- It is important to note that what constitutes "Best Available Techniques" in some areas may not be suitable for all.

- Being able to demonstrate that you have assessed the recognised BAT but that for your production, it is not right, is what is important.

Break

20 minutes

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3.50 pm	Governance Module continues
5.00 pm	*End Day 2*

GM7. Process Control and Quality

A process control and QA system is an integral part of promoting an efficient and resourceful operation for the employees, management team and associated supply chain while minimising negative impact on the surrounding resources.

- Consistently providing products and services that meet customer and applicable regulatory requirements
- Facilitating opportunities to enhance customer satisfaction
- Addressing risks and opportunities through systematic approaches
- Demonstrating conformity to specified quality management requirements
- Applying a risk-based approach that creates preventative controls minimising negative effects
- Formalizing a communication and escalation plan for quality concerns to management
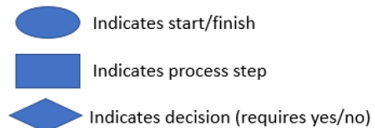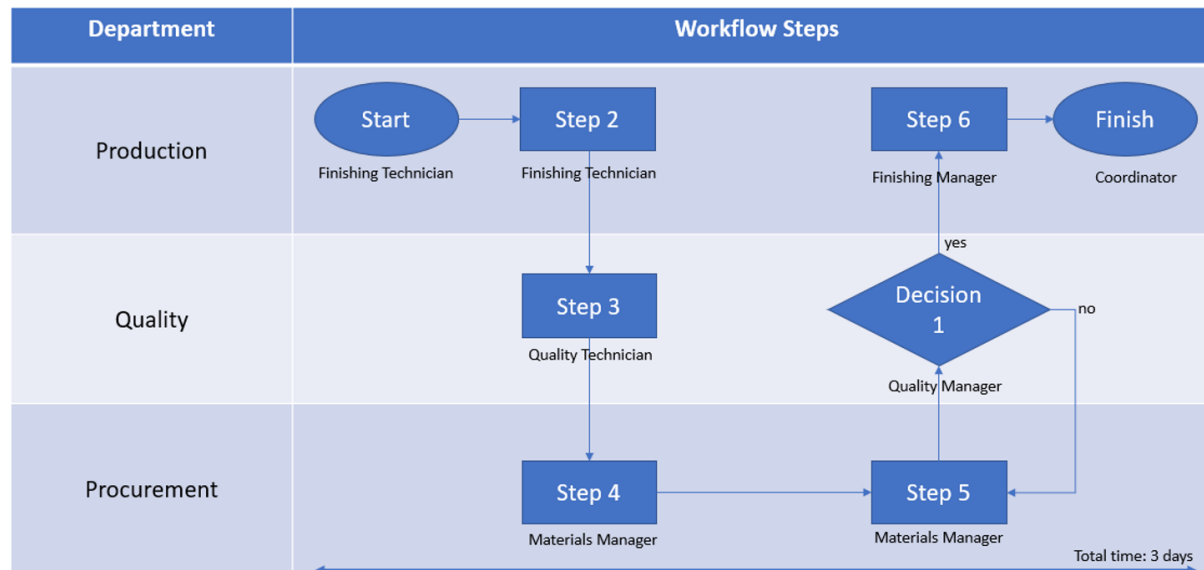
GM7. Process Control and Quality

TEMPLATE 8 – WORKFLOW DIAGRAM

(a separate version of this diagram can be used for all 3 modules – Environmental, Social, Governance)

WORKFLOW DIAGRAM FOR XXX [COMPANY NAME]

Department	Workflow Steps
Production	Start (Finishing Technician) → Step 2 (Finishing Technician) → Step 6 (Finishing Manager) → Finish (Coordinator)
Quality	Step 3 (Quality Technician) → Decision 1 (Quality Manager) yes/no
Procurement	Step 4 (Materials Manager) → Step 5 (Materials Manager) — Total time: 3 days

- Indicates start/finish
- Indicates process step
- Indicates decision (requires yes/no)

1. Each row represents a department "swim lane", meaning all process steps in that row are the responsibility of that department
2. Steps should describe a singular action (using 3-5 words)
3. Title of responsible role should be listed below each step
4. Overall timeline of process from start to finish should be included

Above diagram was made using PowerPoint. Lucid Software and Microsoft Visio are also excellent tools for creating workflow/process flow diagrams.

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Dated 12th December 2022 Version 1.0

The Process Control and QA system will be most effective with alignment directly related to the conformities, obligations, and requirements of the organisation's legal, regional and customer requirements for its facility, service, product, and operations.

Apply the PDCA approach:

Plan-Do-Check-Act

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GM8. Chemical Control

Effective chemical control is an important element of governance and is concerned with:

- Knowledge on chemical information
- Effective labelling using the global harmonised system (GHS) (together with the other global chemical, labelling, and packaging regulations)
- Chemical storage (including samples), and the compatibility between chemicals stored in one confined area.
- Effective dosing and calibration of dosing equipment

GM8. Chemical Control

GHS: Global Harmonised System

REACH: Registration, Evaluation, Authorisation and Restriction of Chemicals

ZDHC: Zero Discharge of Hazardous Chemicals

GM9. Restricted Substances

Restricted Substances: Materials, chemicals, and substances that are restricted or banned in finished leather products because of regulation or law.

RSLs: List of substances that should not be present in the finished products

MRSLs: List of substances that should not be used in the manufacture of leather.

GM9. Restricted Substances

Most brands will have their own RSL, so many tanneries have to test to more than one specification in order to meet their brand requirements.

For MRSL, industry has pretty much got behind the ZDHC MRSL to try to avoid the same duplication of effort.

In the absence of a brand RSL, a facility should have an internal RSL that they can demonstrate compliance against.

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GM9. Restricted Substances

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TEMPLATE 7 – RESTRICTED SUBSTANCE POLICY

1. Introduction

Globally, there is a deep sensitisation towards adverse chemistry – substances that can cause some or all users of leather products to have acute or chronic health reactions. The knowledge and understanding of restricted substances are continuously growing and the <FACILITY NAME> due diligence will grow as well.

<FACILITY NAME> is committed to delivering safe leathers for consumers in a manner that continuously improves their environmental, financial, and safety profile. Underpinned by our commitment to providing compliant and safe consumer products and our overarching product stewardship and social responsibilities, our aim is to make substance decisions that will be right for our consumers.

<FACILITY NAME> maintain an internal Product Restricted Substances List (PRSL) to ensure a consistent, global approach to safeguarding our consumers and employees from exposure to potential substances of concern. The PRSL (which has been in place since 2021) is a list of substances that <FACILITY NAME> has banned or restricted from our global leather product portfolio.

Since the PRSL inception, <FACILITY NAME> has carried out a range of substance removal and restriction programmes in order to implement the Company's positions with regard to the use of affected substances. We take a multi-layered approach to assess the incoming regulations, sustainability, safety, and public landscape of substances we use to identify potential risks and opportunities for substituting leather products with safer, healthier, or more environmentally preferred chemistries. Many of our current customers do not have restricted substance prevention requirements, but this will change over time and <FACILITY NAME> want to be in a position where this can be covered by an experienced, internally led RSL response.

2. Policy

<FACILITY NAME>'s policy is to:

a. Formally monitor and review substances used within our leather products.
b. Assess global or national regulatory, sustainability, safety, and reputation considerations to determine PRSL internal policy statements and directions on the use (or restriction/ prohibition of use) of individual

2. Policy

<FACILITY NAME>'s policy is to:

a. Formally monitor and review substances used within our leather products.
b. Assess global or national regulatory, sustainability, safety, and reputation considerations to determine PRSL internal policy statements and directions on the use (or restriction/ prohibition of use) of individual substances or groups of substances which may be contained within finished goods (formulations, packaging).
c. In many instances, go above and beyond basic regulatory requirements by globally implementing the PRSL policy to continually improve the environmental and safety profile of our leather products by actively removing and/or reducing specific substances of concern.
d. Continuously review the internal PRSL and ZDHC MRSL regarding new and emerging science relating to substances or our products with the aim of always keeping the internal PRSL up to date (and relevant).
e. To work with existing customers who have their own PRSL requirements – to ensure that leather produced for them conforms to their PRSL.
f. Ensure employees have a level of knowledge and understanding of <FACILITY NAME>'s sustainability and product stewardship commitments appropriate to their responsibilities.
g. Conduct an annual review, including progress against sustainability targets and ensure that a summary of that review is available in our annual reports.

3. Scope

GM10. Occupational Health & Safety

The SLF occupational health and safety standard (OHS) deals specifically with facility infrastructure – the physical facility details that are important to effective OHS, looking at:

- policy
- systematic procedures
- internal responsibilities for OHS (including emergency procedures).
- Worker protection (through non-infrastructural means) is directly handled in the Social Module of the SLF Audit Standard.

GM10. Occupational Health & Safety

Key Parameters:

- Guarding / barriers
- Safety Switches and electrical wiring
- Building integrity
- Fire and first aid facilities
- Emergency evacuation

NB: The auditor does not perform a full building survey

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GM11. PR & Communication

- Policies and procedures surrounding public relations, communications, and marketing practices within the organisation.

- Formalised structure of communication governing the internal and external communications of an organisation (including complaints as well as compliments.

- A Public Relations and Communications structure is an integral part of promoting a cohesive, transparent community that sustains and reinforces the organisational strategy, operational targets and environmental, social and governance (ESG) opportunities.

Beware not to unintentionally greenwash.

Exercise

What might be an examples of misleading claims?

Develop 3 claims that you feel that your facility could make and be able to demonstrate

Balance

Finally, my favourite word when talking with any individual or organisation is Balance!

We have to maintain a healthy balance for:

Planet . People . Profit

THANK YOU

More Information:

Deborah@sustainableleatherfoundation.com

www.sustainableleatherfoundation.com