

2024 Program Playbook for Suppliers to Walmart US and Sam's Club US





Supplier Leadership Program on People













Advancing Responsible Recruitment









Program Background

Walmart aspires to become a regenerative company—helping to renew people and planet through our business. In service of this objective, we are focused on transforming systems on which society—including our business—relies. From galvanizing supplier action on climate to helping change worker recruitment practices, Walmart seeks to catalyze positive societal change in ways that are inclusive and just.

To meet this aspiration, Walmart has developed the Supplier Leadership Program on People—Responsible Recruitment, a program to help make responsible recruitment the standard business practice across our global supply chains by 2026. This program seeks to inspire, support, and celebrate leadership efforts among suppliers that are advancing responsible recruitment practices in their operations and supply chains.

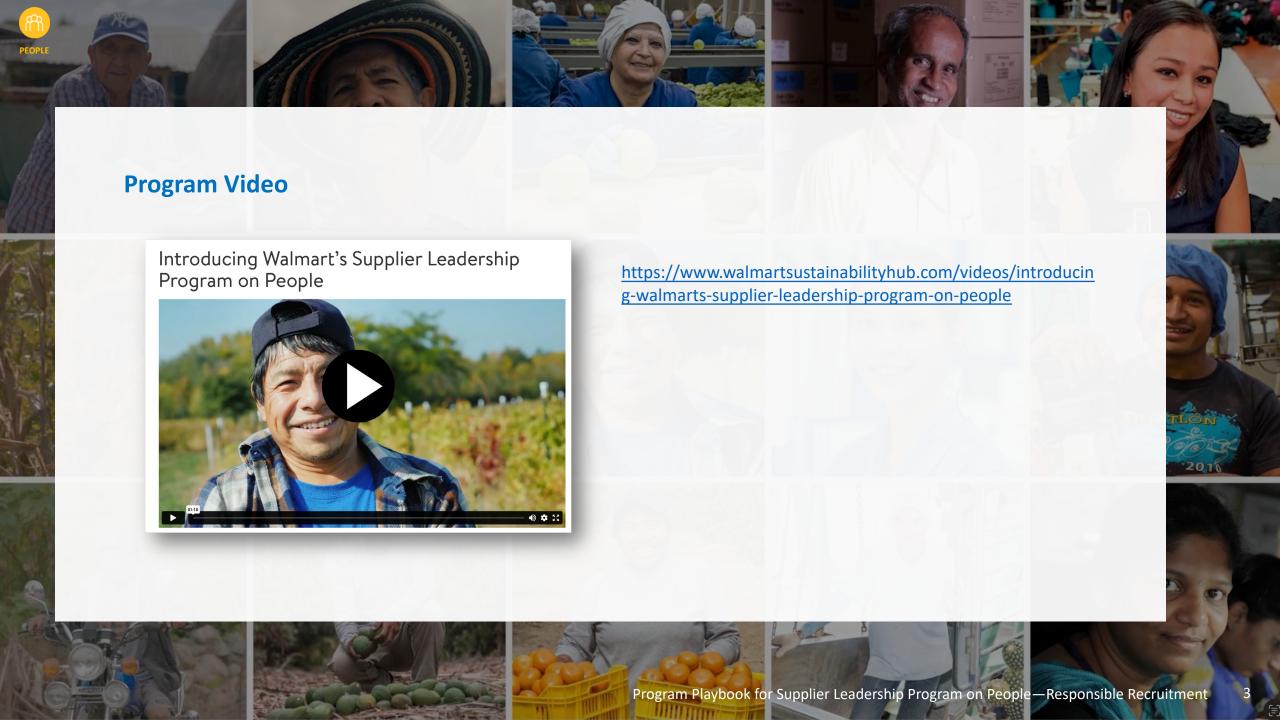
The program has been designed to encourage suppliers to identify meaningful actions to help make progress faster on these issues—with Walmart's help to get them started.

Walmart has developed a set of practices across three priority areas to help suppliers engage in—and continuously improve on—meaningful leadership practices to advance responsible recruitment. These practices draw from external resources and thought leaders on responsible recruitment as well as insights from consultations with more than a dozen external stakeholders, including suppliers and prominent civil society organizations in partnership with Article One.

This program, while separate from Walmart's Global Ethics & Compliance program, is intended to complement Walmart's Responsible

Sourcing Compliance program. Supplier participation is voluntary. We believe a collaborative approach is important to advance dignity for workers in supply chains.

In 2023, over 1,000 suppliers set goals and/or reported progress. Informed by these results, Walmart has continued to make improvements to the program, making it easy for current and new suppliers to participate. For example, in 2024, we are providing guidance and encouraging suppliers to report their participation in external initiatives focused on responsible recruitment.





Playbook Contents

This Program Playbook has been designed to provide suppliers to Walmart US and Sam's Club US with guidance on how to participate in the Supplier Leadership Program on People—Responsible Recruitment.

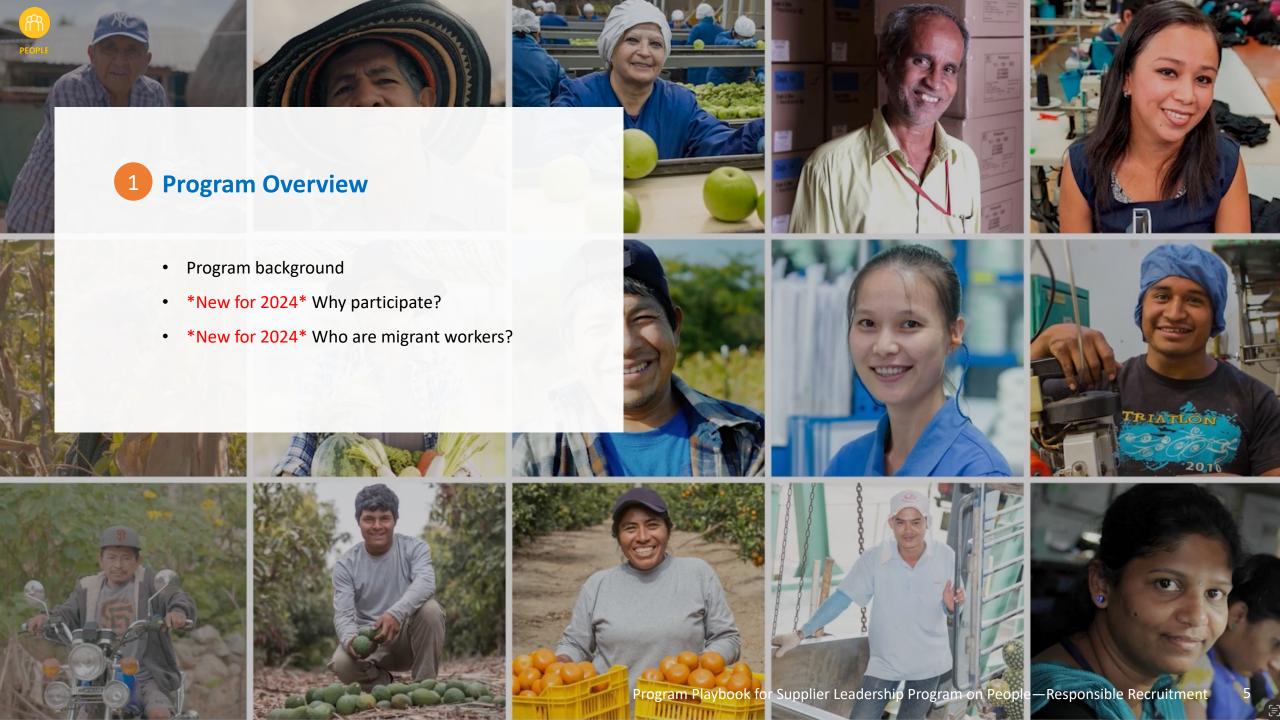
This Playbook also contains information and resources for suppliers to learn more about responsible recruitment.

Any questions about the Playbook should be directed to Rebecca Westover at rebecca.westover@walmart.com or Gavin Bailey at gavin.bailey@Walmart.com.

- 1 Program Overview
- Program overview
- *New for 2024* Why participate?
- *New for 2024* Who are migrant workers?
- 2 How To Get Started
- Who can participate
- How to participate
- 3 Leadership Guide
- Overview of priority areas and leadership practices
- Category-specific guides and resources
- *New for 2024* Initiatives that count towards the People Program

4 Best Practices

- 5 guiding principles to best practice reporting
- Best practice examples
- *New for 2024* Pathways to engage your sub-suppliers
- 5 Additional Resources
- FAQs, goal setting and reporting templates
- Glossary of terms



Why Walmart developed the Supplier Leadership Program on People

and why start with responsible recruitment?

In September 2020, Walmart announced a goal to become a regenerative company, with ambitious targets around reducing our emissions and renewing, restoring, and conserving land and ocean.

At the Walmart US Supplier Growth Forum on March 10, 2022, we announced the next phase of our work to strengthen respect for human rights in supply chains. This includes how we are supporting suppliers who choose to work on making responsible recruitment the standard business practice throughout our global supply chains by 2026.

Responsible recruitment, also referred to as fair or ethical recruitment, means hiring workers lawfully and in a fair and transparent manner that respects their dignity and human rights.¹

Responsible recruitment is a significant challenge in many global supply chains as migrant workers may often be charged recruitment fees in their search for a job.

Recruitment fees and other unfair practices can lead to debt bondage, one of the most common forms of forced labor.

According to the Internal Labour
Organization (ILO), practices that put
workers at risk may include one or
more of the following abuses:

- Deception about the nature and conditions of work
- · Retention of passports
- · Illegal wage deductions
- Payment of recruitment fees leading to debt bondage
- Threats including to family members or expulsion from a country if workers seek to leave their employers

Additional Resources:

- **ILO Fair Recruitment Initiative**
- ILO General Principles and Operational Guidelines for Fair Recruitment and Definition of recruitment fees and related Costs
- International Organization for Migration (IOM) IRIS: Ethical Recruitment Initiative
- <u>ILO International Training Centre:</u>
 <u>Fair Recruitment</u>
- RRT and Stronger Together
 Practical Guide to Responsible
 Recruitment During and Coming
 Out of COVID-19

¹Source: International Organization for Migration (IOM).



Inspiring supplier leadership

Walmart launched this supplier-facing leadership program to help inspire and make responsible recruitment the standard business practice by 2026.

In 2016, Walmart and Walmart Foundation set an aspiration to make responsible recruitment the standard business practice for employers throughout our global supply chains by 2026.

To help achieve this, Walmart developed this voluntary, supplier-facing program to inspire, support, and celebrate leadership efforts among suppliers that are advancing responsible recruitment practices in their operations and supply chains.

The program focuses on three **Priority Areas**, as shown in the graphic on the right. Under each Priority Area there are three different Leadership Practices around which suppliers can engage and report progress. For more details on these Priority Areas, review the Leadership Guides in this Playbook.

Three Priority Areas



Recruitment Practices and Capacity



- Build Capacity
- Invest in Responsible **Labor Systems**



Worker and Community Empowerment

- Strengthen **Awareness**
- Strengthen Worker Voice
- Leverage Place-**Based Projects**

Leadership Practices



Transparency

- Report Efforts **Publicly**
- Map Supply Chain
- Validate Approach



Why participate?

The work you do every day to strengthen and grow your business is an essential part of helping our customers save money and live better. We believe that a focus on responsible recruitment is a critical part of this and can contribute to your business success.

Pursuing leadership practices in responsible recruitment can help you:



Improve worker retention, productivity, and satisfaction.¹



Be better positioned to attract workers and build stronger relationships with customers. ¹



Demonstrate leadership on responsible recruitment to your peers and customers—including Walmart!

¹Source: Stronger Together, <u>Responsible Recruitment Toolkit</u>.

Building on core expectations

This leadership program supports Walmart's broader efforts to ensure respect for human rights in our global supply chains.

Walmart's Global Ethics & Compliance program forms the basis of the company's requirements for suppliers and includes Walmart's Responsible Sourcing Compliance program and core expectations around responsible recruitment.

While this Supplier Leadership Program on People—Responsible Recruitment is separate from our Global Ethics & Compliance program, it is intended to complement Walmart's Responsible Sourcing Compliance program.

Whether or not suppliers participate in this program, they will be expected to continue to meet Walmart's <u>Standards for Suppliers</u> and the requirements outlined in Walmart's <u>Responsible Recruitment Expectations</u>.





Leadership practices build on core expectations

Walmart
Supplier Leadership
Program on People—
Responsible Recruitment

Examples of leadership practices include:

- Recruit workers directly or through ethical and responsible recruiters
- Build capacity around forced labor and responsible recruitment with those who recruit or employ workers
- Invest in capacity building resources to strengthen recruitment agencies
- Choose from 6 other leadership practices (see full list)

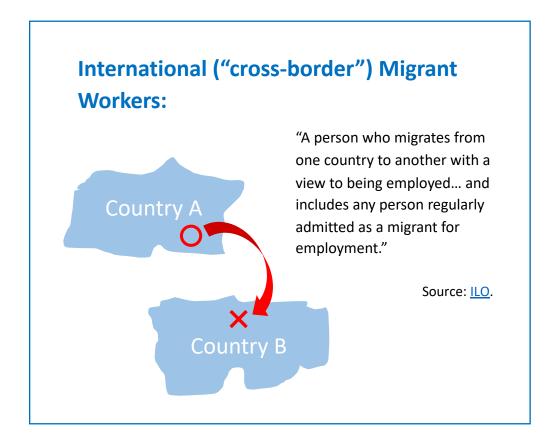
Walmart Global Ethics & Compliance

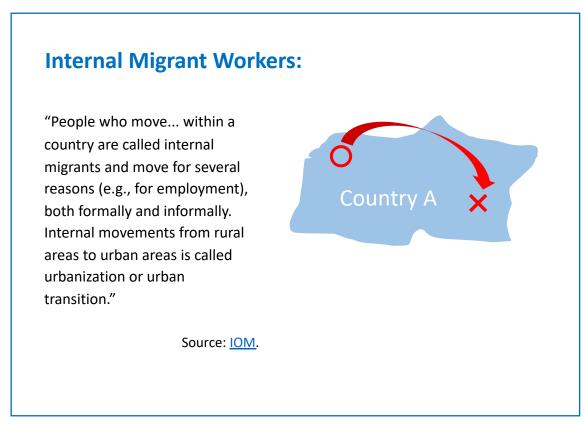
- Standards for Suppliers
- Responsible Recruitment Expectations

Core expectations include:

- Have policies & procedures that provide the company's expectations & requirements for the responsible recruitment of workers
- Implement responsible recruitment practices <u>(see examples)</u> in the normal business operations
- · Have a process in place to identify if any associates or workers have paid recruitment fees
- Calculate and repay fees if it has been identified that associates or workers have paid recruitment fees

This program aims to help mitigate exploitation risks for both crossborder and internal migrant workers:







Suppliers may choose to focus on migrant workers in occupations that generally have fewer educational and skills requirements and may be at increased risk of exploitation.

This risk of exploitation has driven our focus towards migrant workers in the priority categories of produce, seafood, entertainment, fashion/apparel, and home.



Migrant farmworkers may migrate, following the growing and harvesting seasons. Migrant farmworkers are often found in the upstream supply chains of sectors including processed food, beverage and apparel.



Migrants in the seafood sector can work in different parts of the supply chain including on vessels, on farms, or in processing. The growing demand for seafood has led the seafood industry to increasingly rely on migrant workers.



Increasing numbers of migrant workers can be found in the **electronics sector** working on production lines to assemble finished products such as televisions, cell phones, or laptops. These workers can also be found in upstream sites producing discrete components and subcomponents.



Migrant workers are common in the garment and footwear sectors and can be found in cutting, stitching or assembly operations. In the past, it was common for workers to migrate from rural to urban centers, however, migrants are also crossing borders in their search for a job.





This program is focused on suppliers to Walmart US and Sam's Club US

- The scope of participation can be any of the following:
 - Direct operations
 - 1st tier supply chain
 - Upstream supply chain (tier 2+)
- Suppliers to Walmart and Sam's Club
 Canada and Mexico retail markets may also participate.

• Given the risk of exploitation in certain sectors, this program focuses on the following **priority categories:**



Seafood



Entertainment
(Information, Communications, and Technology)



Fresh Produce



Fashion / Apparel



Home

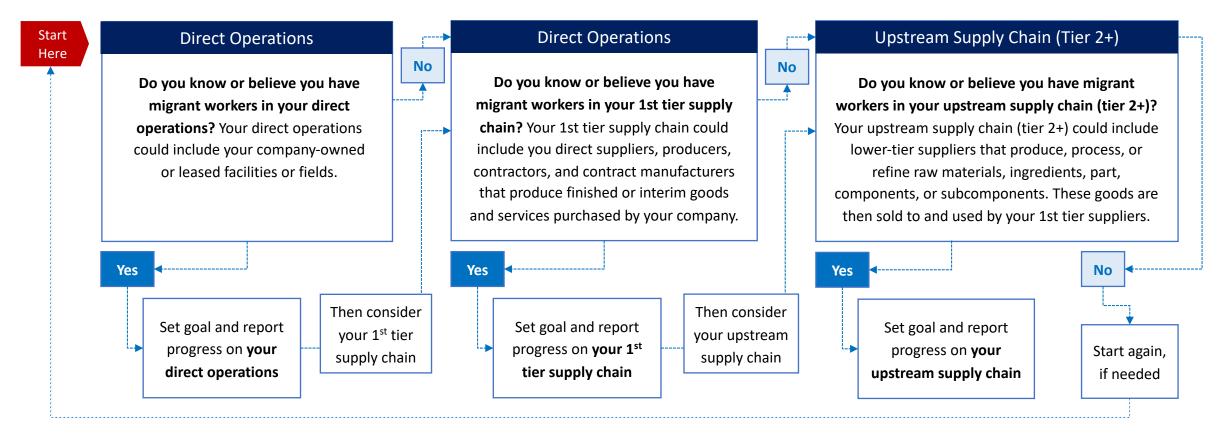


Walmart People Program
Template - Use this
template to preview the
goals and reporting
features of Walmart
Sustainability's People
Reporting Program.



This program is focused on supporting migrant workers in your direct operations and supply chain

This decision-tree may help you to identify where to focus your participation in this program.





To participate, select a Leadership Practice in one of the three Priority Areas and set a goal and/or report progress every year.



Do you have an existing goal?

If you have an active goal that you are still working towards, you can set that as your goal AND report progress on that goal in the same submission year.

Set a SMART Goal

Choose a Priority Area and set a SMART goal for a Leadership Practice within the Priority Area.

SMART goals are Specific, Measurable, Achievable, Realistic, and Timely. Setting goals that are SMART helps ensure goals are clear, are understood by others, and are likely to be achieved. You can set more than one goal, but we encourage you to https://example.com/have-at-least-one-active-goal-set.

Report Progress

Report progress on a Specific Action that you took to meet the goal that you set.

You will be asked to report annualized data and specify the 12-month time period during which the data was gathered, whether if it's a calendar year or a specific 12-month period.

Reporting Season (September through November)











5 key steps to take through November 2024

Prior to Annual Reporting Season



Resources

 Visit the Sustainability Hub to review available resources. including the Program Playbook and Program Template, to help you get better acquainted with the program and prepare to engage this Reporting Season.



Training

- Attend training on the People Program.
- Suppliers unable to attend can access a recorded version.

Visit the Walmart Sustainability Hub to review program resources today!



Portal Account

- Create or update your **Sustainability Portal account** to access your Sustainability Reporting.
- If your company already has an account, please ensure your profile / vendor details are up to date including all active vendor numbers.



Submit Goals

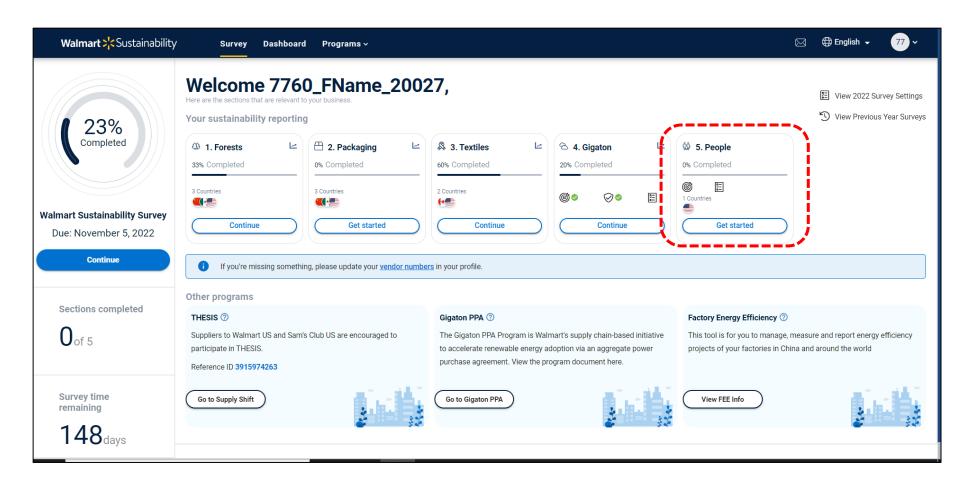
- Create, review and/or update your goals in the Sustainability Portal through the People Program; aim to have at least one active goal in one or more Priority Areas.
- Goals can be submitted once a year, but suppliers are encouraged to set and work towards goals ahead of reporting season.



Report Progress

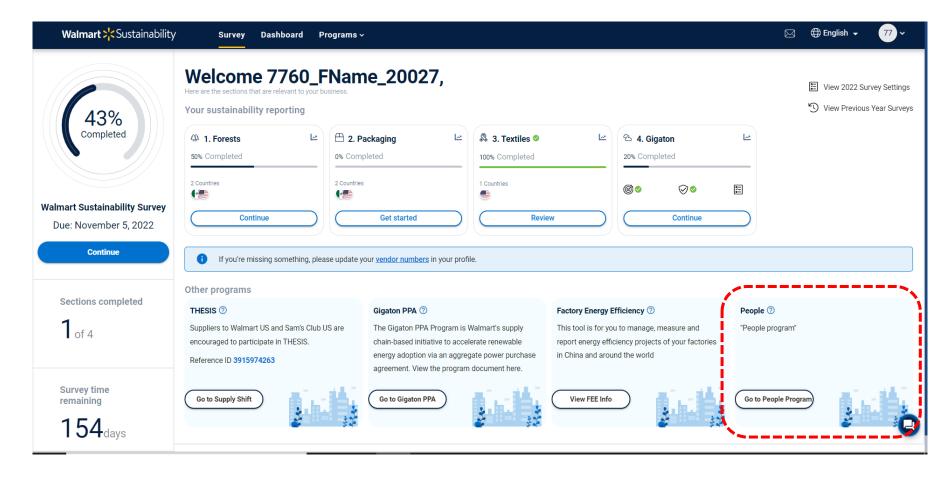
- Report your progress in the Sustainability Portal through the People Program.
- Suppliers should report progress on a Specific Action(s) that they took for the goal(s) they set.

Survey dashboard



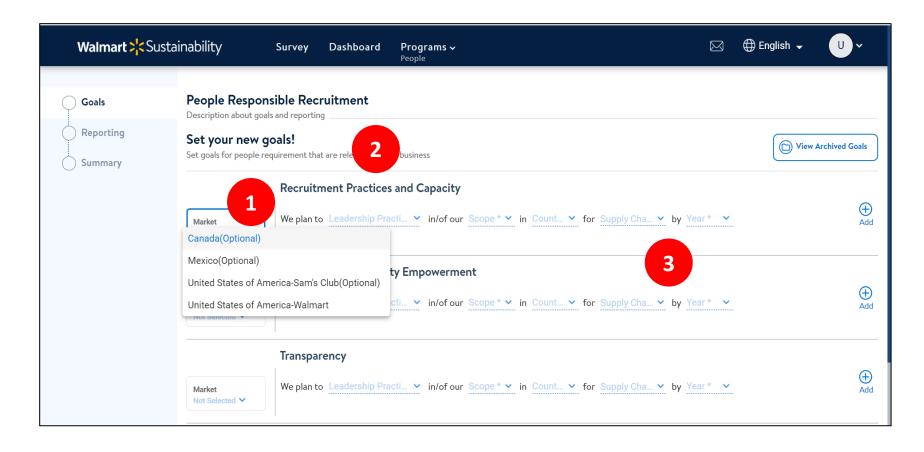
For priority category suppliers, the People Survey will be a tile listed in the top row of the main dashboard.

Survey dashboard



For all other suppliers, including suppliers of eligible international retail markets, the People Survey can be accessed by going to the People tile in the "Other Programs" section of the main dashboard.

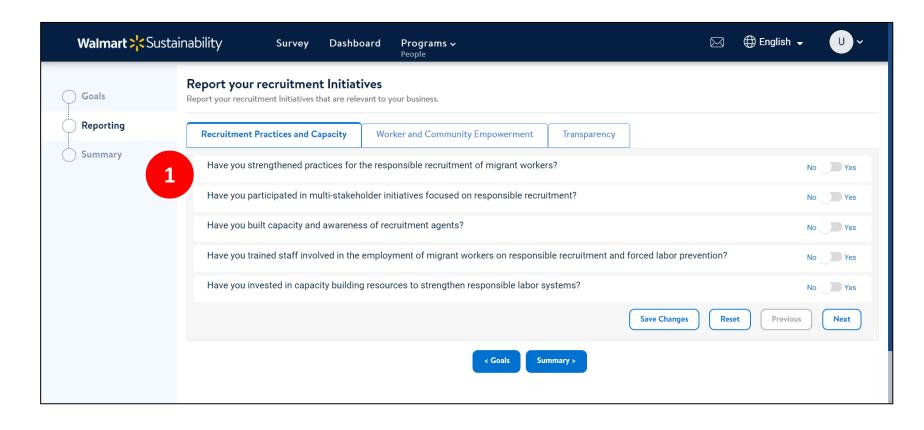
Set goals



- 1. Select your market
- Choose the Priority Area that you would like to set a goal for
- 3. Set a goal by selecting the Leadership Practice and selecting:
 - Scope
 - Country
 - Supply chain category
 - Target year (max year is 2050)

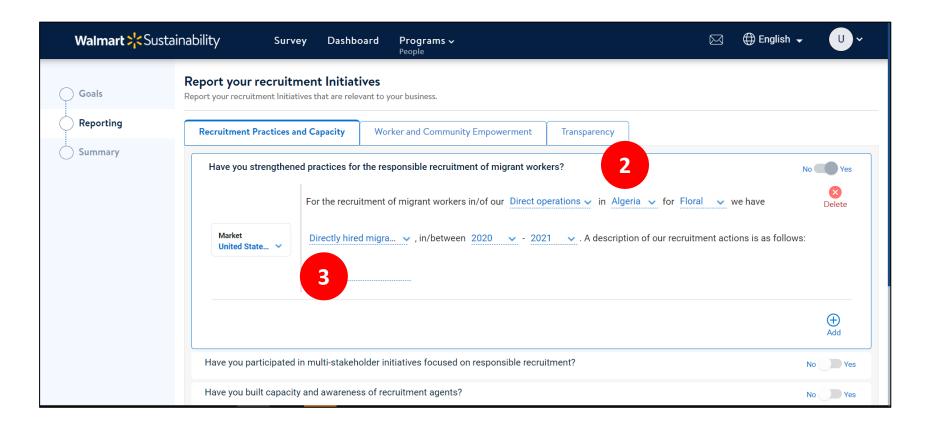
PEOPLE

Report progress



- Find the question that is most relevant to you and answer "yes."
- 2. Make your selection for each drop-down list.
- Provide a full description of the progress you made in the Free Text box.

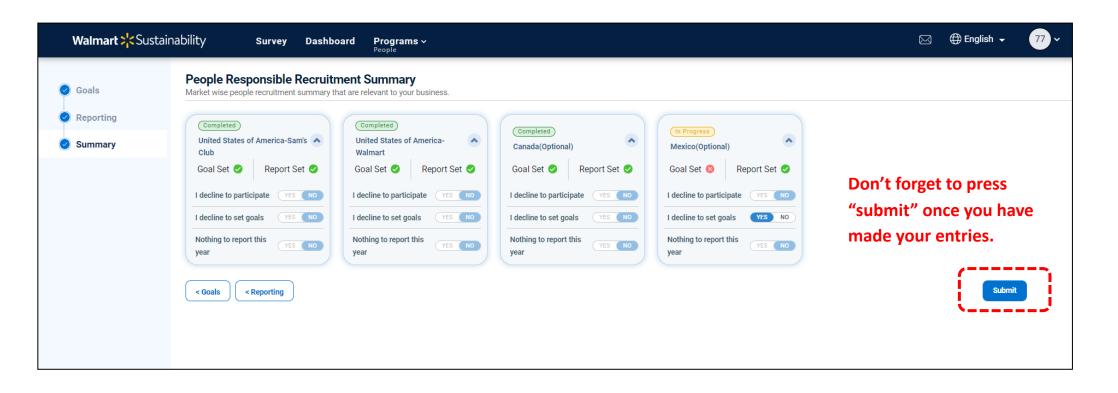
Report progress



- Find the question that is most relevant to you and answer "yes."
- Make your selection for each drop-down list.
- Provide a full description of the progress you made in the Free Text box.

Please reference the "5 guiding principles for best practice reporting."

Summary dashboard











Recruitment Practices and Capacity

Strengthen Practices

Recruit workers through ethical and responsible recruiters or hire directly

Build Capacity

Build capacity and train individuals who recruit or employ workers on responsible recruitment and forced labor prevention

Invest in Responsible Labor Systems

Invest in capacity building resources to strengthen recruitment agencies



Worker and Community Empowerment

Strengthen Awareness

Leverage CSOs to strengthen migrant workers' knowledge around safe migration

Strengthen Worker Voice

Leverage worker-driven, ethical recruitment programs and CSOs to implement channels for independent grievance and remedy

Leverage Place-Based Projects

Leverage regional/country level projects to advance responsible recruitment



Transparency

Report Efforts Publicly

Document and publicly report on challenges, successes, and impact of responsible recruitment activities

Map Supply Chain

Strengthen knowledge and process to assess risk to inform responsible recruitment efforts

Validate Approach

Seek independent review to identify management gaps and develop timebound action plans to strengthen current approach



Priority Area:

Recruitment Practices and Capacity

Leadership Practice	Specific Actions	What this means / where to begin / example	Resources
Strengthen Practices	1. Directly hired migrant workers.	Rather than hiring workers through a recruiter, hire migrant workers directly to ensure they are recruited responsibly.	<u>Fair Hiring Toolkit</u><u>Migrant Worker Guidelines</u>
	 Used labor agencies, brokers or contractors that are certified as ethical and responsible or are clearly using an ethical recruitment business model. 	Ask whether the labor agency that you are seeking to work with use an ethical recruitment business model.	 IRIS: Certification Responsible Recruitment Program Ethical Recruitment Agencies
	3. Participated in multi-stakeholder initiatives focused on responsible recruitment.	Research external initiatives, such as those helping to build supplier capacity on responsible recruitment, to determine which initiative may be most relevant to participate in.	See page 29 for EXAMPLE
Build Capacity	 Screened and hired sending country recruitment agents and provided them with additional resources and support for the responsible recruitment of workers. 	Engage your recruitment agents and share with them examples and best practices on how your company recruits responsibly.	 Ethical Recruitment Agencies See page 29 for EXAMPLE
	 Used recruitment agents that are actively engaging in capacity building and awareness-raising initiative(s) focused on responsible recruitment. 	During the onboarding process of a new recruitment agent, ask how the prospective agent builds its own capacity to ensure its recruitment practices are ethical and responsible.	<u>CIERTO H-2A Services</u>
	3. Trained staff personnel involved in the employment of migrant workers (e.g., supervisors, human resource staff, recruiting managers) on responsible recruitment and forced labor prevention.	Provide hiring and operations managers and supervisors with opportunities to take training on responsible recruitment.	 Online Training: Establishing Fair Recruitment Processes
Invest in Responsible Labor Systems	1. Invested in responsible recruitment capacity-building resources and tools for recruitment agencies, brokers and/or contractors.	Connect with external initiatives that are building resources, tools, and training programs for responsible recruitment and identify opportunities to support these initiatives.	 IRIS: Recruiter Capacity Building Program See page 29 for EXAMPLE
	Invested in building the capacity of CSOs in sending and destination countries that are working to ensure the responsible recruitment of migrant workers.	Research local CSOs in sending and/or destination countries to identify opportunities to support these local CSOs.	IRIS: Stakeholder Engagement



Priority Area:

Worker and Community Empowerment

Leadership Practice	Specific Actions	What this means / where to begin / example	Resources	
Strengthen Awareness	Trained and improved migrant workers' understanding of safe migration.	Develop an in-person training on safe migration and deliver this training to foreign migrant workers.	N/A	
	 Collaborated with CSOs and/or governments (in sending or destination countries) to provide education resources and training for migrant workers about their rights. 	Identify and partner with CSOs that are creating educational resources for migrants to learn about their rights when migrating to a new country for work.	 Empowering Migrants: MigApp CDM: Know Your Rights Training IRIS Handbook for Governments 	
	3. Supported program(s) or initiative(s) that provide predeparture/post arrival training for all migrant workers, including information specific to the working environment and nature of the work for which migrant workers are being recruited. Identify and partner with CSOs that are providing pre-departure or post-arrival training for migrant workers.		 Issara Model for Worker Voice, Partnerships, and Innovation Migrant Workers Resource Centres 	
Strengthen Worker Voice	 Used worker voice surveys, tools or technologies that are independent, accessible and culturally appropriate to understand the needs and concerns of migrant workers. 	Research and identify worker voice tools that can help you understand the needs and concerns of migrant workers in your operations or supply chain	 <u>Transformative Technology for</u> <u>Migrant Workers</u> 	
	 Partnered with CSOs to provide migrant workers access to independent grievance mechanisms and avenues for effective remedy. Supported CSOs in sending and/or designation countries that offer counseling and other services to migrant workers. Identify and partner with CSOs that are providing or promoting access to effective grievance mechanisms. Identify and partner with CSOs that are providing direct counseling services to migrant workers. 			
			 IOM: Migrant Worker Voice and Engagement Pacific Links: Improving worker voice 	
Leverage Place- Based Projects	1. Supported regional/country level projects or partnerships that use risk-informed, impact assessments to identify potential solutions for responsible recruitment.	Identity and partner with place-based projects that are focused on a specific region or country.	 through empowerment Issara Model for Worker Voice, Partnerships, and Innovation 	
	2. Participated in worker-driven, ethical recruitment programs and initiatives at the local level. Identify and partner with external initiatives that are focused on worker-driven ethical recruitment program development.			



Priority Area:

Transparency

Leadership Practice	Specific Actions What this means / where to begin / example		Resources
Report Efforts Publicly	1. Publicly shared our commitments and actions that will be/have been taken to advance responsible recruitment.	Report your progress on responsible recruitment in your annual sustainability report.	See page 29 for EXAMPLE
	Documented outcomes, challenges and successes of responsible recruitment activities and regularly shared those outcomes publicly.	In addition to the goals set through this program, identify other KPIs to help you track progress on responsible recruitment and share these results in your annual sustainability report.	N/A
Map Supply Chain	1. Assessed entities involved in the recruitment, hiring, and employment of migrant workers in the sending and designation countries.	Map all entities that provide labor recruitment services for your company and assess them against your standards for ethical and responsible recruitment	Best Practice Guidance on Ethical Recruitment of Migrant Workers (see page 37)
	Conducted human rights impact assessments focused on responsible recruitment.	Identify a third party to help you conduct a human rights impact assessment on responsible recruitment.	Introduction to HRIAMigrant Worker Tools & Resources
	3. Leveraged third-party, technology-based solutions for supply chain mapping to assess risk and inform responsible recruitment activities.	Research, identify, and implement a third-party solution to help you map your supply chain and assess risks related to responsible recruitment.	See page 30 for EXAMPLES
Validate Approach	1. Engaged a third party to assess your responsible recruitment activities, including identifying gaps in your approach and developing a timebound action plans to address these gaps.	Identify and engage a third-party partner to assess potential risks and help develop a roadmap for addressing the identified risks.	N/A
	2. Engaged a third party to assess, audit, validate or certify recruitment agents that are recruiting and/or employing migrant workers.	Identify and engage a third-party partner to assess whether the recruitment agents that you source workers from are meeting your responsible recruitment standards.	See page 29 for EXAMPLE
	3. Sourced raw materials or ingredients that use a third-party certification program that includes responsible recruitment.	Research and identify a third-party standard or certification that is most relevant to your industry and use the standard to determine whether you or your supplier has met the standard.	See page 30 for EXAMPLES

EXAMPLES

Make sure you tell us what you are doing! If you're actively participating in one of the 3rd-party multi-stakeholder initiatives below that include a focus on responsible recruitment, report this through the People Program.¹

3 rd -Party Initiative	May Be Relevant to These Priority Categories	Specific Activity Within the Initiative	Select This Priority Area	Select This Leadership Practice to Report Progress
Seafood Task Force (STF)	Seafood	Educate supply chain partners on the STF Code of Conduct and engage recruitment agencies on training, capacity building, and remediation around responsible recruitment	Recruitment Practices and Capacity	Built capacity and awareness of recruitment agents
Responsible Labor Initiative (RLI)	Entertainment Fashion / Apparel Home	Be a member of and participate in the initiative	Recruitment	Participated in multi-stakeholder initiatives focused on responsible recruitment
		Participate in RLI's <u>Responsible Recruitment Program</u>	Practices and Capacity	Built capacity and trained individuals who recruit or employ workers
		Conduct a Specialty Validated Assessment Program on Forced Labor	Transparency	Engaged a third party to assess, audit, validate, or certify recruitment agents that are recruiting, and/or employing migrant workers
Ethical Charter Implementation Program (ECIP)	Fresh Produce	Support and promote <u>ECIP LAB</u> to enable growers and suppliers to assess current practices and management systems, access resources, and review information for best practices through a self-guided interactive platform	Transparency	Strengthened your knowledge and process to assess risk to inform responsible recruitment efforts
Fair Labor Association	Fashion / Apparel Home	Sign the <u>Commitment to Responsible Recruitment</u> and report actions to embed elements of this commitment in company policies and processes.	Transparency	Documented and publicly reported (e.g., website, annual report, stakeholder disclosure) your responsible recruitment activities



Technology-based tools and industry standards/certifications

Tool	Sample Use Case		Standard	Sample Responsible Recruitment Indicator (#)
Ganaz	Farmers can use Ganaz to ensure accurate data is used when recruiting workers		EFI Social Standards v.2.1	Workers do not pay recruitment, visa, or other costs or fees related to employment (1.4)
<u>&Wider</u>	Employers can use &Wider to hear from workers about fair recruitment practices		STF Code of Conduct v.2	Employers shall hire workers directly whenever possible (14.0)
<u>Ulula</u>	Suppliers can use Ulula to communicate with workers and detect recruitment fee risks		STF Vessel Auditable Standards v.2	Working conditions described at the point of recruitment are consistent with the employment contract at the time of hiring
<u>SupplyShift</u>	Companies can use SupplyShift to map and trace responsible recruitment risks		BAP Seafood Processing Standard	(3.8) Jobseekers and workers shall not have been subject to
<u>Sustainabil</u>	Companies can use Sustainabil to map and assess upstream sub-suppliers	v5 1	recruitment practices that employ threats, penalties, coercions, physical force, or fraud (SPS 5.6.4)	
Trace Register (TR)	Companies can use TR to simplify the exchange of accurate data		RBA Code of Conduct v.7.0	If any such recruitment fees are found to have been paid by workers, such fees shall be repaid to the worker (1.0)
Higg FSLM	Facilities can use Higg FSLM to assess recruiting and hiring risks at the facility level Members can use CUMULUS to share data on		SMETA Measurement Criteria v.6.1	Employment agencies must only supply workers registered with them (8.5)
CUMULUS Forced Labor Screen	recruitment and forced labor risks		Clearview Technical Standards	The labour provider implemented appropriate management
<u>Transparency-One</u>	Companies can use Transparency-One to manage supplier certifications		<u>v.1.4</u>	systems to seek to recruit workers locally (2.5)
<u>DiginexLUMEN</u>	Companies can use DiginexLUMEN to map, assess, and monitor supply chain risks		IRIS Standard v.1.2	The labour recruiter demonstrates that the employer has paid all recruitment fees and relates costs (1.2.1)

^{*}Note: Being listed on this sample, non-exhaustive list does not represent a specific endorsement by Walmart of any one of these tools or standards.





Case Study: Thai Union

- Increasingly, workers from Cambodia and Myanmar look toward Thailand for economic opportunities their own homelands are currently unable to offer. Not only are Thailand's migrant workers susceptible to discrimination, but they can be coerced into paying high recruitment fees on the way from their home country to secure a job. This means migrants seeking legal employment might find themselves deeply indebted before the work begins buried in debt that often takes years to repay.
- From 2015, Thai Union rolled out its revised <u>Business Ethics and Labor Code of Conduct</u>. It covers the recruitment and treatment of workers, stipulating protocols on employee welfare, benefits, wages, age, the right to freedom of association, the right to collective bargaining, and non-negotiable frameworks for health and safety. The code, which all suppliers must sign and adhere to, sets a baseline for expected behavior across Thai Union's supply chain.
- In 2016, Thai Union eliminated recruitment fees for all workers in its factories and processing plants, effective for all future recruitment of workers both from within Thailand and overseas.
- By committing significant resources and time to dealing directly and building stronger relationships with recruitment agents and NGOs in Myanmar, and now Cambodia, Thai Union has been able to map out recruitment processes more effectively, with the Migrant Workers Rights Network (MWRN) providing oversight and supervision, thereby reducing costs and complexities.
- Thai Union also works with the Issara Institute and provided a case study for their <u>Slavery Free Recruitment Systems</u> issue brief.

Additional Resources:

- RISE: Roadmap for Advancing Responsible Recruitment in Seafood—Step-by-step guidance on responsible recruitment best practices; and case studies
- Impactt: Ethical Recruitment, <u>Translating Policy into Practice</u>—
 Thai Union case study on policy implementation
- RST: Responsible Sourcing Tool, <u>Seafood Industry</u>—Compliance, screening, and evaluation tools; a <u>risk visualization tool</u>; and <u>case</u> <u>studies</u>

Source: Thai Union.



Priority Category: **Entertainment** (Information, Communications, and Technology)

Case Study: Microsoft

- Forced labor risks are associated with recruitment practices, which continually change due to labor market and production needs.
- Microsoft expect its suppliers to embed a responsible recruitment system into their operation practices and to continually identify and mitigate any detected risks.
- In FY21, Microsoft leveraged Responsible Labor Initiatives (RLI) to enhance the capability of responsible recruitment of suppliers located in high-risk countries.
- Practical training with toolkits were provided for these suppliers to guide suppliers to identify, assess, prevent or mitigate, track and report on risks associated with forced labor during the recruitment of migrant workers in the supply chain.
- Around 80 participants from 40 selected suppliers joined the training. In post-training feedback, the training delivery was rated 4.6 out of 5 by participants, of whom many reported that they would apply the toolkit in their recruitment process.
- Microsoft will conduct specified audit on responsible recruitment management system to promote the good practices.

Additional Resources:

LEADERSHIP GUIDE

- KnowTheChain: Responsible Recruitment in ICT Supply Chains—Benchmark of ICT companies on responsible recruitment practices
- Hewlett-Packard: Company SupplyChain Foreign Migrant Worker Standard Guidance Document— Example guidance document with sample screening questions and criteria for evaluating labor agents
- Verité: Forced Labor in the Production Of Electronic Goods in Malaysia—Country report on responsible recruitment in Malaysia's electronics sector
- KnowTheChain: Responsible Recruitment Benchmark, ICT—Case studies, recommendations, and examples of corporate practices

Source: Microsoft Devices Responsible Sourcing Report (FY21), page 59.





Case Studies: Multiple

- Unilever reports that it supported a prevention and remediation workshop for a supplier in Malaysia to ensure adherence to the Employer Pays Principle and develop a corrective action plan to reimburse workers' recruitment fees. The company also reports commissioning a study on migrant workers in Turkey's tomato industry. It states that the study's intent was to increase the company's understanding of recruitment and working conditions and that it worked closely with its supplier in the process. It discloses that this assessment discovered a lack of written contracts, that migrant workers had paid recruitment fees in sending countries or regions, and little awareness of and transparency on wage deductions.
- **Nestlé** discloses that the training it provided to farmers, traders, and recruitment agents—as well as migrant workers on working conditions, labor rights, and grievance and support procedures—resulted in a formal recruitment process being used for the first time with its Turkish hazelnut supply chains. It states that 366 workers, farmers, and labor brokers formed contracts before the hazelnut harvest. Nestlé notes that it is working with the labor research and consultancy organization Verité on strengthening pre-departure programs for Cambodian workers migrating to Thailand.
- **Smucker** states that it is actively involved in the Consumer Goods Forum through membership on its board and Social Sustainability Steering Committee, which identifies key foci and recommends corresponding actions to the board, steers the implementation of the forced labor commitments across the industry, and acts as champion in the fight against forced labor.

Additional Resources:

- RRT.org: Responsible Recruitment
 Toolkit—Online resources for US
 fresh produce businesses
- <u>EFI: What Does Responsible</u>
 <u>Recruitment Mean</u>—On-demand training video and scorecard to identify recruitment risks
- RST: Responsible Sourcing Toolset, Food—Compliance, screening, and evaluation tools; a <u>risk visualization</u> tool; and <u>case studies</u>
- KnowTheChain: Responsible
 Recruitment Benchmark, Food—Case
 studies, recommendations,
 and examples of corporate practices

Source: KnowTheChain.





Case Studies: Multiple

- Adidas reports that it is working with more than 20 recruitment agencies across Taiwan, Thailand, Philippines, and Vietnam as part of its work on recruitment fees. The company also discloses that it is part of a two-year partnership with the International Organization for Migration, which it states involves specialized training for recruitment agencies in sending countries and its business partners in receiving countries. Adidas states that through this partnership, it is also increasing engagement with second-tier suppliers that employ migrant workers. It also discloses that it is working to understand the costs of recruitment in different migrant corridors and high-risk countries such as Taiwan and Thailand, by conducting on-site investigations which include interviews with migrant workers and labor agencies. The company reports that as part of its efforts to tackle recruitment fees, it is focusing in particular on the corridors from Vietnam to Taiwan, the Philippines to Taiwan, and Myanmar to Thailand.
- **Lululemon** states that it conducts assessments of recruitment agencies used by its suppliers which include reviewing personnel files of migrant workers, and that 20 in-country agencies and 20 overseas agencies, which are used by 15 out of 19 of its suppliers in Taiwan, have been assessed. It reports that it has started to train suppliers and develop timelines with suppliers in Malaysia, Thailand, and Japan.
- **Burberry** discloses that it is working with two of its suppliers as well as the NGO Issara Institute to develop "an ethical recruitment route for workers." The company also reports that it is working on mapping recruitment journeys in high-risk hotspots which were identified through a human rights impact assessment. The company also discloses an example of the repayment of recruitment-related fees to workers at 11 supplier facilities, where workers had been charged for pre-employment health checks.

Additional Resources:

- AAFA/FLA Apparel & Footwear
 Industry Commitment to

 Responsible Recruitment—
 Includes webinar recordings,
 slide decks and a <u>list of</u>
 resources for apparel companies
- FLA: Guidance for Responsible Recruitment
- FLA: Addressing Risks of
 Forced Labor in Supply Chains
 —Briefing on best practices for identifying forced labor at the supplier level
- FLA: Addressing Risks and Safeguarding Workers' Freedoms—Includes indicators of forced labor and examples of risks and violations

Source: KnowTheChain.



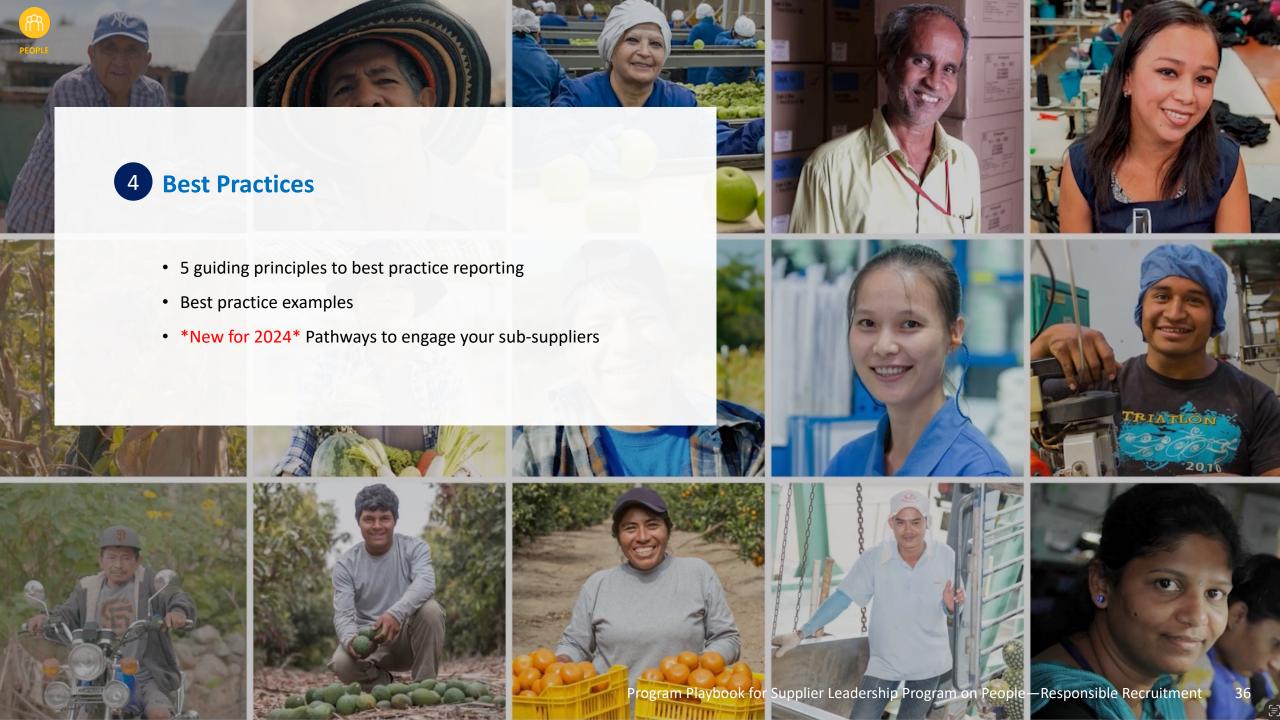
Priority Category: **Home**

Case Study: IKEA

- IKEA has done several projects with the International Organization for Migration (IOM) to map labour supply chains leading to IKEA suppliers in South East Asia. This included assessments at the suppliers and at recruitment agencies in both the countries of origin of migrant workers and countries of destination.
- It provided a clearer picture of migrant workers' journeys from their homes to IKEA suppliers in selected corridors, and highlighted the risks associated with cross-border recruitment. In many countries, legislation and established practice are based on workers paying recruitment fees and costs.
- Workers can accumulate high levels of debt before they even start working at their employer in the country
 of destination. Based on learnings from this project, the IKEA Guidelines on Responsible Recruitment have
 been developed. They aim to build the understanding and ability of suppliers to responsibly manage the
 recruitment of migrant workers. The focus is on cross-border migration through recruitment agencies or
 intermediaries, but the general principles apply to all types of recruitment of all workers.
- IKEA is one of the founding members of the <u>Leadership Group for Responsible Recruitment</u> which is convened by the Institute for Human Rights and Business.

Additional Resources:

- KnowTheChain: Investor Snapshot—Forced labor risks in forestry (including paper and forest products)
- KnowTheChain: Assessing Corporate
 Efforts to Address Forced Labor Risks in the
 Supply Chains of the Paper and Forestry
 and Home Furnishing Retail Sectors
- Verité: Summary of Key Trafficking in Persons Risk Factors in Wood Production— Overview and special brief on wood from Sub-Saharan Africa
- ILO: Forestry—Resources provided by the International Labour Organization on labour conditions in the forestry sector



5 guiding principles for best practice reporting



Provide Sufficient Information

- Suppliers should provide sufficient information describing the Specific Action that they took.
- In most situations, suppliers should aim to provide <u>at</u> <u>least</u> 2 to 3 full sentences describing the actions that they took.



Provide Relevant Information

 Suppliers should provide information that is relevant to the Specific Action in which they selected to report progress on.



Go Beyond Compliance

- Suppliers are encouraged to report actions that go beyond compliance. This program is about inspiring leadership practices.
- Focus on areas where risks are greatest.



Be Specific

- Describe timebound progress and results.
- Name specific programs, initiatives, organizations or collaborations.



Be Clear and Complete

- To ensure accurate understanding of the submission and avoid misinterpretation, suppliers should provide descriptions that are clear, simple and easy-to-understand.
- Responses should be in full sentences, in English and should avoid company jargon. Acronyms should be spelled out whenever possible.



Leadership Practice: Strengthen Practices

This example is illustrative and does not represent an actual submission.

BEST PRACTICES

Reporting Question	Specific Action	Scope
Have you strengthened practices for the responsible recruitment of migrant workers?	Directly hired migrant workers.	Direct operations

Free Text - Best Practice Example



In 2021, we committed to increasing the direct hiring of migrant workers in our seafood processing facilities in Thailand. As of the end of 2022, we have directly hired more than 500 migrant workers. These directly hired migrant workers now account for about 25% of our overall seafood processing workforce in Thailand.

Free Text - Poor Example



In the last few years, we have started to hire migrant workers directly.





Leadership Practice: Strengthen Practices

This example is illustrative and does not represent an actual submission.

Reporting Question	Specific Action	Scope
Have you strengthened practices for the responsible recruitment of migrant workers?	Used labor agencies, brokers, or contractors that are certified as ethical and responsible or are clearly using an ethical recruitment business model.	1 st tier supply chain





In 2019, we began working with CIERTO, a leading recruiting and consulting company specializing in providing well-trained H2A and H2B workers. CIERTO uses a recruitment model that is recognized by the International Labor Organization, the International Recruitment Integrity System, the US federal Government, and the UN. As of the end of 2022, 100% of our farm workers in California have been ethically hired through CIERTO.

Free Text - Poor Example



In 2018, we started to use an ethical recruitment business model.





Leadership Practice: Build Capacity

This	exampl	le is ill	lustrati	ve and	does	not
1	represe	nt an	actual	submi	ssion.	

Reporting Question	Specific Action	Scope
Have you trained staff personnel involved in the employment of migrant workers on responsible recruitment and forced labor prevention?	Implemented training for personnel in management, human resources, and recruiting functions on the importance of forced labor prevention and responsible recruitment.	Direct operations





Since 2020, we have implemented annual training for personnel in management, human resources, and recruiting functions on the importance of forced labor prevention and responsible recruitment. Specifically, we engaged ABC Training Corp. to deliver training on their Ethical Employment learning module to our human resources and operations managers. This module included training on key indicators of forced labor. Since 2020, we trained more than 300 human resources and operations personnel in approximately 80% of our global sites.

Free Text - Poor Example



Last year, we provided our human resources executives with training on diversity and inclusion.



Leadership Practice: Invest in Responsible Labor Systems

This example is illustrative and does not represent an actual submission.

Reporting Question	Specific Action	Scope
Have you invested resources in improving the trainings, tools, and resources that are used to strengthen responsible labor systems?	Invested in building the capacity of CSOs in sending and destination countries that are working to ensure the responsible recruitment of migrant workers.	1 st tier supply chain

Free Text - Best Practice Example



From 2020 to 2022, we invested more than \$10,000 in supporting CSOs in the United States and Mexico that are developing programs to support migrant workers working on fresh produce farms in the United States. These programs are focused on providing responsible recruitment resources for migrant workers and their families. By the end of 2022, more than 5,000 migrant workers and their family members have been impacted by these programs. We now have a goal to invest another \$50,000 and positively impact another 5,000 migrant workers and families by the end of 2026.

Free Text - Poor Example



Last year, we provided resources to CSOs in Mexico on responsible recruitment.



Priority Area: Worker and Community Empowerment

Leadership Practice: **Strengthen Awareness**

This example is illustrative and does	not
represent an actual submission.	

BEST PRACTICES

Reporting Question	Specific Action	Scope
Have you provided training to strengthen migrant workers' awareness and knowledge around safe migration?	Trained and improved migrant workers' understanding of safe migration.	Direct operations

Free Text - Best Practice Example



From 2021 to 2022, we provided training to 500 migrant farm workers from Mexico on the topic of safe migration. We provided this training in both English and Spanish. A pre- and post-training survey confirmed that these migrant workers' understanding of safe migration improved by 80%. We are planning another training with these migrant workers in 2023 to close the knowledge gap.

Free Text - Poor Example



We conducted supplier audits in 2022 and identified 3 nonconformances related to forced labor.



Priority Area: Worker and Community Empowerment Leadership Practice: Strengthen Awareness

This example is illustrative and does not represent an actual submission.

Reporting Question	Specific Action	Scope
Have you provided training to strengthen migrant workers' awareness and knowledge around safe migration?	Collaborated with CSOs and/or governments (in sending or destination countries) to provide education resources and training for migrant workers about their rights.	1 st tier supply chain





In 2022, we partnered with Cambodia's Ministry of Foreign Affairs and local CSOs to train seafood workers who were set to migrate to Thailand. Through these partnerships, 15 local recruiting agencies in Cambodia were provided with financial assistance, training, and other resources to then train Cambodian workers on their rights as they migrate safely to Thailand. By the end of 2022, more than 5,000 Cambodian workers received direct training from the 15 local recruiting agencies.

Free Text - Poor Example



We worked with local CSOs to develop and provide workers with training on forced labor.





Priority Area: Worker and Community Empowerment

Leadership Practice: **Strengthen Awareness**

This example is illustrative and does not represent an actual submission.

Reporting Question	Specific Action	Scope
Have you provided training to strengthen migrant workers' awareness and knowledge around safe migration?	Supported program(s) or initiative(s) that provide predeparture/post arrival training for all migrant workers, including information specific to the working environment and nature of the work for which migrant workers are being recruited.	1 st tier supply chain





In 2023, we provided funding to civil society organizations in Malaysia that focus on providing information, resources, and training to migrant workers from Indonesia who migrate to work in Malaysia's logging industry. Specifically, we supported ABC Nonprofit and XYZ Nonprofit with a major corporate grant to be used towards strengthening their capacity to train migrant workers once they have arrived in Malaysia.

Free Text - Poor Example



We provided grants to local nonprofits in Malaysia where many of our migrant workers live and work.





Priority Area: Worker and Community Empowerment

Leadership Practice: Strengthen Worker Voice

This example is illustrative and does not represent an actual submission.

Reporting Question	Specific Action	Scope
Have you strengthened the voice of migrant workers?	Used worker voice surveys, tools or technologies that are independent, accessible and culturally appropriate to understand the needs and concerns of migrant workers.	1 st tier supply chain





In 2019, we partnered with ABC Worker Voice Solutions to develop a mobile-based worker voice platform for workers in our 1st tier supply chain in Vietnam. Using the West Principles to develop the platform, we deployed our new worker voice platform in 2020 to workers in 50% of our 1st tier, electronics supply chain in Malaysia, reaching more than 75,000 manufacturing workers by the end of 2020. In 2021, we reached the remaining 50% of our 1st tier supply chain in Malaysia, reaching an additional 110,000 workers. Our goal is to expand the platform to all major sourcing regions by the end of 2026.

Free Text - Poor Example



In 2023, we partnered with a local NGO to design a tech-based worker voice tool that will be deployed next year.





Priority Area: Worker and Community Empowerment
Leadership Practice: Leverage Place-Based Projects

This example is illustrative and does not
represent an actual submission.

Reporting Question	Specific Action	Scope
Have you participated in or supported place-based projects or programs to advance responsible recruitment?	Supported regional/country level projects or partnerships that use risk-informed, impact assessments to identify potential solutions for responsible recruitment.	Direct operations





Since 2016, we have been participating in the ABC Responsible Recruitment Forum, a membership-based, multi-stakeholder initiative focused on strengthening responsible recruitment practices for garment workers in India. Through the ABC Responsible Recruitment Forum, we are able to fund industry-wide research projects and risk assessments, as well as share company-level best practices to other participants of this initiative. Since 2016, more than two dozen, industry-wide research projects have been completed, which have helped inform our company's responsible recruitment policies and practices in India.

Free Text - Poor Example



Last year, we worked with an industry group to assess forced labor risks in our upstream supply chain.



Leadership Practice: Report Efforts Publicly

This example is illustrative and does	no
represent an actual submission.	

Reporting Question	Specific Action	Scope
Have you documented and publicly reported (e.g., website, annual report, stakeholder disclosure) your responsible recruitment activities?	Publicly shared our commitments and actions that will be/have been taken to advance responsible recruitment.	1 st tier supply chain

Free Text - Best Practice Example



In 2022, we published our first progress report on the commitments we have made and actions taken on responsible recruitment in the garment manufacturing supply chain in Bangladesh. In this progress report, we have outlined our core strategies and KPIs and have provided detailed descriptions of specific initiatives, programs, and partnerships that we have developed or participated in since 2020 to advance responsible recruitment practices in Bangladesh. Going forward, we aim to publish an updated report every 2 years.

Free Text - Poor Example



Since 2010, we have published an annual CSR report, which provides details on our audit program results.



Leadership Practice: Map Supply Chain

Reporting Question	Specific Action	Scope
Have you strengthened your knowledge and process to assess	Leveraged third-party, technology-based solutions for supply chain mapping to	Upstream supply chain (tier 2+)
risk to inform responsible recruitment efforts?	assess risk and inform responsible recruitment activities	

This example is illustrative and does not represent an actual submission.

Free Text - Best Practice Example



In 2023, we partnered with ABC Solutions to develop and implement a supply chain mapping tool focused on forced labor in the upstream (tier 2+) seafood supply chain. The tool has been deployed to all sourcing managers in Thailand and Malaysia, and we have plans to expand the use of this tool globally by the end of 2025. The tool has helped identify regional hotspots where forced labor risks may be greatest. We are now using the outputs of the tool in our engagements with suppliers in these hotspot regions to inform our risk mitigation efforts in these regions.

Free Text - Poor Example



Last year, we hired an independent consultant to map our seafood supply chain.



Leadership Practice: Validate Approach

This example is illustrative and does not
represent an actual submission.

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Reporting Question	Specific Action	Scope
Have you engaged a third party to assess your responsible recruitment activities, including identifying gaps in your approach and developing timebound action plans to address these gaps?	Engaged a third party to assess responsible recruitment activities.	Upstream supply chain (tier 2+)

Free Text - Best Practice Example



In 2023, we partnered with ABC Consulting to conduct a human rights impact assessment (HRIA) of our upstream (tier 2+) electronics supply chain in Thailand. From this assessment, we identified that forced labor continues to be a potential salient risk, especially for migrants from neighboring countries. We identified opportunities to improve our expectations with our suppliers in Thailand. Specifically, we developed an action plan to provide human rights trainings focused on responsible recruitment for all strategic 2nd tier suppliers by the end of 2026.

Free Text - Poor Example



Last year, we hired a consultant to conduct an assessment of our child labor policies and practices.



Leadership Practice: Validate Approach

This example is illustrative and does not represent an actual submission.

Reporting Question	Specific Action	Scope
Have you sourced raw materials or ingredients that use a third-party certification program that includes responsible recruitment?	Sourced raw materials or ingredients that use a third-party certification program that includes responsible recruitment.	Upstream supply chain (tier 2+)





Since 2018, we have sourced tomatoes from Mexico certified by a third party as produced by workers that were responsibly recruited. The certification program is managed by ABC Nonprofit, a global NGO that maintains one of the food industry's most recognizable certification program for tomatoes. As of the end of 2022, we can confirm that 100% of the tomatoes that we sell in the United States meet this certification.

Free Text - Poor Example



For the last two years we have purchased ethically sourced tomatoes.



Pathways to engage your sub-suppliers on responsible recruitment

Engaging your sub-suppliers on responsible recruitment can be a significant opportunity for you. Here are three suggested pathways (in no particular order) for advancing responsible recruitment practices in your upstream (tier 2+) supply chain:

Pathway A:



- **Scope:** Upstream supply chain (tier 2+)
- Priority area: Recruitment Practices and Capacity
- Leadership practice: Strengthen Awareness
- Specific action: Participated in multistakeholder initiatives focused on responsible recruitment
- Sample free text description: Since 2020, our company has been participating in XYZ initiative, which is working with its members to develop training materials on safe migration for migrant workers producing raw materials in our industry's upstream supply chain.

Pathway B:



- Scope: Upstream supply chain (tier 2+)
- Priority area: Worker and Community **Empowerment**
- Leadership practice: Strengthen Worker Voice
- Specific action: Partnered with CSOs to provide migrant workers access to independent grievance mechanisms and avenues for effective remedy.
- Sample free text description: Our company partnered with ABC Nonprofit in 2023 to validate whether migrant workers in the DR Congo who are producing the raw minerals that go into our products have access to effective grievance mechanisms.

Pathway C:



- **Scope:** Upstream supply chain (tier 2+)
- **Priority area:** Transparency

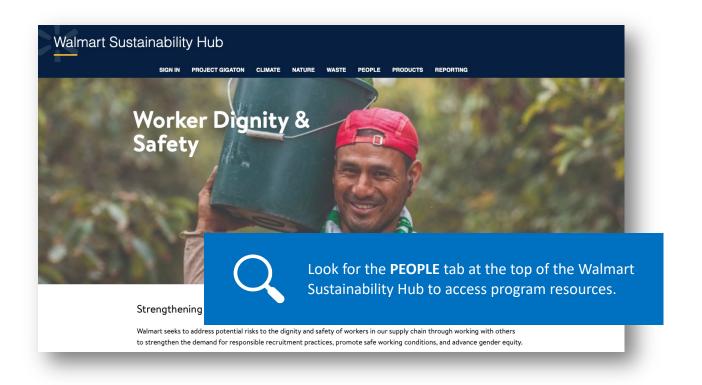
BEST PRACTICES

- **Leadership practice:** Map Supply Chain
- **Specific action:** Conducted human rights impact assessments focused on responsible recruitment.
- Sample free text description: In 2023, We conducted a country- and commodity-level human rights impact assessment (HRIA) focused on internal migrant workers producing cotton in Uzbekistan. Responsible recruitment and forced labor were key topics that we assessed through this HRIA.



Additional resources can be found on the Walmart Sustainability Hub

- The <u>Walmart Sustainability Hub</u> is the main channel to participate and access program resources
- Current resources available include:
 - VIDEO: <u>Engaging in Walmart's Supplier</u> Leadership Program on People
 - People program template
 - FAQs
 - Trainings and webinars
- Use the Sustainability Chatbot within the survey to ask questions



Glossary (1/3)

(In alphabetical order)

Dhaka Principles: The Dhaka Principles provide a roadmap that traces the worker from recruitment, through employment, to the end of contract and provides key principles that employers and migrant recruiters should respect at each stage in the process to ensure migration with dignity.¹

Due diligence: Due diligence refers to an enterprise's ongoing process which aims to identify, prevent, mitigate, and account for how it addresses the adverse human rights impacts of its own activities or which may be directly linked to its operations, products or services by its business relationships. The process should include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed.²

Employer Pay Principles: Reflecting Principle 1 of the Dhaka Principles for Migration with Dignity, the Employer Pays Principle is a concept that no worker should pay for a job. Walmart believes that adoption of the Employer Pays Principle across all industries will move forward our collective efforts to combat exploitation, forced labour, and trafficking of migrant workers in global supply chains and can be an important step in achieving the UN Sustainable Development Goal of decent work for all.³

Farm labor contractor (FLC): A farm labor contractor recruits and hires seasonal or temporary agricultural laborers and may provide transport, house, and provide meals for workers.⁴

Source: ¹Institue for Human Rights and Business, Migration with Dignity: A Guide to Implementing the Dhaka Principles.

²ILO, General Principles and Operational Guidelines for Fair Recruitment.

³Institue for Human Rights and Business, <u>The Employer Pay Principles</u>.

⁴U.S. Bureau of Labor Statistics, Farm Labor Contractors.

⁵Walmart's <u>Responsible Recruitment Expectations</u>.



(Continued from previous slide)

Labor recruiter: A labor recruiter, also sometimes referred to as a labor agency, broker, or contractor, is any entity or person that is involved in the process of recruiting workers for another company or indirectly by a company through the recruiter. These entities or persons can be formal or informal and can be engaged by the employer either directly or indirectly through other entities or agents.⁵

Recruitment: Advertising, information dissemination, candidate selection, transport, and placement into employment. For migrant workers, recruitment will include the return to the country of origin, where applicable. This applies to both workers looking for employment and those already in an employment relationship.⁵

Recruitment fees: Fees or related costs associated with recruitment, documentation, or services paid for the purpose of getting a particular job—even when allowed by local law. Examples of "recruitment fees" may include but are not limited to: costs for medical tests, insurance costs, skill tests, travel and lodging related to travel to destination country and country of origin, administrative costs like work permits or visas, passports obtained with the purpose of obtaining a specific job, marketing costs, personal protective equipment required for safety purposes, employer- required notary or legal fees, or breach of contract fees. Also included are fees or collateral used in situations such as bribes, extortion, or other extra- contractual or undisclosed costs.⁵

Source: ¹Institue for Human Rights and Business, Migration with Dignity: A Guide to Implementing the Dhaka Principles.

²ILO, General Principles and Operational Guidelines for Fair Recruitment.

³Institue for Human Rights and Business, The Employer Pay Principles.

⁴U.S. Bureau of Labor Statistics, Farm Labor Contractors.

⁵Walmart's <u>Responsible Recruitment Expectations</u>.

Glossary (3/3)

(Continued from previous slide)

Sending and destination countries: Sending countries are countries where foreign migrant workers are originating from and destination countries are countries where foreign migrant workers are being recruited to work in.

Sub-agents: Sub-agents are any third parties used by a recruitment agent to help facilitate the recruitment, selection, hiring, and/or transportation of foreign migrant workers.²

Suppliers: Entities providing products to Walmart, including goods for resale and for Walmart's own use.⁵

Workers: Individuals employed by a supplier, facility, or a service provider for work performed in a supplier's operations when producing products sold to or sourced by Walmart.⁵

Worker representatives: Worker representatives can be elected representatives who are freely elected by the workers employed by a particular sector of a business, as defined by applicable national law, with the election conducted in accordance with provisions of national laws or regulations or of collective agreements, whether through affiliation with a trade union or by independent decision of the workers themselves.

Source: ¹Institue for Human Rights and Business, Migration with Dignity: A Guide to Implementing the Dhaka Principles.

²ILO, General Principles and Operational Guidelines for Fair Recruitment.

³Institue for Human Rights and Business, The Employer Pay Principles.

⁴U.S. Bureau of Labor Statistics, Farm Labor Contractors.

⁵Walmart's <u>Responsible Recruitment Expectations</u>.

