

Higg Brand & Retail Module (BRM) Verification Protocol

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1 INTRODUCTION

1.1 BACKGROUND

1.1.1 General

1.1.1.1 Cascade is the apparel, footwear and home textile industry's foremost alliance for sustainable production. It was born from a dynamic and unconventional meeting of the minds when in 2009, Walmart, America's biggest retailer and Patagonia, one of the world's most progressive brands, came together with a radical mission: Collect peers and competitors from across the apparel, footwear and textile sector and together, develop a universal approach to measuring sustainability performance.

1.1.1.2 Today the Coalition has more than 3000 members and represents more than 40% of the global apparel supply chain. Its focus remains the same: develop a standardized supply chain measurement tool for all industry participants to understand the environmental and social and labor impacts of making and selling their products and services. By measuring sustainability performance, the industry can address inefficiencies, resolve damaging practices, and achieve the environmental and social transparency that consumers are starting to demand. By joining forces in a Coalition, members can address the urgent, systemic challenges that are impossible to change alone.

1.1.2 Higg Index

1.1.2.1 Developed by Cascade, the Higg Index is a suite of tools that enables brands, retailers, and facilities of all sizes — at every stage in their sustainability journey — to accurately measure and score a company or product's sustainability performance. The Higg Index delivers a holistic overview that empowers businesses to make meaningful improvements that protect the well-being of factory workers, local communities, and the environment.

1.1.2.2 For those just starting to implement sustainable practices, the Higg Index guides their important first steps, helping to distinguish strengths and weaknesses in the supply chain. For those already deeply engaged, it has more advanced potential, such as benchmarking sustainability performance against other Cascade members, identifying macro risks and performing targeted research and analytics.

1.1.2.3 With the Higg Index, Cascade aims to accomplish the following goals:

1.1.2.3.1 Understand and quantify the sustainability impacts of apparel and footwear products.

1.1.2.3.2 Reduce redundancy in measuring sustainability in apparel and footwear industries.

1.1.2.3.3 Drive business value through reducing risk and uncovering efficiencies.

1.1.2.3.4 Create a common means and language to communicate sustainability to stakeholders.

1.1.3 Higg Brand and Retailer Module Overview

- 1.1.3.1 *Brands and retailers play a key role in the long-term success of sustainable practices and communicating the value of sustainable fashion to consumers globally. Consumers are also becoming increasingly interested in supporting brands and retailers that are socially and environmentally sustainable and transparent about these practices.*
- 1.1.3.2 *Businesses of all sizes can use the Higg Brand & Retail Module (hereafter referred to as: Higg BRM or BRM) to measure the environmental and social impacts of their operations and make meaningful improvements. The Higg BRM also supports these Higg Index users in sharing sustainability information with key stakeholders, including supply chain partners.*
- 1.1.3.3 *This trusted assessment helps brands and retailers around the world establish and maintain strong corporate social responsibility strategies and practices that promote the well-being of workers and the planet. The Higg BRM assesses a product's lifecycle structure from materials sourcing through its end of use.*

1.2 PURPOSE

- 1.2.1 The objective of the BRM Verification Program is to ensure BRM data provided and shared through the Worldly.io platform is credible, trusted, and therefore able to be communicated publicly.
- 1.2.2 The purpose of the BRM Verification Protocol is to communicate the objectives, scope, process and interpretive guidance for the BRM Verification program. This includes:
 - 1.2.2.1 *Ensuring that appropriate information is provided to Brand and Retailers that utilize this program*
 - 1.2.2.2 *Ensure that appropriate information is provided to Verifier Bodies responsible to conduct BRM verifications*
 - 1.2.2.3 *Providing a consistent verification program*
- 1.2.3 Individuals and groups to whom this Manual applies includes:
 - 1.2.3.1 *Cascade Staff*
 - 1.2.3.2 *Cascade Verification Program Manager (VPM)*
 - 1.2.3.3 *Verifier Bodies*
 - 1.2.3.4 *Brands and Retailers utilizing the Verification Program.*

1.3 DEFINITIONS

- 1.3.1 **“BRM Self-Assessment Module (BRM)”** – This is the set of ‘questions’ that are answered by the Brand / Retailer to generate the BRM score. The questions are housed in the Worldly.io platform. These answers and supporting documents are what is ‘Verified’ (aka assured) by the Verifier Body.
- 1.3.2 **“Worldly.io”**- The website through which users can access the Higg Index.
- 1.3.3 **“Higg Index”** - The questions, methodology, know-how, scoring metric, algorithms, ideas, and inventions, related to the suite of sustainability assessment tools, including but not limited to: the BRM; the Higg Facilities Environmental Module (the “FEM”); the Higg Facilities Social and Labor Module (the “FSLM”) (but excluding content related thereto); the Higg Materials Sustainability Index (the “MSI”); the Higg Product Module (the “PM”); and the Higg Design and Development Module (the “DDM”), and any future modules or tools incorporated by Cascade, including data requisite to the methodology of the foregoing, and all new versions of any of the foregoing, provided that the foregoing will constitute the “Higg Index” only after approved by Cascade.
- 1.3.4 **“Lead Verifier”** - The individual in the Verifier Body who is responsible for the verification and its performance, and for the report that is generated. Within current assurance standards this is analogous to “Assurance Partner”.
- 1.3.5 **“Subject Matter Expert”**: Subject matter experts are individuals who do not meet the requirements for being a verifier but have technical knowledge on one or more of the sustainability topics included in a BRM verification. They help verifiers interpret and understand technical subjects but do not make decisions on conformance with BRM criteria.
- 1.3.6 **“Verification”** - The methods and processes by which a VB obtains appropriate evidence in order to express a conclusion on the reliability and accuracy of the BRM self-assessment data (that is, the outcome of the measurement or evaluation of results against defined criteria). Within current assurance standards this is analogous to “Assurance engagement”.
- 1.3.7 **“Verification Program Manager (VPM)”** – This is the oversight organization for the Verification program. The role of an oversight organization is to provide quality assurance to the verification process. This may include, but is not limited to, vetting and management of service providers (e.g., Verifier Bodies), application of quality assurance procedures, risk assessment, and general project management.
- 1.3.8 **“Verification Team”** —All Verifiers and staff performing the verification.
- 1.3.9 **“Verified Module (vBRM)”** - The result of the Verification process, indicating the accuracy/reliability of the self-assessment data and corrected data as needed. A Verifier Body will access and complete a vBRM on the Worldly.io platform. Once a self-assessment is Verified, it can be shared by a Brand/Retailer.

- 1.3.10 **“Verifier”** - The individual(s) conducting the verifications (includes Lead Verifier and other members of the verification team. NOTE: Where Cascade expressly intends that a requirement or responsibility be fulfilled by the Lead Verifier, the term “Lead Verifier” rather than “Verifier” is used. Within current assurance standards this is analogous to “Assurance Practitioner”).
- 1.3.11 **“Verifier Body (VB)”** – A company that is qualified and approved to perform the Verification process in accordance with the defined procedures and protocols. Within current assurance standards this is analogous to “Assurance Provider”.
- 1.3.12 **Use of ‘shall’ or ‘should’**: The word ‘shall’ indicates a requirement and the word ‘should’ indicates a recommendation.

1.4 ROLES AND RESPONSIBILITIES

1.4.1 Roles and responsibilities are summarized in Table 1.

Table 1 Roles and Responsibilities for BRM Verification

Who	Roles and Responsibilities
VPM	<ul style="list-style-type: none"> • Following VPM policies defined in Cascale-VPM Agreements • Managing the Verifier Body Application Process • Vetting VB Applicants • Determining Eligibility of Verifier Bodies • Conducting Quality Assurance • Providing required information and data to Cascale
Verifier Body	<ul style="list-style-type: none"> • General <ul style="list-style-type: none"> ○ Engaging in Verification procedures and processes ○ Ensuring competent Verifiers are used in the verification process ○ Ensuring Verifiers act ethically and honestly ○ Providing necessary oversight and support to Verifiers ○ Ensuring necessary quality controls are in place to produce reliable and accurate results • Lead Verifier <ul style="list-style-type: none"> ○ Responsible for the verification and its performance, and for the quality of verification report that is generated ○ Ensures verification protocols are followed ○ Assigns, reviews and approves the work of other Verifiers. • Verifier <ul style="list-style-type: none"> ○ Conducting the verification (includes Lead Verifier and other members of the verification team). • Scheme Manager <ul style="list-style-type: none"> ○ Overall responsibility for the performance and quality of the Verifications for a VB. ○ Point of contact with Cascale to answer queries or to discuss issues for all activities globally. ○ Responsible for ensuring that Verifiers are up to date with training and updates to the Cascale
Cascale	<ul style="list-style-type: none"> • Programmatic oversight including strategy, capacity, quality, and financial sustainability • Managing the VPM • Serving as the ultimate decision-maker on issues escalated by the VPM
Worldly	<ul style="list-style-type: none"> • Providing and managing data systems and platforms (https://worldly.io) • Redirecting verification queries to Cascale/VPM through Support desk
Brands and Retailer	<ul style="list-style-type: none"> • Completing the self-assessment • Provide Self-Certification documentation to Cascale/VPM (as applicable) • Provide documents, participate in interviews/meetings, etc. as required by VB to make Verification assessment.

2 VERIFIER BODIES

2.1 APPLICABILITY

- 2.1.1 Only Cascade approved Verifier Bodies shall be permitted to conduct a valid verification. Competency and other VB requirements are provided in *Requirements for Verifier Bodies and Verifiers*
- 2.1.1.1 *Only Cascade approved Verifiers, associated to an approved Verifier Body can make verification determinations.*
- 2.1.1.2 *A list of approved Verifier Bodies shall be maintained by the VPM and approval is synced to Worldly.io.*

2.2 VERIFICATION TEAM

- 2.2.1 A verification can be conducted by more than one individual. The individuals involved in the Verification are considered the Verification Team.
- 2.2.1.1 *A verification team shall include a lead verifier who meets the verifier competency requirements.*
- 2.2.1.2 *The verification team shall have knowledge of the apparel/footwear/textile industry.*
- 2.2.1.3 *The verification team shall have experience with sustainability reporting such as GRI, SASB, CDP, UNGC, National Sustainability reporting mandate by Government or stock exchange, market regulator or other comparable standards.*
- 2.2.1.4 *A verification team may include one or more team verifiers.*
- 2.2.1.5 *A verification team may include subject matter experts.*
- 2.2.1.6 *If a verification team includes more than one individual their roles are defined as follows:*
 - 2.2.1.6.1** Lead Verifier: The lead verifier has primary responsibility for determining if BRM requirements are met.
 - 2.2.1.6.2** Team Verifier: Team verifiers assists in gathering information and evidence and makes recommendations to the lead verifier on conformance with BRM criteria.
 - 2.2.1.6.3** Subject Matter Expert: Subject matter experts are individuals who do not meet the requirements for being a verifier but have technical knowledge on one or more of the sustainability topics included in a BRM verification. They help verifiers interpret and understand technical subjects but do not make decisions on conformance with BRM criteria.

3 VERIFICATION DETAILS

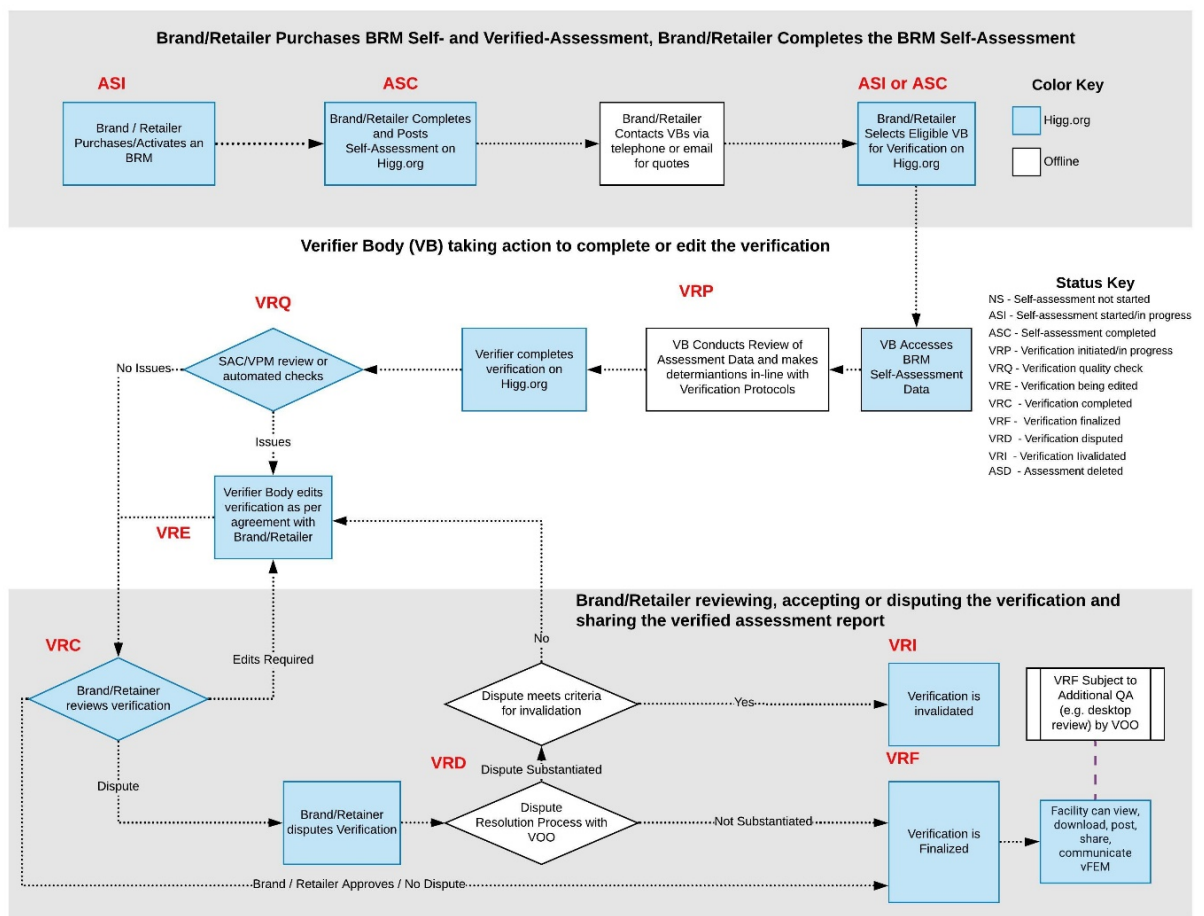
3.1 PROCESS FLOW

3.1.1 The process flow of the BRM verification is provided in Table 2. The status noted in red align with status indicators in the Worldly.io platform.

3.1.1.1 The most up to date version of process flow can be found here:

<https://howtohigg.org/higg-brm-verification-program/>

Table 2 BRM Process Flow



3.2 VERIFICATION CRITERIA

- 3.2.1 The Verifier Body shall use the criteria provided in here [BRM Question by Question Guidance – User Resources: How To Higg](#) and with the online tools.

3.3 VERIFICATION SCOPE

- 3.3.1 Data in the BRM will represent the either calendar year or fiscal year as selected by the Brand/Retailer.

3.4 VERIFICATION STANDARD

- 3.4.1 Verifier Bodies shall adhere to requirements of latest versions of assurance standards AA1000AS or ISAE3000 unless otherwise specified in the sections below.
- 3.4.2 Data that has been verified/assured by an independent 3rd party to a comparable level (see Section 3.5) can be accepted without additional verification.
- 3.4.2.1 *For example, if in the judgement of the Verifier Body, a section or question was included in another verified/assured report (e.g. GRI) no additional verification is required and this will be accepted as ‘Accurate’*
- 3.4.3 Minimum evidence gathering for evaluating the accuracy of the answers shall include (more detailed “How It will be Verified” info is provided in How to Higg, see 3.2 Verification Criteria):
- 3.4.3.1 *Understanding the management of sustainability performance data and data collection processes;*
- 3.4.3.2 *reviewing the design of systems and processes for managing the data;*
- 3.4.3.3 *interviewing, on a sample basis, selected individuals with overall responsibility for data measurement, calculation, and collection;*
- 3.4.3.4 *observing and inspecting, on a sample basis, management practices and data gathering procedures;*
- 3.4.3.5 *test of details on a sample basis (e.g. re-performance or spot checking of underlying calculations);*
- 3.4.3.6 *collecting and evaluating documentary evidence and management representations to support the verification;*
- 3.4.3.7 *confirming answers are consistent with the verification findings and drawing conclusions on accuracy.*

3.5 LEVEL OF VERIFICATION

3.5.1 Starting CY2024 cadence, Higg BRM Verification is only available at Limited Level of verification. Reasonable level of verification shall not be selected for the CY2024 cadence until further notice.

3.5.2 The BRM shall be carried out only under the Limited level of verification.¹ Below section clarifies the difference between Reasonable and Limited levels of verification.

3.5.2.1 *Reasonable Verification*

3.5.2.1.1 In a Reasonable verification the VB shall seek more extensive evidence in all relevant areas as well as corroborative evidence where available. In other words, the VB shall obtain sufficient evidence such that the risk of their accuracy determination being in error is very low

3.5.2.2 *Limited Verification*

3.5.2.2.1 The VB may judge it to be appropriate in the circumstances of Limited verification to place relatively greater emphasis on inquiries of the entity's internal or upper level personnel and relatively less emphasis, if any, on obtaining evidence from all levels of employees or from external sources than may be the case for a reasonable verification.

3.5.2.2.2 In a Limited verification the VB may, select less items for examination; or perform fewer procedures (e.g. interviews of lower level employees).

3.5.2.2.3 In Limited verification, analytical procedures may be designed to support expectations regarding the direction of trends, relationships and ratios rather than to identify data errors or misstatements with the level of precision expected in a Reasonable verification.

3.5.2.2.4 In Limited verification the VB may, use data that is more highly aggregated or use data that has not been subjected to separate procedures to test its reliability to the same extent as it would be for a Reasonable verification

3.5.3 The Verification Level shall apply to the entire BRM module, i.e. all BRM questions. In other words, Levels are not applied on question or section level.

3.5.4 The objectives, focus and required supportive evidence will differ, depending on the verification level. A summary is provided in Table 3.

¹ In comparison to AA1000AS standard nomenclature: Reasonable = High Level; Limited = Moderate Level

Table 3 Summary of Characteristics of Levels of Verification

	Reasonable	Limited
<i>Objective</i>	<p>The Verifier Body will perform procedures to reduce the risk of material misstatement to a low level.</p> <p>The objective is to reach a conclusion on whether the self-assessment (on a question level) is materially free from misstatement.</p> <p>Triangulation of information has been carried out, such as through independent/external data sources, market recognized databases, or Artificial Intelligence.</p> <p>Verification will provide users with a high level of confidence in the data.</p>	<p>The Verifier Body will perform procedures to reduce the risk of material misstatement through the collection of evidence, but not to the low level required by reasonable verification. To achieve this, the Verifier Body will perform different or fewer tests than those required for reasonable verification or uses smaller sample sizes for the verification.</p> <p>The objective is to reach a conclusion that is meaningful and not misstated based on the work performed. Verification will enhance the user's confidence in the data.</p>
<i>Evidence characteristics</i>	Extensive depth of evidence gathering including corroborative evidence and sufficient sampling at lower levels in the organization. Emphasis is on the <i>reliability</i> and quality of the information.	Limited depth of evidence gathering including inquiry and analytical procedures and limited sampling at lower levels in the organization as necessary. Emphasis is on the <i>plausibility</i> of the information.

3.5.5 Information is considered material if its omission or misstatement could influence relevant stakeholders or impact the intent of the question within the self-assessment.

3.6 VENUE

- 3.6.1 Verifications are conducted 'off-site' through desktop review of shared materials, phone or online interviews and communications, and review of public information.
- 3.6.2 On-site meetings or site visits, though not required, may be conducted at the discretion of the VB and with agreement of the Brand/Retailer.

4 VERIFICATION PROCESS

4.1 RESOURCES

- 4.1.1 Cascale does not define minimum or maximum resources hours.
- 4.1.2 It is understood that resource hours should be defined based on: size and complexity of the company, past experience with completing the Higg BRM. Cascale aims to provide more guidance on these parameters upon completion of the pilot.

Timeline

- 4.1.3 Verification shall begin with sufficient time for the Verifier Body to complete the work.
- 4.1.4 Cascale does not define a required amount of time to conduct a Verification, however, the Verification shall be finalized and posted by the prescribed deadline indicated in the cadence for the year.
- 4.1.5 The steps for completing the Verification Process are summarized in Table 5 and include approximate timelines, however these are not requirements.

Table 5 Verification Steps and Approximate Timelines

Step	Summary	Detail	Approximate Timeline	Reference
1	Brand/Retailer Provides Pre-Information	Brand/Retailer shall provide basic information to the Verifier Body on the scope of the BRM self-assessment. Verification Level should be communicated.	1 week	Section 2.1
2	Brand/Retailer Engages with Verifier Body and Assigns on Worldly.io	VB shall be assigned on Worldly.io and can access the detailed self-assessment.		
3	Verifier Body Reviews Self-Assessment to Revise or Update Scope	<p>Verifier Body shall review the scope of the BRM assessment in order to revise or update the scope of work as needed.</p> <p>The VB may request a short list of documentation or description of available documentation to help determine if any scope changes are needed.</p>	1 week	
4	Verifier Body Develops a Verification Plan and initial Interview Schedule	<p>The VB shall review available BRM data and documentation.</p> <p>The VB shall determine the configuration of the Verification Team including any subject matter experts.</p> <p>The VB may also generate an initial interview list/schedule of persons that they will need to interview as part of the Verification.</p>	2 to 4 weeks	
5	Verifier Body Verifies the Data Provided in the Assessment and Makes Final Accuracy Determinations	<p>The VB shall request and review documentation, re-calculate data, and interview relevant personnel in order to make a determination on each self-assessment claim.</p> <p>The VB shall conduct any final internal reviews and mark the verification completed</p>	4 to 8 weeks	Sections 4.2 to 4.3
6	Brand/Retailer Reviews the Information and Negotiates any Necessary Changes	The Brand/Retailer shall review the accuracy findings of the VB. Edits can be made by the VB as necessary.	2 weeks	Section 4.4
7	Brand/Retailer Finalizes (or Disputes) the Verified Report	The Brand/Retailer shall finalize the report. If agreement can't be reached the Brand/Retailer can enter a Dispute which will be arbitrated by the VPM/Cascale.		Sections 4.4 to 4.5

4.2 DATA COLLECTION

4.2.1 General

4.2.1.1 *To achieve a verified assessment report that is of high quality and meets the user's needs, it is important to provide the following data in Worldly.io which will form the Verification Module (Report) and the final score that can be shared:*

4.2.1.1.1 make the right Verification Selection (Section 4.3.2),

4.2.1.1.2 provide the right narrative in the Verification Comments (Section 4.3.3)

4.2.2 Completing the Verification Selection

4.2.2.1 *For each question in the BRM Self-Assessment an accuracy determination is required*

4.2.2.1.1 This includes 'negative' answers. These should also be Verified and education provided to the organization as needed.

4.2.2.1.2 The VB shall form a conclusion about whether the answer is accurate (e.g. free of material misstatement or unverified data).

4.2.2.2 *"Accurate" means: Information provided by the Brand/Retailer is, in the judgement of the VB, plausible and supported by data in accordance with the Limited Level Verification.*

4.2.2.2.1 Additional field to complete with this choice - Verification Comments, if;

4.2.2.2.1.1 *Information provided is not sufficient to explain circumstances.*

4.2.2.2.1.2 *VB wants to provide additional information about circumstances.*

4.2.2.3 *"Inaccurate" means: Information provided by the Brand/Retailer is not considered plausible (Limited). Or information cannot be verified, i.e. the VB cannot plausibly indicate that the answer is accurate.*

4.2.2.3.1 Additional fields to complete with this choice: Corrected Response and Verification Comments

4.2.2.3.1.1 *VB must provide the "Corrected Response" (e.g. a "Yes" answer becomes a "No") and support the response by providing details in "Verification Comments".*

4.2.3 Providing Verification Comments

4.2.3.1 *Verification Comments may be best as context to the accuracy determination and should provide details on the reason why a question was deemed inaccurate.*

4.2.3.2 *If organisations would like to keep this required information confidential and internal to their organisation especially when their vBRM modules are shared with external organisations such as retailers and/or manufacturers the VB may populate verifier comments fields with a placeholder text.*

4.2.3.3 *VB and the brand/retailer should then maintain a separate document containing evidentiary details.*

4.2.3.3.1 *Cascade or the VPM may request these documents during the quality review process.*

4.2.4 Providing Verification Details and Verification Statement

4.2.4.1 *In the Verification Details section, the Verifier Body must provide requested details as well as a free text narrative regarding the specifics of the Verification performed.*

4.2.4.2 *The Verifier will attach or otherwise provide an accompanying “Verification Statement”. A general template is provided in Section 5.*

4.2.4.2.1 *The Verification statement will generally align with ‘Assurance Statement’ requirements of AA1000AS or ISAE3000 unless otherwise noted.*

4.3 INTERNAL QUALITY ASSURANCE

4.3.1 Before submitting the verified assessment report for Brand/Retailer review, the Verifier Body must do an internal quality check. The accuracy of the Verification Selection and Verification Comments are the responsibility of the Lead Verifier/Verifier Body. Minimally, the review should ensure:

4.3.1.1 *Correct use of spelling and grammar*

4.3.1.2 *Verification entries, including photos, do not contain employee names or any personally identifiable information for reasons of confidentiality and privacy.*

4.3.1.3 *Evidentiary Document are attached, as application, where the Verification Selection is “Inaccurate” and the Verifier has copy or example of evidence*

4.3.1.4 *If any part of the BRM response is inaccurate, “Inaccurate” must be selected.*

4.3.1.5 *When applicable, any time the Verification Comments field is completed, a thorough response must be provided considering the key characteristics of Verification Comments narrative.*

4.4 CLIENT REVIEW

- 4.4.1 Once the verification is completed, the Brand or Retailer is notified via Worldly.io and can access the verified assessment report online for review (status is VRC). The Brand/Retailer should do one of the following:
- 4.4.1.1 *Reach out to the Verifier Body for clarifications, concerns, questions about the verified assessment report, especially with regards to question level issues and conclusion statements. A Verification can be placed in VRE status to make agreed upon edits. Once a Verifier has completed any agreed upon edits, the status is returned to VRC by the Verifier Body. From VRC the status can be changed back to VRE (for additional edits) or to VRF/VRD as noted below.*
 - 4.4.1.2 *Dispute the verified assessment report due to Verifiers not following Verification Protocol or complaints about Verifier Body verification team conduct. This changes the assessment status from "Verification Completed" to "Verification Disputed" (VRD). When raising the Brand/Retailers will have to provide more detailed information about the Dispute, so the VPM is well informed.*
 - 4.4.1.3 *Accept the verified assessment report, which changes the assessment status from "Verification Completed" to "Verification Finalized" (VRF).*

4.5 QUALITY ASSURANCE / INTEGRITY

- 4.5.1 The VPM can choose to conduct any type of quality assurance procedures for any verified assessment outlined in in the *Quality Assurance Program* document (Currently in DRAFT and not available).
- 4.5.2 QA activity by the VPM can result in invalidations of the verified assessment report, which means that the report can no longer be shared with end users and the full report is no longer available on Worldly.io.

5 RELATED DOCUMENTS

BRMSFS2021041.1 – [Higg BRM Fees Table](#)

TBD – Quality Assurance Program

BRMPVBR2021041.1 – Requirements for Verifier Bodies and Verifiers

BRMGH2020041.0 – [HowtoHigg](#)

6 DOCUMENT CHANGE LOG

Version	Date	Section	Summary of Changes
1.0	June 22, 2023		Original Document
2.0	March 27, 2024	3.5 Levels of verification	Clarified that only Limited level of verification applies to CY2024.
2.0	March 27, 2024	All	Changed “SAC” to “Cascade” in text and branding