



Higg Facility Environmental Module (FEM) Ethics Investigation Protocol

Version 1.1, April 2024

Document #: FEMEIP2024041.1

Authorization: Cascale

Acknowledgments

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1 INTRODUCTION

1.1 GENERAL INFORMATION

- 1.1.1 Ethical behaviors and perceptions are paramount to the Higg FEM Verification Program.
- 1.1.2 Any unethical behavior or perceptions is unacceptable.
- 1.1.3 The VPM's main duty is to protect the integrity of the Higg FEM Verification Program; therefore, in all ethical investigations or decisions, they will lean towards protecting the integrity of Higg FEM Verification Program.
- 1.1.4 Cascale/VPM has sole authority to:
 - 1.1.4.1 *Conduct ethical investigations.*
 - 1.1.4.2 *Determine and enforce any consequences, including suspending or permanently revoking Verifier Body (VB) or Verifier status.*
- 1.1.5 Ethical investigations include discussions with any individuals, whether at the manufacturer, verification company, Cascale (including member experts) or others that can provide information pertinent to the investigation.
- 1.1.6 VBs and Verifiers acknowledge:
 - 1.1.6.1 *That the integrity of the Higg FEM Verification Program is paramount.*
 - 1.1.6.2 *That the ability to conduct Higg FEM Verifications is a privilege, and not a right.*
 - 1.1.6.3 *That VB or Verifier status may be suspended or revoked at any time due to substantiated ethics-related concerns.*

1.2 ETHICS REPORTING

- 1.2.1 Any individual may report an ethics concern. All concerns are treated seriously and where warranted, further investigated by VPM in conjunction with Cascale as per this Protocol.
- 1.2.2 Ethics concerns should be reported to the VPM by email to: FEM@sumerra.com or by phone at: +1 (503) 601-0717 (US) or +852 2824 8802 (Asia).

2 ETHICS INVESTIGATIONS

- 2.1.1 The integrity of Cascale and Higg FEM Verification program is paramount, and it is expected that VBs and Verifiers work in a manner that enhances this integrity.
- 2.1.2 VBs must never act unethically or give the perception of unethical behavior. This applies to:
 - 2.1.2.1 *All VB staff including VB management staff.*
 - 2.1.2.2 *Company processes, systems, procedures or other systemic measures that encourage, force, or incentivize individual Verifiers to work in an unethical manner.*
- 2.1.3 All levels of VB staff are expected to be transparent with Cascale/VPM during ethical investigations.
- 2.1.4 Cascale /VPM has sole authority to:
 - 2.1.4.1 *Investigate ethical issues.*
 - 2.1.4.2 *Determine results from ethical investigations.*
 - 2.1.4.3 *Apply disciplinary actions, if needed.*
- 2.1.5 If there is a 'Credible Report' or suspicion of unethical behaviors by a VB:
 - 2.1.5.1 *VBs status and the statuses of some (or all) Verifiers associated with that VB may be suspended or permanently revoked.*
 - 2.1.5.2 *At the discretion of Cascale/VPM, VBs and/or specified Verifiers may not be permitted to conduct Higg FEM-related work until the investigation is complete.*
- 2.1.6 A 'Credible Report' includes:
 - 2.1.6.1 *Information received that includes some details, including:*
 - 2.1.6.1.1 VB or Verifier Name
 - 2.1.6.1.2 Place (Facility)
 - 2.1.6.1.3 Date or time
 - 2.1.6.1.4 Alleged ethical violation(s)
 - 2.1.6.2 *Information submitted by any of the following parties:*
 - 2.1.6.2.1 Cascale Member Companies
 - 2.1.6.2.2 Facilities
 - 2.1.6.2.3 Organizations

2.1.6.2.4 Verifying Bodies

2.1.6.2.5 NGO's

2.1.6.2.6 Other knowledgeable individuals

2.1.7 If information is received that is 'not credible', Cascale/VPM will attempt to validate the information. Until the information is validated, the report is considered 'not credible' and no actions are taken to suspend or revoke the statuses of the VB or its Verifiers.

2.1.8 Regardless of whether the report is creditable or not, Cascale/VPM will investigate. This may include:

2.1.8.1 Talking with or getting information from:

2.1.8.1.1 Verifiers

2.1.8.1.2 Other VB Staff

2.1.8.1.3 The Facility (or Facilities) where the alleged incident(s) occurred

2.1.8.1.4 Other facilities where the VB or Verifier has conducted work

2.1.8.1.5 Other knowledgeable individuals or companies

3 INVESTIGATION RESULTS

3.1.1 If the investigation results show no unethical actions or behaviors and there is no suspected unethical actions or behaviors, VB and/or Verifier status reinstated (if suspended during the investigation) and they may conduct Higg FEM-related work, including verification activities.

3.1.2 If the investigation cannot confirm unethical activities or behaviors, but there are suspected unethical activities or behaviors, Cascale/VPM may:

3.1.2.1 Suspend the VB for a period of time not to exceed 18 months

3.1.2.2 Provide a warning to the VB

3.1.2.3 Place the VB or Verifier on probation for up to 2 years, which may include the following stipulations (at the discretion of Cascale/VPM):

3.1.2.3.1 Providing a warning to the VB/Verifier.

3.1.2.3.2 Require the VB to provide additional training to their Verifiers as per the *Higg FEM Verifier Body Program Requirements Protocol and other relevant documents*.

3.1.2.3.3 Require the VB to provide additional oversight of Verifiers.

3.1.2.3.4 Conduct additional Quality Assurance (QA) oversight activities on the VB and/or Verifiers as defined in the *Cascale Higg FEM Verification Quality Assurance Manual*.

- 3.1.2.3.5 Other activities or tasks that will protect the integrity, and perception of integrity, of Cascale and Higg Program as defined by Cascale/VPM
- 3.1.3 If the investigation confirms unethical activities or behaviors:
 - 3.1.3.1 *The VB status and statuses of any associated Verifiers will be suspended or permanently revoked, meaning that:*
 - 3.1.3.1.1 The VB is prohibited from conducting all Higg FEM related work including provision of FEM verification services.
- 3.1.4 The length of status suspension will be determined by Cascale/VPM, but will typically be for a period of no less than 12 months.
- 3.1.5 VB or Verifier Status revocation is indefinite, however Cascale/VPM may allow VBs or Verifiers to reactivate their status if sufficient remedial actions are demonstrated.
 - 3.1.5.1 *Should a VB or Verifier whose status has been revoked wish to re-enter the Higg FEM program as a service provide, a request must be made to the VPM at FEM@sumerra.com*

4 DOCUMENT CHANGE LOG

Date	Section	Summary of Changes
2021-06-22	n/a	<ul style="list-style-type: none"> • Extracted as standalone protocol from Higg FEM Approval Maintenance and Verifier List Policy (VPM-004)
2024-04-30	n/a	<ul style="list-style-type: none"> • Updated for Cascale (formerly SAC) rebrand.