

Higg Facility Environmental Module (FEM) Verifier Body/Verifier Code of Professional Conduct

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Acknowledgments

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1 INTRODUCTION

1.1 GENERAL INFORMATION

- 1.1.1 The Sustainable Apparel Coalition (SAC) expects Verifier Bodies (VB) and Verifiers vetted and approved through the Verification Program Manager to acknowledge and adhere to the principles outlined in this Code of Professional Conduct.
- 1.1.2 The SAC/VPM has sole authority to:
 - 1.1.2.1 *Conduct investigations of potential Code of Professional Conduct violations.*
 - 1.1.2.2 *Determine and enforce any consequences, including suspending or permanently revoking Verifier Body (VB) or Verifier status.*
- 1.1.3 VBs and Verifiers acknowledge:
 - 1.1.3.1 *That the integrity of the Higg FEM Verification Program is paramount.*
 - 1.1.3.2 *That the ability to conduct Higg FEM Verifications is a privilege, and not a right.*
 - 1.1.3.3 *That VB or Verifier status may be suspended or revoked at any time due to violations of this Code of Professional Conduct.*

2 CODE PROFESSIONAL OF CONDUCT

2.1 INTEGRITY

- 2.1.1 VBs and Verifiers shall promote a culture of integrity.
- 2.1.2 VBs and Verifiers shall manage and address verification integrity and bribery risks that may exist before, during and after each Higg FEM Verification.
- 2.1.3 VBs or Verifiers shall not knowingly be a party to any illegal activity or engage in acts that are discreditable to the SAC.
- 2.1.4 VBs shall manage risks and ensure compliance with all applicable laws related to corruption.
- 2.1.5 The highest standards of integrity shall be upheld in all VB business interactions.
- 2.1.6 VBs shall have a zero tolerance policy to prohibit any and all forms of bribery and corruption.

2.2 CONFLICT OF INTEREST & IMPARTIALITY

- 2.2.1 VBs and Verifiers shall be impartial and avoid conflict of interests that may create an incentive to report inaccurate facts.
- 2.2.2 VBs and Verifiers shall not accept anything (e.g. bribes, gifts, benefits, hospitality, meals, entertainment) of any value from a facility) including its management, employee, or affiliates) before, during, and after Higg FEM Verification that may impair or be presumed to impair their professional judgment.
 - 2.2.2.1 *A list of acceptable items to receive during Verification is provided in Appendix A.*

2.3 CONFIDENTIALITY

- 2.3.1 VBs and Verifiers shall maintain confidentiality with respect to information gathered while executing Higg FEM Verification.
- 2.3.2 VBs and Verifiers shall take reasonable steps to prevent unauthorized access to information collected during or relating to Higg FEM Verification. This includes information available on the Higg.org platform.

2.4 PERFORMANCE & PROFESSIONALISM

- 2.4.1 VBs and Verifiers shall perform Verifications in accordance with the Higg FEM Verification Protocol.
- 2.4.2 VBs and Verifiers shall provide verification results via the Higg.org platform in a timely manner as outlined in the Higg FEM Verification Protocol.
- 2.4.3 VBs and Verifiers shall act in a respectful manner to all persons including management, workers, and other facility personnel.
- 2.4.4 During Verification, Verifiers shall:
 - 2.4.4.1 *Obtain permission to take photos and walk through the facility before performing said activities.*
 - 2.4.4.2 *Act in a safe manner at all times, respecting and following site-specific safety rules, including but not limited to, wearing Personal Protective Equipment and reading all caution signs on facility premises.*

2.5 DATA PROTECTION & INTELLECTUAL PROPERTY RIGHTS

- 2.5.1 VBs and Verifiers shall have systems in place to ensure all data is collected, stored and transferred in compliance with applicable law, is secure, and only accessible to authorized persons.
- 2.5.2 VBs and Verifiers shall respect intellectual property rights.

- 2.5.3 VBs and Verifiers may come across sensitive information during the course of a Verification. Sensitive information may include, innovative designs or processes, price sensitive information, strategy documents, and any other information which differentiates the facility providing them with a competitive advantage.
- 2.5.3.1 *Sensitive information shall be guarded under extreme care and with security measures to ensure its confidentiality.*
- 2.5.3.2 *Sensitive information shall be considered confidential and shall not be shared with any person or organization.*
- 2.5.3.3 *VBs and Verifiers shall not request or use sensitive information unless necessary for Verification.*
- 2.5.3.4 *If sensitive information is accidentally provided and is not required for Verification, it shall be returned immediately.*
- 2.5.3.5 *VBs and Verifiers shall not include specific details about sensitive information in the verification report.*
- 2.5.4 VBs and Verifiers shall not share Verification results with any other entities for any purposes.
- 2.5.4.1 *Sharing of the Verification results shall be done via the Higg.org platform by the owner of the information (i.e. the facility).*
- 2.5.5 VBs and Verifiers shall adhere the following rules to ensure they are protecting information collected during Verifications:
- 2.5.5.1 *Verifiers shall not leave their belongings such as notes or other verification related documents out in the open for public consumption*
- 2.5.5.2 *Verifiers shall ask permission from facility staff when accessing information related to Verification.*
- 2.5.5.3 *Verifiers shall secure all electronic devices with a password to prevent unauthorized access to Verification information.*
- 2.5.5.4 *Verifiers shall not discuss the, Verification results, or any other information gained from the Verification with anyone outside of the facility management staff, the verification team, SAC or the Verification Program Manager, and only as necessary to finalize the Verification results.*

3 DOCUMENT CHANGE LOG

Date	Section	Summary of Changes
2021-10-29	n/a	<ul style="list-style-type: none"> Inclusion of Verifier Body as responsible party Revision of Document Format (including combination of some sections)

4 APPENDICES

4.1 APPENDIX A – ACCEPTABLE ITEMS TO RECEIVE DURING VERIFICATION

4.1.1 As per the Verifier Body/Verifier Code of Professional Conduct, VBs or Verifiers shall not “accept anything (e.g. bribes, gifts, benefits, hospitality, meals, entertainment) of any value from a facility (including its management, employee, or affiliates) before, during, and after Higg verification with the exception of the items explicitly listed below:

4.1.2 Transportation:

4.1.3 In most circumstances, it is expected that VBs or Verifiers provide their own transportation to and from the facility(s) being verified.

4.1.4 In some situations, it may be appropriate for the facility to provide transportation during the Verification if:

4.1.4.1 *The facility is extremely difficult to find;*

4.1.4.2 *There are safety concerns for the Verifier travelling to the facility which can be mitigated by having the Facility provide transportation.*

4.1.5 If the facility does provide transportation, the following rules shall apply:

4.1.5.1 *The facility knows and understands that they are not obligated to provide transportation.*

4.1.5.2 *The transportation shall be what is typically used for and by facility employees (i.e. the factory car).*

4.1.5.3 *The transportation is used for Verification purposes only (no side trips or personal use of facility transportation is allowed).*

4.1.6 If the VB or Verifier is unsure if they should accept transportation from the facility because there is a concern that it could be viewed as a bribe or be questioned for ethical considerations, it is recommended that they do not accept the transportation.

4.1.7 If specific questions occur and the VB or Verifier does not know whether acceptance of a transportation is Ok, they shall contact their company leadership and/or the VPM.

4.1.8 If transportation was accepted and there is any concern at any time during or after the Verification that it could be viewed as a bribe or be questioned for ethical considerations, the VB or Verifier shall contact the VPM and inform them of the situation and what occurred.

4.1.9 Meals:

- 4.1.10 In most circumstances, it is expected that VBs or Verifiers provide their own meals before, during and after the Verification.
- 4.1.11 In some situations, it may be appropriate for the facility to provide a meal (typically a lunch) to the Verifier during the verification if:
 - 4.1.11.1 *The facility is far away (more than 20 minutes) from lunch options or does not have available transport (see Transportation above);*
 - 4.1.11.2 *There are safety concerns for the Verifier to leave the facility to eat.*
- 4.1.12 If the facility does provide lunch, the following rules apply:
 - 4.1.12.1 *The facility knows and understands that they are not obligated to provide a meal.*
 - 4.1.12.2 *The meal shall be inexpensive (not more than \$20 USD).*
 - 4.1.12.3 *The facility may make the meal (i.e. in the facility Canteen), as long as the Verifier's meal is the same as the facility employees eat.*
 - 4.1.12.4 *There is no alcohol provided.*
- 4.1.13 If the VB or Verifier is unsure if they should accept a meal from the facility because there is a concern that it could be viewed as a bribe or be questioned for ethical considerations, it is recommended that they do not accept the meal.
- 4.1.14 If specific questions occur and the VB or Verifier does not know whether acceptance of a meal is Ok, they shall contact their company leadership and/or the VPM.
- 4.1.15 If a meal was accepted and there is any concern at any time during or after the Verification that it could be viewed as a bribe or be questioned for ethical considerations, the VB or Verifier shall contact the VPM and inform them of the situation and what occurred.