

Business & Human Rights Resource Centre

Questionnaire about Due Diligence Policies in Timber and Beef Companies in Brazil

**Research by Business & Human Rights Resource Centre, University of Nottingham,
BRICS Policy Center – PUC RJ , Repórter Brasil
and Coalition of Corporate Responsibility (CORE)**

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Name of company:

Headquarters address:

Website:

I. Introduction

- a. What is your understanding of slave labour?
- b. What is your annual turnover?

II. Traceability and general information:

- a. Have you started to trace your meat/timber supply chain to farm?
- b. If so, what percentage of your suppliers have you traced to this level?
- c. Do you have any plans to publish the names and locations of your company's meat/timber suppliers, and in what timeframe?
- d. What is the proportion of your production exported to the EU and what proportion to the UK?
- e. What percentage of your primary raw material do 20% of your largest suppliers provide?
- f. How many direct suppliers are there of your primary raw material?
- g. How many "indirect" suppliers (supplier of your suppliers) are there of your primary raw material?
- h. How many of primary raw material suppliers are: i) suppliers with whom you have a long term relationship ii) spot market suppliers?
- i. What percentage of your primary raw material is supplied a) from your own operations b) from suppliers with whom you have long-term relationships and/or c) from the spot market?
- j. What is the time period between placing a contract or purchase order with your raw material supplier and its delivery?
- k. Is your product incorporated into goods sold in the UK and, if so, through which customers?

II. Human rights and due diligence

- a. Does your company have a publicly-available policy commitment to respect human rights in its operations that addresses a) the rights of workers employed by the company and b) the rights of workers employed by subcontractors? Please provide links or attachments to the company's relevant policies
- b. Does your business conduct due diligence to identify risks of forced labour? If so, when did you begin to do this and what prompted you to do it? (Was it an initiative that came from inside or outside the company?)
- c. Describe the human rights due diligence process. Do you conduct due diligence in line with any international human rights standards or guidelines?
- d. Are your suppliers involved in your due diligence process? If so, how?
- e. Do you involve other stakeholders, for example workers and their representatives?
- f. Has your due diligence process evolved? If so, how? What policies, principles, codes of practice or contractual clauses have you introduced to eradicate the risk of slavery?
- g. Do you take labour rights issues into account when you select suppliers? If so, how?
- h. Have you provided information to UK customers about labour conditions of:
 - 1) your own operations?
 - 2) your suppliers? If yes, to which tier of your supply chain?
- i. Do your investors require you to complete due diligence assessments that include slavery risks and, if so, what are their requirements?
- j. Do you block the purchase or supply of products to companies on the lista suja (dirty list)? Do you complete any voluntary disclosure questionnaires and, if so, which ones?
- k. Have you signed the Pacto?
- l. Has the introduction of particular Brazilian or UK anti-slavery legislation affected practices in your supply chain and, if so, how?

III. Audits/risk assessment

- a. What are the main risks that you have identified (including environmental such as climate change, human rights risks)?
 - 1. How do you mitigate them? How effective are your mitigation measures?
 - 2. Do you take labour rights issues into account when you select suppliers? If so, how?

IV. Worker voice:

- a. Grievance mechanisms: Does your company ensure workers have access to effective grievance mechanisms? If yes, please explain what mechanisms are available for workers. Please also explain how you ensure those mechanisms fulfil the effectiveness criteria under the UN Guiding Principles for Business & Human Rights, in particular how you ensure mechanisms are communicated.
- b. Worker engagement and empowerment: How does your company ensure that workers are made aware of their rights, and empowered to exercise their rights (e.g. freedom of association)?

V. Other stakeholders' voices (human rights impact assessments)

VI. Monitoring/Certification

- a. Have certification schemes influenced your efforts to tackle forced labour in the supply chain and if so, how?
- b. How many of your direct suppliers are certified by a third party?

VII. Remediation

- a. Describe any remediation processes that are in place.
- b. Are there any joint responsibilities? (responsabilidade solidaria) or strict liability

VIII. Payment & wages

- a. What is your company's process for determining the wages of its workers, and what external benchmarks does it use to set wage levels? Does your company consider a living wage in setting its wage amounts? Please explain.
- b. Does your company operate on a contractual "pay when paid" basis in relation to:
 - a) Subcontractors?
 - b) Employee wages?
 - c) Other creditors? Please specify.
- c. What mechanisms does your company have in place to detect unpaid wages to workers on your projects? Does your company maintain reserves to ensure salary commitments can be met, and has the company ever intervened to pay workers' wages when the direct employer has defaulted or gone into liquidation? Please describe.