

1. Public Consultation - Green Button 2.0 Due Diligence Requirements

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Introduction

Thank you for your participation in the first public consultation on the proposed **Green Button 2.0 due diligence requirements**.

The survey will be available online until January 31st, 2021. Supplemental feedback on the indicators can also be provided at revision@gruener-knopf.de <mailto:revision@gr%C3%BCner-knopf.de> until January 31st, 2021.

A thorough completion of the survey is estimated to take 2.5 hours. That being said, you have the option of saving the survey at any point in time and continuing at a later date using a unique link that will be provided to you. You can also determine at which point you would like to start the survey and submit your response upon completion of the first subsection. Further instructions will follow.

We deeply appreciate your time and support!

Privacy Notice

The survey is voluntary and anonymous; it is not possible for the Green Button Secretariat (Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH) to establish a link between the respondent and the survey submitted.

We would like to ask you to refrain from personal entering data in the open-ended questions of the survey, that would allow the survey to be traced back to natural persons. In case of non-compliance, the survey will unfortunately have to be deleted for reasons of data protection law, and no evaluation will be possible. The data will not be passed on to third parties.

Please also note the data protection information of Askallo as the provider of the online survey tool.

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The Indicators

The proposed indicators of the Green Button 2.0 due diligence requirements can be found **on our consultation website** [<https://www.gruener-knopf.de/en/consultation>](https://www.gruener-knopf.de/en/consultation). To adequately respond to this survey, it is necessary to read the indicators and have them available while answering the survey. If you would like to compare the requirements with the existing Green Button 1.0 requirements, the current Standard and indicators can be accessed **here** [<https://www.gruener-knopf.de/en/criteria>](https://www.gruener-knopf.de/en/criteria).

In total, there are **71 proposed indicators in five core elements**, which - as with the Green Button 1.0 - were designed based on the United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles) and operationalized in the German government's National Action Plan on Business and Human Rights (NAP). New to the Green Button 2.0 (following a due diligence dynamic) is the **logic of continuous improvements** to ensure the further development of a company's management system within the certificate period of three years.

- For Green Button certification, companies must demonstrate compliance with the **71 “level A” indicators** in the **initial audit** (year 1).
- The first surveillance audit takes place 12 months later. Here, it is assessed whether the existing requirements continue to be met and the management system has been made more robust; additional requirements are not applied (year 2).
- In the **second surveillance audit**, after 24 months, companies must demonstrate further improvements, i.e. compliance with **41 in-depth “level B” indicators**. The **logic of continuous improvements** was introduced to better reflect the intentions of the UN Guiding Principles in the Green Button 2.0, which aim to foster continued further development (year 3).

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Structure of the Survey

First, we ask for general information about you, and where applicable, the organization you represent. This will help us better understand the expectations and wishes of the various stakeholder groups.

The survey is then divided into three sections relating to the content of the consultation on the proposed Green Button 2.0 due diligence requirements:

1. Key Topics

First, you will have the opportunity to provide feedback on the key topics of the revision of the Green Button 2.0 due diligence requirements. These are:

- a) First steps toward living wages
- b) Further development of grievance mechanisms
- c) Policy and reporting
- d) Engagement of potentially affected stakeholders
- e) Embedding due diligence within the company
- f) Expansion of supply chain management

At the beginning of each section, there is an introduction to the topic with an explanation of key changes. Subsequently, an overview of the corresponding indicators from the indicator grid are shown, after which you then have the possibility to give a short feedback on your assessment via a scale (quantitative evaluation) and by answering open-ended questions (qualitative evaluation).

2. Indicator Methodology and Additional Questions

In this section, you can provide feedback on the logic of continuous improvements that the Green Button 2.0 will introduce in the due diligence requirements. In addition, you will find questions on applicability of the requirements to different types of companies.

3. Five Core Elements

In this section, you can provide feedback on each of the core elements of the indicator grid, which are aligned with the UN Guiding Principles and read as follows:

- Core Element 1: Policy on responsible corporate governance
- Core Element 2: Analysis and prioritization of risks and impacts
- Core Element 3: Prevention and mitigation of risks and impacts
- Core Element 4: Reporting and communication
- Core Element 5: Grievance mechanisms and remedy

If you have any questions, please contact revision@gruener-knopf.de.
<<mailto:revision@gr%C3%BCner-knopf.de>>

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About You

In order for us to ensure that we reach a balanced and representative group of people in this consultation, we ask that you provide us with some information about yourself.

Type of Stakeholder

- ☐ Individual
- ☐ Civil society, non-governmental organization
- ☐ Multi-stakeholder partnership / multi-stakeholder initiative
- ☐ Standard-setting organization
- ☐ Foundation
- ☐ Public institution (e.g. federal/state/local governments)
- ☐ International organizations (e.g. OECD, UN, WTO)
- ☐ Certification body / auditors
- ☐ Company
- ☐ Company carrying Green Button certified products
- ☐ Legal experts
- ☐ Other

Interested in a direct exchange?

As the survey is anonymous, we will not be able to contact you directly to follow-up on your responses. For a direct exchange, please feel free to email [**revision@gruener-knopf.de**](mailto:revision@gruener-knopf.de) <mailto:revision@gruener-knopf.de> at any time.

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About Your Organization / Company

If you have not identified as an individual, please provide us with the following information:

Your Organization / Company (Name)

Location of Your Organization / Company (Country)

Please provide information about the size of your company

- ☐ ≤ 10 employees
- ☐ 11-50 employees
- ☐ 51-250 employees
- ☐ ≤ 500 employees
- ☐ > 500 employees

Only for companies in the textile sector

Please provide details on your core business

- ☐ Brand or Retail
- ☐ Manufacturer
- ☐ Importer
- ☐ Other

Please provide information on your sub-industry

- ☐ Fashion
- ☐ Home textiles
- ☐ Workwear
- ☐ Other

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Options for Proceeding with the Survey

Your answers will be transferred to the askallo system and saved there every time you click on "next", "back" or "continue later". If you want to pause the survey, simply click on "continue later", save the link that will be provided to you and close the window. At a later point in time, restart the survey using the saved link.

You can now choose whether you want to start working at the beginning of the survey by commenting on the key topics or jump directly to the sections on methodology and the core elements.

If you choose to start at the key topics sections, you have the option of ending the survey without completing the section on the core elements, in case you find your responses satisfactory.

Thank you and enjoy!

Desired Proceeding

- ☐ Start at the beginning of the survey (sections on key topics and methodology)
- ☐ Forward to sections on methodology and commentary of core elements

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31%

First Steps towards Living Wages

Short Introduction

The non-payment of **living wages** is one of the biggest challenges facing the **textile sector** (and beyond) and one of the designated OECD sector risks. Indeed, wage levels in the textile sector tend to be low. **The causes are complex**. The rights to freedom of association and collective bargaining are not or insufficiently implemented in some producing countries, so **workers cannot organize, and demand wage increases on their own**^{[1]↔}. In addition, the **textile industry is very sensitive to price and competition**. Contracting companies do not pay the wages of workers in local factories directly, and capacity utilization in factories is often low, with producers changing from time to time. Accordingly, the room to use the available leverage is limited.

While **minimum wages** are strongly linked to a country's competitiveness and are often far below a necessary salary for a dignified life, **living wages** relate primarily to the well-being of workers and their families. In general terms, it refers to the compensation necessary **for a household to achieve a decent standard of living**.

Measures for improvements to wage increases can be divided into those that are intended to have a *systemic* effect (general increase in wage levels in regions or countries) and must be carried out **in cooperation with other actors**, and *individual* measures that are intended to achieve **selective** improvements in the relationship between the purchasing company and the production site. A basic requirement on the part of the purchasing companies is to review their own **purchasing practices with a focus on prices**. It is also important to look at **how big the gap is between the actual wages and a living wage** at the production-level. With the understanding from one's own influence through existing purchasing practices and the identified wage gaps, procurement strategies should be adjusted in order to trigger wage increases with producers.

[1]↔Partnership for Sustainable Textiles, 2019: Implementing Living Wages – Practical Approaches for Businesses

Proposed Implementation in the Green Button 2.0

In the Green Button 1.0, the issue of wages is identified in the due diligence requirements as one of the sector risks and is on par with other sector risks. For Green Button 2.0, the **topic of wages is explicitly highlighted** and promoted with its own corresponding set of requirements and indicators.

In the presented proposal, the focus is on creating **strategies, processes and management structures in purchasing companies** in order to develop concrete objectives for promoting living wages and to act accordingly. In this way, organizational conditions are to be created that will lead to at least selective improvements in wage payments at local producers no later than two years after initial certification with the Green Button 2.0.

With this approach, the Scheme owner would like to introduce companies to targeted approaches in fostering living wages. As such, companies should develop a sound strategy for dealing with the issue and implement initial pilot projects. The requirements for living wages are to be evaluated and expanded for the Green Button 3.0.

Overview of indicators with reference to living wages

Core Element 1- Policy on responsible corporate governance

1.1.0. Components of the policy

- * Indicator 1.1.3 Commitment to living wages

Core Element 2 - Analysis and prioritization of risks and impacts

2.3.0. Purchasing practices and living wages

- Indicator 2.3.1 Analysis of procurement and purchasing practices
- *Indicator 2.3.3. Recording of wage levels
- Indicator 2.3.4 Gap analysis

Core Element 3 - Prevention and mitigation of risks and impacts

3.2.0 Implementation of measures

- Indicator 3.2.2 Improving purchasing and procurement practices
- *Indicator 3.2.3 Strategy to promote living wages

**Indicator with two levels: Level A (initial audit; year 1) and Level B (2nd surveillance audit; year 3).*

Questions on the Requirements

1. How clear do you find the requirements?

☐

N/A

☐

1

☐

2

☐

3

☐

4

☐

5

(not applicable)

(very unclear)

(very clear)

2. What is your overall rating of the proposed requirements?

☐

N/A

☐

1

☐

2

☐

3

☐

4

☐

5

(not applicable)

(highly unsatisfactory)

(very good)

3. How feasible do you think the requirements are for companies to implement?

☐

N/A

☐

1

☐

2

☐

3

☐

4

☐

5

(not applicable)

(implementation highly unfeasible)

(implementation very feasible)

4. How auditable (in a conformity assessment) do you consider the indicators to be?

This question is especially addressed to auditors

☐

N/A

☐

1

☐

2

☐

3

☐

4

☐

5

(not
applicable)

(not
auditable
at all)

(highly
auditable)

Kommentary to Question 4

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

5. In terms of the continuous improvements, have the levels A and B of relevant indicators listed above been reasonably chosen?

☐

N/A

☐

1

☐

2

☐

3

☐

4

☐

5

(not
applicable)

(not well
chosen)

(very well
chosen)

Comment to Question 5

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

6. How would you rate the chosen form of linkage between the gap analysis (identification of needs based on analysis of purchasing practices and recorded wage levels), strategy and implementation?

☐

N/A

☐

1

☐

2

☐

3

☐

4

☐

5

(not
applicable)

(not well
implemented)

(very well
implemented)

Comment to Question 6

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

Additional notes / commentary on this topic and your responses



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36%

Further Development of Grievance Mechanisms

Short Introduction

Access to **effective grievance mechanisms and remedy** is an element of due diligence that is highly important for **strengthening workers' rights** in textile supply chains. At best, affected people can turn to mechanisms on the ground, such as bodies representing workers (councils, trade unions) and file formal complaints with the company itself or with local courts. **In practice, these complaint channels**, especially in high-risk countries, often either **do not exist or prove insufficiently effective**. "Effective," according to the UN Guiding Principles on Business and Human Rights, means that grievance mechanisms are legitimate, **accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue**.

Companies sourcing internationally can work to improve local mechanisms at the factory-level through their communicated requirements and business relationships in the supply chain. Nevertheless, in practice there is always a lack of opportunities for those affected to obtain help outside their own company if the company grievance mechanisms do not work. Companies, non-governmental organizations (NGOs) and multi-stakeholder initiatives (MSIs) are trying to close this gap through so-called "back-up" mechanisms^[1] that supplement local mechanisms. One example is the Accord on Fire and Building Safety Grievance Mechanism in Bangladesh^[2]. Nonetheless, the **effectiveness of "back-up" systems also varies widely**.

^[1] „back-up“-Mechanismen sind Systeme, die von Initiativen (bspw. NROs, Multi-Stakeholder-Initiativen) oder Auftrag gebenden Unternehmen bereitgestellt werden und richten sich an Arbeiterinnen und Arbeiter in Produktionsbetrieben.

^[2] Accord on Fire and Building Safety in Bangladesh, **Safety and Health Complaints Mechanism** <<https://bangladeshaccord.org/updates/safety-complaints>>, June 2018

Proposed Implementation in the Green Button 2.0

The Green Button 1.0 requirements already include a set of indicators to address grievances. **For the Green Button 2.0, these indicators should be expanded to provide stronger guidance to companies** on how to practically address the effectiveness of grievance mechanisms. In this way, their effectiveness can be promoted in a more targeted manner.

In the present proposal for Green Button 2.0 requirements, the **focus is on data collection on existing factory-level grievance mechanisms, a gap/effectiveness analysis and a strategy for risk-based implementation** as a prerequisite for informed and targeted improvement measures. **Clear incentives shall be established** for cooperation with other buying companies and additional stakeholders to promote effective grievance channels. The **requirements are intended to enable a phased, risk-based implementation**. The focus is on **functioning operational factory-level mechanisms as a basic requirement**. In addition, the Green Button 1.0 requirements on effective remedy are to be concretized.

Overview of indicators with reference to Grievance Mechanisms

Core Element 5 - Grievance Mechanisms and Remedy

5.1.0. Access to effective grievance mechanisms

- Indicator 5.1.1 Access to effective grievance mechanisms
- *Indicator 5.1.2. Overview and effectiveness analysis
- Indicator 5.1.3 Identification of gaps and improvement measures
- *Indicator 5.1.4 General requirements for improvement measures
- *Indicator 5.1.5 Effective factory-level grievance mechanisms

5.2.0. grievances remedy	Handling and	<ul style="list-style-type: none"> • *Indicator 5.1.6. Effective back-up grievance mechanisms • Indicator 5.2.1 Handling grievances and remedy • *Indicator 5.2.2. Requirements • *Indicator 5.2.3 Corrective and remedial measures. • Indicator 5.2.4 Implementation of measures • *Indicator 5.2.5. Follow-up of measures
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**Indicator with two levels: level A (initial audit; year 1) and B (2nd surveillance audit; year 3).*

Questions on the Requirements

1. How clear do you find the requirements?

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
N/A	1	2	3	4	5
(not applicable)	(very unclear)				(very clear)

2. What is your overall rating of the proposed requirements?

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
N/A	1	2	3	4	5
(not applicable)	(highly unsatisfactory)				(very good)

3. How feasible do you think the requirements are for companies to implement?

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
N/A	1	2	3	4	5
(not applicable)	(implementation highly unfeasible)				(implementation highly feasible)

4. How auditable (in a conformity assessment) do you consider the indicators to be?

The question is especially relevant to auditors

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
N/A	1	2	3	4	5
(not applicable)	(not auditable at all)				(highly auditable)

Commentary Question 4

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

5. In terms of the continuous improvements, have the levels A and B of relevant indicators listed above been reasonably chosen?

- ☐ N/A
- ☐ 1
- ☐ 2
- ☐ 3
- ☐ 4
- ☐ 5

(not applicable)

(not well chosen)

(very well chosen)

commentary q5

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

6. Do the requirements meets the needs of and serve to empower potentially affected stakeholders?

- ☐ N/A
- ☐ 1
- ☐ 2
- ☐ 3
- ☐ 4
- ☐ 5

(not applicable)

(not at all helpful)

(very helpful)

q6

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

Additional notes / commentary on this topic and your responses

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40%

Embedding Due Diligence within the Company

Short Introduction

Due diligence is a cross-cutting issue and should therefore be a **guiding principle** for the entire company. Accordingly, senior-level management (or the board of directors, supervisory bodies) and **executives should share responsibility for implementing due diligence**, exemplify it themselves in their decisions and communicate it as important. Conversely, this also means that management should be measured by the progress made in implementing its own due diligence obligations.

For the implementation of corporate due diligence processes, management must ensure that **responsibility is clearly assigned to relevant departments**. In particular, those positions in the company whose actions and decisions have the greatest influence on compliance with **due diligence processes and influence on relevant risks** should be considered. In the apparel sector, these include in particular the **purchasing department** or **purchasing management**.

In this context, senior-level management must ensure that the personnel entrusted with implementation have the necessary expertise and **resources to fulfill their responsibilities**. Where knowledge and expertise are lacking, personnel should be trained accordingly. Likewise, it should be ensured that **expectations in dealing with conflict situations are clearly communicated** and appropriate incentives are set to encourage appropriate action on the part of personnel, e.g., appropriate targets for departments, individual performance evaluations, bonus systems, or the like.

In addition, it is important for companies to take the **results of risk analysis** and prioritization into account throughout the company in **relevant strategy and decision-making processes** in order to avoid or mitigate adverse impacts. This includes, for example, entering into new business relationships or developing new sourcing countries and product lines.

Proposed Implementation in the Green Button 2.0

Requirements for the embedding of due diligence within the company already exist in Green Button 1.0. For **Green Button 2.0, the topic is to be established more strongly as a cross-cutting issue**. For this reason, the draft Green Button 2.0 requirements include new specifications for embedding due diligence in the company across the various core elements (especially Core Elements 1, 3 and 5). While Core Element 1 differentiates the responsibility of senior-level management, Core Element 3 specifies, among others, sets requirements for responsible personnel, necessary resources and embedding of due diligence in strategic and decision-making processes.

Overview of indicators with reference to embedding due diligence within the company

Core Element 1 – Policy on responsible corporate governance	
1.1.0. Components of the policy	<ul style="list-style-type: none">• *Indicator 1.3.1 Senior management responsibility and objectives
Core Element 3 - Prevention and mitigation of risks and impacts	
3.1.0. Internal anchoring and planning	<ul style="list-style-type: none">• Indicator 3.1.1 Embedding and planning• *Indicator 3.1.2 Expertise

- Indicator 3.1.5 Financial and time resources
- *Indicator 3.1.6 Incentive structures
- *Indicator 3.1.7 Recording of key data
- *Indicator 3.1.8 Consideration in decision-making and strategy processes

Core Element 5 - Grievance Mechanisms and Remedy

5.2.0. Handling
grievances and remedy

- *Indicator 5.2.2 Requirements

**Indicator with two levels: level A (initial audit; year 1) and B (2nd surveillance audit; year 3).*

Questions on the Requirements

1. How clear do you find the requirements?

☐

N/A

☐

1

☐

2

☐

3

☐

4

☐

5

(not
applicable)

(very
unclear)

(very
clear)

2. What is your overall rating of the proposed requirements?

☐

N/A

☐

1

☐

2

☐

3

☐

4

☐

5

(not
applicable)

(highly
unsatisfactory)

(very good)

3. How feasible do you think the requirements are for companies to implement?

☐

N/A

☐

1

☐

2

☐

3

☐

4

☐

5

(not
applicable)

(implementation
highly
unfeasible)

(implementation
highly
feasible)

4. How auditable (in a conformity assessment) do you consider the indicators to be?

The question is especially relevant to auditors

☐

N/A

☐

1

☐

2

☐

3

☐

4

☐

5

(not
applicable)

(not
auditable
at all)

(highly
auditable)

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

5. In terms of the continuous improvements, have the levels A and B of relevant indicators listed above been reasonably chosen?

☐

N/A

(not applicable)

☐

1

(not well chosen)

☐

2

☐

3

☐

4

☐

5

(very well chosen)

Commentary Q6

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

6. Do the requirements adequately address due diligence as cross-cutting issue within a company?

☐

N/A

(not applicable)

☐

1

(not at all)

☐

1

☐

2

☐

3

☐

5

(very well)

Commentary Q6

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

Additional notes / commentary on this topic and your responses

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45%

Policy and Reporting

Short Introduction

The **corporate strategy on responsible business conduct** ("RBC strategy") forms the **starting point** for effective due diligence processes. It is **supplemented by reporting to external parties**, which aims to create transparency on targeted measures and progress in implementing the RBC strategy and make it comprehensible to external stakeholders. While the **strategy is forward-looking, reporting focuses on what has been achieved** but also on remaining challenges. Both topics are closely linked to due diligence activities within the own company and in the supply chain, i.e. risk analysis, prioritization, implementation of measures as well as grievance management and remedy.

It is of particular importance that the link between RBC strategy and reporting is also evident in corporate practice. This is related to the challenge of the time gap between commitments (goal setting) in the RBC strategy and downstream reporting. It should be clear to external stakeholders what goals a company has set and what has already been achieved.

Proposed Implementation in the Green Button 2.0

In the Green Button 1.0, both core elements were already included. The revision of the requirements serves to improve overall comprehensibility, as well as to **strengthen the link between Core Element 1 (Policy) and Core Element 4 (Reporting)**.

Overview of indicators with reference to policy and reporting

Core Element 1 - Policy on responsible corporate governance		<i>*Indicator with two levels: level A (initial audit; year 1) and B (2nd surveillance audit; year 3).</i>
1.1.0. Components of the policy	<ul style="list-style-type: none">• *Indicator 1.1.2 Commitment to international standards & frameworks• *Indicator 1.1.3 Commitment to living wages• Indicator 1.1.5 Specifications on subcontracting• Indicator 1.1.7 Description of severe risks	
1.4.0 Communication	<ul style="list-style-type: none">• Indicator 1.4.4 Communication to business partners and producers	
Core Element 4 - Reporting and communication		
4.1.0. Formal reporting requirements	<ul style="list-style-type: none">• Indicator 4.1.3 Relation to Policy	
4.2.0. Content of reporting	<ul style="list-style-type: none">• Indicator 4.2.2 Progress and challenges• *Indicator 4.2.6 Involvement of external stakeholders and potentially affected stakeholders	

Questions on the Requirements

1. How clear do you find the requirements?

☐
N/A

☐
1

☐
2

☐
3

☐
4

☐
5

(not
applicable)

(very
unclear)

(very
clear)

2. What is your overall rating of the proposed requirements?

☐
N/A

☐
1

☐
2

☐
3

☐
4

☐
5

(not
applicable)

(highly
unsatisfactory)

(very good)

3. How feasible do you think the requirements are for companies to implement?

☐
N/A

☐
1

☐
2

☐
3

☐
4

☐
5

(not
applicable)

(implementation
highly
unfeasible)

(implementation
highly
feasible)

4. How auditable (in a conformity assessment) do you consider the indicators to be?

The question is especially relevant to auditors

☐
N/A

☐
1

☐
2

☐
3

☐
4

☐
5

(not
applicable)

(not
auditable
at all)

(highly
auditable)

Commentary Q4

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

5. In terms of the continuous improvements, have the levels A and B of relevant indicators listed above been reasonably chosen?

☐
N/A

☐
1

☐
2

☐
3

☐
4

☐
5

(not applicable)

(not well chosen)

(very well chosen)

Q6

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

6. How would you rate the rationale behind the linkages between the policy and reporting?

☐

N/A

☐

1

☐

2

☐

3

☐

4

☐

5

(not applicable)

(highly unsatisfactory)

(very good)

Q6

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

Additional notes / commentary on this topic and your responses

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50%

Meaningful Engagement with Affected Stakeholders

Short Introduction

Constructive engagement with potentially affected parties is a fundamental principle of the UN Guiding Principles and a key concept in the implementation of due diligence: *"To enable business enterprises to assess their human rights impacts accurately, they should seek to understand the concerns of potentially affected stakeholders by consulting them directly in a manner that takes into account language and other potential barriers to effective engagement."* (UN Guiding Principles, p.25)

"Potentially affected stakeholders":

- According to the OECD, stakeholders are persons or groups who are or could be **directly or indirectly affected** by the **actions of the enterprise and its interlocutors**. The OECD also speaks of affected stakeholders or persons.
- Particularly relevant to the Green Button are: workers, trade unions in the company's supply chain, members of population groups affected by the company's business activities.

The OECD recommends including these groups of people in the following due diligence processes: Assessing producers on the ground, developing corrective action plans, reviewing/confirming/monitoring impacts, developing factory-level grievance mechanisms, and measuring the effectiveness of measures

The requirement to actively engage (potentially) affected stakeholders in the elaboration and implementation of due diligence processes poses major challenges for companies in practice. How, for example, can contact be established with those affected and an exchange effectively designed? Best practice here includes direct agreements with trade unions. Other companies conduct interviews with workers as part of their own visits to production sites or have such interviews conducted by external parties as part of audits. Among other things, cultural, language and gender challenges must be taken into account in addition to ensuring that freedom of expression is possible.

Proposed Implementation in the Green Button 2.0

In the existing Green Button 1.0 indicator grid, appropriate communication with potentially affected persons is required in the stand-alone criterion (criterion 4.2). In line with the OECD requirements for corporate due diligence, for Green Button 2.0 it is now proposed to anchor **the topic as a cross-cutting issue in various relevant indicators in all core elements**.

Overview of the indicators with reference to meaningful engagement of potentially affected stakeholders

Core Element 1 - Policy on responsible corporate governance

1.1.0. Components of the policy

- Indicator 1.1.8: Approach to dealing with vulnerable stakeholders or groups

Core Element 2 - Analysis and prioritization of risks and impacts

2.1.0. Analysis and prioritization of risks	<ul style="list-style-type: none"> Indicator 2.1.5: Vulnerable stakeholders and groups
2.2.0. Identification and prioritization of impacts	<ul style="list-style-type: none"> *Indicator 2.2.1: Identification of own impacts
Core Element 3 - Prevention and mitigation of risks and impacts	
3.2.0. Implementation of measures	<ul style="list-style-type: none"> Indicators 3.2.3: Strategy to promote living wages *Indicator 3.2.5: Formal requirements
3.3.0 Measuring effectiveness	<ul style="list-style-type: none"> *Indicator 3.3.1: Measurement of effectiveness
Core Element 4 - Reporting and communication	
4.2.0. Contents of the reporting	<ul style="list-style-type: none"> *Indicator 4.2.5: Grievance mechanisms and grievances received *Indicator 4.2.6: Involvement of external stakeholders and potentially affected stakeholders
Core Element 5 - Grievance Mechanisms and Remedy	
5.1.0. Access to effective grievance mechanisms	<ul style="list-style-type: none"> *Indicator 5.1.5: Effective factory-level grievances mechanisms *Indicator 5.1.6: Effective back-up grievance mechanisms
5.2.0. Handling grievances and remedy	<ul style="list-style-type: none"> *Indicator 5.2.2: Requirements Indicator 5.2.4: Implementation of measures *Indicator 5.2.5: Follow-up of measures

**Indicator with two levels: level A (initial audit; year 1) and B (2nd surveillance audit; year 3).*

Questions on the Requirements

1. How clear do you find the requirements?

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
N/A	1	2	3	4	5
(not applicable)	(very unclear)				(very clear)

2. What is your overall rating of the proposed requirements?

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
N/A	1	2	3	4	5
(not applicable)	(highly unsatisfactory)				(very good)

3. How feasible do you think the requirements are for companies to implement?

☐ N/A

☐ 1

☐ 2

☐ 3

☐ 4

☐ 5

(not applicable)

(implementation highly unfeasible)

(implementation highly feasible)

4. How auditable (in a conformity assessment) do you consider the indicators to be?

The question is especially relevant to auditors

☐ N/A

☐ 1

☐ 2

☐ 3

☐ 4

☐ 5

(not applicable)

(not auditable at all)

(highly auditable)

commentary q4

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

5. In terms of the continuous improvements, have the levels A and B of relevant indicators listed above been reasonably chosen?

☐ N/A

☐ 1

☐ 2

☐ 3

☐ 4

☐ 5

(not applicable)

(not well chosen)

(very well chosen)

Commentary q5

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

6. Does it make sense to establish the meaningful engagement of affected stakeholders as a cross-cutting issue within the indicator grid as opposed to creating a separate criterion?

☐ N/A

☐ 1

☐ 2

☐ 3

☐ 4

☐ 5

(not applicable)

(not at all, better as separate criterion)

(very much so, better as cross-cutting issue)

commentary q6

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

7. Do the requirements meet local needs and serve to empower potentially affected stakeholders?

☐
N/A

☐
1

☐
2

☐
3

☐
4

☐
5

(not applicable)

(not at all)

(to a great extent!)

commentary q7

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

Additional notes / commentary on this topic and your responses

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54%

Expansion of the supply chain management

Short Introduction

International instruments such as the UN Guiding Principles on Human Rights and Business require the implementation of due diligence for the entire supply chain. The OECD Due Diligence Guidance specifies this for the textile sector and describes requirements for due diligence from raw material extraction to trade. In general, human rights, environmental and integrity risks are found at all stages of the textile supply chain.

From the perspective of brands and retail companies, a distinction can be made between "upstream" and "downstream" supply chains. "Upstream" includes the stages from raw material extraction to manufacturing (deeper supply chain), "downstream" the remaining stages to retail or end customers. **The focus of the Green Button is on the upstream textile supply chain**, where there have been repeated and glaring incidents in the past in connection with human rights violations and environmental damage.

Risks in the upstream supply chain are sometimes difficult for companies to address, especially when there is a lack of knowledge about their own supply chain. However, **this knowledge is a prerequisite for identifying risks**.

In particular, transparency along the supply chain, i.e. beyond direct contractual relationships and these upstream producers, continues to pose challenges for most companies. At the same time, for complex issues such as living wages and grievance mechanisms, adequate solutions in the sector have so far only existed at the manufacturing level.

Proposed Implementation in the Green Button 2.0

Supply chain management should be gradually expanded for activities such as risk analysis and the implementation of mitigation measures **along the entire supply chain**, through Green Button 2.0 indicators[1] <=>. To make this possible, on the one hand, clear requirements for applicability as well as details of risk analysis are proposed, evolving from the initial audit (level A) to the second surveillance audit (level B) over two years. Complementary to this are proposed requirements aimed at progressively increasing data collection along textile supply chains.

In the current Green Button 1.0 due diligence requirements, supply chain coverage varies within individual criteria and core elements. For the risk analysis and derived measures, manufacturing and another production step must be covered. In contrast, individual requirements apply only to the manufacturing stage (e.g. complaints mechanisms), while others apply to the entire supply chain (Core Element 1 – Aligning corporate policy).

[1] <=> Due to sector-wide implementation challenges, the key topics of grievance mechanisms and living wages are excluded.

Overview of the indicators with reference to expansion of the supply chain management

Core Element 2 – Analysis und prioritization of risks and impacts

2.1.0. Analysis and prioritization of risks

- *Indicator 2.1.1: Mapping the supply chain
- Indicator 2.1.2: Scope of risk analysis and prioritization
- *Indicator 2.1.4: Country, sector, material and product-related risks

- Indicator 2.1.5: Vulnerable stakeholders and groups
- Indicator 2.1.6: Likelihood assessment

Core Element 3 – Prevention and mitigation of risks and impacts

3.1.0. Embedding and planning

- Indicator 3.1.4: General requirements for measures
- Indicator 3.1.5: Financial and time resources

**Indicator with two levels: level A (initial audit; year 1) and B (2nd surveillance audit; year 3).*

Questions on the Requirements

1. How clear do you find the requirements?

☐

N/A

☐

1

☐

2

☐

3

☐

4

☐

5

(not applicable)

(very unclear)

(very clear)

2. What is your overall rating of the proposed requirements?

☐

N/A

☐

1

☐

2

☐

3

☐

4

☐

5

(not applicable)

(highly unsatisfactory)

(very good)

3. How feasible do you think the requirements are for companies to implement?

☐

N/A

☐

1

☐

2

☐

3

☐

4

☐

5

(not applicable)

(implementation highly unfeasible)

(implementation highly feasible)

4. How auditable (in a conformity assessment) do you consider the indicators to be?

The question is especially relevant to auditors

☐

N/A

☐

1

☐

2

☐

3

☐

4

☐

5

(not applicable)

(not auditable at all)

(highly auditable)

commentary q4

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

5. In terms of the continuous improvements, have the levels A and B of relevant indicators listed above been reasonably chosen?

☐

N/A

(not applicable)

☐

1

(not well chosen)

☐

2

☐

3

☐

4

☐

5

(very well chosen)

q2

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

Specifically referencing Indicator 2.1.4., how appropriate to you find levels A and B?

☐

N/A

(not applicable)

☐

1

(highly unsatisfactory)

☐

2

☐

3

☐

4

☐

5

(very appropriate)

q6

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

7. Do you think that the proposed indicators for the increase of internal data transparency on a company's supply chain are appropriate?

☐

N/A

(not applicable)

☐

1

(highly unsatisfactory)

☐

2

☐

3

☐

4

☐

5

(very appropriate)

q7

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

Additional notes / commentary on this topic and your responses

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59%

Methodology and additional questions

Indicator Methodology

Due diligence, as described by the UN Guiding Principles, does not represent a rigid management system, but requires **process-based continuous improvement**. As a result, this logic was adopted for the **Green Button 2.0**, which includes a **successive increase of the ambition level of requirements over the course of the three-year certificate period**.

In total, there are **71 proposed indicators in five core elements**, which - as with the Green Button 1.0 - were designed based on the United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles) and operationalized in the German government's National Action Plan on Business and Human Rights (NAP). New in the Green Button 2.0 (following a due diligence dynamic) is the **logic of continuous improvements** to ensure the further development of a company's management system within the certificate period of three years.

- For Green Button certification, companies must demonstrate compliance with the **71 development level A indicators** in the **initial audit** (year 1).
- The first surveillance audit takes place 12 months later. Here, it is assessed whether the existing requirements continue to be met and the management system has been made more robust; additional requirements are not applied (year 2).
- In the **second surveillance audit**, after 24 months, companies must demonstrate further improvements, i.e. compliance with **41 in-depth requirements of development level B** in the indicator grid is assessed. The **logic of continuous improvements** was introduced to better reflect the claims of the UN Guiding Principles in the Green Button 2.0, which aim at continued and constant further development (year 3).

In the indicator grid, there is one **overview indicator** per criterion (such as 1.1.1 Existence of a policy or 3.1.1 Embedding and planning (of measures), each of which summarizes the following indicators. In addition, references to related indicators were also made within indicators. This is intended to increase comprehensibility and clarity.

3. What is your overall assessment of the introduction of the logic of continuous improvements in the Green Button 2.0?

☐
N/A

☐
1

☐
2

☐
3

☐
4

☐
5

(not
applicable)

(highly
unsatisfactory)

(very well
implemented)

2. Do you find the sequence of levels A and B reasonably chosen?

Clarification: Conformity with level A indicators at initial audit (year 1) and level B indicators in the second surveillance audit (year 3)

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
N/A	1	2	3	4	5
(not applicable)	(not well chosen)			(very well chosen)	

q2

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

3. Do you find the content of the indicators at level A and B reasonably chosen?

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
N/A	1	2	3	4	5
(not applicable)	(not well chosen)			(very well chosen)	

Comment Q3

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

4. How clear, concise and understandable do you think the requirements are?

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
N/A	1	2	3	4	5
(not applicable)	(not clear, concise, and understandable)			(very clear, concise, and understandable)	

q4

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

Additional comments on methodology



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63%

Methodology and additional questions

Additional Questions

This section is especially geared toward business representatives

Textile companies are very different. They differ in size but also in their core business. **The aim of the Green Button is to spread accountability**, so the requirements should be applicable to both large and small companies, but also, for example, to brands and retailers, producers or importers. For the consultation, the assessment of the feasibility for small companies and producers is particularly relevant.

1. How do you assess the feasibility of the requirements for small companies?

☐
N/A

☐
1

☐
2

☐
3

☐
4

☐
5

(not
applicable)

(implementation
highly
unfeasible)

(implementation
highly
feasible)

Commentary q1

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

2. How do you rate the requirements for producers?

☐
N/A

☐
1

☐
2

☐
3

☐
4

☐
5

(not
applicable)

(highly
unsatisfactory)

(very good)

Further comments on the implementation feasibility for different types of companies as well as your answers

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68%

Further Proceeding

You have now already completed a very large part of the survey already. There remains just one section to be answered. We appreciate your tenacity.

You have the option to complete the survey by commenting on the individual core elements. Alternatively, you may end and the survey now send submit your responses.

Please remember that by clicking "**continue later**" and saving the link, you can also pause the survey at any time to continue later at a later point in time.

Please choose your desired proceeding

- ☐ Continue to the section on core elements
- ☐ Complete and submit the survey here

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72%

The 5 Core Elements

In this section, in addition to the key topics discussed earlier, you have the opportunity to comment on the core elements in general, which give the Green Button due diligence requirements their structure and are based on the UN Guiding Principles on Business and Human Rights:

Core Element 1 Policy on Responsible Corporate Governance

Core Element 2 Analysis and prioritization of risks and impacts

Core Element 3 Prevention and mitigation of risks and impacts

Core Element 4 Reporting and communication

Core Element 5 Grievance mechanisms and remedy

In some cases, individual questions within the core elements have been highlighted where we are particularly in need of your feedback..

For each core element, an overview of the indicators is presented to you in an abbreviated form. Please also take a look at the complete indicator grid to guide you in your feedback.

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77%

Core Element 1: Policy on Responsible Corporate Governance

Overview of the Indicators

1.1.0. Components of the policy	<ul style="list-style-type: none">*Indicator 1.1.1 Existence of a policy*Indicator 1.1.2 Commitment to international standards and frameworks*Indicator 1.1.3. Commitment to living wages*Indicator 1.1.4 Expectations toward business partners and producersIndicator 1.1.5 Specifications on subcontractingIndicator 1.1.6. Description of own due diligence processes and objectivesIndicator 1.1.7. Description of severe risksIndicator Approach to dealing with vulnerable stakeholders or groups*Indicator 1.1.9. Approach to handling with grievances and remedy
1.2.0. Formal requirements	<ul style="list-style-type: none">*Indicator 1.2.1. Review and updateIndicator 1.2.2 Integrating expertise
1.3.0. Embedding due diligence within the company	<ul style="list-style-type: none">*Indicator 1.3.1 Senior management level accountability and objectives
1.4.0 Communication	<ul style="list-style-type: none">Indicator 1.4.1 Publication on websiteIndicator 1.4.2. Communication to relevant target groupsIndicator 1.4.3. Communication to own employees*Indicator 1.4.4. Communication to business partners and producers

**Indicator with two levels: level A (initial audit; year 1) and B (2nd surveillance audit; year 3)*

Questions to Core Element 1

1. What is your overall rating of the proposed requirements of Core Element 1?

☐ N/A ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

(not applicable)

(highly unsatisfactory)

(very good)

2. How auditable (in a conformity assessment) do you consider the requirements to be?

The question is especially relevant to auditors

☐ N/A ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

(not
applicable)

(not
auditable
at all)

(highly
auditable)

q2

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

In your view, what are the minimum frameworks that should be referenced for environment and integrity?

In these proposed indicators, human rights, environment, and integrity (such as anti-corruption) are to be given equal weight. While reference to human rights instruments (UN human rights conventions, ILO core labor standards, etc.) is self-explanatory, this is not the case for environment and integrity.

Do you have any additional notes or commentary on Core Element 1, which have not been covered in the sections on Policy and Reporting?

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81%

Core Element 2: Analysis and prioritization of risks and impacts

Overview of the Indicators

2.1.0. Analysis and prioritization of risks	*2.1.1 Mapping of the supply chain 2.1.2 Scope of risk analysis and prioritization. *2.1.3. Analysis of risks *2.1.4. Country, sector and specific material and product risks 2.1.5 Vulnerable stakeholders and groups 2.1.6. Assessment of probability of occurrence *2.1.7. Prioritization of risks *2.1.8. Formal requirements	<i>*Indicator with two levels: level A (initial audit; year 1) and B (2nd surveillance audit; year 3)</i>
2.2.0. Identification and prioritization of impacts	*2.2.1 Identifying your own impact. *2.2.2 Prioritization of impacts 2.2.3. Formal requirements	
2.3.0. Purchasing practices and living wages	2.3.1. Analysis of own procurement and purchasing practices. *2.3.2. Formal requirements *2.3.3. Recording of wage levels 2.3.4. Gap analysis	

What is your overall rating of the proposed requirements of Core Element 2?

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
N/A	1	2	3	4	5
(not applicable)	(highly unsatisfactory)				(very good)

How auditable (in a conformity assessment) do you consider the requirements to be?

The question is especially relevant to auditors

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
N/A	1	2	3	4	5
(not applicable)	(not auditable at all)				(highly auditable)

q2

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

Do you have any additional notes or comments on Core Element 2, which have not been covered in the section Expansion of Supply Chain Management?

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86%

Core Element 3: Prevention and mitigation of risks and impacts

Overview of the Indicators

3.1.0 anchoring planning	Internal and	3.1.1 Anchoring and planning *3.1.2 Expertise *3.1.3 Planning of measures 3.1.4. Overarching requirements for measures 3.1.5. Financial and time resources *3.1.6. Incentive structures *3.1.7. Recording of key figures *3.1.8. Consideration in decision and strategy processes	<i>*Indicator with two levels: level A (initial audit; year 1) and B (2nd surveillance audit; year 3)</i>
3.2.0. Implementation of measures		3.2.1. Implementation of measures *3.2.2. Improve purchasing and procurement practices. *3.2.3. Strategy to promote living wages 3.2.4. Due diligence processes of business partners and producers *3.2.5. Formal requirements *3.2.6. Incentives for business partners and producers *3.2.7. Dialogue with business partners and producers *3.2.8. Support for business partners and producers *3.2.9. Termination of business relations	
3.3.0. Efficacy measurement	Efficacy	*3.3.1. Efficacy measurement	

What is your overall rating of the proposed requirements in Core Element 3?

☐ N/A
 ☐ 1
 ☐ 2
 ☐ 3
 ☐ 4
 ☐ 5

(not applicable)
 (highly unsatisfactory)
 (very good)

How auditable (in a conformity assessment) do you consider the indicators to be?

The question is especially relevant to auditors

☐ N/A
 ☐ 1
 ☐ 2
 ☐ 3
 ☐ 4
 ☐ 5

(not applicable)
 (not auditable at all)
 (highly auditable)

q3

Please comment on your answer. Please refer to relevant indicators where helpful. This is

important in order to assess the scope of the answer.

Do you have any suggestions on concrete prevention and mitigation measures along the supply chain?

q3

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

Do you have any additional notes or comments on Core Element 3, which have not been covered in previous sections?

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90%

Core Element 4: Reporting and Communications

Overview of the Indicators

4.1.0. Formal reporting requirements	4.1.1. Formal requirements
	4.1.2. Regularity and systematics
	4.1.3. Reference to policy
	*4.1.4. Comprehensibility and accessibility
4.2.0. Contents of the reporting	4.2.1. Content requirements
	4.2.2. Progress and challenges
	*4.2.3. Prevention, mitigation, and remediation activities
	4.2.4. Learning experiences
	*4.2.5. Complaint channels and complaints received.
	*4.2.6. Involvement of external stakeholders and potentially affected parties
	4.2.7. Increasing supply chain transparency
Reference to external references: OECD Guiding Principles, National Action Plan, UN Guiding Principles (General), CHRB (corporate due diligence), KnowTheChain, FWF (reporting on grievance and redress mechanisms)	

**Indicator with two levels: level A (initial audit; year 1) and B (2nd surveillance audit; year 3)*

What is your overall rating of the proposed requirements in Core Element 4?

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
N/A	1	2	3	4	5
(not applicable)	(highly unsatisfactory)				(very good)

How auditable (in a conformity assessment) do you consider the indicators to be?

The question is especially relevant to auditors

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
N/A	1	2	3	4	5
(not applicable)	(not auditable at all)				(highly auditable)

q2

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

Do you have any additional notes or comments on Core Element 4, which have not been covered in the sections on Policy and Reporting?

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95%

Core Element 5: Grievance Mechanisms and Remedy

Overview of the Indicators

5.1.0. Access to effective grievance mechanisms	5.1.1. Access to effective grievance mechanisms
	*5.1.2. Overview and analysis of effectiveness
	5.1.3. Identification of gaps and improvement actions.
	*5.1.4. Overarching requirements for improvement actions
	*5.1.5. Effective internal factory grievance mechanisms
	*5.1.6. Effective back-up complaint mechanisms
5.2.0. Complaint handling, redress and reparation	5.2.1. Handling complaints, remedies and redress
	*5.2.2. Prerequisites
	*5.2.3. Remedial and reparation measures
	5.2.4. Implementation of the measures
	*5.2.5. Follow-up of measures
Reference to external references: OECD Guiding Principles, UN Guiding Principles, National Action Plan (General), CHRB (corporate due diligence)	

**Indicator with two levels: level A (initial audit; year 1) and B (2nd surveillance audit; year 3)*

What is your overall rating of the proposed requirements in Core Element 5?

☐ N/A ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

(not applicable) (highly unsatisfactory) (very good)

How auditable (in a conformity assessment) do you consider the indicators to be?

The question is especially relevant to auditors

☐ N/A ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

(not applicable) (not auditable at all) (highly auditable)

q2

Please comment on your answer. Please refer to relevant indicators where helpful. This is important in order to assess the scope of the answer.

--

Do you find a list of "severe impacts" useful and would you add further issues to the list? If so, which ones?

Indicator 5.2.3 defines child labor, forced labor, freedom of association and gender-based violence as particularly severe impacts that require immediate remediation activities.

Do you have any additional notes or comments on Core Element 5, which have not been covered in the section Further Development of Grievance Mechanisms?

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99%

Last chance for additional commentary