



Certifications Red Flags Checklist

This checklist is designed to assist investors in evaluating a certification scheme against the 14 Red Flags. Each of the Red Flags is equally important – no flag can be prioritized above another – and therefore the scheme should be assessed against all flags.

Alignment with International Standards

1. No Explicit Commitment to International Human Rights Standards or Covers Some but Not All Salient Human Rights

Does the certification reference either the [UN Guiding Principles on Business and Human Rights](#) (UNGPs) or the [OECD Guidelines for Multinational Enterprises \(MNE\) on Responsible Business Conduct](#)?

- Yes
- No
- Partially

Does the scheme indicate that it conducts a saliency assessment or requires member companies to conduct saliency assessments to determine and prioritize the most severe impacts associated with the sector, product (including raw material components), or high-risk location?

- Yes
- No
- Partially

Notes:

2. No Explicit Role for Rights Holders in Standard Setting

Does the scheme provide an explicit role for affected rights holders in the development and subsequent revisions of the certification standard?

- Yes
- No
- Partially

Notes:

Scope

3. No Requirement of Brands to Share Responsibility with Suppliers

Does the scheme have a requirement that the brand or lead company takes responsibility for impacts occurring throughout its operations?

- Yes
- No
- Partially

Good practices include, but are not limited to:

- *Conducting ongoing due diligence that is participatory, transparent, and timely*
- *Practicing responsible purchasing that enables all suppliers in the value chain to fully respect the rights of workers*
- *Sharing responsibility for remediating harms*
- *Including in the standard a provision for evaluating a company's sourcing strategies*

Notes:

4. Does Not Adequately Account for Vulnerable People

Does the scheme identify the most vulnerable workers and communities, or consumers in their operations and center prevention of harm to them in their standard and guidance?

- Yes
- No
- Partially

Good practices include but are not limited to:

- *Requiring member companies to report the percentage of vulnerable people in their workforce*
- *Requiring member companies to document all employment relationships, including seasonal, contract workers, day laborers, and migrants*
- *Including within the standard, indicators that predictably lead to forced labor, e.g., sourcing below the production cost*
- *Mandating that employers cover the full cost of recruiting and supply proof of payment*
- *Having in place adequate procedures and safeguards to ensure that workers, including contractors and temporary staff, and communities feel safe in speaking with auditors.*

Notes:

5. Does Not Adequately Account for Gender

Does the scheme apply a gender lens in designing the standard and establishing procedures for conducting audits?

- Yes
- No
- Partially

Signs of a gender lens include but are not limited to:

- *Explicit guidelines or training on how to fight the practice (commonplace in agriculture and mining) of women worker exploitation, for example having women and children work without pay on certain tasks and/or helping the husband fulfill a quota.*
- *The presence of a women's organization during the audits.*
- *The use of women auditors that have human rights competencies and speak the local language.*
- *A requirement that interviews are conducted privately and in a safe space.*
- *A remedial system that punishes gender-based violence and harassment (GBVH) offenders, as defined by the International Labour Organization (ILO).*
- *Use of technologies that allow women to respond anonymously.*

Notes:

Audits

6. Allows the Company or Supplier Being Audited to Pay Directly for and/or Choose the Auditor

Does the scheme have a credible firewall to insulate auditing from conflicts of interests?

- Yes

- No
- Partially

A firewall can be created through, for example:

- *A dedicated independent body that conducts audits and investigates complaints for the scheme*
- *An oversight mechanism that ensures the scheme follows its own policies and procedures*

Notes:

7. No Requirement for Auditors to Have Human Rights Competencies and Knowledge of the Local Context

Does the scheme require auditors to have human rights competencies or training requirements?

- Yes
- No
- Partially

Human rights competencies, but are not limited to, include knowledge of:

- *What constitutes a rights-based approach (transparency, identifying and centering the most vulnerable affected people, access to remedy, etc.)*
- *The salient human rights issues and most vulnerable people in the industry*
- *Human rights risks in the local context*
- *The local language(s) of the rights holders (workers and communities)*

Notes:

8. Audits Not Carried Out in Person, Among Other Procedural Weaknesses

Do the scheme's audit procedures include all of the following:

- Audits conducted onsite
- A rationale for when announced and unannounced audits are conducted
- Interview protocols to protect rights holders from reprisal
- Requirements for audit coverage – i.e., the percentage of workers or community members interviewed per site and the percentage of audited sites
- Ongoing monitoring after the audit to prevent retaliation or other adverse consequences for audit participants.

Does the scheme require that certified (member) companies publicly report on their process for identifying audit errors, instances of corruption, and efforts it makes to rectify these problems?

- Yes
- No
- Partially

Notes:

9. Certification Granted Despite Insufficient Sample Size

Does the scheme provide requirements and/or clear guidance for member companies' sampling methodology?

- Yes
- No
- Partially

Are member companies required to procure a larger percentage of their supply product from certified suppliers over time?

- Yes
- No
- Partially

Notes:

Grievance Mechanisms

10. No Grievance Mechanism at the Scheme Level and/or No Requirement for a Grievance Mechanism in the Standard

Does the scheme require member companies to have a complaints mechanism that meets the effectiveness criteria established in UNGP 31?

- Yes
- No
- Partially

Does the scheme require member companies to report on how often the complaint mechanism is used?

- Yes
- No

Partially

Does the scheme itself have a grievance mechanism that is used and does it report on how often it is used?

Yes

No

Partially

Notes:

11. No Controls to Ensure the Effectiveness of the Grievance Mechanisms in Providing Remedy

Does the scheme require grievance mechanisms of certified mills to have the following features? Select all that apply.

- Publicly available complaints and resolutions
- Rights holders participation in the design and implementation of the mechanism
- Guidelines for providing remedy
- Safeguards against repetition

Notes:

Governance & Accountability

12. No or Poor Communication of the Certification Requirements to the Chain of Custody Participants

Does the scheme require member companies to clearly communicate the purpose and expectations of the scheme to all actors throughout the supply chain?

- Tier 1
- Tier 1 and 2
- Beyond tier 2
- Scheme has not such requirement

Notes:

13. No Process to Suspend or Withhold Certification until Corrective Action Plans are Adopted and Implemented

Does the scheme have a clearly defined process to hold members accountable when significant deviations from the standard are identified, including revoking certification compliance when appropriate?

- Yes
- No
- Partially

Are there public complaints levied against the scheme for not following the procedures for suspending and withholding certification?

- Yes
- No
- Partially

Notes:

14. Does Not Make Information on Audits, Complaints, or Compliance Public

Does the scheme require certified entities (members) to publicly disclose their audits and remedial action plans?

- Yes
- No
- Partially

Notes:

Record of Complaints

Use this space to track complaints against the scheme.