

HRM enters into K with contractor
 3 requirements must be met before HRM signs:

1. K must include explicit reference to requirements of Policy
2. Contractor confirm in writing it adheres to Policy
3. Contractor must provide names and addresses of all sub-contractors

HRM receives complaint that contractor has violated Policy

HRM sends Demand for Information to Contractor describing

1. Which Minimum Labour Right(s) was/were violated
2. Who violated the right, could be:
 - a. Contractor
 - b. Sub-contractor

Alleged violator denies allegation
 Must provide detailed written response with supporting materials demonstrating violation did not occur

Violator has 60 days to respond

Alleged violator acknowledges violation
 Must provide detailed written program with supporting materials demonstrating violation will be rectified in 6 months

HRM receives response

HRM does not receive response

HRM receives program details

HRM *may* demand Contractor submit to third party auditor to verify response at any time

HRM may take action, including:

- ⇒ Imposing sanctions
- ⇒ Recovering damages
- ⇒ Terminating contract

HRM *may* demand Contractor submit to third party auditor to verify response any time after 6 months

Audit confirms response. No further action required

Third party audit conducted

Audit refutes response/program

Third party audit conducted

Audit confirms response. No further action required

HRM sends Demand for Information to Contractor.
 Contractor must provide detailed written program with supporting materials demonstrating violation will be rectified in 4 months

HRM receives response

HRM does not receive response

HRM *may* demand Contractor submit to third party auditor to verify response any time after 6 months

Audit confirms response. No further action required

Third party audit conducted

Contractor has not met requirements. HRM may take action, including:

- ⇒ Imposing sanctions
- ⇒ Recovering damages
- ⇒ Terminating contract