

Briefing 4.3 – Introducing the partners who can play a role in preventing gender-based violence in global supply chains

1. Introduction

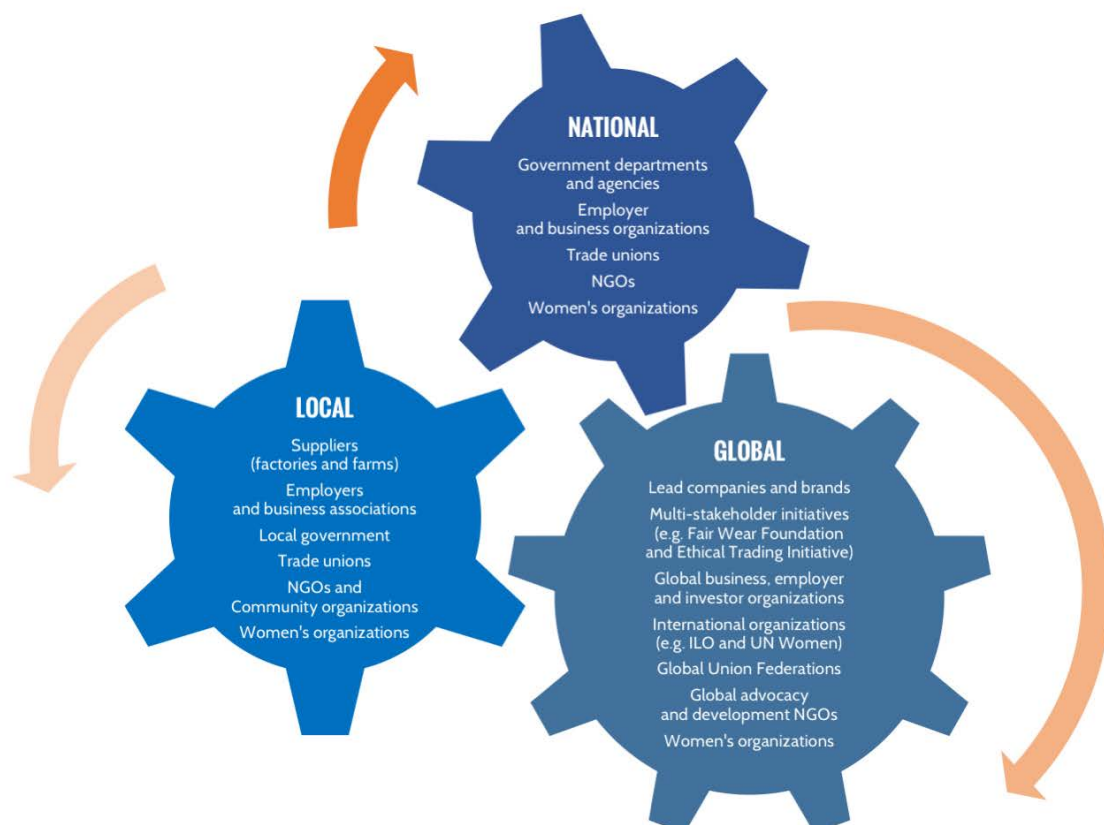
Summary of key points

- There are many different stakeholders who can play a part in preventing and responding to gender-based violence in global supply chains at global, national and local levels.
- Multi-agency approaches and partnerships are the best way to achieve workplaces that are free from sexual harassment and violence.
- This requires practical strategies and tools across the supply chain.

This briefing continues the focus on the governance system that can support the prevention and elimination of gender-based violence at work. It introduces some of the main stakeholders that have a responsibility to address sexual harassment and violence in global supply chains. The briefing starts with the duty of governments to prevent gender-based violence, and then refers to the role of non-State actors in eliminating gender-based violence in global supply chains.

Chart 4 illustrates the wide range of stakeholders that can play a role in preventing sexual harassment in global supply chains, and the inter-relationship between global, national and local actions.

Chart 4: The national, local and global stakeholders who can play a part in preventing sexual harassment



2. The role of governments

Effective implementation of legislation, protection of workers' rights and greater investment in factory inspection are some of the ways in which workers in global supply chains can be protected from exploitation and the risk of gender-based violence.

Governments have a crucial role in reducing inequalities in the workplace through implementing international Conventions, ensuring compliance with national legislation and raising awareness and support for organizations involved in tackling gender-based violence.

Better enforcement of legislation and standards in the context of global production requires governments, employers and trade unions working together to implement solutions through social dialogue. (Barrientos, Kabeer & Hossain, 2004) Governments also have a duty to raise awareness about gender-based violence and establish enterprise taxation policies and minimum wage policies to address the risk factors identified in Module 2.

Effective economic and social policies are also needed to provide economic opportunities, dignity at work and social protection for workers. In Brazil and Cost Rica, for example, enterprise development and social policy reforms have helped to build competitiveness and promote gender equality. In Costa Rica, where the economy has a strong export sector in electronics and agricultural products, government policies have helped to manage the impact of global competitive risks on workers through the introduction of inclusive universal health and education services, and social protection measures. (UN Women, 2015)

An example of State-wide government action is the **California Transparency in Supply Chains Act of 2010**, which aims to make initiatives for the elimination of slavery and human trafficking visible to consumers. The law covers all retailers and manufacturers that do business in California and have global annual sales of more than \$100 million. These companies are required to release information publicly, for example, on their website, concerning their initiatives aimed at preventing human trafficking.

However, recent research (LeBaron and Lister, 2016) argues that a reliance on company audits to monitor the implementation of labour standards, whether carried out by companies or NGOs, has had the effect of reducing the role of states in regulating business enterprises and is re-orientating global corporate governance towards the interests of private business.

Labour inspection has an important role to play in implementing and enforcing the legal provisions that promote gender equality. However, in many developing countries labour inspection is under-resourced and often does not give priority to gender equality issues or gender-based violence in the workplace.

The ILO has produced a guide on how to address gender issues in labour inspection, including the knowledge, attitudes and tools by which inspectors can recognize and address gender-related issues. The guide sets out the need to train and provide guidance to labour inspectors on how to identify gender-related issues in the workplace and promote the implementation of national laws and the fundamental ILO Conventions. Suitably trained women labour inspectors who specialize in sectors that employ large numbers of low-skilled women, such as domestic service, the garment sector and horticulture, is another important way to address these challenges. There are some good practices from countries across the world, including in Costa Rica where special campaigns addressed to women workers and young workers by the labour inspectorate have been implemented to protect the rights of pregnant women and adolescents.

For further information on how labour inspection can address gender equality issues see ILO (2014) Labour inspection, gender equality and non-discrimination in the Arab states: Guide Book. Available at: http://www.ilo.org/beirut/publications/WCMS_249296/lang--en/index.htm



3. The role of non-State actors

This section discusses the three main ways in which non-State actors can play a role in eliminating gender-based violence in global supply chains:

- Social dialogue – employers, workers and trade unions.
- Engagement with lead companies and brands.
- Working with multi-stakeholder initiatives.

Human rights and international labour standards are increasingly reflected in commitments undertaken by industry bodies, multi-stakeholder and other collaborative initiatives, through codes of conduct, performance standards, global framework agreements between trade unions and transnational corporations, among others.

Preventing and responding to sexual harassment in global supply chains can enhance productivity and economic development and ensure decent work for women. This requires the involvement of all stakeholders across a supply chain.

Employers, trade unions, MSIs and NGOs can develop programmes to encourage changes in workplace culture and social norms in order to prevent sexual harassment. The role of local actors, including NGOs and women's organizations at the local level, is discussed in more detail in Module 8.

Lead companies have a key role to play in promoting decent working conditions; however they cannot drive these initiatives alone. Governments, employers, trade unions and NGOs also have a critical role to play in promoting decent work and in addressing sexual harassment. Initiatives that aim to empower women through social dialogue have a key role in promoting workplaces free from violence and sexual harassment.

3.1 Social dialogue initiatives

Key points about social dialogue (employers, trade unions and workers)

- Social dialogue at the company, sector, national and international levels is crucial to preventing sexual harassment.
- It requires good negotiation systems within companies, commitment to the development of social dialogue mechanisms and the right to freedom of association.
- Gender-awareness training will help trade unions and employers at the local level to fully understand and identify sexual harassment.
- A proactive step is to include clauses related to the prevention of sexual harassment in collective agreements.
- Sexual harassment is found in global production sites and is an issue that can be used to organize women workers into unions.
- Trade union participation in multi-stakeholder activity can help raise awareness of, and prevent, sexual harassment in global supply chains.

According to the ILO “Social dialogue is crucial for shaping an enabling environment to provide better links between economic and social benefits in GSCs.” (ILO, 2015, p. 148) In global supply chains social dialogue can help to secure improvements in productivity, safe work practices and respect for workers' rights, such as limits on long working hours and improved work organization. (ILO, 2015) Social dialogue initiatives at the global level include international framework agreements negotiated by employers and trade unions that cover workers across a global company and its suppliers.

Definitions

Social dialogue is a process of negotiation between workers and managers, which can result in collective bargaining agreements in specific areas, such as pay, working hours, sexual harassment, violence and dignity at work. Social dialogue varies from one country to another, and can exist at the national, regional, sectoral and workplace level. It is based on the principle of ‘freedom of association’, including the right to form a trade union and negotiate collective agreements, which is embedded in international human rights norms.

Freedom of association and the right to bargain collectively are core labour standards and human rights.³ This right should be included in all initiatives – without the right to be represented and bargain collectively workers have very little ability to influence their working lives.

The risk of sexual harassment and violence is likely to be higher in workplaces where there is no trade union representation or collective bargaining. Trade unions have an important role to play in helping victims of sexual harassment and violence to understand that they can take action to have their rights respected.

In workplaces at the bottom of global supply chains there are frequently no trade unions, or where they are present, there are weak social dialogue structures. In some instances collective organization is either suppressed or there are inadequate institutional supports and legal frameworks. Social dialogue is crucial if the voice of women workers is to be heard, particularly on issues such as long working hours, access to toilet breaks and complaints’ systems to deal with sexual harassment. All these are issues that can, and are, negotiated in collective bargaining agreements.

However, the reality is that private sector firms and suppliers frequently violate workers’ rights to freedom

3 ILO Convention 87 on Freedom of Association and Protection of the Right to Organise (1948) and ILO Convention 98 on the Right to Organise and Collective Bargaining (1949)

of association. According to the ITUC (2011) in most cases corporate social responsibility initiatives address these issues by redefining freedom of association and do not focus on the responsibility of business enterprises for their adverse impacts on these human rights. The Better Work programme considers that women need access to independent workers’ organizations that can empower them and represent their interests in the workplace. Trade unions must be able to form, organize and to bargain on behalf of workers. Barriers that prevent them from doing so should be removed. By their own admission, trade unions also need to better represent women workers, particularly in sectors with a high staff turnover.

Worker participation in garment factories in Bangladesh

The **Bangladesh Accord** is a unique legally binding agreement between brands/lead firms and trade unions in the garment sector and shows a new model of cooperation between global buyers and trade unions. It has opened up possibilities for new solutions to be found to other entrenched supply chain rights challenges, including issues such as gender-based violence and sexual harassment. The Accord focuses on factories with a registered trade union and active Accord signatory companies.

The **Bangladesh Accord Occupational Safety & Health (OSH) Committee Pilot Programme** commenced in September 2015 with 15 factories nominated by Bangladesh Accord signatories. The pilot programme covers building and fire safety but could be a model for dealing with women workers’ personal safety. It has led to the establishment of Occupational Safety and Health (OSH) Committees, with training for committee members and consultations with employees to inform workers of the existence and functions of the OSH Committee. The Accord training programme for workers and managers who serves on these OSH Committees aims to explain the role of the OSH Committee, establishes workplace OSH maintenance and monitoring systems, and develops labour-management committee joint problem solving techniques.

Source: Bangladesh Accord Quarterly Update – November 2015. Available at: <http://bangladeshaccord.org/2015/11/quarterly-update-november-2015/>



Social dialogue has played a positive role in progressing decent work for women through addressing sexual harassment in the workplace, HIV/AIDs, maternity protection, equal pay and living wages, in organizing low paid women workers and domestic workers, and in addressing violations of women's rights in global supply chains. The absence of a specific international standard on gender-based violence in the workplace has led to a call for a new ILO standard on gender-based violence at work. In 2018 the International Labour Conference will consider "Violence against Women and Men in the World of Work" as a standard-setting agenda item.

There are a number of different ways in which trade union action and social dialogue can help identify abuses in global supply chains. Two examples are given below of how trade unions have addressed this issue.

Union responds to sexual harassment in Ethiopia

An Ethiopian affiliate of the global union IndustriALL reported that sexual harassment was 'rampant' in a factory producing for a German brand. Because IndustriALL had a good relationship with the brand and the factory was organized, IndustriALL was able to contact the brand head office to let them know that there was a problem with sexual harassment. The brand called their factory in Ethiopia and the managers there took immediate action. Some local managers were dismissed and local factory awareness-raising training organized. After this, women members reported that the situation improved. (Based on interview with Monika Kemperle, Assistant General Secretary)

The collective approach and freedom of association: women informal workers organizing for change in global supply chains

The Self-Employed Women's Association (SEWA) was established in India in 1972 and is now affiliated to the International Trade Union Confederation. SEWA has supported home-workers at the bottom of global supply production. It organizes informal workers with the longer-term aim to support women to negotiate for change with employers, sub-contracting firms and buyers and the national and local governments. SEWA provides a range of services to members—including savings and credit, health and childcare, insurance, legal aid and capacity building—to enable women to become self-reliant. SEWA also supports members in negotiations with employers to improve working conditions. For example, SEWA Delhi, in partnership with the UK-based Ethical Trading Initiative, negotiated with lead firms to buy directly from home-based workers rather than through intermediaries in the supply chain. This enabled sub-contracted workers to become self-employed, with their own producer group, and to negotiate better rates for their goods. (UN Women, 2015, p. 119)

Global Framework Agreements (GFAs)

The International Trade Union Confederation (ITUC) and Global Union federations (GUFs) covering different sectors of the economy have worked at the global level to implement ILO core labour standards through framework agreements. The GUFs have played an important role in promoting women's decent work and gender equality through GFAs, policy developments to raise awareness among affiliates at country level and through ILO policy and global programmes.

GFAs, also known as International Framework Agreements, between multinational enterprises and GUFs are an important way in which GUFs and global brands have sought to build international co-operation and joint action in different countries that share common employers. The purpose of GFAs is to stimulate global social dialogue between a multinational company and the representatives of

workers. They aim to promote compliance with ILO labour standards throughout complex supply chains.


Up to March 2014 a total of 142 GFAs had been negotiated and signed between multinational enterprises and global union federations. (ILO, 2014b) Worker and employer representatives monitor the agreements. Through industry-wide bargaining, these agreements enable wages and working conditions to improve for all workers in an industry.

The following four examples of global framework agreements have been negotiated in global supply chain sectors, with a specific focus on sexual harassment and gender-related workplace issues. The agreements are an effective form of collective bargaining to create sustainable improvements in working conditions and help secure living wages for workers. The agreements also have provisions in place for reviewing and monitoring their implementation.

- Global Framework Agreement between Unilever and the International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Association (IUF) and IndustriAll 'Joint Commitment to preventing sexual harassment' (2016)
- Global Framework Agreement (GFA) between H&M Hennes & Mauritz GBC AB and IndustriALL and Industriefacket Metall (2015)
- Global Framework Agreement between Inditex and IndustriALL on the 'implementation of international labour standards throughout the supply chain of Inditex' (2014)
- Global Framework Agreement between IUF/ COLSIBA/Chiquita 'Joint Understanding on Sexual Harassment' (2013)

For example, the most recent agreement, signed in 2016, between Unilever and IUF and IndustriAll is the '**Joint Commitment to preventing sexual harassment at the workplace**', which is addressed to Unilever management at every level and all employees, including employees provided by third-party labour suppliers. It also contains detailed guidelines for jointly implementing the commitment at every Unilever workplace and for evaluating progress. It builds on work carried out to raise awareness of gender inequalities, for example, under the Unilever programme 'Winning Balance', which aims to improve gender diversity in the supply chain. Unilever's goal was for every factory to have gender

balance in every job. IndustriAll, IUF and Unilever have established a gender equality working group spanning two continents.

 See Information Sheet 2: Global Framework Agreements addressing gender-based violence, for the full texts of these four examples of global framework agreements.

3.2 Multi-Stakeholder Initiatives

Key points about multi-stakeholder initiatives (MSIs):

- MSIs are alliances of companies, trade unions and NGOs to promote respect for workers' rights to tackle issues collectively that cannot be addressed by individual companies working alone.
- Companies with a commitment to ethical trade adopt a code of labour practice that they expect all their suppliers to work towards, usually with reference to ILO Conventions.
- MSIs have different approaches to issues such as auditing, verification of workers' conditions and relationship to companies.
- MSIs have an important role to play in building capacities with relevant stakeholders along the supply chain. Working alone governments, businesses, trade unions or civil society organizations are unable to solve complex global supply problems.
- MSIs have supported the development of 'Global Framework Agreements' whereby a company and the global trade union agree the conditions across a sector.
- MSIs have a key role to play in preventing sexual harassment. Several MSIs have undertaken initiatives, including training, to challenge sexual harassment.

Many producers and suppliers want to comply with requests that come from companies or brands that are members of MSIs as a means to secure future orders from that buyer. Although many of the existing MSIs do not have a direct role in the workplace, they have the potential to influence workplace rights and support new strategies to prevent and respond to sexual harassment. Where trade unions exist in

factories or farms they may find MSI involvement assists in making agreements across a whole sector, such as the Framework Agreement signed by Inditex and the global union IndustriALL.

Auditing has been one of the ways in which ethical trade is monitored. However, many companies and MSIs now acknowledge the limitations of audits, particularly in relation to identifying discrimination and sexual harassment.

The following are examples of how MSIs have addressed sexual harassment:

Ethical Tea Partnership (ETP): has used the Ethical Trading Initiative Base Code for the tea sector to set standards for suppliers in the sector, including a specific standard on discrimination and equal treatment. ETP also carries out equal treatment training for supervisors in tea plantations.

➔ **Refer to Case Study 4.1: Ethical Tea Partnership Standards**

US Fair Food Program: this programme on decent work and work in dignity has developed a new model for addressing sexual harassment on farms.

➔ **Refer to Case Study 4.2: US Fair Food Program and Code of Conduct – a new model for addressing sexual harassment on farms**

Fair Wear Foundation has developed a Prevention of Violence Programme in garment factories.

➔ **Refer to Case Study 4.3 Challenging sexual harassment in the apparel supply chain through MSI action**

There are other national and global initiatives that bring together a range of stakeholders, an example of which is the Better Work partnership between the ILO and IFC.

3.3 Lead company and business-led initiatives

Key points about lead companies/brands

- Lead companies and brands can ensure that their supply chains promote gender equality, decent work and effective implementation of national and international standards.
- Building on the ILO 'Recommended Action to Increase the Voice of Women in Social Dialogue', lead companies and brands have a role in supporting initiatives to ratify and implement the key ILO Conventions that address freedom of association and collective bargaining as well as gender equality and non-discrimination, particularly Conventions Nos. 87, 98, 100, 111.
- Specific ways in which lead companies/brands can influence suppliers and prevent sexual harassment include the ending of buying practices that lead to excessive hours.
- Initiatives can also provide support and finance for projects to prevent sexual harassment, through complaints and grievance processes, support for victims, and resources and incentives for training of managers, supervisors and workers on gender-based violence and its negative impact on productivity and well-being.

Lead companies have a responsibility to prevent and address human rights violations in their own operations and in their supply chains. To be able to fulfill this responsibility brands and retailers have to know where their products are being made. Without such knowledge, addressing human rights risks is impossible. Lead firms are increasingly recognizing the importance of tackling gender inequalities across the supply chain. They have significant leverage to ensure that suppliers respect international labour standards and adopt gender-specific measures in their contracting and sourcing policies, in areas such as training, non-discrimination and complaints systems. (Staritz and Guilherme Reis, 2013)

Trade and investment agreements are also important instruments to promote compliance with international labour standards, for example, through commitments not to lower domestic labour legislation in order to

attract foreign trade or investment. However, the ILO (2015) argues that although these commitments are important they rarely address the particularities of global supply chains.

One of the main barriers is that codes of conduct implemented by lead companies often fail to reach workers at the bottom of complex supply chains, particularly where workers are employed through sub-contracting, in contract labour, informal work and home work. (Barrientos, Kabeer & Hossain, 2004) In addition, company and multi-stakeholder codes do not always address key gender equality issues such as childcare and the reproductive health of workers (Barrientos et al., 2003).

Lead companies can support changes in factory organization to create workplaces free from gender-based violence, which in turn can influence social norms in the wider community. If there is a culture change in the workplace – women treated with respect and managers and supervisors adopt zero-tolerance approaches to violence against women – there is likely to be a knock-on effect in the communities in which workers, supervisors and managers live.

Social norms are powerful prescriptions reflected in formal structures of society and in its informal rules, beliefs and attitudes. Social norms define what is deemed appropriate behaviour and desirable attributes for women, men, boys and girls, creating gender roles. (World Bank, 2014)

Some lead firms have invested in the sustainable development impacts of their supply chain activities by revising their purchasing and pricing practices through buyer responsibility agreements to deal with cost competition between lead and supplier firms. (ILO, 2015) For example, some lead firms have improved the capacity of their suppliers to deal with fluctuations in demand through annualized hours schemes and multiskilling, which has helped to reduce reliance on temporary employment and balance concerns of competitiveness with the needs of workers. (ILO, 2014a)

A growing number of lead companies are seeking to promote and assess compliance with ILO's labour standards through company codes of conduct, multi-stakeholder ethical codes and sourcing policies. These initiatives recognize that consumers want to buy products that are supplied by workers who

have opportunities for decent work and fair working practices. However, these initiatives do not always reach women in the lowest tiers of global supply chains where sub-contracting takes place.

While some lead companies have adopted voluntary codes of conduct, corporate social responsibility commitments and private compliance initiatives that may contribute to improvements in the monitoring and compliance with labour standards, they often lack transparency and in some cases do not adhere to domestic regulations. (ILO, 2015) The problems of auditing systems are documented in recent research by LeBaron and Lister (2016). Their research found that auditing systems are failing to detect, report and correct labour abuses, poor working conditions and environmental degradation within global supply chains, and are an ineffective way to implement standards. They argue that: "Corporations have embraced CSR goals and ethical audits as an opportunity to preserve their business model and take responsibility for supply-chain monitoring out of the hands of governments." (p.6) The report cites examples of the failure of audits to detect labour abuses, such as for example, the collapse of the Rana Plaza garment factory in Bangladesh in April 2013 and an exposé of slavery and human trafficking in the Thai shrimp industry in 2014 both of which took place within 'certified' and audited supply chains.

A further problem is that lead companies do not always give attention to sexual harassment in the workplace or integrate the issue into their policies and audits. Many critics have noted that regular factory audits do little to address problems rooted in the behaviour of lead companies, such as the effects of excessive price pressure. In addition, corporate initiatives may not address gender inequalities in a systematic way, nor have effective mechanisms to have an impact at factory or farm level, particularly on sensitive issues such as sexual harassment. Gender-based violence is almost impossible to identify via traditional audit methodologies. Workers, for many reasons, are reluctant to discuss their experiences of harassment and violence, and almost never raise the issue with auditors.

In some cases, follow-up investigations of factories that had been audited have revealed discrepancies. Findings differed significantly from those of the audits carried out on behalf of multinational corporations. There is also anecdotal evidence from garment factories of workers signing forms that verify they have

received training, when in fact they have never received the training at all; and of workers being instructed by managers to give the 'right' answers to auditors. In addition, gender issues are not systematically integrated into voluntary corporate instruments or in purchasing and contracting practices. Sexual harassment is rarely identified as an issue.

EIRIS, an NGO promoting responsible investment, reported in 2009 on the implementation of core labour standards in company supply chains. The report *A Risky Business? Managing core labour standards in company supply chains* found that 45 per cent of companies analysed in the research had no policy or management system in place to protect labour standards in their supply chain, including a failure to report on the issue. It argues that a breach of supply chain labour standards is a risk to investors affecting company value and performance. It suggests that companies should link their management systems for supply chain labour standards with their internal procurement systems.



(Palle Stenberg, CEO Nudie Jeans, Sweden)

Brands hope to demonstrate their commitment to gender equality and labour standards in their supply chain, particularly as consumers have increasingly higher expectations for the way supply chains are managed. And factories want to enhance their standing with the international brands on which their order books depend.



(Mark Held, Secretary General European Outdoor Group)

In order to end sexual harassment and violence in garment factories we encourage brands to take positive preventative action against the production pressures in which harassment flourishes: long hours working, unfair power differentials and pay incentives that lead to abuse and pressure on the production line. Brands and suppliers need to address the causes, as well as establish fair complaints' procedures.

Tool 2: Tips on how brands, lead companies, retailers and supermarkets can reduce the risks of gender-based violence in their global supply chains

- ✓ Become familiar with the various international guidelines for businesses on human rights and how they can be used to prevent gender-based violence.
- ✓ Address these issues through social dialogue (with trade unions and workers).
- ✓ Partner with multi-stakeholder initiatives to find new solutions to uncovering workplace sexual harassment and violence.
- ✓ Work with governments in promoting and implementing labour laws that guarantee decent work and freedom from gender-based violence.
- ✓ Aim to promote transparency across all tiers of global supply chains, and particularly where there are sub-contracting arrangements.
- ✓ Address pricing, sourcing and procurement policies as part of corporate accountability and ensure that they do not result in adverse pressures on suppliers that may lead to a heightened risk of labour abuses and gender-based violence. Include in this the social and environmental quality of sourced products, as well as production targets and lead times.
- ✓ Build long-term buyer-supplier relationships to enable suppliers to improve working conditions on a continuous basis and address gender-based violence in a systematic way.
- ✓ Take a proactive approach that addresses the causes of gender-based violence.
- ✓ Raise awareness about and provide training on gender-based violence with suppliers and employers.



Examples of lead company initiatives

The following examples of lead company initiatives illustrate different approaches taken, although they are not intended to recommend or endorse any specific approach.

The **Panasonic Code of Conduct on Global Human Rights and Labor Policies** sets out how the company adheres to human rights principles that it expects to be applied to all tiers of the global supply chain (covering prohibition of forced labour and child labour, rights of migrant workers, prohibition of discrimination, decent work and working hours, fair wages, freedom of association and the right to collective bargaining). The Code of Conduct stipulates that labour-management dialogue and collective bargaining are one of the conditions for doing business with suppliers in its Standard Purchase Agreement, and demands suppliers comply with this condition. Specific reference is made to the UN Guiding Principles on Business and Human Rights. An Equal Employment Opportunity Office has been established at each Company and business division, in an effort to provide a place for employees to go to discuss their concerns about sexual harassment. For further information see: http://www.panasonic.com/global/corporate/sustainability/human_rights/approach.html

The technology company Dell has drawn up a **Human Rights and Labor Policy Statement** to ensure that all employees are treated with respect and dignity, are working under their own free will, and are paid fairly. Dell is committed to ensuring that they are not complicit in any human rights violations and hold their suppliers and partners to this same high standard. The statement covers freely chosen employment, no child labour, minimum wages, legally mandated working hours and benefits, the right to freedom of association and collective bargaining, and the right to a safe and healthy working environment. On non-discrimination it states that: “We are committed to a workforce that is free of harassment and unlawful discrimination”. For further information see: <http://www.dell.com/learn/us/en/uscorp1/corp-comm/cr-report-human-rights-labor-policy>

Levi Strauss & Co carried out a **stakeholder consultation** process on human rights standards as part of its global supply chain strategy. This led to a new Code of Conduct with a focus on gender equality and sexual harassment across its global supply chain. However, it found many problems with compliance, monitoring and reporting on its original Code of Conduct. The new approach focuses on five priority areas: economic empowerment; health and family well-being; equality and acceptance; education and professional development; and access to a safe and healthy environment. For information see: <http://www.ceres.org/resources/reports/improving-workers-well-being-a-new-approach-to-supply-chain-engagement>

