

# Non-Trademark Activation Due Diligence

## Human Rights Assessment Tool



### Global Workplace Rights



If you have questions about human rights or related issues, contact Global Workplace Rights at [humanrights@coca-cola.com](mailto:humanrights@coca-cola.com)

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## Why Conduct a Human Rights Due Diligence Assessment?

The Company's success is built on high standards of quality, integrity and excellence. We are committed to being a valued member of the communities in which we operate. Our Human Rights Statement, Workplace Rights Policy and Supplier Guiding Principles confirm the Company's commitment to respecting the human rights of our employees, those in our supply chain and in the community

There is an increasing expectation from our customers and from the public that we will demonstrate our respect for human rights across our value chain. This expectation includes understanding the possible human rights impacts of our business relationships and actions, including production and product distribution.

Each prospective new activation that will be used to promote our initiatives (or brand) may have different risks and challenges to our Company's reputation that vary regionally. By conducting a human rights assessment, we can identify and mitigate human rights risks, and risk to our Company's reputation globally.

### Case Study

*This picture in the media around a World Cup activation; we created specific production management controls to mitigate this risk.*



## How Do I Use This Assessment Tool?

The purpose of this Assessment is to identify the potential human rights-related risk as the result of new programs and initiatives. The Assessment questions will require you to identify:

- ✓ Low risk activities
- ▲ High risk activities

A low risk identification means that there is a low human rights-related risk with respect to that activity and further action may not be necessary or that a limited and manageable response action may mitigate or eliminate the risk. A high risk identification, on the other hand, suggests that further inquiry or action may be needed in order to mitigate against potential human rights-related risk. In the case of a high risk identification, one or more of the following actions could be taken:

- ☑ Perform the action suggested in the assessment question.
- 📄 Obtain further information about the subject matter before determining next steps.
- 👤 Contact internal subject matter experts (SME) (e.g., Global Workplace Rights, Legal, Environmental, etc.) for further guidance on addressing the situation.
- ↔ Engage community stakeholders in a discussion about the proposed activity (see the next page of this Tool for guidance).

**This human rights self-assessment tool focuses on the principal indicators of potential human rights impact. The questions are not exhaustive and local conditions may require examination and remediation of additional factors**

# Partner Engagement

## Partner Engagement

Partner engagement is at the center of all Human Rights due diligence activities. Ensuring that you choose a partner that has a focus on the Human Rights for all workers is essential for assuring rights.

### Non-Profit/NGO's

If you engage with a community based charitable organization to connect to the workers, here are three key steps

- Share this Human Rights Due Diligence Checklist to provide an overview
- Request them to provide the background data to be able to complete this assessment
- Engage with Global Workplace Rights through your local Workplace Accountability Manager to address any concerns and review action steps

### For Profit

If you engage with a business to connect to the workers, here are three key steps

- Ensure compliance with all company Legal, SGP and Regulatory requirements
- Share this Human Rights Due Diligence Checklist to provide an overview and request they complete this assessment and provide for review
- Engage with Global Workplace Rights through your local Workplace Accountability Manager to address any concerns

### Case Study

A multinational company paid \$903,000 to the State of California to cover back wages for a contractor who violated child labor, minimum wage and overtime laws while producing toy tiaras and wands. One of the toy makers went out of business. It employed 800 workers to make thousands of bright beaded tiaras. In a five-month investigation, state officials found that they often had workers assemble tiaras and wands at home, though state law bars such work. Investigators found that the home workers typically worked 48 hours a week, with their wages averaging \$1.35/hr

# The Human Rights Due Diligence Assessment

**KEY:** Low risk High risk  Perform Action Obtain further info Contact SME Engage Community

## Production Process:

*The location and environment for the actual production is a key factor in determining potential human rights risk.*

1. Is the work conducted at a production facility or a community center?

YES NO

2. Does any part of the production take place in a home environment?

NO YES

3. Are the production, assembly and finishing process of a skill level that would limit children's participation?

YES NO

4. Does the facility ensure that all artisans, employees and independent contractors, are paid for all hours worked, including the overtime premium, or paid for all piecework?

YES NO

## Work Environment

5. Do workers bring children to the worksite (or is work completed in a home setting with children present)?

NO YES

6. If yes to the above, does the worksite provide an onsite child care facility?

YES NO

7. If work is completed in a home setting with children present, are there controls to ensure children do not participate in the process?

YES NO

8. Is all work strictly voluntary?

YES NO

## Health and Safety

*Maintaining a safe work environment and providing appropriate training will minimize injuries due to production and is key to mitigating human rights risks.*

9. Do workers receive health and safety training and the appropriate functional personal protective equipment?

YES NO

10. If the work is conducted at a production facility or community center, does it meet the legal requirements for Health and Safety?

YES NO

## Engagement

11. If you work through NGO's, Government or community groups to engage workers, do we conduct due diligence to ensure that they are focusing on the human rights of the workers?

YES NO

12. If any KO trademark is being applied or used, have you ensured compliance with all company Legal, SGP and Regulatory requirements?

YES NO