



C.A.F.E. Practices Verifier and Inspector Zero Tolerance Corrective Action Plan (ZT-CAP) Procedure Manual

Starbucks Coffee Company

V1.0

English Version

SCSglobal
SERVICES

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1.0 Introduction

The purpose of this manual is to outline for verification organizations the steps and actions related to the Zero Tolerance Corrective Action Plan (ZT-CAP) procedure, as an integral part of C.A.F.E. Practices' program. The ZT-CAP procedure starts once the supplier commits to addressing Zero Tolerance Non-Conformities (ZTNCs) found during C.A.F.E. Practices verifications by accepting the Early ZT-Notification, signing the Commitment Letter, and developing a Work Plan to correct the issues identified by verification organizations. The ZT-CAP procedure is completed once a ZT-CAP check has been conducted, resulting in a determination of whether the ZTNCs have been corrected. As the scope of this manual is ZT-CAP procedure only, all other operations related to ZTNCs (e.g., early ZT notification, etc.) can be found in the C.A.F.E. Practices Verifier and Inspector Operations Manual.

2.0 ZT-CAP Related Terminology

Commitment Letter: A letter signed by the supplier to Starbucks committing to addressing the ZTNCs found in the application during the verification.

Corrective Actions: Actions developed by the supplier to address Non-Conformities with Zero Tolerance indicators. They are part of the supplier Work Plan.

Early Zero Tolerance (ZT) Notification: A notification sent to both Starbucks and the supplier that indicates whether there is non-compliance with Zero Tolerance indicators for a given verification. The Early ZT Notification is required for all applications, and must be sent within five business days of the closing meeting of the verification.

Desk Check: A ZT-CAP check where the verification organization reviews documentation requested from the supplier remotely.

On-Site Check: A ZT-CAP check where the verification organization conducts an inspection at either the office and/or field locations of the supplier, as determined by the Corrective Action Plan.

In-Harvest Classification: Set of conditions required to meet in-harvest classification for specific entities or the entire supply chain. See C.A.F.E. Practices Terms and Conditions v4.0, section 7 for full definitions of in-harvest classification by entity type.

Inspector: An individual who conducts inspections against the C.A.F.E. Practices Generic Scorecard and/or C.A.F.E. Practices Smallholder Scorecard for an approved C.A.F.E. Practices verification organization.

Root Cause Analysis: A root cause is the core issue leading to the non-conformity of a Zero Tolerance indicator. In the Work Plan, the supplier must provide a root cause analysis. Analyzing the root cause will provide understanding of the issue and its context, allowing for an effective Corrective Action Plan to be developed to address the issue.

SCS Global Services (SCS): A third-party evaluation, certification and auditing firm that is charged with providing oversight, training, support, and approval of third-party organizations carrying out

verifications against the C.A.F.E. Practices evaluation criteria. SCS also works with Starbucks Coffee Company in the design and improvement of the C.A.F.E. Practices program.

Supplier: Entity that enters direct contractual supply agreements with Starbucks Coffee Trading Company to sell green coffee.

Supplier Continuous Improvement: The C.A.F.E. Practices program is based on a model of continuous improvement, with the goal of suppliers to steadily improve practices over time.

Verifier: The designated representative(s) from a third-party verification organization charged with the tasks of training of inspectors, internal review of reports, and handling communications with SCS and Starbucks.

Verifier Reporting System (VRS): The online proprietary reporting system designed for the writing, collection, management, and analysis of all C.A.F.E. Practices inspection reports. The VRS also generates aggregated scores for supply chains based on indicator evaluations and weighting and tracks progress over time.

Work Plan: A plan that suppliers will submit to Starbucks upon receipt of an Early ZT Notification that details how the supplier plans to address all Not-Comply evaluations of Zero Tolerance indicators.

Zero Tolerance: Specific indicators in the C.A.F.E. Practices evaluation criteria that require compliance for participation in C.A.F.E. Practices.

Zero Tolerance Corrective Action Plan (ZT-CAP): The process of initiating and undergoing corrective actions to address all Not-Comply evaluations of Zero Tolerance indicators identified during a verification. Successful implementation of corrective actions followed by third party ZT-CAP check is necessary for an application with ZTNC evaluations to be eligible for validity in the C.A.F.E. Practices program.

Zero Tolerance Non-Conformities (ZTNC): Zero Tolerance indicators that have received a Not-Comply evaluation and that will need to be corrected through a ZT-CAP process.

3.0 ZT-CAP Process Overview

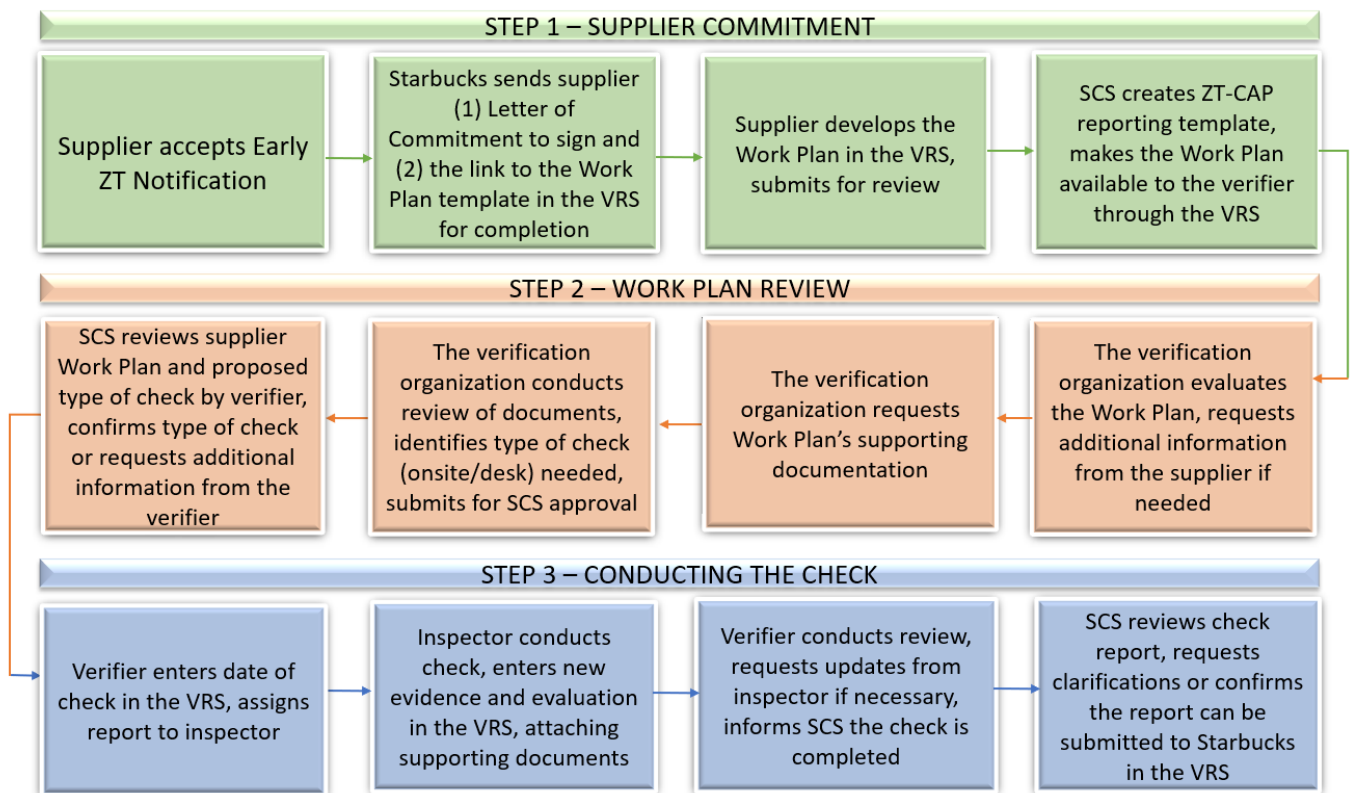
3.1 ZT-CAP Check Responsibilities and Principles

As verification organizations identify ZTNCs during verifications, they are in a unique position to evaluate corrective actions presented by the supplier, and to determine if they appropriately address the non-conformities observed during the verification. Work related to the ZT-CAP check procedure is divided, like in regular C.A.F.E. Practices verifications, between a verifier and an inspector. Verifiers are responsible for main communications with the client, with SCS, and overseeing reporting work to ensure high quality reports, while the inspector is responsible for conducting the check, following up with the supplier when needed, and writing the report. The principles of ZT-CAP checks are the same as for C.A.F.E. Practices verifications, namely:

- Ethical: Verifiers and inspectors will faithfully evaluate suppliers' Work Plan based on C.A.F.E. Practices principles and requirements.
- Fair: Verifiers and inspectors will fully and accurately report all findings of check activities.
- Objective: Verifiers and inspectors will be unbiased in their evaluation of all entities being verified.
- Independent: Verifiers and inspectors will not have any conflicts of interest with any activities or entities being verified.
- Transparent: Evidence presented in reports will be verifiable and clear.

Similarly to regular C.A.F.E. Practices verifications, deadlines established for the ZT-CAP check process must be respected. Starbucks has implemented policies that more closely link the verification approval status of a coffee supply chain with purchasing relationships. For that reason, the timing when ZT-CAP check reports are received may determine when coffee is purchased or shipped. Adherence to deadlines in the VRS and provided by SCS is integral to this timing. Organizations that continually fail to meet deadlines will be issued Non-Conformities with progressively stronger consequences, which may culminate in removal of approval to conduct work in the program.

3.2 ZT-CAP Flow Chart



3.3 Step 1—Supplier Commitment

The initial steps of the ZT-CAP process take place between the supplier and Starbucks. Once the supplier commits to addressing ZTNCs through a Corrective Action process by signing the Commitment Letter and developing a Corrective Action Plan, or Work Plan, SCS will alert the verification organization. At that point the verifier may reach out to the supplier for next steps. A new contract between the verification organization and the supplier can then be established for the ZT-CAP check. Only the verification organization that conducted the most recent verification of the application may be contracted to do the ZT-CAP check. Note, however, that the verification organization is not obligated to assign the ZT-CAP check to the same inspector that conducted the original verification.

Verification organizations will be responsible for evaluating the Work Plan and highlighting areas for improvement (see following section “Work Plan review”), but they **shall not provide any recommendations or support** to the supplier in the development of the Work Plan.

3.4 Step 2—Work Plan Review

Once informed by SCS that the supplier Work Plan is accessible in the VRS, it is the responsibility of the verification organization to review the Work Plan and evaluate if it will be sufficient to correct the ZTNC(s), once the corrective actions have been implemented. The verification organization should refer to section 6.0 “Evaluating Work Plans” of this manual as support for this evaluation. In the case of any questions, the verifier should contact SCS.

If the verification organization deems that the Work Plan does not address the issues sufficiently, the verification organization should request from the supplier to update the Work Plan accordingly. The supplier can access the Work Plan from the link they have received from Starbucks and update it at any time. Only the supplier may use this link. Any updates made by the supplier should be saved and resent to Starbucks. The verifier interface will always show the most up-to-date Work Plan that the supplier has submitted.

If the verification organization deems that the Work Plan addresses the ZTNC(s) appropriately, the verification organization will need to request supporting documentation from the supplier (which may be outlined in the Work Plan, or identified independently by the verification organization), and set a due date for receiving these documents. The SCS ZT-CAP committee (ZTCAPcafepractices@scsglobalservices.com) must be kept in copy on all supplier communications. The due date for receiving documents from the supplier must be reasonable, and in line with the timeline of implementation of the corrective actions. For example, if a training is planned, the due date could be a couple of days after the completion of the training, so training records can be reviewed.

Once all the requested materials are received, the verification organization will need to determine if implementation of Corrective Actions has started and is advanced enough to support correction of ZTNCs through a check. The verification organization will then need to determine whether the check can be conducted on-site or as a desk check. A description of both types of check, as well as instances in which each can or must be conducted, can be found in section 5.0 “Types of ZT-CAP Check” of this manual.

Once the initial review of the Work Plan and supporting documents has been completed, the verification organization can determine a ZT-CAP check date with the supplier. Several factors, such as timeline of

corrective action implementation, harvest status during the check, as well as planned coffee shipments that may affect the timing for the check, need to be considered when choosing a date for the ZT-CAP check. This date will need to be communicated to SCS by email for approval, and once validated can be entered in the VRS (see section 3.2). If it is not possible to conduct a ZT-CAP check before the end of the harvest period, please refer to section 5.2 of this manual to determine what actions can be taken.

- **Deadlines for Work Plan review.** After the Work Plan is made available in the VRS, verification organizations should review the Work Plan, address any issues with the supplier, and suggest a ZT-CAP check date and type with SCS within 10 business days. In case of any foreseeable delay, verifiers should inform SCS prior to the deadline.

3.5 Step 3—Conducting the ZT-CAP Check

Verification organizations must be familiar with the requirements necessary to close or keep open ZTNCs during a ZT-CAP check (see section 7.0 of this manual). Inspectors need to complete the ZT-CAP report using the report template within the VRS (see section 4.0 on how to access link). Verifiers are expected to conduct an internal review of the ZT-CAP report completed by the inspector before informing SCS by email that the ZT-CAP report has been internally reviewed and is ready for SCS review. SCS will then determine if the report can be submitted to Starbucks by the verifier, or if further clarification is needed. If the ZTNCs are corrected, the application may receive an approval status.

- **Deadlines for ZT-CAP Reporting.** Verifiers must enter the planned ZT-CAP check date in the VRS for each ZT-CAP check once agreed upon with the supplier and confirmed by email with SCS. ZT-CAP reports are due **5 business days** after completion of the ZT-CAP check. Failure to respect this deadline will result in Non-Conformities for the Verification Organization that will need to be addressed to ensure maintenance of approval status.

Verifiers should always reach out to SCS (ZTCAPcafepractices@scsglobalservices.com) with any questions regarding the responsibilities of verification organizations for the ZT-CAP procedure.

4.0 Navigating the ZT-CAP Process in the VRS

4.1 Accessing the Supplier's Work Plan

- Verifiers have access to the supplier's Work Plan through their VRS account:

Manage Supplier Applications

Active Applications (7) Submitted Applications (1) **ZT CAP (4)** Archived Applications (136) Calendar

ZT Corrective Action Plans (ZT-CAP)

ID	Application Name	ZT-CAP Report	Assign ZT-CAP Report	Planned date of ZT CAP check	Supplier Documents
####FY##	APPLICATION NAME - COUNTRY	incomplete	Select Inspector... Assign	<input type="text"/> Set Date	• Work Plan

4.2 Entering Check Date and Assigning to Inspector

- The date of the ZT-CAP check should be entered by the verifier in the “Planned date of ZT-CAP check” field before clicking on “Set Date”:

Planned date of ZT CAP check

2021-01-07 **1**

Supplier Document

• [Work Plan](#)

Planned date of ZT CAP check

2021-01-07

Set Date **2**

February 2021

Su	Mo	Tu	We	Th	Fr	Sa
31	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	1	2	3	4	5	6
7	8	9	10	11	12	13

- An inspector should be assigned by the verifier to write the ZT-CAP check report:

Assign ZT-CAP Report

Select Inspector... **1**


Assign **2**

- The verifier will then need to provide the inspector with the link to the ZT-CAP report, by first accessing the report and then by copying it from the report page web address (URL), and sending it by email/text/chat to the inspector:

Manage Supplier Applications

Active Applications (7) Submitted Applications (1) **ZT CAP (4)** Archived Applications (136) Calendar

ZT Corrective Action Plans (ZT-CAP)

ID	Application Name	ZT-CAP Report	Assign ZT-CAP Report	Planned date of ZT CAP check	Supplier Documents
#####FY##	APPLICATION NAME - COUNTRY	 incomplete	Select Inspector... Assign	<input type="text"/> Set Date	• Work Plan

1. Access to report

cafepactices.info/zl-car/ #####

C.A.F.E. Practices Verifier Reporting System Verifier, Name L

 IDs or names. Use * for wildcard Search Home

2. Copy address, send to assigned inspector

3rd Party ZT Check Report for Application Name (#####FY##)

Print Save Sub

App ID	#####FY##
Application Name	Application Name

4.3 Inspector reporting

- The screenshot below shows the different parts of the report to be filled out by the inspector. The inspector can access the report once they are logged into the VRS with their inspector account and paste the link into the browser. Once the reporting has been completed, the inspector will need to save their work by clicking “Save” on the top right of the screen, and must inform the verifier that the report is ready for their review:

[Print](#) [Save](#)

New evidence based on ZT-CAP check

New evaluation based on ZT-CAP check

SR-HP4.1 ZERO TOLERANCE: Employer does not directly or indirectly employ any persons who are under the age of 14 or the legal working age (ILO Conventions 10 and 138).	Evidence of Non-Conformity from original verification	<div style="border: 1px solid #ccc; height: 100px; margin-bottom: 10px;"> Type new evidence here... </div> <div style="display: flex; align-items: center;"> Upload File: Choose File </div> <div style="margin-top: 5px;"> Age of youngest worker: <input style="width: 50px;" type="text"/> </div> <div style="margin-top: 5px;"> Source of Evidence: <i>(This is required)</i> </div> <div style="display: flex; margin-top: 5px;"> <input type="checkbox"/> Documentation: <input style="width: 100px;" type="text"/> </div> <div style="display: flex; margin-top: 5px;"> <input type="checkbox"/> Interview: <input style="width: 100px;" type="text"/> </div>	<div style="display: flex; flex-direction: column; align-items: center;"> <div style="margin-bottom: 10px;"> <input type="radio"/> Comply <input type="radio"/> Non-Comply </div> <div style="border: 1px solid #ccc; padding: 5px; width: 100px; text-align: center;"> Add Comment </div> </div>
---	---	--	--

Upload supporting documentation (ZIP file format for multiple documents)

To use for communications between verifier and inspector

- After the review has been completed by the verifier, the verifier will need to ensure the information in the report is complete, before informing SCS the report is ready for SCS review, as shown below:

C.A.F.E. Practices Verifier Reporting System
Verifier, Name Logout CAFE Cocoa

IDs or names. Use * for wildcard

Search

[Home](#) [Staff](#) [Learn More](#)

3rd Party ZT Check Report for Application Name (#####FY##)

[Print](#) [Save](#) [Submit to Starbucks](#)

App ID	#####FY##
Application Name	Application Name
Date of original verification	MMDDYY - MMDDYY
Date ZT-CAP letter sent to client	MMDDYY
Date Supplier Corrective Action approved by Starbucks	MMDDYY
Date of zero tolerance check	<input style="width: 50px;" type="text"/> MMDDYY
Type of zero tolerance check	<div style="border: 1px solid #ccc; padding: 2px;">Desk or Check</div>
Report written by	<div style="border: 1px solid #ccc; padding: 2px;">Inspector assigned</div>
Report reviewed by	<div style="border: 1px solid #ccc; padding: 2px;">- Select -</div>

To be entered by verifier

Save progress

Submit to Starbucks only when requested by SCS

5.0 Types of ZT-CAP Checks

5.1 Desk Check and On-Site Check

There are two types of ZT-CAP checks that can be conducted:

- **On-site check:** The verification organization conducts an inspection at either the office and/or field locations of the supply chain, as determined by the Corrective Action Plan. As a general rule, on-site ZT-CAP checks that are conducted while the entity is classified as in-harvest are preferable. By default, certain ZT-CAPs, with ZTNCs related to child labor, or those requiring worker interviews, will need to be conducted on-site, and in most cases during the harvest period so workers are present.
- **Desk check:** The verification organization reviews documentation requested from the client at the office of the verification organization. Desk checks can be performed where the risk related to the ZTNC is low, and a review of documentation is sufficient to confirm that a ZTNC has been corrected. For example, if an entity received a ZTNC for missing a written procedure, a ZT-CAP desk check may be sufficient. Other instances of desk checks are possible, as long as the verification organization can provide sufficient justification as to why a desk check would be sufficient to address specific ZTNCs.

5.2 In-Harvest Requirements for ZT-CAP Checks

ZT-CAP checks should generally be conducted at entities that are classified as in-harvest. The full set of requirements for in-harvest classification of each entity type can be found in the Verifier Guidance Update #13 (VGU 13) and the C.A.F.E. Practices Verifier and Inspector Operations Manual section 6.6.3 “Qualifying Entities and Applications as Inspected in Harvest.” However, if a ZTNC is found during a verification that is taking place towards the end of the harvest season, the time required for the entity to incorporate its corrective actions might mean that the ZT-CAP check can only take place off-harvest. In such situations, the verification organization must address the following:

- If the ZT-CAP check is a **desk check** (approved by SCS), the check can be carried out.
- For ZT-CAP checks that require an **on-site visit**:
 - If the check does *not require interviews* with hired labor, it can be conducted off-harvest (e.g., for CG-CB3.1).
 - If the check *requires interviews with permanent workers only* (not seasonal/temporary; e.g., SR-HP 1.1), and that the minimum required sample size for worker interviews (15% of all workers—see section 7.0 of this manual, or section 6.7.2.3 “Sample Size for Interviews” of the C.A.F.E. Practices Verifier and Inspector Operations Manual) can be met during the time of the check, it can be conducted off-harvest.
 - If the check *requires interviews with permanent and/or temporary workers*, and if the minimum required sample size for worker interviews will not be present at the time of

the check, the check cannot take place. A ZT-CAP check may be carried out at a later time when enough workers are present at the entity.

- If it is deemed that the Corrective Action Plan requires an on-site check during a period where there is harvest-related activity on the farm (e.g., indicators relating to child labor, pesticide use, or traceability), the check will need to be conducted at a time when such activities are taking place.

In any case, the verification organization will need to inform SCS if there is risk for the check to be conducted off-harvest, and SCS will advise on the steps to follow.

Appendix A of this document presents a decision map to determine the correct type of ZT-CAP check. In all cases, each type of ZT-CAP check will need to be validated by SCS, who may request a different type of check than that suggested by the verification organization.

6.0 Evaluating Work Plans

The **supplier** is responsible for developing a robust Work Plan to address the ZTNCs identified for each concerned entity, and the **verification organization** is responsible for reviewing Work Plans of each entity and ensuring they meet all of the requirements to satisfactorily address the ZTNCs. A satisfactory Work Plan incorporates at minimum the following elements:

- A **root cause analysis** of the situation that led to the Non-Conformity,
- The **corrective actions** (e.g., trainings, retroactive payments, etc.) to be taken in order to tackle the ZTNCs and ensure they do not reoccur, with all **relevant stakeholders** (trainers, managers, producers, etc.),
- A **timeframe** for implementation of the corrective actions,
- Any **follow up action** required to ensure implementation in the long term (if applicable),
- Supporting **documentation**.

Training(s) on the topic of the found ZTNC(s) is expected to be provided to all relevant entities:

- For **all applications**: each entity with ZTNCs.
- For **smallholder networks**: in addition to training and correcting the ZTNCs at each applicable entity, the PSO must train at least 75% of producers in their network on all of the ZTNCs identified during the verification.

The format of these trainings (in person, remote, day sessions, emails/calls/text communications, etc.) is left to the discretion of the supplier, provided it is adequate for the nature and extent of the ZTNCs. The verification organization needs to confirm, during the review of the Work Plan (and during the check), that such trainings are adequate.

When reviewing Work Plans, verifiers must also be attentive to any actions that go against C.A.F.E. Practices' principle of continuous improvement. Some examples of corrective actions that are **not** to be accepted include:

- Removal of entities/farmers from the supply chain or cooperative/PSO,
- Any punitive actions or retaliation.

In such cases, the verification organization should inform SCS (ZTCAPcafepractices@scsglobalservices.com) immediately of the situation.

A supportive checklist for ZT-CAP Work Plan Evaluation can be found in Appendix B. This document is intended to help evaluate a Work Plan, providing a list of all of the required aspects of a Work Plan to appear. Verification organizations are encouraged to adopt it as an active resource, but it is not a program requirement to complete this checklist.

7.0 ZT-CAP Check Reporting

During the desk or on-site ZT-CAP check, the assigned inspector must review the following criteria in order to confirm that the Corrective Action Plan has been fully implemented:

- Each corrective action aspect mentioned by the supplier in the Work Plan is being addressed,
- Trainings have been or are being conducted according to established timelines,
- Trainings have reached the percentage of the farms in the network proposed by the supplier in the corrective action plan by the time of the desk or on-site verification,
- If follow up actions are planned to be taken at a later time, there is supporting evidence that such activities will take place.

In addition, the inspector is expected to:

- Conduct interviews to confirm implementation of corrective actions,
- Review all relevant supporting documentation provided by the supplier,
- Gather any additional documentation (e.g. pictures) to support the new evaluation.

While conducting interviews, it is essential to interview a representative sample. Inspectors should interview 15% of the total number of workers. Where 15% of the total number of workers is more than 25, inspectors should limit their interview sample to a maximum of 25. Where 15% of the total number of workers is fewer than three, inspectors should increase their interview sample to reach a minimum of three workers. Increasing the workers interview sample size to include more workers is often necessary in the event that interviews consistently reveal conflicting information. For further information on how to approach the calculation of the sample size for interviews, please refer to the C.A.F.E. Practices Verifier and Inspector Operations Manual, section 6.7.2.3 "Sample Size for Interviews."

When writing the report in the VRS, the inspector should provide sufficient information to support the new evaluation (Comply or Not Comply) given. The inspector will need to elaborate on each of the points described above, adding any information related to follow up actions planned for a later time (if applicable), and should include all supporting documents related to each Zero Tolerance indicator. Multiple documents need to be uploaded together in the VRS in a ZIP-file format.

Once the inspector has completed the report through the link in the VRS, the inspector should save the report by clicking “Save” in the VRS and communicate to the verifier that the report is ready for internal review. The verifier will then be responsible for the review of the report, ensuring all required elements detailed above have been met (a supportive checklist of all required elements to be included in the new evidence can be found in Appendix C) before informing SCS that the report is ready for SCS review. SCS will then determine if the report can be submitted to Starbucks, or if it needs further attention. SCS will remain in contact with the verifier throughout this process.

8.0 Finding Additional ZTNCs during ZT-CAP Checks

Additional ZTNCs may be found during a ZT-CAP check. The ZT-CAP check should still focus on the ZTNCs that were found during the verification, but the verification organization will need to inform SCS if any additional ZTNCs are found during the on-site ZT-CAP check. Inspectors should be sure to collect as much information as possible to support the evaluations of a new ZTNC. Depending on the nature of the ZTNC(s) found, the application may need to undergo an additional ZT-CAP check to address these newly found ZTNCs. In this case, SCS will be in touch with the verification organization on how to proceed in such situations.

9.0 Non-Compliant ZT-CAP Checks

A ZT-CAP check may result in (a) ZTNC(s) remaining Non-Compliant, which can occur for several reasons. Below is a non-exhaustive list of some examples:

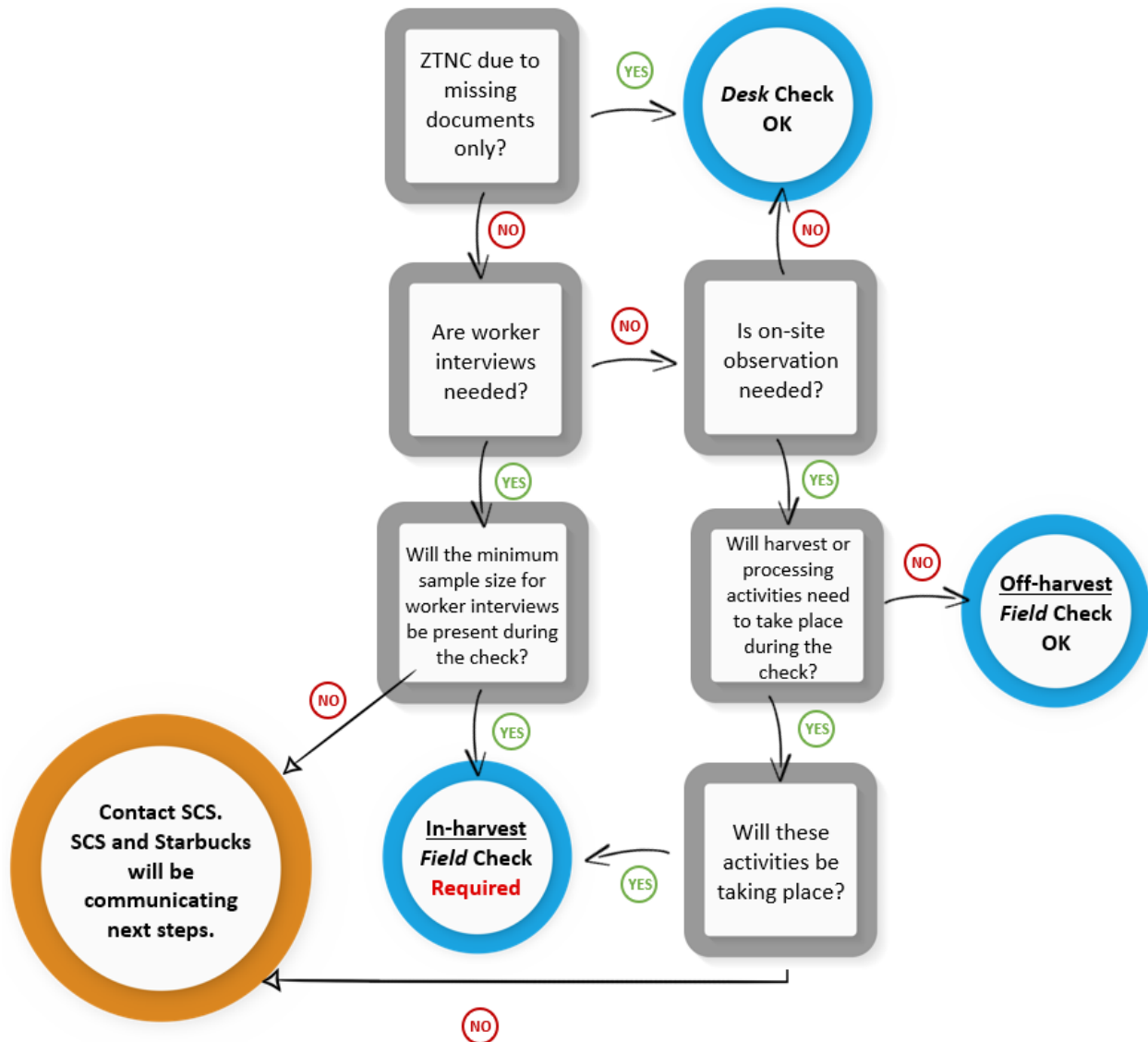
- The corrective actions described in the supplier Work Plan are not implemented, and/or the supply chain does not show any proof of implementation in the nearby future,
- Corrective actions are implemented, but are too weak to prevent reoccurrence of the non-conformities,
- Supporting documentation and/or Work Plan do not match what has been implemented on-site,
- The ZTNCs observed during the verification are re-observed during the check, despite any corrective actions implemented.

In the case of Non-Compliant ZT-CAP checks, the minimum required evidence for ZTNC evaluation should be referenced in the new evaluation. These requirements are listed in Appendix D of the C.A.F.E. Practices Verifier and Inspector Operations Manual, and in Appendix D of this manual. In cases where Non-Compliance is due to unsuccessful or insufficient implementation of the Work Plan, evidence should note all deficiencies of the Work Plan implementation, as outlined in Appendix C (Supportive Checklist for writing and reviewing ZT-CAP reports).

SCS and Starbucks will be in touch with the supplier and the verification organization in cases when a ZT-CAP check results in non-compliance.

Appendix

A. Determining ZT-CAP Check Type



B. Supportive Checklist for Evaluating Work Plans

This checklist is intended as a supporting document for evaluating Work Plans. SCS will not request a copy, but highly recommends using it as part of the internal procedure for ZT-CAP Work Plan evaluation.

Critical Aspects	Yes / No/ Other	Comments	Follow up needed
A Root Cause is identified			
Corrective Actions are relevant and appropriate			
Training is to be provided to all relevant entities			
All relevant stakeholders are involved			
A timeframe is provided and is reasonable			
Follow-up actions are planned			
Supporting documentation can be made available			
Red flags (e.g., removal of entities, punitive actions against entities)			
Other			

C. Supportive Checklist for Writing and Reviewing ZT-CAP Reports

Critical Aspects	Notes
<input type="checkbox"/> Each corrective action point mentioned by the supplier in the Work plan is addressed	
<input type="checkbox"/> Trainings have been or are being conducted according to established timelines	
<input type="checkbox"/> Trainings have reached the percentage of the farms in the network proposed by the supplier by the time of the check	
<input type="checkbox"/> Interviews were conducted and support corrective actions	
<input type="checkbox"/> Potential follow up actions planned to be taken at a later time are elaborated on	
<input type="checkbox"/> Review of any supporting documentation	
<input type="checkbox"/> Supporting documentation is attached	

D. Evidence Requirements for Zero Tolerance Indicators Evaluated as Not Comply

The requirements in this appendix refer to the *qualitative evidence* requirements for Zero Tolerance indicators that are evaluated as Not Comply. In addition to the requirements specified below, information must also *always* be completed in the quantitative evidence and sources of evidence fields in the VRS for ZT-CAP checks.

For those indicators marked by an asterisk, a citation to a legal reference must be provided in the qualitative evidence. The citation should include the title of the document, publication year, and relevant section or article.

SR-HP1.1*	ZERO TOLERANCE: All permanent workers are paid the nationally or regionally established minimum wage. If minimum wages for permanent workers have not been established, all permanent workers are paid the local industry standard wage. If workers are paid by production, wages meet the nationally or regionally established minimum wage, or, where minimum wage has not been established, the local industry standard wage.
SR-HP1.2*	ZERO TOLERANCE: All temporary and seasonal workers are paid the nationally or regionally established minimum wage. If minimum wages for temporary/seasonal workers have not been established, all temporary/seasonal workers are paid the local industry standard wage. If workers are paid by production, wages meet the nationally or regionally established minimum wage, or, where minimum wage has not been established, the local industry standard wage.
	<ul style="list-style-type: none"> ○ Number or percentage of workers who are not meeting the minimum wage; ○ Tasks conducted by workers not meeting minimum wage; ○ Payment rate of workers who are not meeting minimum wage; ○ National/regional minimum wage or industry standard wage, including the legal reference; and, ○ For workers that are paid by productivity (i.e., piece-rate), evidence must include average productivity (e.g., kg/ha), price per unit (e.g., \$ per kg), average time required for meeting productivity, AND corresponding payment rate. <p>*LEGAL REFERENCE ALWAYS REQUIRED</p>
SR-HP1.3*	ZERO TOLERANCE: Wages are paid regularly to all workers in cash, cash equivalent (check, direct deposit), or through in-kind payments (e.g., food), if legally permissible.
	<ul style="list-style-type: none"> ○ Type of payment to workers; ○ Frequency of payment to workers; ○ Description of system of in-kind payments (if applicable); and, ○ Legal reference related to requirements for in-kind payments (if applicable). <p>*LEGAL REFERENCE MAY BE REQUIRED</p>
SR-HP1.17*	ZERO TOLERANCE: Labor intermediaries are only used where legally permissible. Legal status of the intermediary can be demonstrated at the time of inspection. All necessary documentation from the labor intermediary is made available at the time of the inspection to support evaluation of relevant Social Responsibility indicators.

	<ul style="list-style-type: none"> ○ Description of type of labor intermediary, including legal status; ○ Activities carried out by workers for labor intermediary; ○ Legal reference related to requirements for labor intermediaries; and, ○ Confirmation of whether all documentation was provided, and if not, which documentation was missing. <p>*LEGAL REFERENCE MAY BE REQUIRED</p>
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SR-HP4.1*	<p>ZERO TOLERANCE: Employer does not directly or indirectly employ any persons who are under the age of 14 or the legal working age (ILO Conventions 10 and 138).</p> <ul style="list-style-type: none"> ○ Age(s) of worker(s) under 14 or the legal working age; ○ Reference to the legal working age; ○ Activities conducted by workers under 14 or the legal working age; ○ Schedule of when children under 14 or the legal working age work and/or are present at the entity; ○ Payment system for work done by children under 14 or the legal working age, including whether payment is direct to the child or indirect (e.g., through parents or other person or organization); ○ Information about whether children are accompanied by a parent or legal guardian; and, ○ Any additional circumstances as to why the children are working and what the circumstances are (e.g., whether work is voluntary, how many hours children work, how long has this been occurring). <p>*LEGAL REFERENCE MAY BE REQUIRED</p>
SR-HP4.2*	<p>ZERO TOLERANCE: Employment of authorized minors follows all legal requirements, including, but not limited to, work hours, wages, education, working conditions, and does not conflict with or limit their access to education (ILO Convention 10).</p> <ul style="list-style-type: none"> ○ Ages of authorized minors**; ○ Legal reference for requirements for authorized minors; ○ Activities conducted by authorized minors; ○ Schedule of when authorized minors work and/or are present at the entity; ○ Payment system (if applicable) for work done by authorized minors; and, ○ Information about whether authorized minors are accompanied by a parent or legal guardian. <p>*LEGAL REFERENCE MAY BE REQUIRED</p> <p><i>**For the purpose of the indicator, “authorized minors” typically refers to minors above the age of 14, or the legal working age, up to their 18th birthday.</i></p>
SR-HP4.3	<p>ZERO TOLERANCE: Employer enforces a policy of prohibiting discrimination on the basis of gender, race, ethnicity, age or religion (ILO Convention 111). <i>Written policy required for large/medium farms, mills, and warehouses with more than 5 employees.</i></p> <ul style="list-style-type: none"> ○ Confirmation of whether a written policy exists (if applicable); and, ○ If discrimination is observed, evidence should specify (i) the number and type of workers affected, and (ii) the type of discrimination observed.
SR-HP4.4	<p>ZERO TOLERANCE: Employer enforces a policy that prohibits the use of forced, bonded, indentured, convict or trafficked labor (ILO Conventions 29, 97, 105 and</p>

	143). <i>Written policy required for large/medium farms, mills, and warehouses with more than 5 employees.</i>
	<ul style="list-style-type: none"> ○ Confirmation of whether a written policy exists (if applicable); and ○ If forced, bonded, indentured, convict or trafficked labor is observed, evidence should specify (i) the number and type of workers affected, and (ii) the type of labor observed.
SR-HP4.5	<u>ZERO TOLERANCE:</u> The workplace is free from physical, sexual, and verbal harassment and abuse.
	<ul style="list-style-type: none"> ○ Number of workers affected by harassment and/or abuse; ○ Type of workers affected by harassment and/or abuse (provided that information does not put workers at risk); and, ○ Type of harassment and/or abuse, including person(s) responsible.
SR-HP4.6	<u>ZERO TOLERANCE:</u> Workers do not surrender their identity papers or other original personal documents or pay deposits as a condition of employment.
	<ul style="list-style-type: none"> ○ If original identity papers are required for employment, then details should be provided about the (i) types of identity papers that are surrendered and, (ii) length of time that identity papers are kept. ○ If a deposit is required for employment, then the evidence should specify the type and amount of deposit.
SR-WC2.1	<u>ZERO TOLERANCE:</u> Children of legal school age who live onsite or accompany family members who are working onsite attend school.
	<ul style="list-style-type: none"> ○ National legislation regarding mandatory school attendance, including the age or level to which children must attend school; ○ The number and ages of children living or working onsite; ○ The school and work status of each child (attends school: Y/N; works or helps on the farm: Y/N); ○ Types of activities that the child is doing on the farm; ○ The school and working hours of any children working or helping on the farm.
SR-MS 1.1	<u>ZERO TOLERANCE:</u> Entity provides transparency into their operations, policies, processes, and relevant records to Starbucks or its designated third party. Payroll records and time cards provided by management are true and accurate.
	<ul style="list-style-type: none"> ○ Aspects of the operation that were not available during the verification; and/or, ○ Items provided to the inspector that were not true or accurate.
SR-MS 1.2	<u>ZERO TOLERANCE:</u> Money and/or gifts of any type are not offered to Starbucks or its designated third party.
	<ul style="list-style-type: none"> ○ Type of money or other gift that was offered, and the reason for offering.
CG-CB3.1	<u>ZERO TOLERANCE:</u> No conversion of natural forest to agricultural production since 2004.
	<ul style="list-style-type: none"> ○ Date that land was converted; ○ Type of forest or land that was converted; ○ Purpose for land conversion; and, ○ Approximate area converted (in hectares).

CG-EM1.1*	ZERO TOLERANCE: Farm does not use pesticides that are listed by the World Health Organization as Type 1A or 1B, or that are banned according to national, regional, or local laws.
	<ul style="list-style-type: none"> ○ Active ingredient of illegal or prohibited pesticides used; ○ Purpose for use of illegal or prohibited pesticides; ○ Duration of time that illegal or WHO-listed pesticide has been in use; and, ○ Legal reference (if applicable) or specification of whether pesticide is listed as Type 1A or 1B. <p style="text-align: right;">*LEGAL REFERENCE MAY BE REQUIRED</p>
CP-MT1.1	ZERO TOLERANCE: Entity has a system and is tracking C.A.F.E. Practices coffee from initial purchase through point of export.
CP-MT1.2	ZERO TOLERANCE: Mill has a system and is tracking C.A.F.E. Practices coffee from initial purchase or intake through final sale or output.
	<ul style="list-style-type: none"> ○ Description of methods for keeping C.A.F.E. Practices coffee physically separate from non-C.A.F.E. Practices coffee (e.g., bag labels; storage areas; separate processing runs, etc.); ○ System of documentation used for ensuring C.A.F.E. Practices coffee is separate from non-C.A.F.E. Practices coffee (e.g., receipts; invoices; weigh-bridge tickets, etc.); and, ○ Deficiencies in the system of documents or physical segregation that would lead to mixing of C.A.F.E. Practices and non-C.A.F.E. Practices coffee.
PS-MT1.1	ZERO TOLERANCE: All supply chain entities have and implement a system to track the movement of C.A.F.E. Practices coffee from initial purchase through point of export.
	<ul style="list-style-type: none"> ○ Description of methods for keeping C.A.F.E. Practices coffee physically separate from non-C.A.F.E. Practices coffee (e.g., bag labels; storage areas; separate processing runs, etc.); ○ System of documentation used for ensuring C.A.F.E. Practices coffee is separate from non-C.A.F.E. Practices coffee (e.g., receipts; invoices; weigh-bridge tickets, etc.); ○ Information about ALL entities in the C.A.F.E. Practices supply chain, including farms and mills, as well as any other entity that handles coffee (e.g., collectors or farmer delegates that may collect coffee from farms and deliver it to wet mills); and, ○ Deficiencies in the system of documents or physical segregation that would lead to mixing of C.A.F.E. Practices and non-C.A.F.E. Practices coffee.
PS-MT1.2	ZERO TOLERANCE: Organization has an annually updated list of producers participating in the C.A.F.E. Practices program.
	<ul style="list-style-type: none"> ○ Date when the producer list was most recently updated; and, ○ Specific discrepancies between the list of producers in the approved C.A.F.E. Practices application and the list encountered at the PSO. In most cases, a supply chain discrepancy notification is also necessary.
PS-MT1.3	ZERO TOLERANCE: Each farm in the supply chain receives a receipt for coffee purchased.
	<ul style="list-style-type: none"> ○ Description of the receipt system that is used;

	<ul style="list-style-type: none"> ○ Information from farms that were visited during the verification and whether receipts were observed; and, ○ Explanation of system for coffee purchases, if no receipts are issued.
PS-EM1.1*	<u>ZERO TOLERANCE:</u> Producer Support Organization does not buy, distribute or apply pesticides prohibited under the World Health Organization Type 1A or 1B lists, or that are banned according to national, regional, or local laws.
	<ul style="list-style-type: none"> ○ Active ingredient of illegal or prohibited pesticides used or distributed; ○ Purpose for use of illegal or prohibited pesticides; ○ Duration of time that illegal or WHO-listed pesticide has been in use or distributed; and, ○ Legal reference (if applicable) or specification of whether pesticide is listed as Type 1A or 1B. <p style="text-align: right;">*LEGAL REFERENCE MAY BE REQUIRED</p>