



Starbucks Coffee Company

## COCOA Practices

Scorecard

October 2018

*Version 3.3*

## GENERAL QUESTIONS - Producer

|  |   |
|--|---|
| General Information  | Entity code   |
|  | Entity Name   |
|  | Name of owner   |
|  | Gender of owner   |
|  | GPS longitude   |
|  | GPS latitude  |
|  | Address   |
|  | Village   |
|  | Region  |
|  | Country   |
|  | Is the person responsible for farm management the owner of the land? <input type="checkbox"/> Yes <input type="checkbox"/> No   |
|  | If not, is the person who manages the farm an Aboussan? <input type="checkbox"/> Yes <input type="checkbox"/> No  |
|  | If an Aboussan, please specify length of time at farm (years):  |
|  | Age of the farm manager (owner or aboussan):<br><input type="checkbox"/> Less than 25 <input type="checkbox"/> 25 - 35 <input type="checkbox"/> 36 - 45 <input type="checkbox"/> 46 - 55 <input type="checkbox"/> More than 55                      |
|  | In the past 12 months, was there a time during which your family did not have enough food? <input type="checkbox"/> Yes   |
|  | How many members does the household have?<br><input type="checkbox"/> 1 or 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 or 6 <input type="checkbox"/> 7 or 8 <input type="checkbox"/> 9 or more               |
|  | Are any household members ages 6 to 16 attending mandatory school this year?<br><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> No one ages 6 to 16   |
|  | Can the producer read and write? <input type="checkbox"/> Read only <input type="checkbox"/> Write only <input type="checkbox"/> Both   |
|  | If the producer is able to read or write please specify in what language ?  |
|  | What is the source of water for the household? <input type="checkbox"/> Public standpipe <input type="checkbox"/> Well <input type="checkbox"/> Water   |
|  | Please specify the distance to the water source:  |
|  | What type of toilet do you have? <input type="checkbox"/> None <input type="checkbox"/> Pit latrine   |
|  | What type of cooking fuels are used?<br><input type="checkbox"/> Firewood <input type="checkbox"/> Paraffin or kerosene <input type="checkbox"/> Charcoal <input type="checkbox"/> If others, please specify:                                       |
|  | Does the household have electricity? <input type="checkbox"/> Yes <input type="checkbox"/> No   |
|  | Does the producer have a phone that receives SMS? <input type="checkbox"/> Yes <input type="checkbox"/> No  |
|  | Does the producer sell products from the farm other than cocoa? <input type="checkbox"/> Yes <input type="checkbox"/> No  |
|  | The producer discusses farming methods and issues with other people. <input type="checkbox"/> Yes <input type="checkbox"/> No   |
|  | What was the main type of training you received?<br><input type="checkbox"/> Agronomy <input type="checkbox"/> Health <input type="checkbox"/> General Education <input type="checkbox"/> Other   |
|  | How many visits from an extension agent or agronomist did you receive in the last 12 months?  |
|  | What certification/verification program does the farm hold?<br><input type="checkbox"/> COCOA Practices <input type="checkbox"/> Rainforest Alliance <input type="checkbox"/> Fairtrade <input type="checkbox"/> UTZ <input type="checkbox"/> Other |
|  | Was all of the main cocoa crop sold under one or multiple certification/verification programs?<br><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> I Don't Know  |
|  | What type of cocoa varieties does this plantation have?<br><input type="checkbox"/> Forastero <input type="checkbox"/> Criolo <input type="checkbox"/> Trinitario <input type="checkbox"/> If another type, please specify which:                   |
|  | How many kilograms of Cocoa beans is produced annually from this plantation?  |
| How many Cocoa trees per hectare do you have on your plantation?   |   |
| What is the average age of the cocoa trees on your farm?<br><input type="checkbox"/> 5-10 <input type="checkbox"/> 11-15 <input type="checkbox"/> 16-20 <input type="checkbox"/> 21-25 <input type="checkbox"/> More than 25 |   |
| What is the estimated area in hectares that is uncultivated on your plantation?  |   |
| What are the most common pest and diseases that affect your cocoa trees?   |   |

## ECONOMIC ACCOUNTABILITY - Producer

| Criteria  | Indicators |  | C/NC/NA |
|---|------------|--|---------|
| EA-IS1: Demonstration of Financial Transparency | EA-IS1.3   | Entity verified maintains receipts or invoices for the cocoa it buys or sells. Receipts can be verified to correspond to actual transactions.                                      |         |
|   | EA-IS1.4   | Documents observed clearly indicate <b>dates, names of buyer and seller, unit of measure</b> (volume or weight), <b>price per unit, quantity, type of cocoa</b> (e.g. wet or dry). |         |

## SOCIAL RESPONSIBILITY - Producer

| Criteria  | Indicators |   | C/NC/NA |
|---|------------|---|---------|
| SR-HP1: Wages and Benefits  | SR-HP1.1   | <u>ZERO TOLERANCE</u> : All <b>permanent workers</b> 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.<br>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   | <u>ZERO TOLERANCE</u> : All <b>temporary and seasonal workers</b> 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.<br>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-HP1.3   | <u>ZERO TOLERANCE</u> : Wages are paid <b>regularly</b> to all workers in cash, cash equivalent, (check, direct deposit), or through in-kind payments (e.g., food), if legally permissible.   |         |
| SR-HP4: Child Labor/ Non-Discrimination/ Forced Labor                                   | SR-HP4.1   | <u>ZERO TOLERANCE</u> : 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).  |         |
|   | SR-HP4.2   | <u>ZERO TOLERANCE</u> : Employment of authorized minors follows <b>all</b> 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).  |         |
|   | SR-HP4.4   | <u>ZERO TOLERANCE</u> : Employer enforces a policy that prohibits the use of forced, bonded, indentured, convict or trafficked labor (ILO Conventions 29, 97, 105 and 143).<br><i>Written policy required for entities (large farms, producer organizations, suppliers) with more than 5 employees.</i>   |         |
|   | SR-HP4.5   | <u>ZERO TOLERANCE</u> : The workplace is free from physical, sexual and verbal harassment and abuse.  |         |
|   | 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 for employment.  |         |
| SR-HP6: Child Labor/ Forced Labor - Family Labor*<br>(*farms dependent on family labor) | SR-HP6.2   | <u>ZERO TOLERANCE</u> : Children do not perform tasks defined as hazardous in ILO Convention 182, Article 3.  |         |
| SR-WC1: Access to Housing, Water and Sanitary facilities                                | SR-WC1.2   | Employer provides workers with convenient access to safe drinking water.  |         |
|   | SR-WC1.4   | Workers have convenient access to sanitary facilities that do not contaminate the local environment.  |         |
| SR-WC2: Access to Education   | 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.  |         |

| SOCIAL RESPONSIBILITY - Producer   |            |  |         |
|------------------------------------|------------|--|---------|
| Criteria                           | Indicators |  | C/NC/NA |
| SR-WC4: Worker Safety and Training | SR-WC4.2   | <p>Anyone handling or applying agrochemicals and operating machinery uses the appropriate protective equipment.</p> <ul style="list-style-type: none"> <li>• When applying pesticides, workers use respirators with filters, goggles, rubber boots, water-proof gloves, and impermeable clothing.</li> <li>• When applying chemical fertilizers, workers use rubber boots, and if appropriate, gloves and protective goggles.</li> </ul> |         |
| SR-MS1: Management Systems         | SR-MS1.1   | <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.   |         |
|                                    | SR-MS1.2   | <u>ZERO TOLERANCE</u> : Money and/or gifts of any type are not offered to Starbucks or its designated third party.   |         |

| ENVIRONMENTAL LEADERSHIP - Producer         |            |  |         |
|---|------------|--|---------|
| Criteria                                    | Indicators |  | C/NC/NA |
| CG-WR1: Water Body Protection               | CG-WR1.9   | <u>CRITERIA REQUIREMENT</u> : There is no application of <b>agrochemicals</b> within <b>5</b> meters of any permanent water body.  |         |
| CG-CB3: Conservation Areas                  | CG-CB3.1   | <u>ZERO TOLERANCE</u> : No conversion of natural forest to agricultural production <b>since 2007</b> .   |         |
| CG-EM1: Ecological Pest and Disease Control | CG-EM1.1   | <u>ZERO TOLERANCE</u> : The entity does not use, buy or distribute <b>pesticides</b> that are listed by the World Health Organization as Type 1A or 1B, or that are banned according to national, regional, or local laws. |         |

## ECONOMIC ACCOUNTABILITY - Producer Organization

| Criteria  | Indicators |   | C/NC/NA |
|---|------------|---|---------|
| EA-IS1: Demonstration of Financial Transparency | EA-IS1.3   | Entity verified maintains receipts or invoices for the cocoa it buys or sells. Receipts can be verified to correspond to actual transactions.   |         |
|   | EA-IS1.4   | Documents observed clearly indicate <b>dates, names of buyer and seller, unit of measure</b> (volume or weight), <b>price per unit, quantity, type of cocoa</b> (e.g. wet or dry).  |         |
| EA-IS2: Equity of Financial Transactions        | EA-IS2.3   | The entity has price setting documentation and this is made available to producers.   |         |
|   | EA-IS2.4   | If the entity distributes premium payments, receipts for COCOA Practices Sustainability Premium payments (if awarded) are maintained by the entity and these receipts are provided to producers. Premium payments are distributed to producers according to COCOA Practices program requirements. |         |
|   | EA-IS2.8   | If the entity distributes premium payments, the entity has an accounting system for the COCOA Practices Sustainability Premium payments that it makes.  |         |
|   | EA-IS2.9   | If the entity distributes premium payments, premium payments can be demonstrated to correspond to the correct amount of COCOA Practices cocoa that was delivered to the entity.   |         |
|   | EA-IS2.10  | The entity does not retain any portion of the COCOA Practices Sustainability Premium payment.   |         |
| EA-FV1: Financial Viability                     | EA-FV1.3   | The entity has a mechanism to provide credit to producers.  |         |

## INTERNAL CONTROL SYSTEMS - Producer Organization

| Criteria                                 | Indicators |   | C/NC/NA |
|--|------------|---|---------|
| IC-IP1: Product Tracking System          | IC-IP1.3   | The Entity is able to document the product flow of cocoa from each production unit to the collection point and during handling and transport to the warehouse, even when these processes are outsourced.  |         |
|  | IC-IP1.4   | Entity is able to track and confirm volumes of COCOA Practices cocoa received and sold using a Segregation system.  |         |
| IC-MM1: Management and Monitoring System | IC-MM1.2   | Entity has a written description of the Management and Monitoring System that includes job titles and job descriptions of the persons responsible for the traceability of the cocoa. These persons are identified on an organizational chart and can explain how the system works and provide examples. |         |
|  | IC-MM1.7   | The Management and Monitoring System described in IC-MM1.2 is implemented. The System clearly identifies the total quantity of cocoa delivered by the COCOA Practices declared producers and includes purchase and sale prices.   |         |
|  | IC-MM1.8   | The Management and Monitoring System includes an annual report which details the annual total quantity of cocoa delivered by the COCOA Practices declared producers and includes purchase and sale prices and premium award to each producer.   |         |

## SOCIAL RESPONSIBILITY - Producer Organization

| Criteria  | Indicators |   | C/NC/NA |
|---|------------|---|---------|
| SR-HP1: Wages and Benefits                                  | SR-HP1.1   | <u>ZERO TOLERANCE</u> : All <b>permanent workers</b> 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.<br>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   | <u>ZERO TOLERANCE</u> : All <b>temporary and seasonal workers</b> 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.<br>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-HP1.3   | <u>ZERO TOLERANCE</u> : Wages are paid <b>regularly</b> to all workers in cash, cash equivalent, (check, direct deposit), or through in-kind payments (e.g., food), if legally permissible.   |         |
|   | SR-HP1.4   | Management maintains complete written earning records for at least the past year, which itemize all: wages, overtime worked and deductions.   |         |
|   | SR-HP1.5   | Workers have access to their earning records, which itemize all wages, overtime and deductions.   |         |
| SR-HP3: Hours of Work                                       | SR-HP3.1   | All workers do not work more regular hours (before overtime) per day or week than allowed by local law. If regular hours are not established, regular hours are considered as 8 hours per day, 48 hours per week.   |         |
|   | SR-HP3.2   | All <b>permanent workers</b> must have, as a minimum, the equivalent of one continuous 24 hour period off in each 7 day period, or longer if required by law, whichever is greater.   |         |
|   | SR-HP3.3   | All workers must not work more total hours (including overtime) in one day or week than allowed by local laws. If total hours have not been established by law, workers do not work more than 60 hours per week, except where a written agreement exists between workers and management.  |         |
|   | SR-HP3.5   | Hours worked on potentially hazardous activities (e.g., pesticide exposure, very heavy labor, etc.) are limited according to the law. If hours have not established by law, the activities are limited to six hours per day.  |         |
| SR-HP4: Child Labor/<br>Non-Discrimination/<br>Forced Labor | SR-HP4.1   | <u>ZERO TOLERANCE</u> : 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).  |         |
|   | SR-HP4.3   | <u>ZERO TOLERANCE</u> : Employer enforces a policy of prohibiting discrimination on the basis of gender, race, ethnicity, age, or religion (ILO Convention 111).<br><i>Written policy required for entities (large farms, producer organizations, suppliers) with more than 5 employees.</i>  |         |
|   | SR-HP4.4   | <u>ZERO TOLERANCE</u> : Employer enforces a policy that prohibits the use of forced, bonded, indentured, convict or trafficked labor (ILO Conventions 29, 97, 105 and 143).<br><i>Written policy required for entities (large farms, producer organizations, suppliers) with more than 5 employees.</i>   |         |
|   | SR-HP4.5   | <u>ZERO TOLERANCE</u> : The workplace is free from physical, sexual and verbal harassment and abuse.  |         |
| SR-WC2: Access to Education                                 | 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.  |         |
| SR-WC4: Worker Safety and Training                          | SR-WC4.1   | <u>CRITERIA REQUIREMENT</u> : Employer provides personal protective equipment to all applicable workers at no cost.   |         |

## SOCIAL RESPONSIBILITY - Producer Organization

| Criteria                   | Indicators |  | C/NC/NA                |
|----------------------------|------------|--|------------------------|
| SR-MS1: Management Systems | SR-MS1.1   | <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. |                        |
|                            | SR-MS1.2   | <u>ZERO TOLERANCE</u> : Money and/or gifts of any type are not offered to Starbucks or its designated third party.   |                        |
|                            | SR-MS1.3   | <u>ZERO TOLERANCE</u> : Entity demonstrates a commitment to continuous improvement and engages in the improvement process.   | Evaluated by Starbucks |

## ORGANIZATIONAL STABILITY - Producer Organization

| Criteria                         | Indicators |   | C/NC/NA |
|----------------------------------|------------|---|---------|
| OS-PT1: Farm Management Training | OS-PT1.1   | Entity has a documented plan and timetable for training its members on responsible farm management.   |         |
|                                  | OS-PT1.3   | Entity monitors productivity (via cocoa yields per hectare or trees) of members and annual percentage change resulting from the training program. |         |

## ENVIRONMENTAL LEADERSHIP - Producer Organization

| Criteria                                    | Indicators |   | C/NC/NA |
|---|------------|---|---------|
| CG-CB1: Maintaining Shade Canopy            | CG-CB1.2   | Entity facilitates access to or distributes tree seeds or seedlings.  |         |
| CG-CB2: Protecting Wildlife                 | CG-CB2.1   | Entity has a written list of wildlife species native to the region and identified which of those species are classified as vulnerable, endangered or critically endangered according to the IUCN red list ( <a href="http://www.redlist.org">http://www.redlist.org</a> ) or local government resource and shares it with the producers in the network. |         |
| CG-EM1: Ecological Pest and Disease Control | CG-EM1.1   | <u>ZERO TOLERANCE</u> : The entity does not use, buy or distribute <b>pesticides</b> that are listed by the World Health Organization as Type 1A or 1B, or that are banned according to national, regional, or local laws.  |         |
|   | CG-EM1.2   | <u>CRITERIA REQUIREMENT</u> : Entity maintains a register specifying the date, quantity, and type (i.e., commercial name) of each <b>pesticide</b> purchased or given for use by the organization's members.  |         |
|   | CG-EM1.3   | <u>CRITERIA REQUIREMENT</u> : <b>Agrochemicals</b> are stored in a secure place with adequate ventilation, safeguards to prevent spills and separated from any food products.   |         |
|   | CG-EM1.17  | Spraying equipment is maintained in good working order and cleaned in the agrochemical storage or mixing areas after use.   |         |
|   | CG-EM1.18  | Empty chemical containers are rinsed and punctured, or as required by local regulations, and appropriately disposed of to prevent further use or injury.  |         |

## ECONOMIC ACCOUNTABILITY - Supplier

| Criteria  | Indicators |   | C/NC/NA |
|---|------------|---|---------|
| EA-IS1: Demonstration of Financial Transparency | EA-IS1.3   | Entity verified maintains receipts or invoices for the cocoa it buys or sells. Receipts can be verified to correspond to actual transactions.   |         |
|   | EA-IS1.4   | Documents observed clearly indicate <b>dates, names of buyer and seller, unit of measure</b> (volume or weight), <b>price per unit, quantity, type of cocoa</b> (e.g. wet or dry).  |         |
| EA-IS2: Equity of Financial Transactions        | EA-IS2.3   | Entity has price setting documentation and this is made available to producers.   |         |
|   | EA-IS2.4   | If the entity distributes premium payments, receipts for COCOA Practices Sustainability Premium payments (if awarded) are maintained by the entity and these receipts are provided to producers. Premium payments are distributed to producers according to COCOA Practices program requirements. |         |
|   | EA-IS2.8   | If the entity distributes premium payments, the entity has an accounting system for the COCOA Practices Sustainability Premium payments that it makes.  |         |
|   | EA-IS2.9   | If the entity distributes premium payments, premium payments can be demonstrated to correspond to the correct amount of COCOA Practices cocoa that was delivered to the entity.   |         |
|   | EA-IS2.10  | The entity does not retain any portion of the COCOA Practices Sustainability Premium payment.   |         |
| EA-FV1: Financial Viability                     | EA-FV1.3   | The entity has a mechanism to provide credit to producers.  |         |

## INTERNAL CONTROL SYSTEMS - Supplier

| Criteria                                 | Indicators |   | C/NC/NA |
|--|------------|---|---------|
| IC-IP1: Product Tracking System          | IC-IP1.3   | The Entity is able to document the product flow of cocoa from each production unit to the collection point and during handling and transport to the warehouse, even when these processes are outsourced.  |         |
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|  | IC-MM1.7   | The Management and Monitoring System described in IC-MM1.2 is implemented. The System clearly identifies the total quantity of cocoa delivered by the COCOA Practices declared producers and includes purchase and sale prices.   |         |

## SOCIAL RESPONSIBILITY - Supplier

| Criteria  | Indicators   |  | C/NC/NA |
|---|--|--|---------|
| SR-HP1: Wages and Benefits                                  | SR-HP1.1   | <u>ZERO TOLERANCE</u> : 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.<br>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.                                |         |
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|   | SR-HP1.4   | Management maintains complete written earning records for at least the past year, which itemize all: wages, overtime worked and deductions.  |         |
|   | SR-HP1.5   | Workers have access to their earning records, which itemize all wages, overtime and deductions.  |         |
|   | SR-HP1.7   | Employer pays for any national, legally required benefits (social security, vacation, disability) for <b>permanent workers</b> .   |         |
|   | SR-HP1.8   | Employer pays for any national, legally required benefits (social security, vacation, disability) for <b>temporary and seasonal workers</b> .  |         |
|   | SR-HP1.9   | Overtime pay meets national requirements. If workers are paid by production, overtime wages meet the local/regional/national requirements. If overtime pay has not been established by law, overtime is calculated at 150% of regular pay. If workers are paid by production, wages meet the above requirements.   |         |
|   | SR-HP1.13  | Time spent by workers in any required trainings and meetings is considered working time and workers are compensated at their normal rate.  |         |
|   | SR-HP1.14  | Financial disciplinary penalties are not assessed against workers.   |         |
| SR-HP1.16   | Workers are not required to pay a recruitment fee as a condition for employment. |  |         |
| SR-HP2:<br>Freedom of Association/<br>Collective Bargaining | SR-HP2.1   | Workers have either direct communication or a designated representative to communicate with management or employer.  |         |
|   | SR-HP2.2   | Workers are able to talk about workplace grievances with management or employer with no fear of reprisal.  |         |

## SOCIAL RESPONSIBILITY - Supplier

| Criteria  | Indicators |   | C/NC/NA                |
|---|------------|---|------------------------|
| SR-HP3: Hours of Work                                       | SR-HP3.1   | All workers do not work more regular hours (before overtime) per day or week than allowed by local law. If regular hours are not established, regular hours are considered as 8 hours per day, 48 hours per week.   |                        |
|   | SR-HP3.2   | <b>All permanent workers</b> must have, as a minimum, the equivalent of one continuous 24 hour period off in each 7 day period, or longer if required by law, whichever is greater.   |                        |
|   | SR-HP3.3   | All workers must not work more total hours (including overtime) in one day or week than allowed by local laws. If total hours have not been established by law, workers do not work more than 60 hours per week, except where a written agreement exists between workers and management.                |                        |
|   | SR-HP3.5   | Hours worked on potentially hazardous activities (e.g., pesticide exposure, very heavy labor, etc.) are limited according to the law. If hours have not established by law, the activities are limited to six hours per day.  |                        |
| SR-HP4: Child Labor/<br>Non-Discrimination/<br>Forced Labor | SR-HP4.1   | <u>ZERO TOLERANCE</u> : 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).  |                        |
|   | SR-HP4.3   | <u>ZERO TOLERANCE</u> : Employer enforces a policy of prohibiting discrimination on the basis of gender, race, ethnicity, age, or religion (ILO Convention 111).<br><i>Written policy required for entities (large farms, producer organizations, suppliers) with more than 5 employees.</i>            |                        |
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| SR-MS1: Management Systems                                  | SR-MS1.1   | <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.  |                        |
|   | SR-MS1.2   | <u>ZERO TOLERANCE</u> : Money and/or gifts of any type are not offered to Starbucks or its designated third party.  |                        |
|   | SR-MS1.3   | <u>ZERO TOLERANCE</u> : Entity demonstrates a commitment to continuous improvement and engages in the improvement process.  | Evaluated by Starbucks |