

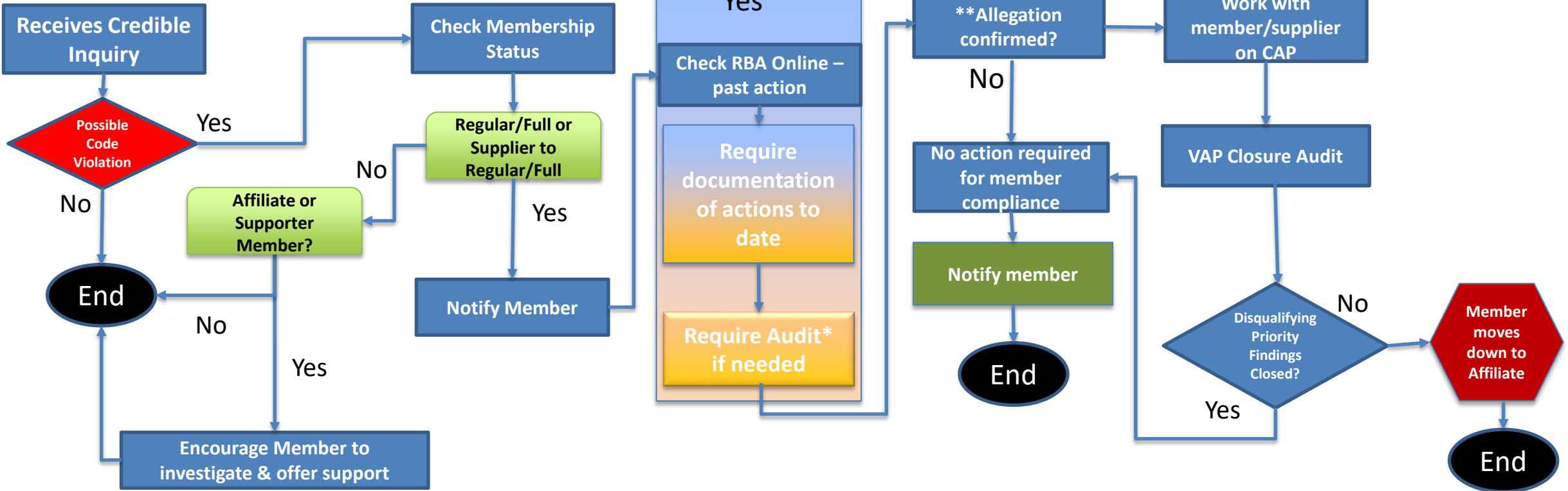


Incident Management Process Flow

≤ 3 business days

≤ 45 days

Closure timelines aligned with most recent version of the VAP Operations Manual



*If VAP/SVAP shows no confirmation of allegations, RBA absorbs cost of audit, otherwise auditee is responsible for cost
** Multiple inputs go into the RBA determination of confirmation of allegations



Business Leverage

The OECD has an expectation of business leverage and a framework for companies to follow to help define where their responsibilities are focused. In the event of a membership compliance issue (using the OECD Framework as a model) the RBA expects the following steps of members found to have confirmed Priority Non-Conformance in their supply chain.

STEP #1
Create a Plan

Together with the supplier, develop and implement a Corrective Action Plan to prevent, or mitigate, actual or potential adverse impacts of the conditions outlined in the audit non-conformance

STEP #2
Monitor Improvement

Monitor improvement during continuation of the relationship and if necessary; temporary suspension of the relationship while pursuing ongoing risk mitigation

STEP #3
Engage others

Set the expectation that the member will attempt to influence the situation through “another entity” or “collaborative action” and increase leverage through shared remediation with other customers

STEP #4
Accountability

After failed attempts at mitigation, or where the enterprise deems mitigation not feasible, or because of the severity of the adverse impact, disengagement* with the supplier.

- *Disengagement is discouraged by the RBA and should not be taken lightly, as improvement is preferable, but lack of disengagement results in drop of membership level to Affiliate.*
- *It should be considered only as a last resort and used in the case of refusal to cooperate or lack of meaningful progress after 6 months*