

Social Accountability Audit and Requirements

Below is a summary of Staples® requirements that are measured as part of each supplier audit. Requirements in **bold** are designated as “critical” requirements.

Forced Labor

- **The supplier does not engage in or support the use of forced or prison labor.**
- Prospective employees are given full disclosure of the terms and conditions of employment prior to employment and these are in no way linked to the worker becoming indebted in any way.
- Employees are free to leave employment after giving reasonable notice and the employer will not hold any original identification papers that might limit the employees to leave.
- Employees are not required to lodge deposits and wages are paid in a timely manner after completion of a pay period.
- Employees are allowed to keep their own identification documents and to resign from their positions at any time.

Child Labor

- **There is no evidence the factory ever engaged in or is currently engaged in Child Labor.**
- **The supplier does not allow hazardous work to be conducted by employees younger than the applicable legal age limit, or the age of 18 if no applicable law exists.**
- **Suppliers shall not employ people younger than 15, or the minimum age for the completion of compulsory education, or the minimum age of employment required by law in the country of manufacture, whichever is highest.**
- Documentary evidence exists for proof of age.
- The supplier has a written policy specifying the youngest age for workers hired at the facility which is in compliance with all applicable laws.
- ID verification equipment is in use.

Harassment and Abuse

- **The supplier does not engage in or support the use of corporal punishment, mental or physical coercion, and verbal abuse.**
- The supplier does not apply fines or make deductions from wages, withhold pay or require work without pay for disciplinary purposes.
- The supplier has a written policy that expressly forbids the disciplinary practices set out above. (It may however set out alternative disciplinary actions that include oral, written and final written warnings for unsatisfactory performance or conduct.)

Nondiscrimination

- **The supplier does not engage in or support discrimination in hiring, remuneration, access to training, promotion, termination or retirement based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, age or as dictated by local and national law.**
- The supplier does not discriminate against pregnant women and respects their rights under local and national law.
- The supplier does not allow behavior, including gestures, language and physical contact, that is sexually coercive, threatening, abusive or exploitative.
- The supplier has a written policy and/or procedure with respect to discrimination, which complies with local and national law.

Health and Safety

- Suppliers shall provide a safe and healthy environment to prevent accidents and injury to health from occurring and comply with applicable laws and regulations.
- Suppliers shall identify, assess and minimize the impact of emergency situations by implementing emergency plans and response procedures. These plans and procedures must include the following: Emergency exits are accessible and fully functional at all times, fire extinguishers must be visible, accessible, present and charged, evacuation plans must be posted and drills must be conducted annually.
- Supplier shall identify, evaluate and control exposure to hazards and ensure the use of any applicable personal protective equipment.
- The facility has appointed a senior management representative responsible for the health and safety of all personnel.

First Aid and Medical Services

- Adequate first aid supplies are readily available to all employees, are kept restocked, and are inspected monthly.
- There is a hospital, clinic or other medical facility capable of providing life support within 15 minutes of the facility.
- A sufficient number of employees with first aid qualifications are available on all shifts (2 per shift or 1% of employees, whichever is higher).
- The facility has a first aid room and/or provides medical services.
- Injured employees receive appropriate treatment and a log is maintained of worker injuries and treatment received.

The Staples logo, consisting of the word "STAPLES" in white, bold, sans-serif capital letters, is positioned on a red rectangular background that is slightly tilted.

- Procedures and emergency numbers are posted in an accessible location for use in the event of an injury or accident.

Facilities

- **Electrical installations (power sockets, switches, junction boxes, fuse boxes, etc.) function properly, are properly grounded and installed, and have proper voltage warnings and/or locks where necessary.**

- The temperature and air quality in the facility is maintained and conducive to a healthy working environment through adequate provision of heating, cooling and ventilation.
- Adequate lighting is provided in all areas of the facility appropriate to the work being conducted.
- Noise levels are below 85db, or proper hearing protection is in use. The facility is clean and free of obvious insect/rodent infestation.
- Employees have unrestricted access to potable water.
- There are a sufficient number of lavatories provided.

NOTE: Female: 1 per 25, Male: 1 per 50, Workforce of 150 or more: 1 per 40 workers regardless of gender

- All machinery has functioning safety devices that guard against injury including finger guards, drive belt safety covers, ventilator guards and other safety devices. Where hazardous chemicals must be used in manufacturing, material safety data sheets (MSDSs) are on hand for all chemicals used, workers have been made aware of the risks, and all precautions are being followed.
- Management provides proper protective safety equipment (safety glasses, face shields, hearing protection, helmets, respirators, dust masks, and/or other equipment) free of charge as needed and its use is enforced.
- The temperature in the supplier facility is verified and documented each month. There is a rodent control/eradication program in place.
- There is an insect control / eradication program in place.
- Lavatories are accessible at all times.
- Lavatories are functional and cleaned daily.
- Lavatories are well lit and ventilated.
- Lavatories are segregated for males and females and provide adequate privacy.
- Water is available for washing in the lavatory area.
- Supplies of soap are available without charge.
- Supplies of toilet paper or other customary hygiene solutions are available without charge.
- Facility structure appears sound and safe for its intended use.
- The interior of the facility and its grounds are cleaned daily.
- Each machine has an individual power shut-off switch.
- Work on electrical systems is done by qualified personnel only and electrical installations are inspected for safety at regular intervals.

- All stationary furnaces, steam boilers, and/or generators are installed in separate rooms or buildings to which only authorized qualified persons have access. Machine operators are given accident prevention training when they start work at a new workplace/machine and training is documented.
- All machines are subject to regular maintenance schedules and maintenance records are kept.

Food Preparation and Services

- Provision exists for the safe storage of food to avoid contamination (if provided).
- Refuse is contained and disposed of safely and hygienically avoiding odors and pests.
- The food preparation / eating /sitting areas are cleaned and disinfected daily in a health conscious manner and are rodent/ insect free.
- There is a cafeteria / eating area / sitting area on site.
- The eating area is separate from the work area and is covered and protected from the elements.
- There is sufficient seating for the employees.

Fire Safety and Emergency Evacuation

- **Emergency exits are unlocked, adequate for the number of employees, well signed and clear of obstacles.**
- **Facility-appropriate fire extinguishers are charged, visible and accessible to all workers. Fire fighting equipment is serviced regularly and tagged with inspection date.**
- The facility has an audible fire alarm system that is tested regularly with the testing documented.
- High-risk materials are stored in contained areas with close access to fire fighting equipment. Fire safety training is given to all employees.
- An illustrated evacuation plan is in clear view on each floor in the native language of workers. Evacuation drills are conducted at least semi-annually and documented.
- Aisles between workstations are wide enough to provide adequate room for evacuation.
- Exit lanes are clearly marked and kept free of obstruction.
- There is functional emergency lighting.

Dormitories and Housing

- The dormitory has an operational fire alarm system.
- The staff housing is within the facility compound or the staff housing has sufficient security.
- The grounds surrounding the dormitory are well lit.
- The dormitory provides adequate shelter from the elements.
- Staircases leading to the staff housing are well maintained and free from debris.
- The stairwells have adequate handrails.
- The stairwells are well lit.
- The dormitory has an adequate amount of emergency exits per floor.

- There is a functioning exterior staircase per floor.
- The dormitory provides an adequate number of fire extinguishers for every floor.
- There are first aid supplies provided for each floor.
- The electricity operates for 24 hours daily.
- Emergency lighting is installed and functional for all emergency exits and stairwells
- An adequate number of lavatories are available on every floor.
- All lavatories are functional with running water and adequate drainage.
- There is a designated area for bathing/washing purposes and hot water is available.
- There is potable water available to the residents.
- The living areas and lavatories are segregated by gender.
- Each individual in the dormitory has their own sleeping area, with beds a minimum of 1 meter apart (side to side). A minimum of 2 square meters per person of living space is provided.
- There is 24-hour security service, including patrolling security guards.
- There is secure storage space for employees.
- The facility has a room available for leisure activities.
- An area or facility is available for the pursuit of sports.
- Television and Internet are provided.
- There are desks or writing tables available for employees to use.

Freedom of Association

- **The supplier respects the right of all personnel to form and join trade unions of their choice and to bargain collectively. In those situations in which the right to freedom of association and collective bargaining are restricted under law, to facilitate parallel means of independent and free association and bargaining for all such personnel. Management is encouraged to engage in direct communication with employees.**

Wages and Benefits

- **The facility pays wages that meet at least legal or industry minimum standards for a standard working week and are sufficient to meet basic needs of personnel and to provide some discretionary income. In addition to their compensation for regular hours of work, suppliers shall compensate employees for overtime hours at the applicable premium rate in their country. In countries that have not established premium overtime rates, suppliers shall not pay employees less than their regular hourly rate for overtime hours.**
- The facility has posted legal and company minimum wage rates or makes these available to employees.
- The facility maintains adequate records of wages.
- Wages (to include overtime) and other benefits are rendered either in cash or check form, in a manner convenient to employees.
- The facility does not engage in labor-only contracting arrangements and / or false apprenticeship schemes in an effort to avoid fulfilling its obligations to personnel under applicable

laws pertaining to labor and social security legislation and regulations.

- The facility has a written policy on wages and benefits, which is in compliance with local law. No deductions from wages are made for disciplinary purposes.
- Wage and benefits composition is detailed clearly and provided regularly to employees.
- No deductions are made for services such as transport, meals, medical assistance and lodging or if deductions are made they are fair and reasonable and employees sign a form to approve deductions.
- No deductions are made for safety and personal protection equipment. The facility has proof of deposit to the respective agencies for all taxes, social security, pension and other similar deductions made from wages.

Hours of Work/Compensation

- **The facility maintains adequate records of all hours engaged in work which appropriately matches all production records.**
- Employees should not be required to work more than 60 hours a week, or the maximum number of work hours per week permitted in the applicable country of manufacture, whichever is less, except in extraordinary business circumstances.
- Employees are given a minimum of one day off in every seven-day period.
- Employees are given adequate meal and personal breaks.

Ethical Standards

- **Suppliers are held to the highest standards of integrity. Corruption, bribery and extortion are strictly prohibited.**
- Suppliers must respect all intellectual property rights and applicable regulatory requirements of the countries from and to which they ship.

Environmental Impact

- **The facility has obtained all required environmental permits, all permits are up to date, and the facility is following the operational and reporting requirements of all applicable permits and/or environmental regulations.**
- Rubbish is removed to a legitimate dumpsite, not deposited directly into the environment.
- The facility actively encourages pollution prevention and waste minimization through reducing, reusing, and recycling the materials it uses and sources.
- The facility has a written document describing its policies and procedures for ensuring compliance with all applicable environmental regulations.

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