

GWJ Document ID#: SOP05	Document Title: Escalation and Communication of Non-Compliances
Version: 2.0	Issue Date: May 24, 2021



## Standard Operating Procedure (SOP): Escalation and Communication of Non-Compliances

### 1. Scope

This SOP describes the process of communication between GoodWeave International (GWI) and its licensees regarding non-compliances against the GoodWeave Standard in monitored supply chains.

It applies to all importer and exporter licensees.

### 2. Referenced Document

SOP13 GoodWeave Certification Methodology

SOP04 IMC Manual

P08 Expectations for Licensees

### 3. Procedure

#### 3.1. Roles and Responsibilities

- 3.1.1. GoodWeave International is responsible for timely communication to importers licensees regarding non-compliances (NCs).
- 3.1.2. The IMC division in each country is responsible for communicating with exporters regarding non-compliances.
- 3.1.3. GoodWeave International maintains a Certification Committee, a panel of independent experts that make decisions regarding certification. The Certification Committee may review major non-compliances and make decisions on suspending labels and withdrawing licenses.
- 3.1.4. Licensed importers and licensed exporters designate a primary point of contact for communications related to compliance.
- 3.1.5. The licensed exporter is the primary party responsible for compliance within its supply chain. Whenever non-compliance issues are reported, the licensed exporter is responsible for taking necessary corrective actions and (if applicable) enforcement actions against its subcontractors.

#### 3.2. Types of Non-Compliances

- 3.2.1. **Major Non-Compliance (Major NC)** Failure to maintain critical objectives of the GoodWeave Standard, including but not limited to: use of child labor, forced labor, or trafficking, failure to disclose the supply chain, or cooperate with or allow access by GoodWeave inspectors to conduct audits/inspections or to carry out remediation when non-compliances are found. Any Major NC will lead to suspension of certification if not corrected as specified in the corrective actions timeline. In general, Major NCs require immediate action.
- 3.2.2. **Minor Non-Compliance (Minor NC)** Failure to adhere to requirements of the GoodWeave Standard, however not critical to the immediate safety or well-being of the individuals involved. For example: failure to maintain a policy, records or other documentation. Minor NCs must be corrected within the time period given in the corrective actions timeline, which ranges from 1-6 months.
- 3.2.3. Additional information on how NCs are categorized as major or minor is included in [SOP13 GoodWeave Certification Methodology](#).

#### 3.3. Escalation of Non-Compliances

- 3.3.1. When non-compliances are identified during audits and inspections, they are communicated to producers as follows:

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3.3.1.1. All NCs are recorded on the audit/inspection report. Child labor cases are handled as per the GoodWeave policies for child protection and remediation.

3.3.1.2. The GoodWeave inspector informs the producer verbally of the non-conformance during the audit/inspection.

3.3.1.3. After the audit takes place, GoodWeave provides exporters a written report of all NCs raised at their own sites and their subcontracted and home-based work sites. Subcontractors and home based work sites do not receive written reports from GoodWeave.

3.3.2. The timeline for resolving non-compliances is specified in [SOP13 GoodWeave Certification Methodology](#).

3.3.3. Major non-compliances may result in suspension of label issuance and withdrawal of the GoodWeave license. P08 Expectations for Licensees defines when labels may be suspended and when licenses may be withdrawn.

3.3.3.1. In cases where there are major NCs related to child labor or forced labor at an exporter site, the country office IMC informs the GWI business communication team. The GWI Business Communication team obtains POs from the licensed importer(s).

3.3.3.2. GoodWeave's Certification Committee may be consulted for a decision regarding suspension of labels and/or withdrawal of the GoodWeave License.

3.3.4. For all major NCs GoodWeave may inform the importer so that the importer can take additional enforcement action.

3.3.5. In cases where labels are suspended, GoodWeave informs the importer. GoodWeave also informs the importer if there are major NCs under review by the Certification Committee where it is likely labels will be suspended.

3.3.6. In cases where GoodWeave informs the importer of Major NCs and/or label suspensions, GoodWeave may provide the importer with the a report that includes description of the non-compliance, date of the incident, and information related to decisions of the Certification Committee.

3.3.7. In addition to informing importers about major NCs, GoodWeave may also inform importers in cases where exporters misuse certification labels, or fail to schedule annual audits.

### **3.4. Reporting to external parties**

3.4.1. GoodWeave may be obligated by applicable to law to report certain non-compliances to government authorities.

### **3.5. Confidentiality**

3.5.1. Other than the information described in this procedure, GWI keeps information obtained during the inspection process confidential.

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#### Change History

Version	Summary of Changes
1.2	SOP revised to read more clearly as an external procedure that explains to exporters how information obtained by GoodWeave during audits/inspections is shared; Appendix 1 – FlowChart of Certification Decisions, Non-Compliance and Corrective Actions Process removed; Appendix 2 Guidelines for Classification of NCs by Principle removed (superseded by Certification Methodology); Section 4.3 on escalation of non-compliances revised and clarified.