



# Together for Sustainability

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The Chemical Industry Initiative for  
Sustainable Supply Chains

Third Party Audit Program  
Version 4.0

**One Audit for All**



## Table of contents

About this document.....	- 2 -
Introduction: Together for Sustainability (TfS).....	- 2 -
Introduction: TfS Audit Program .....	- 2 -
Documents and References .....	- 3 -
1 Audit Objectives, Scope and Duration.....	- 5 -
1.1 Audit Objective.....	- 5 -
1.2 Audit Scope.....	- 6 -
1.3 Multi-site audit.....	- 7 -
1.4 Audit Duration & Lead-time .....	- 7 -
1.5 Audit Cost .....	- 8 -
1.6 Combined Audits.....	- 9 -
1.7 Recognition of other audit standards.....	- 9 -
2 Auditor Approval and Selection .....	- 9 -
2.1 Selection of Audit Companies .....	- 9 -
2.2 Approval Process for Auditors.....	- 10 -
2.3 Approval Criteria for Auditors .....	- 10 -
2.4 Witness Audits .....	- 11 -
Annex 1: Glossary.....	- 11 -
Annex 2: Equivalent auditing standards.....	- 14 -
Annex 3: Short Audits.....	- 14 -
Annex 4: Enhanced Audits .....	- 14 -
A4.1 Annex 4 – Enhanced TfS (eTfS) Audit .....	18

**Introduction:** Together for Sustainability (TfS)

## About this document

This document has been developed by the Together for Sustainability (TfS) Initiative as an information source for TfS members, suppliers, audit companies, auditors, potential new members, and other interested stakeholders.

It sets out the objectives, requirements and procedures of the TfS Audit Program to ensure a credible, transparent, and consistent audit approach.

## Introduction: Together for Sustainability (TfS)

TfS is an international non-profit association under Belgian law (“association internationale sans but lucratif – AISBL”). Founded in August 2011 by the Chief Procurement Officers of six multinational companies, TfS has developed and implemented a global audit and assessment program to assess and improve sustainability practices within the supply chains of the Chemical Industry. In 2015 the TfS Office opened in the CEFIC premises in Brussels.

## Introduction: TfS Audit Program

The TfS Audit Program is one element of the overall TfS framework to support supply chain partners (namely buyers and suppliers) in their continuous efforts to improve sustainability in their business practices.

A TfS audit is an on-site examination by an independent third party auditor looking at relevant sustainability practices. It typically covers a single or combined business location such as a production site or a warehouse. Following the TfS audit process the supplier's sustainability performance is verified against a pre-defined set of audit criteria covering management, environment, health & safety, labor & human rights, and governance issues. These topics have been defined by TfS and are tailored to the requirements of the Chemical Industry.

TfS audits are performed by a pool of approved sustainability auditors from independent audit companies. Audits can neither be passed nor failed, but highlight areas of improvement that are documented in audit reports.

Following the completion of a Data Sharing Agreement (DSA) by the auditee, audit reports are shared between the supplier and all TfS member companies, enabling members and suppliers to have a productive dialogue on where improvements can be made. The supplier owns the audit report and is free to share it with any current or future customers, beyond the TfS members.

The following external references have been used to develop the TfS Audit Questionnaire, amongst others:

- United Nations Global Compact (UNGC)
- Safety & Quality Assessment System (SQAS) of the European Chemical Industry Council (CEFIC)
- Responsible Care Global Charter of the ICCA
- International Labor Organization (ILO)

## Documents and References

- Declaration on Fundamental Principles and Rights at Work as well as other key ILO statements.
- Conventions on Labor Standards
- International Organization for Standardization (ISO)
  - ISO 26000: Guidance on Social Responsibility
  - ISO 9001: Standard for Quality Management Systems
  - ISO 14001: Standard for Environmental Management Systems
  - ISO 19011: Guidelines for Quality and/or Environmental Management System Auditing
- OHSAS 18001: Occupational Health and Safety Assessment Series
- Social Accountability International, SA8000 Standard
- United Nations, Universal Declaration of Human Rights
- United Nations, UN Convention against Corruption
- Organization for Economic Co-operation and Development, OECD Guidelines for Multinational Enterprises

## Documents and References

All documents related to the TfS audit process are listed below. TfS documents bear version numbers and are approved by the TfS Work Stream before issuance.

Document Type	Document Name	Description
Background	TfS One-pager	An introduction to the purpose, objectives and structure of the TfS initiative.
	Frequently Asked Questions (FAQ)	Further detail on the TfS organization, audit and assessment programs in a “question and answer format”.
	TfS Supplier Academy	E-Learning modules available on the TfS website, providing a background on sustainability and describing the audit process.
Auditor Approval	Auditor Evaluation Form	A form used by the TfS Office to evaluate the credentials of auditors nominated to conduct TfS audits.
Audit Program	Third Party Audit Program 4.0 (This document)	The reference document for the TfS Audit Program, describing the process, roles and responsibilities of all involved in detail.

## Documents and References

Preparation for an Audit	Online audit preparation	<p>Online form editable by suppliers and accessible for members. This form replaces the previous Supplier Confirmation Form (SFC) and audit request form.</p> <p>The supplier uses this to send an automated audit request to all 4 audit companies. It is also used as an information tool for the buyers.</p>
	Data Sharing Agreement (DSA)	A legal document signed by the supplier to confirm consent for the audit to be shared with TfS members.
	Supplier Academy: Audit Process	Online training modules for suppliers to understand the basics of sustainability and the TfS audit process.
	Audit Preparation Document	A checklist for suppliers, detailing the tasks that must be completed and documents that must be submitted or available to prepare for a TfS audit.
During an Audit	Opening and Closing Meeting Template	A presentation providing an overview of the activities during an audit, which must be used by auditors during the opening and closing meetings of an audit.
	Audit Guidance and Reporting Template (AGRT) with Corrective Action Plan (CAP)	<p>The document used by auditors to conduct a TfS audit, and to record subsequent corrective actions. The document is also used to record progress against the actions in the event of an audit <b>follow-up</b>.</p> <p>A copy of the questionnaire can be made available in PDF format by the TfS office on request.</p>

## Audit Objectives, Scope and Duration

	Enhanced TfS (eTfS) Audit Guidance and Reporting Template (AGRT) with Corrective Action Plan (CAP)	The document used by auditors to conduct a TfS mining audit (see Annex 4)
	TfS Audit Report	The finalized audit report which is shared with TfS members, consisting of: <ul style="list-style-type: none"> <li>• DSA with the confirmation by the audit company</li> <li>• The completed AGRT</li> <li>• Finalized bilingual CAP</li> </ul>
	Witness Auditor Checklist	A form to be completed during a witness audit, documenting the performance of an auditor during the audit.
	Witness Audit Process	Explanation and description of a witness audit.
After the Audit	Confirmation by the Audit Company (AC) form	Document to be signed by an independent reviewer of the audit company

## 1 Audit Objectives, Scope and Duration

### 1.1 Audit Objective

The objectives of the TfS Audit Program and the TfS Audits are to establish and maintain:

- A review process suitable to raise suppliers' awareness about sustainability expectations and requirements;
- A consistent assessment of a supplier's performance on key sustainability criteria and the implementation of corresponding management systems;
- A **TfS Audit Report** including a **CAP** (if needed) appropriate for suppliers to understand their performance and areas of improvement needed;

#### Audit Objectives, Scope and Duration

- A TfS Audit Report as a valid information source for sustainability information for buyers to evaluate the business relationship with a supplier; and
- An information basis for TfS members to individually and independently decide upon further actions to be taken supporting the supplier to improve its sustainability performance.

The TfS Audit Program is not and must not be understood as:

- A certification scheme
- A compliance exercise with a pass or fail outcome

## 1.2 Audit Scope

The Audit Program and criteria are designed to focus on the key issues and risks related to raw material, contract manufacture, and other product-related supplies for the Chemical Industry. TfS members may apply the Audit Program to further supply categories, e.g. technical goods or packaging.

For auditing mining operations with the enhanced TfS (eTfS) Audit, see Annex 4 of this document.

Applying TfS Audit standards, suppliers are assessed against nationally and internationally recognized standards (as detailed in Introduction: TfS Audit Program) and expected to continuously improve performance in the following areas:

<b>Management</b>	
✓ Management in Charge	✓ Training
✓ Policy & Continual Improvement	✓ Business Partners
<b>Environment</b>	
✓ Environmental Compliance	✓ Energy
✓ Waste	✓ Land Use and Biodiversity
✓ Emissions to Air and Climate Change	✓ Soil and Groundwater
✓ Water and Wastewater	
<b>Health and Safety Criteria</b>	
✓ Product Safety	✓ Emergency Preparedness
✓ Transportation Safety	✓ Medical Care
✓ Process Safety and Storage	✓ Security
✓ Occupational Health and Safety	
<b>Labor and Human Rights</b>	
✓ Child Labor	✓ Freedom of Association
✓ Forced and Compulsory Labor	✓ Discrimination

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**Audit Objectives, Scope and Duration**

<ul style="list-style-type: none"> <li>✓ Working Hours</li> <li>✓ Minimum Wages</li> </ul>	<ul style="list-style-type: none"> <li>✓ Special Work Contracts</li> <li>✓ Facilities &amp; Dormitories</li> </ul>
<b>Governance</b>	
<ul style="list-style-type: none"> <li>✓ Business Integrity</li> <li>✓ Privacy and Intellectual Property</li> <li>✓ Risk Area: Conflict Minerals</li> </ul>	<ul style="list-style-type: none"> <li>✓ Risk Area: Animal Care</li> <li>✓ Fair Competition</li> <li>✓ Disciplinary and Complaint Procedures</li> </ul>

The standards are the same for all suppliers and applicable no matter where they are located.

A TfS Audit typically covers a clearly defined supplier location or legal entity. In some cases, the physical inspection can be specific to a plant/related infrastructure within the supplier location, for example a production plant or warehouse location. The location which is to be in scope of the audit must be agreed between the supplier and TfS member prior to the audit taking place and clearly defined by the supplier in the **SFC** and subsequently by the auditor in the **TfS Audit Report**.

The **TfS Audit Report** must contain an explanation which parts of the supplier site are not included and why the audit excludes these parts (e.g. low sustainability risk profile, different location, unforeseen circumstances leading to a limited audit time, access denied by supplier).

TfS will only conduct announced audits. The audits follow a defined series of steps encompassing awareness raising, audit preparation, audit execution, CAP, audit report sharing, **follow-up**.

### 1.3 Multi-site audit

Since the 4.0 version it is possible to describe several audit sites in one report. The requirement is that these share a common purpose (eg warehouse connected to a production facility, or logistics).

### 1.4 Audit Duration & Lead-time

There are several factors determining the duration of a TfS Audit:

- ✓ The number of employees and therefore the number of employee interviews
- ✓ The supplier size (i.e. area of production facilities)
- ✓ The nature and complexity of the operations
- ✓ The diversity of tasks in the workplace might have an impact on the number of interviews (i.e. reducing the number when there is a high similarity).

A thorough preparation for the audit by the supplier is a key factor determining the efficiency and thus the time the auditor needs to collect the required evidence. The estimates shown in figure 2 below are based on the assumptions that suppliers actively support a thorough preparation of the audit and that only one auditor is present. They do not include **follow-up** activities (desk reviews / on-site visits etc.).



**Figure 1: Guidance for duration based on the TfS AGRT Reporting Template**

Size of the facility (excluding management)	No. of Auditor Days	No. of Individual Interviews	No. of Group Interviews	Total No. of Employees Interviewed	Total No. of Employee records
1-50 employees	1	3	1 group of 2 employees	5*	5*
50-1000 employees	2	5	2 groups of 5 employees each	15	15-20
above 1000 employees	3	10	3 groups of 5 employees each	25	25-30

\* 5 employee interviews is the minimum requirement for a TfS audit.

An audit can be conducted by a team of two auditors within half of the “standard time”. In such cases, a lead auditor must be defined who takes overall responsibility for the audit. Furthermore, it is required that the two auditors take two independent audit streams to ensure the standard audit time is spent effectively and covers all audit subjects to the required level of detail. Therefore, the auditor team will split up after the opening meeting and will meet again in the afternoon to briefly discuss and summarize their audit findings before the closing meeting starts.

The audit company has to ensure that a minimum number of interviews will be conducted as described above. Deviations from these reference values have to be reported and explained in the sheet “Audit Information” of the AGRT.

The following factors may influence the audit duration planning, amongst others:

- **Increasing factors** are e.g. large site, large number of employees, high risk products/ processes, high complexity processes, high number of unique processes, enhanced Audits (see Annex 4).
- **Reduction factors** are e.g. small site, small number of employees, low risk products/ processes, less complex processes, high number of similar processes, no production on site (office), Short Audits (see Annex 3).

If concerns are raised by employees during an audit, auditors must take the time to explore these issues.

The typical lead-time for scheduling and audit from the day the contract is signed with the Audit Company is 3 months.

## 1.5 Audit Cost

The supplier-paid model is a principle of TfS. The cost for a TfS Audit is negotiated between the supplier and the TfS approved Audit Company. The cost can vary depending on many factors, for

example the size and complexity of the facility being audited or the country in which the audit is taking place.

## 1.6 Combined Audits

In addition to sustainability topics, there may be other specific audit subjects relevant in a business relationship such as product quality, quality management systems or regulatory compliance. The TfS Audit can be combined with other audit subjects, contributing to an efficient approach for TfS members as well as suppliers.

If a combined audit is conducted, the TfS Audit report produced must be completely separated from other audit modules. The TfS audit process should be followed as detailed in this document, using the TfS AGRT, and must include the opening and closing meeting. Any matters beyond the sustainability topics (as described in section 1.2) are not part of the TfS Audit, must not be reflected in the TfS Audit report and will not be shared with TfS members.

A combined audit can be requested either by the supplier or by a TfS member. In both cases, it is responsibility of the respective audit company to ensure that the TfS Audit is conducted according to the process and standards detailed in this document.

All requirements defined in this document, including the approval of auditors/ audit teams (as described in section 2), have to be fulfilled in order to declare the sustainability audit to be a TfS Audit.

## 1.7 Recognition of other audit standards

In some instances, TfS has recognized other audit standards as being equivalent to TfS Audits. A list of these standards can be found in 'Annex 2 – Equivalent auditing standards'.

# 2 Auditor Approval and Selection

## 2.1 Selection of Audit Companies

TfS Audits are conducted by qualified auditors from the approved audit companies, listed on the TfS webpage. Suppliers can use this list to identify and select an audit company in their relevant region to carry out a TfS Audit.

Before becoming an approved audit provider, audit companies are required to undergo an approval procedure through the TfS Office to verify their credentials. During this process, internal controls, quality management and evidence of proven records are considered. The final decision on whether an audit company will be accepted rests with the TfS Steering Committee. TfS monitors the collaboration with the audit companies on a regular basis and may decide on accepting new audit companies or discontinuing the relationship with existing audit companies.

Audit companies are expected to ensure only qualified and approved TfS auditors are deployed for TfS Audits. A TfS specific auditor training program needs to be conducted by the audit companies to provide the necessary background information and requirements with regard to the purpose and objectives of the TfS initiative, as well as training on the audit process, documentation and follow-up. TfS approved audit companies may be requested to confirm and provide evidence of according auditor trainings for example by sending the list of participants and training materials to the TfS Office.

## 2.2 Approval Process for Auditors

TfS requires auditors to prove competencies and experience in a range of sustainability relevant aspects. Approved audit companies can nominate qualified auditors for the TfS approved auditor pool. A set of reference criteria has been developed that serves as a basis for approving auditors before they are able to conduct TfS Audits.

An Auditor Evaluation Form (AEF) is required to be completed for every new auditor proposed by the audit company. The form sets out certain criteria with regard to the qualifications and experience of the potential auditor and must be sent to the TfS Office for final validation supplemented by proof of evidence to verify the information provided (e.g. CV, certificates, audit log). If a potential auditor does not meet the minimum requirements, the TfS Office can request the audit company to provide an alternative candidate. The audit company is welcome to re-submit the rejected auditors for approval at a later stage, if they have obtained additional qualifications.

All TfS approved audit companies must ensure that even in peak times an adequate number of qualified auditors is available to perform TfS Audits. If there is no auditor qualified or available in the supplier country or region, the selected audit company must send further auditor profiles to the TfS Office for approval. (Refer to section 2.3 for the approval criteria of auditors)

## 2.3 Approval Criteria for Auditors

Approved auditors must have achieved and maintain proven expertise in labor and human rights, health & safety and environmental issues confirmed by:

- Basic SA8000 auditor qualification and 10 social audits every 2 years performed (to be approved for the social elements of a TfS Audit).
- ISO 14001 and OHSAS 18001 training completed and 10 HSE audits every 2 years performed (to be approved for HSE elements of a TfS Audit).
- Being knowledgeable and up-to-date in applicable laws as well as international standards with regard to social, ethical, and HSE audit subjects.
- Chemical Industry experience (to be approved for Chemical Industry specific audits)
- Familiar with local language and culture.
- Good working knowledge of English language (written and spoken).
- Qualified and trained for the TfS Audit Program (in accordance with section 2.1).

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#### Auditor Approval and Selection

TfS therefore requests audit companies to take these criteria into account when proposing an auditor for approval.

To cover all areas of sustainability, a TfS Audit can be performed by an audit team with combined expertise in labor and human rights, health & safety and environmental issues.

Hence, auditors can be approved for either social or HSE aspects individually and join the team for their specific area of expertise. In this case, a lead auditor has to be named by the audit company to take responsibility for the entire TfS Audit execution. The lead auditor has to ensure that audit planning, audit execution, documentation and follow-up is performed in compliance with the requirements defined in this guidance document.

The auditors' performance will be monitored through audit report quality reviews conducted by the TfS Office, and feedback provided by suppliers, witness auditors or TfS members.

## 2.4 Witness Audits

On a random sample basis, TfS members will conduct witness audits (observed audits). This means audits will be accompanied by experienced staff assigned by the individual TfS member according to the principles outlined in the TfS Witness Auditor Checklist. When requesting a TfS Audit, TfS members will inform the supplier if they plan to conduct a witness audit. However, a witness audit requires the consent of the respective supplier. This information will be recorded in the SCF and subsequently communicated to the TfS Office.

TfS requires all witness auditors to complete a **Witness Auditor Checklist** form in order to receive a systematic feedback on the audit preparation, audit process as well as the lead- and co-auditor performance. This checklist evaluates the overall audit organization, the auditor and audit performance.

Due to antitrust requirements, disclosure on the supplier relationship must be avoided while sharing the results of the witness audits. Subsequently, witness auditors will report their findings to the TfS Office only. Relevant statistics and information regarding auditor performance and the auditor pool will be established annually.

## Annex 1: Glossary

Audit Guidance and Reporting Template (AGRT)

TfS specific template for auditors to document the audit and findings. Needs to be provided in English.

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**Auditor Approval and Selection**

Auditor	<p>A person appointed and authorized to deliver a qualified audit judgment on the sustainability performance of the supplier. The auditor may collect objective evidence by means of examination of documents, interviews and site inspection.</p> <p>For the purposes of TfS, auditors have to be qualified and approved by the TfS Office. They must satisfy high quality criteria and meet the requirements defined in the auditor evaluation tool. A conflict of interest must be prevented in any cases.</p>
Auditor Evaluation Form	<p>Excel tool that needs to be completed by the audit company for every auditor in order to evaluate the auditor's qualifications. Only auditors that have adequate qualifications will be part of the TfS approved auditor pool.</p>
Auditor Pool	<p>Pool of auditors that have been approved by the TfS Office. Only auditors that work for an accredited audit company can be part of the TfS auditor pool.</p>
Corrective Action	<p>In the context of TfS, it refers to the implementation of measures or systemic change to eliminate the cause(s) of an existing deviation from the criteria defined in the TfS AGRT and to prevent recurrence.</p>
Corrective Action Plan (CAP)	<p>The plan of actions drawn up by the supplier and agreed upon with the auditor. It states the non-compliances identified during the audit and what measures have to be taken within a certain time frame to remedy these deviations from the criteria defined in the TfS AGRT.</p>
Data Sharing Agreement (DSA)	<p>TfS specific form that documents suppliers' consent to share the audit report with all TfS members.</p>
OASIS	<p>Online Audit Sharing IT Solution (OASIS) is the online tool used by members to: nominate suppliers, invite them to prepare the audit, access shared audits and upload shared non-TfS audits. Suppliers access the tool to prepare their audit, send the request to audit companies, update Corrective Actions and access their audit.</p>
Enhanced Audits	<p>Additional specific modules to Standard TfS Audit questionnaire (see Annex 4)</p>
TfS Audit Follow Up	<p>An on-site inspection or a desktop review aimed at the verification of the closure of findings from the previous audit.</p>
Short Audits	<p>Suppliers in possession of an approved certificate are eligible to conduct a shorter version of the TfS audit; please send the certificate and report for review to your requesting customer and the audit company for verification of eligibility. See Annex 3 for full list of approved certificates.</p>

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**Auditor Approval and Selection**

TfS Assessment	A systematic process of collecting and analyzing data and information to determine the current status of the management systems of an organization. The TfS initiative has contracted the service provider EcoVadis to perform sustainability assessments and develop a CSR rating for supplier organizations.
TfS Audit	A methodical examination or review of a condition or situation. For the purposes of TfS, the audits will verify environmental, health & safety and social conditions in the supply chain of TfS members, against the TfS AGRT through an on-site inspection.
TfS Work Stream(s)	The working groups of TfS composed of TfS member participants, responsible for driving topics forward in the Initiative
TfS Mutual Recognition Partner List	The TfS Mutual Recognition Partner List summarizes the other standards that TfS has recognized as being equivalent to a TfS Audit.
TfS Steering Committee	The executive body of the TfS Initiative composed of 7 CPOs of the TfS Members, including the TfS President
Witness Audit	An audit that will be accompanied by experienced staff assigned by the individual TfS member.

## **Annex 2: Equivalent auditing standards**

- SQAS (Logistics Service Providers)
- SMETA (full reports, 4 pillars)
- PSCI (full report by external auditor, 4 pillars)
- CRSAS(Logistics Service Providers in China)

## **Annex 3: Short Audits**

- RCMS®/RC 14001® in the United States and Canada

## **Annex 4: Enhanced Audits**

- [A4.1 Annex 4 – Enhanced TfS \(eTfS\) Audit](#)

# Together for Sustainability

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The Chemical Initiative for  
Sustainable Supply Chains

## Annex 4:

Mining Module (eTfS Audit)  
Version 1



Auditor Approval and Selection

Table of contents

About this document.....	- 2 -
Introduction: Together for Sustainability (TfS).....	- 2 -
Introduction: TfS Audit Program .....	- 2 -
Documents and References .....	- 3 -
1 Audit Objectives, Scope and Duration.....	- 5 -
1.1 Audit Objective .....	- 5 -
1.2 Audit Scope.....	- 6 -
1.3 Audit Duration & Lead-time .....	- 7 -
1.4 Audit Cost .....	- 8 -
1.5 Combined Audits.....	- 9 -
1.6 Recognition of other audit standards .....	- 9 -
2 Auditor Approval and Selection .....	- 9 -
2.1 Selection of Audit Companies .....	- 9 -
2.2 Approval Process for Auditors .....	- 10 -
2.3 Approval Criteria for Auditors .....	- 10 -
2.4 Witness Audits .....	- 11 -
3 Audit Process and Responsibilities .....	<b>Error! Bookmark not defined.</b>
3.1 Introduction to the Audit Process.....	<b>Error! Bookmark not defined.</b>
3.2 Roles and Responsibilities .....	<b>Error! Bookmark not defined.</b>
4 Guidance through the Audit Process.....	<b>Error! Bookmark not defined.</b>
Step 0 Supplier Selection.....	<b>Error! Bookmark not defined.</b>
Step 1 Supplier Invitation .....	<b>Error! Bookmark not defined.</b>
Step 2 TfS Audit Preparation .....	<b>Error! Bookmark not defined.</b>
Step 3 TfS Audit Execution .....	<b>Error! Bookmark not defined.</b>
Step 4 Closing Meeting and Findings.....	<b>Error! Bookmark not defined.</b>
Step 5 TfS Audit Report Sharing & CAP .....	<b>Error! Bookmark not defined.</b>
Step 6 CAP Monitoring and Verification .....	<b>Error! Bookmark not defined.</b>
Step 6.1 CAP Progress Monitoring .....	<b>Error! Bookmark not defined.</b>
Step 6.2 TfS Audit Follow Up .....	<b>Error! Bookmark not defined.</b>
5 Contact Details .....	<b>Error! Bookmark not defined.</b>
Annex 1: Glossary.....	- 11 -
Annex 2: Equivalent auditing standards.....	- 14 -
Annex 3: Short Audits.....	- 14 -
Annex 4: Enhanced Audits .....	- 14 -

---

**Auditor Approval and Selection**

A4.1 Annex 4 – Enhanced TfS (eTfS) Audit .....	18
A4.2 eTfS Audit Objective and Scope .....	18
A4.2.1 eTfS Audit Objective .....	18
A4.2.2 eTfS Audit Scope.....	18
A4.2.3 Consistency Across Operations.....	20
A4.3 eTfS Audit Duration.....	20
A4.3.1 Engagement with the Community .....	21
A4.3.2 Number of Auditors for eTfS .....	21
A4.3.3 eTfS Audit Cost .....	22
A4.4 Guidance for Auditors on the eTfS AGRT .....	22
A4.5 eTfS Auditor Approval and Selection.....	23

## A4.1 Annex 4 – Enhanced TfS (eTfS) Audit

This document provides guidance on auditing mining operations, as well as some general information on audit good practice, when using the enhanced TfS (eTfS) Audit Guidance and Reporting Template (AGRT). It is an annex to the TfS Audit Program and should be consulted in case a mining operation will be audited.

### A4.2 eTfS Audit Objective and Scope

#### A4.2.1 eTfS Audit Objective

The objective of the eTfS Audit is to enable TfS members to audit mines against sustainability standards and to address and evaluate mining specific concerns. The goal is to enable mines to improve and engage in improvement actions regarding their sustainability performance.

In order to achieve this objective, TfS has developed an additional module that supplements the core TfS Audit questionnaire (see Audit Program Guidance Document). The eTfS audit template therefore contains an additional module with mining specific questions that enhances the core TfS Audit questionnaire and program.

The questions and guidance in the eTfS AGRT refer to numerous internationally accepted mining and other standards. In addition to the standards used to develop the core part of the TfS audit, the following additional external references have been used to develop the eTfS Audit questionnaire, amongst others:

- the IFC Environmental and Social Performance Standard,
- Voluntary Principles on Security and Human Rights,
- UN Declaration on the rights of Indigenous Peoples
- The Cyanide Code
- The Initiative for Responsible Mining Assurance (IRMA)
- UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials

#### A4.2.2 eTfS Audit Scope

The questionnaire is to be applied to opencast and underground mining operations and is intended to be globally applicable. The scope of the eTfS Audit is best applied to large scale mining operations. It may be difficult for artisanal and small-scale mining (ASM) activities to fulfill best practice standards designed for the formal mining sector.

The decision on which suppliers are to be audited against the eTfS module remains with the individual TfS Member company. See “Step 0” in Section 4 regarding Supplier Selection in the Audit Program Guidance document.

For some eTfS mining section questions, there may be an overlap with questions in the core part of the TfS AGRT (Management, Environment, Health and Safety, Labor and Human Rights, Governance). The questions in the core TfS Audit part are relevant but not sufficient to cover mining specific operations.

**A4.2 eTfS Audit Objective and Scope**

It is expected that the mine not only complies with the local legislation, but aligns its operations, systems and processes with internationally accepted good or best practices. The questions and guidance in the eTfS refer to numerous internationally accepted mining and other standards.

Through the TfS process, suppliers are assessed against nationally and internationally recognized standards and expected to continuously improve performance in the areas outlined in the table below. In the eTfS Audit, further criteria and focus areas specific to mining are included, in addition to the topics in the core part of the TfS audit questionnaire:

<b>TfS Audit</b>	
<b>Management</b>	
<ul style="list-style-type: none"> <li>✓ Management in Charge</li> <li>✓ Policy &amp; Continual Improvement</li> </ul>	<ul style="list-style-type: none"> <li>✓ Training</li> <li>✓ Business Partners</li> </ul>
<b>Environment</b>	
<ul style="list-style-type: none"> <li>✓ Environmental Compliance</li> <li>✓ Waste</li> <li>✓ Emissions to Air and Climate Change</li> <li>✓ Water and Wastewater</li> </ul>	<ul style="list-style-type: none"> <li>✓ Energy</li> <li>✓ Land Use and Biodiversity</li> <li>✓ Soil and Groundwater</li> </ul>
<b>Health and Safety Criteria</b>	
<ul style="list-style-type: none"> <li>✓ Product Safety</li> <li>✓ Transportation Safety</li> <li>✓ Process Safety and Storage</li> <li>✓ Occupational Health and Safety</li> </ul>	<ul style="list-style-type: none"> <li>✓ Emergency Preparedness</li> <li>✓ Medical Care</li> <li>✓ Security</li> </ul>
<b>Labor and Human Rights</b>	
<ul style="list-style-type: none"> <li>✓ Child Labor</li> <li>✓ Forced and Compulsory Labor</li> <li>✓ Working Hours</li> <li>✓ Minimum Wages</li> </ul>	<ul style="list-style-type: none"> <li>✓ Freedom of Association</li> <li>✓ Discrimination</li> <li>✓ Special Work Contracts</li> <li>✓ Facilities &amp; Dormitories</li> </ul>
<b>Governance</b>	
<ul style="list-style-type: none"> <li>✓ Business Integrity</li> <li>✓ Privacy and Intellectual Property</li> <li>✓ Risk Area: Conflict Minerals</li> </ul>	<ul style="list-style-type: none"> <li>✓ Risk Area: Animal Care</li> <li>✓ Fair Competition</li> <li>✓ Disciplinary and Complaint Procedures</li> </ul>

#### A4.3 eTfS Audit Duration

Mining Module	
<ul style="list-style-type: none"> <li>✓ Environmental, Social and Human Rights management</li> <li>✓ Stakeholder and Rights Holder Engagement</li> <li>✓ Labor and Working Conditions</li> <li>✓ Mine and Community health, and safety</li> <li>✓ Security Arrangements</li> <li>✓ Land acquisition and involuntary resettlement</li> <li>✓ Indigenous Peoples</li> <li>✓ Cultural heritage</li> <li>✓ Water Management</li> <li>✓ Mineral Waste and Water Holding Facilities</li> </ul>	<ul style="list-style-type: none"> <li>✓ Protected Areas, Biodiversity and Ecosystem Services</li> <li>✓ Noise and Vibration</li> <li>✓ Greenhouse Gases / Climate Change</li> <li>✓ Substances of Concern: Cyanide and Mercury Management</li> <li>✓ Local social and economic development</li> <li>✓ Closure, rehabilitation and financial planning</li> <li>✓ Compliance</li> <li>✓ Transparency</li> <li>✓ Supply Chain Management</li> </ul>

#### A4.2.3 Consistency Across Operations

When auditing more than one operation for the same auditee, finding descriptions and finding types should be checked for consistency, where there is a group approach to managing an aspect of the operations. Where there are differences in execution at site level and/or a different risk profile, these differences should be documented, and the same finding type assigned where findings are similar.

#### A4.3 eTfS Audit Duration

Audits of mining operations will likely require more time than audits of other types of operations, both because of the scale and nature of mines (typically containing multiple mining and possible beneficiation processes) and because of the additional questions in the mining section in the eTfS AGRT. The table below is a guide for determining the time for conducting an eTfS Audit.

The following factors should be considered for determining the required on-site audit time:

- Complexity of operations:
  - Extent of mining operations – e.g. opencast, underground, or both, and number of pits or mine shafts; and
  - Extent of beneficiation/processing on site.
- Nature of the risks, considering sensitive receptors;
- Specific complex issues where additional effort for one section is anticipated e.g. recent fatality(ies), strikes, community action, contraventions that have resulted in closure, prosecution, political issues; and

Geographical distance:

#### A4.3 eTfS Audit Duration

- to and between mining operations (pits, working areas underground) and beneficiation processes that required significant driving or walking time,
- to and between communities and other sensitive receptors outside of the mine boundary (e.g. water courses, heritage sites, protected or sensitive flora/fauna areas); and
- distance from auditor accommodation, for example where mines are located in a remote area without onsite accommodation, requiring extensive daily travel).

Considering the additional complexity of auditing mining operations, there may be the possibility that there is not enough time to complete a review of an issue during the audit. This should be clearly documented in the AGRT by raising it as a finding and providing further recommendations in the CAP. The auditor should provide a full description of what was evaluated, and why a conclusion could not be made. The TfS Member can discuss with the supplier on what further action may be required to complete the review.

#### A4.3.1 Engagement with the Community

Engagement with the members of the public, the community or other stakeholders should not be undertaken unless permitted by the site and if time permits. Site visits to the area in which the community resides or works, however, can be conducted, for example to inspect projects funded/supported by the mine, or housing and associated utilities where resettlement has taken place.

#### A4.3.2 Number of Auditors for eTfS

It is recommended to have up to three auditors who audit different focus areas (i.e. environment, health and safety, and social). The audit company will decide on the number of auditors on a case-by-case basis dependent on the knowledge of the auditors conducting the audit and the potential issues specific to the site to be audited.

For simple mine operations, two auditors may be considered, where one auditor has strong competencies in two focus areas. This may also apply to complex mine operations; however three auditors would likely be more suitable. Where fewer auditors are selected, additional audit time may be necessary.

Table 3.1 Guidance for no. of auditors and audit duration (on site) based on the eTfS AGRT:

Mine Type	Description	No. Auditors	No. days on site
Simple mine	Small, only opencast or underground, no or simple beneficiation involving no / limited hazardous chemicals, no or limited communities	2-3	3
Complex mine	Multiple processing/beneficiation processes, opencast and underground mining, operations and/or sites outside of mine boundary (community) geographically spread out; complex and high risk social, environmental or health safety issues	2-3	4-5

### **A4.3.3 eTfS Audit Cost**

The supplier-paid model is a principle of TfS. The cost for a TfS Audit is negotiated between the supplier and the TfS approved Audit Company. The cost can vary depending on many factors, for example the size and complexity of the facility being audited or the country in which the audit is taking place.

## **A4.4 Guidance for Auditors on the eTfS AGRT**

For the specific audit process steps and responsibilities, as well as the **follow-up** process, please refer to Section 4 of the Audit Program Guidance Document.

The auditor(s) should always ensure that there is consistency across the answers and finding type where there is any overlap across the core TfS Audit questionnaire and the Mining section.

Comments based on evidence are required to support all findings, including when there are no findings (either because the site is either considered fully compliant or the question is not applicable).

Questions relating to policies, strategy, processes, procedures, programs and plans shall be supplemented by a confirmation on whether the documents are being implemented. The auditor should therefore review the actions the site has taken to fulfil the objectives of these documents and assess whether the site can demonstrate their success in achieving the intended objective(s).

Finding Type: Ensure that the finding description provides adequate detail to explain why the finding is considered critical, major or minor, taking consideration of the guidance “Notes to the Auditor”.

If there was insufficient evidence found by the auditor, a finding should be made in cases where documentation has been requested but not been made available and is required to conclude the finding.

When documenting the explanation of audit results, the auditor should make mention of the site’s position on the issue and explain why the site considers the existing measures in place to be adequate. Furthermore, the auditor should provide clarity on why the recommended action (i.e. application of an international standard or accepted practice) would be beneficial and decrease any associated risks.

Conversely to the point above, it may be acceptable to the auditor that the site has not implemented ‘best practice’ (that should be in place according to the respective eTfS question and guidance) and has rather implemented ‘standard’ practice that is considered adequate, even though the site does not fully meet the TfS requirement. Here, the context of the organization is important. Context may include internal and external factors (e.g. existing relations with the community, site and corporate culture). For example, the level of stakeholder engagement for an operation where there is little community impact/involvement would be expected to be lower (and therefore best practice not necessarily required), in comparison to one where there are many communities that are directly impacted by the site’s operations. The auditor should take the

#### A4.5 eTfS Auditor Approval and Selection

context of the mine into account when making a finding, ensuring the explanation of the finding and finding type is explicit.

### **A4.5 eTfS Auditor Approval and Selection**

For the selection of audit companies and the approval process of auditors, as well as additional information on the criteria, please refer to section 2 of the Audit Program Guidance Document.

#### **Approval Criteria for eTfS Auditors**

Auditors should be able to demonstrate both audit skills, competence in the field they are auditing, an understanding of local legislation, and experience with the sector they are auditing. In addition to the current qualification requirements for the core part of TfS Audits, the auditor should be able to demonstrate experience evaluating operating mines against internationally accepted standards on environmental and social performance.