# Due Diligence Improvement Plan

# Subsidy Programme for Responsible Business (SPVO)

## Step 1: Ensure clear policies

| **Action** | **What sub-actions do you need?** | **Who should be involved?** | **Who is responsible?** | **What is the deadline?** |
| --- | --- | --- | --- | --- |
| 1.1 Find out if your company is already committed to Responsible Business Conduct (RBC) |  |  |  |  |
| 1.2 Define a RBC commitment |  |  |  |  |
| 1.3 Get management agreement on RBC policy |  |  |  |  |
| 1.4 Appoint an internal RBC coordinator and provide a consultation structure |  |  |  |  |
| 1.5 Analyse which policies, agreements and practices are RBC-related |  |  |  |  |
| 1.6 Determine how policies, agreements and practices should be adjusted |  |  |  |  |
| 1.7 Costs for adaptation |  |  |  |  |
| 1.8 Define RBC KPIs |  |  |  |  |
| 1.9 Inform employees of commitments and changes in working practices |  |  |  |  |
| 1.10 Inform customers and suppliers of commitments and changes in working practices |  |  |  |  |

## Step 2: Know your supply chain and sustainability risks

| **Action** | **What sub-actions do you need?** | **Who should be involved?** | **Who is responsible?** | **What is the deadline?** |
| --- | --- | --- | --- | --- |
| 2.1 Map the product's value chain by means of supplier(s) and production countries |  |  |  |  |
| 2.2 Identify the main sustainability risks |  |  |  |  |
| 2.3 Analyse if there are severe sustainability risks that you should address in the short term. |  |  |  |  |
| 2.4 Carry out an analysis to identify the sustainability risks of the product/commodity |  |  |  |  |
| 2.5 Create a plan for a step-by-step analysis of the entire portfolio. This can be a multi-year plan |  |  |  |  |

## Step 3: Addressing risks

| **Action** | **What sub-actions do you need?** | **Who should be involved?** | **Who is responsible?** | **What is the deadline?** |
| --- | --- | --- | --- | --- |
| 3.1 Discuss sustainability risks with suppliers and define an approach for discussion |  |  |  |  |
| 3.2 Identify what measures the supplier is already taking |  |  |  |  |
| 3.3 Analyse on which subject you need to take extra measures |  |  |  |  |
| 3.4 Define the appropriate approach with suppliers |  |  |  |  |
| 3.5 Document the agreements made and discuss with relevant departments how to ensure that they are met |  |  |  |  |

## Step 4: Check and monitor progress

| **Action** | **What sub-actions do you need?** | **Who should be involved?** | **Who is responsible?** | **What is the deadline?** |
| --- | --- | --- | --- | --- |
| 4.1 Determine responsibilities for monitoring sustainability KPIs |  |  |  |  |
| 4.2 Develop the monitoring plan and determine the frequency of monitoring |  |  |  |  |
| 4.3 Identify who collects what information on observing internal agreements |  |  |  |  |
| 4.4 Identify who collects what information on progress in the chain |  |  |  |  |
| 4.5 Plan meetings with suppliers to discuss progress |  |  |  |  |
| 4.6 Set up a regular meeting structure to discuss progress |  |  |  |  |

## Step 5: Communicate about results

| **Action** | **What sub-actions do you need?** | **Who should be involved?** | **Who is responsible?** | **What is the deadline?** |
| --- | --- | --- | --- | --- |
| 5.1 Make a list of all internal communication channels |  |  |  |  |
| 5.2 Determine through which internal channels you can best share sustainability news with employees |  |  |  |  |
| 5.3 Identify which channels are used to communicate externally |  |  |  |  |
| 5.4 Identify through which channels you can best share sustainability results externally |  |  |  |  |
| 5.5 Determine who should be involved in creating and implementing internal and external communications |  |  |  |  |
| 5.6 Determine what results you will report in internal and external communications |  |  |  |  |

## Step 6: Take responsibility

| **Action** | **What sub-actions do you need?** | **Who should be involved?** | **Who is responsible?** | **What is the deadline?** |
| --- | --- | --- | --- | --- |
| 6.1 Analyse if complaints by all stakeholders in the chain reach your organisation |  |  |  |  |
| 6.2 Identify how complaints reach your organisation |  |  |  |  |
| 6.3 Delegate clear responsibilities for complaint management |  |  |  |  |
| 6.4 Develop a rule-based complaints system |  |  |  |  |
| 6 5 Discuss how the company deals with negative impacts in the chain |  |  |  |  |