### Question I6: Supplier conformance - Products

#### Scoring Rubric

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**Question I6**

1. How does your company ensure conformance with your chemicals requirements?

a. Our company ensures conformance with chemicals requirements through methods listed in question 2, below.

   - n/a
   - n/a
   - n/a
   - n/a
   - n/a
   - n/a
   - n/a

b. Our company does not ensure conformance with chemicals requirements through methods listed in question 2, below.

   - n/a
   - n/a
   - n/a
   - n/a
   - n/a
   - n/a
   - n/a

2. Our company: (Follow up to question 1)

   Choose all that apply.

   a. has an audit program to verify supplier submitted data
      - 1.25
      - 1.25
      - 1.25
      - 1.25
      - 1.25
      - 1.25
      - 1.25

   b. requires suppliers to test parts in third party approved labs and provide results
      - 1.25
      - 1.25
      - 1.25
      - 1.25
      - 1.25
      - 1.25
      - 1.25

   c. trains suppliers on how to comply with reporting requirements
      - 1.25
      - 1.25
      - 1.25
      - 1.25
      - 1.25
      - 1.25
      - 1.25

   d. routinely tests parts, components, or products to assure conformance with reporting requirements
      - 1.25
      - 1.25
      - 1.25
      - 1.25
      - 1.25
      - 1.25
      - 1.25

**I6 Maximum points**

- 5.00
- 5.00
- 5.00
- 5.00
- 5.00
- 5.00
- 5.00
**Questions I6: Supplier conformance - Products**

**Explanation**
This question asks about the measures your company takes to ensure that suppliers are accurately reporting on their claims regarding chemicals in products, especially CoHCs. It seeks to understand the level of certainty that your company achieves to verify supplier compliance with your chemical information requirements.

A first step many companies take is to review the reporting forms submitted by suppliers. Many companies also require their suppliers to test parts in an approved laboratory and provide these results. Some companies offer training programs to their suppliers to help ensure compliance with reporting. Many companies also conduct their own routine testing of parts, components and products or contract with a third party to do so. Companies may also compare submissions by different suppliers to identify discrepancies.

If your company avoids all CoHCs in its products and as impurities, describe how you ensure that these chemicals are not in the products you sell. You must include supporting documentation to receive points for this question.

Note that you can check all that apply.

**Example**
As part of its Restricted Substances List program and through the Zero Discharge of Hazardous Chemicals initiative *Levi Strauss & Co.* is likely to meet the following response options:
- Response option “a” by auditing its suppliers,
- Response option “b” by requiring suppliers test products at LS&Co approved laboratories,
- Response option “c” by training its suppliers, and
- Response option “d” by routinely testing its own products.

**Option I6.2.a**
A CFP Survey responder implemented a Supplier Quality Management program that includes specifications for supplier audits and methods for corrective action plans. The audit process determines supplier compliance with the company requirements and verifies chemicals data.

**Electronics** *HP* uses a combination of local internal auditing teams and third-party audits, backed by independent quality verification, to verify supplier data. The supplier audit process at HP is an essential component of the HP risk assessment framework and important for identifying opportunities for sustained improvement with suppliers. In 2019 HP also worked with final assembly suppliers to confirm that they audit companies in their own supply chains that represent approximately 80% of their spend.

**Supply Chain Responsibility HP Sustainable Impact Report**

**Medical Devices and Supplies** *Case Medical* uses ToxServices as a third-party auditor and all chemicals and chemical suppliers must be assessed and approved by ToxServices.

**Option 16.2.b**
A company could, for example, require suppliers to show compliance to chemicals requirements by providing the company with up-to-date laboratory analysis results and/or relevant certification documents. Testing requirements may be communicated in supplier contracts to ensure suppliers conduct all relevant tests in certified labs and provide the company with results.

**Electronics** All HP suppliers must use HP-approved test methodologies to perform testing on materials content to verify compliance. The test methodologies are listed in the HP General Specification for the Environment (GSE).

**Option 16.2.c**
Companies may train suppliers on how to meet company standards and unacceptable ingredients to ensure compliance with reporting and provide suppliers with clear information. This may include training on how to meet requirements that are beyond legal compliance and how to complete and submit all forms and documents.

**Option 16.2.d**
A company could, for example, routinely send materials, parts, components, or products to a third-party for testing to ensure that the supply chain is meeting all chemicals requirements. While products should be tested routinely, it is important to test whenever there is a change in formulation to ensure suppliers are continuing to meet requirements.

**Supporting documentation**
Provide a narrative summary of how your company assures conformance with its reporting requirements.