



# **Analytical Framework to assess the fitness of Voluntary Sustainability Standards for Human Rights Due Diligence**

## **User Guide**

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# Introduction

# ◀ Introduction

This user guide has been developed by Kumi to support users in completing the *Analytical Framework to assess the fitness of Voluntary Sustainability Standards for Human Rights Due Diligence (Framework)*, which has been co-developed by Kumi and the project group copper of the Sector Dialogue Automotive Industry.

The Framework's aim is to evaluate Voluntary Sustainability Standards (VSS) against the recommendations as set out in the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Due Diligence Guidance for Responsible Business Conduct (OECD RBC), and several research studies and relevant tools (see list of references in the Framework).

**The Framework focuses on the fitness of VSS to include adequate risk management of Human Rights abuses along the entire value chain** including all supplier tiers from raw materials extraction to transportation and trading, processing, (semi-)manufacturing, assembly, etc.

The Framework is intended as a hands-on working tool that users actively have to work and engage with based on their own organisation's risk management, research about the assessed VSS, commenting of observations, etc.. As such, its main purpose is to gain a deeper understanding of a small number of VSSs that already have been pre-selected and shortlisted by the user's organisation, enabling it to reach an ultimate decision whether to join a VSS or not. Most of the assessment criteria therefore have to be answered by the users themselves through research, allowing adjustments to specific user needs (e.g. on relevant tiers of the supply chain of relevance to them).

**This user guide has been prepared to support users in the completion of the Framework. Kumi does not take liability or responsibility for how the Framework is used in practice.**



# Overview of the Analytical Framework

# ◀ Analytical Framework – Overview (1/2)

The Framework is intended to support companies in their decision to join a Voluntary Sustainability Standard. It is applicable to all VSS regardless sector, industry, or supply chain stage (tier 1+n). In addition, the Framework enables its users to directly learn about the development and implementation of human rights due diligence procedures in private companies.

The Framework consists of 4 main components that each represent different tabs in the Framework highlighted by separate colours:

- **Pre-work** (green)
- **Dashboard** (blue)
- **Initiative Assessment Surveys** (VSS1 – VSS3) (orange)
- **Shadow Audits** (yellow)

**Navigate between the different components:**

**Action:**

By clicking on the different tabs, you can navigate through the Framework.



# ◀ Analytical Framework – Overview 2/2



## Structure of Assessment Surveys (VSS1-VSS3):

Each Assessment Survey (orange) consists of 3 main parts divided into **5 sections** in order to assess the VSS:

- **Overview - Section 1** provides a profile of the VSS covering general questions on the VSS's purpose, focus, etc. The results of this section do not feed into the rating of the VSS.
- Quality of the VSS - **Sections 2 to 4** assess the quality of the VSS based on three main categories:
  - **Credibility:** This category includes questions on governance structure, general transparency, stakeholder involvement and more in order to assess the overall reliability and accountability of the VSS.
  - **Auditing:** This category asks in more detail about processes, standards, training and rightsholder inclusion in audits to assess the reliability of a VSS' results and ratings of its members.
  - **Due diligence measures:** This category covers important aspects of the previous two points in more detail, complemented by additional points such as grievance and remediation. The main focus is on requirements that members of a VSS have to meet in terms of data provision and mechanisms that may support your due diligence practice when conducting your own risk assessment, stakeholder engagement, as well as grievance and remediation processes.
- **Issue areas - Section 5** assesses the scope of human rights & sustainability issues covered by the VSS. The results of this section do not feed into the rating of the VSS. Several issue areas include further sub issues that will automatically show once you select "yes" (i.e. that the issue area is covered by the VSS).



# Assessment Process



# ◀ Assessment Process 1/3

In order to maximise your benefit from the use of the Framework, we recommend the steps below. They do not have to be followed in a linear way, although it is recommended all users begin with Step 1 to ensure the scope and rationale for joining as VSS is understood.

**Step 1:** Complete the **pre-work** to the best of your knowledge and based on your organisation's own due diligence policies & systems, as well as supply chain risk assessment results and priorities.

**Step 2: Choose** the VSS you would like to assess and compare.

**Step 3: Collect** and read the VSS' documents and resources, especially the standards' requirements to become a member. Additional materials may include documents on topics such as policy, guidance, governance structure, etc. of the assessed VSS, as well as toolkits provided by it. The VSS's website should be the first point of reference and the availability of information should be considered already an important factor of the VSS's transparency.

**Step 4: Complete** the survey for each of the VSS to be assessed. For a selection of eight VSS some general information of the overview section is already provided. All other information are to be completed manually no matter which VSS you choose.

**Step 5:** For those questions for which sufficient information is missing, you may **inquire** directly at the VSS or consult third-party sources (reports, etc.)

**Step 6: Review** and update the surveys based on step 4 above. For sections 2 to 4 of the survey (Credibility, Audit, Due Diligence measures), you will need to complete the full survey in order to receive the results in the dashboard. In case you are not able to answer some questions after steps 3 and 4, choose either "unclear" or "no" to the best of your knowledge.

**Step 7:** Compare the **results** in the dashboard. In the left-most column, the dashboard allows you to assign priorities to each category based on your organisation's needs. Assign priorities based on your organisation's needs, in particular the results of the pre-work (step 1).

# ◀ Assessment Process 2/3



- Step 1: Pre-Work**
- Step 2: Choose**
- Step 3: Collect**
- Step 4: Complete**
- Step 5: Inquire**
- Step 6: Review**
- Step 7: Results**

# ◀ Assessment Process 3/3

## Technical notes:

- We strongly recommend downloading and using a clean version every time you start a new assessment of one or several VSS. Re-using already completed and saved Framework templates may cause technical issues especially with the pre-selection of standards in the orange survey tabs.
- Once you completed the Framework, we recommend to record the date of completion in the tab "version history". Subsequent updates of your assessments should be documented likewise in the same tab.
- The standard version of the Framework uses macros in order to hide and show notes via buttons, as well as to open additional options in the section on issue areas depending on your answers (see section on *How to use the four main components of the Framework* for details). In order to use this functionality, the use of macros has to be enabled in your Excel program. Depending on your technical and/or security settings, you may experience issues with the macro functions which may impact your use of the Framework. In this case we recommend to contact your organisation IT services. Alternatively, you may download and use the macro-free version. The macro-free version does not include any buttons or automatic hide/show functions but shows the full content of the tool at all times. This may make the Framework more difficult to navigate at certain times, but does not affect its content.
- The content of both versions of the Framework, macro-enabled and macro-free, have not been locked in order to allow users to make adjustments based on their needs.



# How to use the four main components of the Framework

# Pre-work (green) 1/2

This section represents the foundation for assessing the VSS in order to determine your needs and the extent to which they are addressed by the VSS. It concerns due diligence processes and priorities **in your own business**. Answering the questions should be based on your own risk identification and analysis of your supply chain as part of your ongoing due diligence. This pre-work is therefore intended to cover the specific risks and their contexts (raw materials, geographies, supplier companies, etc.) as identified on individual enterprise level of users and should go beyond generic industry-level risk identification. **Conducting your own risk analysis is a separate process that should precede the completion of the Framework and the Framework is not intended to assist users in their risk analysis.**

Please note that in line with questions 0.1 – 0.3, the Framework **can be applied to all raw materials, geographies and supply chain stages equally**. In question 0.15 on the selection of identified issue and risk areas, several issue areas include further sub issues that will automatically show once you select "yes" (i.e. that you identified this area as an issue/risk in your supply chain).

## What do you need to do?

- Collect the latest results of your supply chain due diligence for sustainability risks
- Answer the questions in the Pre-work tab
- Note down important comments from your research and consult the notes and references for further information

## Answering the questions:

Question	Answer	Comments
<b>0. Pre-work - Assessing your own needs and priorities</b>		
0.1	What raw material(s) do you want to prioritise in the context of this assessment of VSS?	[please delete and complete manually]
0.2	Which geographies are these minerals mainly extracted from and processed in? [Please provide information for both extraction and processing]	[please delete and complete manually]
0.3	In which tier(s) of the supply chain do you want to prioritise?	[please delete and complete manually]
0.6	Do you expect the VSS to be aligned against OECD recommendations?	Full alignment
0.14	What are your most important criteria to assess the support a VSS can provide you for your due diligence? [Please compare with section 3 on support measures in the VSS survey tabs (orange) to choose your main priorities. For more information, see also the point Quality of the VSS in the introduction tab]	[please delete and complete manually]
0.15	What sustainability risks and issues have you identified in your supply chain? [Please complete the list below]	
	DECD Annex II risks	Yes
	Serious human rights abuses	No
	Support to armed groups	No
	Security contracting	Yes

**Action:**  
Answer the question by deleting the instruction and adding your answer manually.

**Action:**  
Answer the question by choosing from available options.

Some questions may prompt additional sub questions highlighted in grey.

# Pre-work (green) 2/2

## Using comments and notes:

**Action:**  
You can toggle explanatory notes and reference links by clicking on the button.

Comments	Hide Notes	Notes	Link
		OECD Alignment Assessments evaluate the alignment of an industry, government or multi-stakeholder initiative with the recommendations of OECD due diligence guidance, using the OECD's alignment assessment tools and methodology. An initiative's standards, implementation and overall credibility are assessed against detailed criteria of due diligence using an assessment tool. Each criterion is linked to discrete recommendations from specific OECD due diligence guidance. Initiatives are evaluated as being fully, partially or not aligned against each due diligence criterion, contributing towards an overarching alignment score.	<a href="https://www.oecd.org">https://www.oecd.org</a>
		Select "Yes" to see further details	<a href="https://www.oecd.org">https://www.oecd.org</a>

**Action:**  
Use the comments to add important observations, needs, or specifications.

## Adding additional issue areas:

**Action:**  
Specify additional issue areas if needed.

GhG emissions	No
Energy	No
Other (Please delete and complete manually)	
Other (Please delete and complete manually)	
Other (Please delete and complete manually)	

# Dashboard (blue)

The dashboard shows the results of your pre-work and compares it with the results of your assessments of up to 3 VSS. The assessment of VSS is down in the subsequent Assessment Surveys (orange).

## What do you need to do?

- Compare the results of your assessment of VSSs with your pre-work
- Assign priorities to criteria based on your pre-work You can also filter the priorities to display only high-priority categories. We recommend ticking the “blank” box in the filter by default to keep the graphs in the dashboard.

## Navigating the dashboard and prioritise results:

The information from your pre-work will be shown here.

The results of your assessment of up to 3 VSS are shown here.

**Action:**  
Assign priorities to each criterium, and filter results based on assigned priorities

DASHBOARD					
Priority	Criteria	Company expectations	VSS1 COPPERMARK	VSS2 IRMA	VSS3 COPPERMARK
	<b>1. Overview</b>		<b>Results</b>		
MEDIUM	Which raw material(s) does the standard cover?	[please delete and complete manually]	Copper	All mined materials except energy fuels	Copper
?	What geographies does the standard cover?	[please delete and complete manually]	Global	Global	Global
HIGH	Which tier(s) of the supply chain does the standard apply to?	[please delete and complete manually]	Mine to processor	Exploration and operations for mine	Mine to processor
LOW	What is the main purpose of the scheme?	[please delete and complete manually]	Best practices, guidance and support	Best practices, guidance and support	Best practices, guidance and support
?	Is the VSS a member of ISEAL? (Community Member, Code Compliant, Accreditation Member, no member)	NA	ISEAL Community Member	ISEAL Community Member	ISEAL Community Member
	<b>2. Quality of the VSS</b>				
?	Credibility	[please delete and complete manually]	51%	54%	57%
?	Audit	[please delete and complete manually]	57%	63%	56%
?	Due Diligence Measures	[please delete and complete manually]	100%	100%	94%
?	<b>Overall score</b>		69%	72%	69%
	<b>3. Which issue areas does the VSS cover?</b>				
?	OECD Annex II risks	Yes	⊗	⊗	⊗
?	Serious human rights abuses	No	⊗	⊗	⊗

**Action:**  
You can show and compare detailed results of each category under quality via separate buttons.

# ◀ Initiative Assessment Surveys (orange) 1/2

The surveys are to be completed for assessing the VSS. Up to three surveys can be completed in order to compare the results of max. 3 different VSS. Results will be automatically fed into the dashboard. The survey is structured in 5 different sections: Section 1 – Overview; Section 2 – Credibility; Section 3 – Auditing; Section 4 - Due diligence measures; Section 5 – Issue Areas.

Please note that in line with questions in section 1.1 – 1.3, the Framework **can be applied to all raw materials, geographies and supply chain stages equally**. In section 5 on issues areas, several issue areas include further sub issues that will automatically show once you select "yes" (i.e. that you identified this area as an issue/risk in your supply chain).

## What do you need to do?

- Specify the VSS under consideration for up to three different VSS (one tab for each VSS)
- Answer the questions for each VSS in the respective tabs
- Note down important comments from your research and consult the notes and references for further information

## Recommended information and documentation:

In order to complete the Surveys, the collection of various information about the VSS is required. As a starting point, a VSS' website should be consulted to collect the following documents and information. **The availability of information on the website is an important indicator for the VSS' transparency.**

- The VSS' requirements in order to become a (certified) member
- Ancillary documentation on the standard requirements incl. methodology for the standard development and review, verification and accreditation processes (e.g. auditing, etc.)
- Information about the governance structure of the VSS
- If applicable, any additional toolkits, guidance documents, publications, social media activity that may support the assessment of a VSS in terms of its expertise, credibility, and overall quality in comparison to the needs and priorities of the users of the Framework.
- External sources, esp. news and reports on the VSS and its main focus areas (sector, raw materials, risks, geography)

**In addition, it is strongly recommended to complement any desk research with interviews with VSS representatives and members on important and/or unclear topics for the completion of the Framework. The misinterpretation of documents is a common high-risk leading to wrong assessments and conclusions regarding a VSS. Direct conversations with VSS representatives and members are an important mitigation measure**



# Initiative Assessment Surveys (orange) 2/2

## Selecting a VSS and answering questions of section "1. Overview":

- Start by using the drop-down menu in cell C2 of each of the orange survey tabs in order to select a VSS. If you choose a VSS from the drop-down menu, section 1 ("Overview") will be completed automatically, except for questions 1.11 and 1.12 which need to be researched and filled in manually.
- If the VSS is not in the drop-down menu, choose "other" and enter the name of the VSS in cell C3. You will need to complete part 1 manually. Sections 2 to 5 ("Credibility", "Auditing", "Due diligence measures", "Issue Areas") are to be completed manually no matter which VSS you choose.

**Answer options:** Sections 2 to 4 that assess the quality of the VSS typically offer 4 answers (yes, partially, unclear, no, out of scope). Some questions offer alternative answers but usually retain the number of 4 options. In case a specific question is out of scope of the assessed VSS or your own priorities, there is a separate answer option ("out of scope") in which case the question will not be factored into the rating of the VSS.

	A	B	C
1			VSS1
2		NAME OF VSS1	Other
3		If other, please delete contents of cell C3 and specify VSS	IRMA (updated 06/2023)
4		Question	ICMM Assurance and Validation Procedure (updated 10/2023)
5		1. Overview	Towards Sustainable Mining (updated 10/2023)
6	1,1	Which raw material(s) does the standard cover?	Aluminium Stewardship Initiative - CoC and CoP (updated 10/2023)
7	1,2	What geographies does the standard cover?	Responsible Steel Initiative (updated 10/2023)
			Responsible Minerals Initiative - RMAP (updated 10/2023)
			Responsible Minerals Initiative - DAP (updated 10/2023)
			Other

**Action:**  
 - Choose the VSS you want to assess from the drop-down list.  
 - Choose "Other" if your VSS is not listed.

	A	B	C
		NAME OF VSS1	Other
		If other, please delete contents of cell C3 and specify VSS	Other

	A	B	C
		NAME OF VSS1	Other
		If other, please delete contents of cell C3 and specify VSS	RMI

**Action:**  
 If you selected "Other", delete the content of the cell (C3) and add the name of your VSS instead.

	A	B	C
		NAME OF VSS1	COPPERMARK
		If other, please delete contents of cell C3 and specify VSS	COPPERMARK
		Question	Answer
		1. Overview	
	1.1	Which raw material(s) does the standard cover?	Copper
	1.2	What geographies does the standard cover?	Global
	1.3	Which tier(s) of the supply chain does the standard apply to?	Mine to processor

**Action:**  
 - If you selected a VSS from the list, section "1. Overview" will be completed automatically  
 - If you selected "Other", answer the questions of section manually

## Answering the questions of sections 2 to 5 and using comments and notes:

See "Answering the questions" (slide 15) and "Using comments and notes" (slide 16) in Pre-work.

	A	B	C
		Other	
		RMI	
		Answer	
		Delete cell and complete manually	
		Delete cell and complete manually	
		Delete cell and complete manually	

# ◀ Shadow audits or site visits (yellow) (optional)

This tab provides the user with a simple set of key guiding questions when conducting shadow audits or site visits in order to assess the actual implementation of a VSS in practice. The tab functions as a template to be multiplied in case of several audits.

## What do you need to do?

- Collect your notes from shadow audits for each of the assessed VSS (you can

## Using the shadow audit template:

Question	Shadow Audit Notes
1) Date, site, auditor and participants of the audit (names, affiliation and roles)	
2) Did the auditor implement the standard and the expectations of the VSS in its entirety?	
3) Was the auditor qualified to deliver the audit?	
4) Do you have confidence the implementation of the VSS aligns with the policies and standards as written in the standard?	
5) Do you have confidence in sourcing from sites that are members of this VSS?	

**Action:**  
Collect your notes for each of the questions.





## **Limitations and scoring**

# ◀ Limitations and scoring

## LIMITATIONS

- The analytical framework was developed with the idea in mind to be filled-out in less than four hours per VSS.
- This user guide is not intended to provide information about how to conduct due diligence and risk management, nor does it provide any data on actual risk profiles.
- No analytical framework alone can help companies truly determine how effective a VSS is, as it is in its implementation that the realistic interpretation of effectiveness can be known. The framework, however, does offer guidance to users on what the scheme may or may not do, and how effectively it may or may not do those things.
- The actual implementation of the Standard can be understood in more detail by reviewing technical documents on assurance processes, auditor selection, etc. This analytical framework requires a light-touch review of these documents, but a deep-dive can support here.

## SCORING

- Sections 2 to 4 of the analytical framework are given a percentage score depending on the results.
- The scoring methodology ranks in-scope answers on a 0 to 3 scale per section, with 3 being the highest score achievable per criterion.
- This is subsequently converted into a percentage score.
- Sections 2 and 4 are comparable as they have 15 criteria each, whereas section 3 only has 11. This has an impact on scoring, as with fewer criteria percentage swings are larger.

**Therefore, we recommend using the score as a guide only, and focusing on answers given to make determinations on usefulness of the VVS for company due diligence efforts.**

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