



# **WRAP Facility Handbook 2025**

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## 1. HOW TO USE THE FACILITY HANDBOOK

The purpose of this Handbook is to serve as a guideline for facilities seeking WRAP certification. The Handbook will describe how facilities obtain a WRAP certificate, starting with the application, then the pre-audit self-assessment, facility audit and evaluation, and finally certification. WRAP reserves the right to make any changes to policy and procedure and will provide updates in a timely manner through various platforms, including the WRAP website and memos.

WRAP recommends that new facilities read this Handbook in sequential order before registering on WRAP's website. Facilities that are already familiar with WRAP certification may not need to read the full Handbook. If there are specific topics about which the reader needs more information, the Table of Contents of this Handbook functions as links to each section.

This Handbook is a living document, to be updated and available to facilities (and monitoring firms) on a continual basis, with memos sent throughout the year and incorporated into the Facility Handbook on an annual basis.

Hyperlinks that direct the reader to an external web address will be underlined and written in navy. Additionally, words or phrases that are defined in the Glossary of Terms at the end of this document will be hyperlinked and underlined in bronze.

Please note there are multiple appendices in this handbook. Links directing the reader to an appendix (or to another section within this handbook) will also be underlined in bronze.

One of the most significant changes to this edition of the Facility Handbook that users should be aware of is an overall refit of the style of the handbook that favors a more cohesive, narrative style than used in past editions. It is the editorial hope that users find this approach cleaner, easier to read, and a better reference tool to support the registration, audit and reporting processes.

Questions about the Handbook can be sent to WRAP's Compliance Administration Department (See Appendix 1).

## 2. INTRODUCTION TO WRAP

Worldwide Responsible Accredited Production (WRAP) is an international certification program dedicated to ensuring workers have safe, humane, lawful, and ethical working conditions. We promote transparent, sustainable, and responsible manufacturing and sourcing practices through education, certification, and collaboration. WRAP is headquartered in Arlington, Virginia, USA, with branch offices in Hong Kong SAR and Bangladesh, and representatives in Europe, India, Pakistan, Southeast Asia (Indonesia, Thailand, & Vietnam), Latin America, the Middle East and Africa. WRAP certification is recognized by many well-known brands, retailers, and buying agents around the world. You can find some of the major buyers on [WRAP's website](#).

WRAP's Certification Program seeks to independently monitor and ensure compliance with WRAP's 12 Principles. The WRAP Principles ([See Appendix 2](#)) are based on generally accepted international workplace standards, local laws, and workplace regulations. They also include the spirit or language of relevant conventions of the International Labour Organization (ILO), including [CO95 - Protection of Wages Convention](#), [the United Nations Universal Declaration of Human Rights](#), [United Nations Guiding Principles on Business and Human Rights](#), and [the Organization for Economic Cooperation and Development \(OECD\)'s Guidelines for Multinational Enterprises](#).

The first nine Principles cover child and forced labor, health and safety, harassment and abuse, discrimination, hours of work, compensation and benefits, and freedom of association. Principle 10: Environment serves to demonstrate a facility's commitment to environmentally responsible business practices. The final two Principles, on customs compliance and security, ensure that goods being shipped overseas comply with applicable customs laws and that no non-manifested cargo (drugs, bombs, etc.) is transported along with finished products. WRAP follows the United States Customs and Border Protection (CBP)'s [Customs Trade Partnership Against Terrorism \(CTPAT\)](#) "[Guidelines for Foreign Manufacturers Minimum Security Criteria \(MSC\)](#)" as minimum requirements and has adopted those guidelines under WRAP's Principle 12: Security. In addition to a social compliance certification, certified facilities meet the criteria necessary for a supply chain security audit.

Facilities that demonstrate proper adoption, implementation, and monitoring of all 12 Principles receive certification, typically for a one-year period. A WRAP audit provides an on-the-ground perspective of a facility's operations to ensure that they are maintaining compliant practices; as such, the certificate only applies to an individual facility, not a parent company or brand. All certifications require regular renewal, and all certified facilities are subject to unannounced [Post-Certification Assessments \(PCAs\)](#) during their certification periods to ensure compliance with WRAP's 12 Principles remains in place after the certification audit.

Compliance with WRAP Principles is verified via audits carried out by professional third-party monitoring firms that have been accredited by WRAP. The monitoring firms and individual auditors who conduct WRAP audits must meet rigorous accreditation requirements and must be members of the [Association of Professional Social Compliance Auditors \(APSCA\)](#). To become qualified WRAP auditors, they must undergo either the Five-Day Auditor Training course (for ASCAs) or the Two-Day Bridge Training course (for CSCAs) conducted by WRAP. All WRAP auditors must attend refresher training courses once every two years to keep their status with WRAP.

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**WRAP maintains high expectations of its staff, accredited monitoring firms, and facilities. All WRAP activities should be conducted with the highest degree of honesty, transparency, and commitment to WRAP values and principles.**

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### 3. USE OF WRAP LOGOS



**Certified  
Facility**



**MADE IN A  
CERTIFIED  
FACILITY**

[The WRAP Logo](#) is the exclusive property and registered trademark of Worldwide Responsible Accredited Production (WRAP) in the United States and other countries. A WRAP certification represents assurance of socially responsible production, and use of the logo indicates an entity has either affirmatively undergone a successful audit and been certified or that it has partnered with WRAP to help promote social compliance in the manufacturing industry. The logo is available to parties who manufacture, buy, or sell products made in a facility that is certified at the gold or platinum levels. It may also be used by WRAP's accredited monitoring firms and corporate partners.

There are three versions of the logo: the WRAP Logo, WRAP Certified Facility Logo, and the "MADE IN A WRAP CERTIFIED FACILITY" logo. PNG and vector/SVG file versions of each are available for download on WRAP's website.

WRAP's logos are typically used on stakeholders' websites, social media graphics, event promotions and signage, newsletters, products, marketing collateral, and more. Where used, these logos must appear as they do on WRAP's website. They must not be stretched or warped. Their colors must not be distorted, and they may only be applied against a white background. If you would like to apply one of our logos to a tinted background or on an image, please reach out to WRAP to coordinate as this may be permitted under certain circumstances.

Where used, the logos must be reproduced as shown above. Where possible, the trademark credit line should be cited as well. In all instances of use, care must be taken to ensure the significance of the logo is put in its proper context; in particular, it should be clear that it is not being used to make a product quality claim (for instance, if the logo is to be placed on a product, then the user should utilize the "Made in a WRAP Certified Facility" version).

Additional use conditions for some users include:

#### **Production facilities**

A production facility may use the "Certified Facility" logo only if it holds a valid WRAP gold or platinum certification. The facility must maintain full compliance with WRAP's 12 Principles during its certification period. The facility or facility group is responsible for ensuring that the logo's use is limited to the certification period. Facilities may use the logo on websites, business cards, social media, and other materials.

## Buyers

Brands and retailers may use WRAP logos on consumer goods, packaging, websites, social media, corporate social responsibility reports, and related materials if the facilities that produce their goods are WRAP-certified at the gold or platinum level and maintain their certification status in compliance with our guidelines.

## Monitoring Firms

Monitoring firms may use our logos on their websites, business cards, promotional materials, and social media provided they remain accredited by WRAP.

## 4. CONFIDENTIALITY OF AUDIT DOCUMENTS

WRAP strongly values the confidentiality and privacy of the facilities in the WRAP Certification Program. Audit reports are the property of the facility. Only with expressed permission from the facility or whoever pays for the audit, which is almost always the facility itself, would WRAP share audit reports with entities outside of the WRAP organization. WRAP does, however, have the liberty to disclose a facility's status with regards to whether it is certified or not and if not, what the noncompliance(s) is(are). For facilities that have chosen to display their certification status on WRAP's website, that information can also be ascertained through that public portal.

Facilities can obtain audit reports through two channels; the monitoring firm who conducted their audit, and WRAP's platform which is freely accessible to facilities. Facilities have the right to share the audit report with any entity they choose.

## 5. REGISTRATION

To start the registration process, the facility will need to determine its status based on its previous history with WRAP.

### 5.1 FACILITY STATUS

Facilities are classified in one of the following three ways within the WRAP Program: New, Lapsed, and Renew. These statuses affect the online registration path that will be used by a given facility.

- **New:** Facilities either going through their first certification process or have previously been certified by WRAP but have since moved to a new address/location
- **Lapsed:** Facilities that have been WRAP certified before but have not had any audit activities take place in the 12 months after their last certificate expired
- **Renew:** Facilities that have previously been certified or audited in the last 12 months; their current certificates may still be valid while in the process of being audited

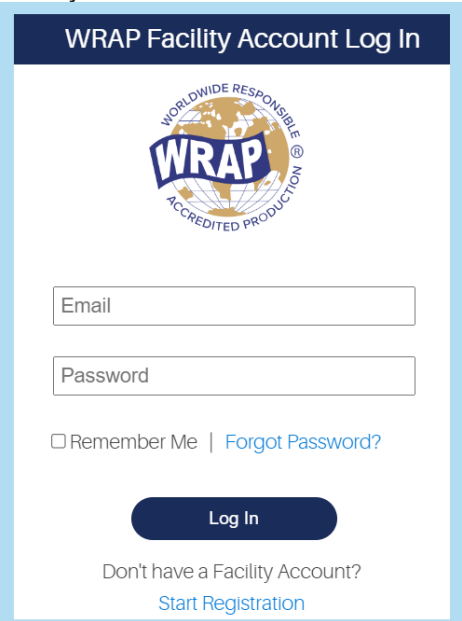
All facilities should follow the instructions given below. See [Appendix 3](#) for illustrative screenshots of the process. First time users should follow the [New User Registration Link](#) to create a user account and register their facility on the platform. Please note that the use of the WRAP platform is free to facilities and WRAP's monitoring partners.

If the user forgot their password, click 'Forgot Password' and then enter the email address to receive the temporary password email message and then log in using the temporary password provided in the message. Once logged in, the user will have the option to update their password from the 'My Profile' page. Upon registration confirmation, log in at



<https://my.wrapcompliance.org/pages/default.aspx> to register a new facility or make a renewal for a renew or lapsed facility.

After logging in, click on 'My Dashboard' to access any existing WRAP facilities or to register a new facility (all documents available to the facilities can also be accessed on this page in the left navigation as well as the user's profile).

<p>For <b><u>NEW</u></b> Facilities:</p> <ul style="list-style-type: none"> <li>To begin the registration process, click "<a href="#">Login</a>" on WRAP's website <a href="http://www.wrapcompliance.org">www.wrapcompliance.org</a></li> <li>Click "<a href="#">Start Registration</a>" to create a Facility Account:</li> </ul>  <ul style="list-style-type: none"> <li>Fill out the detailed user registration form, including a password</li> </ul>	<p>For <b><u>RENEW or LAPSED</u></b> Facilities:</p> <ul style="list-style-type: none"> <li>Use the existing user account credential to <a href="#">Login</a> on WRAP's website <a href="http://www.wrapcompliance.org">www.wrapcompliance.org</a>, as the photo to the left shows</li> <li>Once logging in, click on "My Dashboard" on top of the page and then "<b>Renew existing certification</b>" for the designated facility</li> <li>Be sure to review facility's information, including current buyers, and update if needed</li> </ul> <p>Facilities are encouraged to start the recertification process <b>up to 90 days</b> prior to their current certification expiration to avoid any lapse between certification periods.</p> <p>The registration is valid for six (06) months starting from the date of the payment. Facilities must get audited and certified within this six month timeframe.</p>
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Once the form is complete, the user will be prompted to submit payment after choosing a monitoring firm.

Select 'Proceed to Checkout' from the 'My Cart' page

- Make sure the correct billing address is added at the top of the page
- The user can select their payment method (check, wire transfer, or credit card)

Note if the user is paying via check or wire transfer, **Facility Name and Invoice number** MUST be included on the payment to avoid delay in applying the payment to your facility's registration.

The six-month registration period will begin the day that WRAP applies the payment. The Pre-Audit Self-Assessment, auditing, and evaluation process is expected to be completed within the six-month registration period.

## 5.2 NAME OR LOCATION CHANGE

If a facility's name changes, it is the responsibility of the facility to notify WRAP's Compliance Administration Department by submitting a [Facility Name Change Form](#) along with relevant legal verification, such as a business license. An updated certificate will be issued and uploaded on the WRAP platform. The [Facility Name Change Form](#) can be completed online.

If the facility's address changes due to government re-zoning (or any other reason that does not relate to actual physical relocation), it is the responsibility of the facility to notify WRAP's Compliance Administration Department by submitting a [Facility Address Change Form](#). The facility can keep their WRAP ID and will be issued an updated certificate.

**If the facility moves to a new location, the existing WRAP ID cannot be used and will become obsolete. The Facility Name Change Form must be completed and submitted to WRAP to document the move.** The certificate associated with the previous address will automatically expire. The facility must register as a new facility, get a new WRAP ID, and go through the audit process to get a certificate for the new location. The facility can still use the same login credentials to register the new location by creating a new facility.

## 6. PREPARATION PRIOR TO AUDIT

The [Pre-Audit Self-Assessment \(PASA\)](#) is an optional guidance document a facility may find helpful in preparing for the WRAP Audit. This document can be downloaded from the [WRAP website](#). The PASA is available in three (3) languages: Chinese, English, and Spanish. Facilities that use the PASA as a preparatory tool may find it increases efficiency during the audit and reduces the number of observations and/or non-compliances to be corrected.

Whether or not facilities use the PASA process to prepare for their audit, they must understand WRAP's requirements and implement them in their operations. To do so, facility top management must commit to making sure they understand the 12 Principles by reading the [Worldwide Responsible Accredited Production Principles](#) and this Handbook. The management must also commit to adopting, implementing, and monitoring WRAP's requirements in their operations. If there are any questions regarding the [Principles](#), facility managers should email the WRAP [Compliance Administration Department](#). Facilities must also identify the qualified individual(s) responsible for audit preparation, which may include a mix of both management and employees. Management should prepare the required documents in advance and explain responsibilities and expectations of the WRAP Certification Program to the facility employees, subcontractors, and vendors.

### 6.1 UPLOADING THE PRE-AUDIT SELF-ASSESSMENT

The [PASA](#) is an effective tool that can help a facility prepare itself for the upcoming audit. It also provides critical information that helps the monitoring firm plan for the audit in the most efficient way possible. A facility should use the PASA to conduct internal monitoring and risk assessment twice a year and document the process, a requirement by WRAP. Should a facility choose to fill out the PASA, they must upload it to WRAP's platform and submit the document prior to the initial audit. See [Appendix 4](#) for illustrative screenshots of the process.

- If the document was not uploaded during the initial application process, click on the company name from the 'My Dashboard' page
- Under the 'Applications' tab, there is a column labelled 'Self-Assessment?'
- If the document failed to upload, the field will display a 'No'
- Click on 'No' and the upload screen will appear
- Once the file is selected, click 'Submit Document'
- PASAs with insufficient information will not be accepted by the auditor(s), which could delay the audit

## 6.2 INTERNAL MANAGEMENT SYSTEM

WRAP promotes a management systems approach to achieve compliance with the 12 WRAP Principles and encourages the integration of the WRAP Principles into a facility's existing management systems. WRAP's approach requires top management at facilities to **adopt** the [WRAP Principles](#) in writing, assign the necessary and competent staff to ensure the required practices are implemented throughout the facility, and **implement** internal risk assessment systems to **monitor** the facility's processes over time. This approach also demands that all departments within a facility communicate with each other regularly, address issues jointly, and report to top management routinely. This holistic approach to the 12 WRAP Principles can more easily and effectively make ongoing compliance audits move quicker and have fewer deficiencies to correct in future audits. Ultimately, it can demonstrate the facility as a safe, lawful, humane and ethical manufacturer.

Facilities must conduct an internal audit assessment at minimum twice a year to ensure maintenance of appropriate protocol; health and safety will require more frequent checking depending on what is being examined (for example, fire extinguishers should be checked at least monthly, while aisles should be checked for blockages on an ongoing daily basis).

It is also encouraged for facility management to explain the WRAP Principles to employees as written in the facility policy manual, highlighting how different parts of the facility's internal management system meet the WRAP Principles. Understanding how their role contributes to the maintenance of an ongoing compliant state of operations encourages workers to report deficiencies or maintenance needs to management well before they are reviewed at a monitoring visit and, in general, provides a complimentary backup to existing internal management protocol.

The facility's internal management system should be designed to provide the following information for management review:

- Practices and evidence related to each WRAP Principle and each question on the PASA form
- Accurate written manuals, bulletins, and procedures relating to the labor practices, facility conditions, environmental, customs compliance, and security covered by the WRAP Principles
- The internal procedures for supervising the practices related to the WRAP Principles, including the results of internal monitoring and corrective action reports

A facility's ongoing compliance with WRAP's 12 Principles and adoption of the Adopt, Implement, Monitor approach will help the facility identify and address human and labor rights issues if/when they arise, ultimately will reduce, prevent or eliminate harms to its workers. Such an approach, practically speaking, will also help resolve general operational safety matters and ensure smoother audits and fewer instances of noncompliance.

Demonstrating that a facility has adopted, implemented, and monitored all relevant practices will require documentation and actions beyond responding "Yes" to the questions in the PASA. The facility must provide objective evidence to show that all THREE – Adopt, Implement, and Monitor – have been achieved in relation to the required practices related to the WRAP Principles. The facility can opt to use the PASA as a tool to prepare themselves for the audit, and it includes questions where objective evidence will be necessary to prove a required practice is implemented. Below are several examples of compliance, which are supplied for illustration only.

## 6.3 ADOPT

### Elements to Consider:

- Has the facility's top management committed to the WRAP Principles and their required practices?
- Has the facility adopted practices that align with the WRAP Principles?

- Have competent individuals at the facility been assigned responsibility for communicating the practices that align with the WRAP Principles?

#### Examples of Evidence:

- **Written commitment signed by top management.** The facility President/Chief Executive Officer, Chief Operation Officer, and/or Chief Financial Officer signed a statement committing to the Adopt, Implement, Monitor approach to implement the policies and procedures required by WRAP in its operations. The statement should include the commitment to conducting adequate due diligence and risk assessment to help prevent, reduce, and eliminate harms to its workers.
- **Written policies and procedures, such as an operating policy manual.** As an example, the facility management staff obtains proof of age documentation from all potential workers prior to hiring and critically examines the documentation for authenticity; this is evidenced by photocopies of the documents kept in personnel files.
- **List the designated facility individuals who are responsible for communicating the practices that align with the WRAP Principles.** As an example, a job responsibility chart showing the facility human resources manager with responsibility for listed activities such as affirming the workers' understanding of the facility's anti-discrimination policies and procedures.
- **Program and materials to train relevant facility individuals on the practices related to the WRAP Principles,** when appropriate. An example is documenting a training session for all facility individuals taking part in the hiring process to explain the facility's policy prohibiting involuntary or forced labor.

## 6.4 IMPLEMENT

#### Elements to Consider:

- Are the practices relevant to the WRAP Principles being followed consistently?
- Has enough time elapsed (typically 45 days minimum) since the adoption of the practices to show consistent use?
- Is the practice communicated by the relevant individual and understood by the relevant facility workers?

#### Examples of Evidence:

- **Effective communication of the practice to workers.** An example could include posters prominently displayed in the facility in the language(s) understood by workers. Another example could be a poster of "Not Employing Child Labor".
- **Documenting requirements.** An example could include minimum wage rates, benefits policies, and additional overtime payment information in the employee manual and/or posted in worker accessible spaces. Another example could be a list of questions to ask job seekers, including age verification questions.
- **The facility follows a practice consistently.** For example, the facility's health and safety records go back 90 days with entries at appropriate intervals.
- **Relevant individuals demonstrate familiarity with the facility's anti-harassment and abuse prevention policies.**

## 6.5 MONITOR

#### Elements to Consider:

- Does your facility verify the effectiveness of the facility practices on an ongoing basis?
- Are noncompliances identified, analyzed, and investigated?
- Does the facility correct the noncompliances and document the correction on an ongoing basis?

**Examples of Evidence:**

- **The facility routinely reviews their practice related to the WRAP Principles.** For example, the facility periodically reviews age documentation records and hiring procedures to verify that age documentation is obtained from all potential workers and that all prospective employees are interviewed.
- **Documentation is maintained by the facility management, when appropriate.** As an example, the facility keeps comprehensive payroll records to support all employee compensation, including overtime calculations.
- **The facility provides workers a confidential mechanism to communicate violations of practices to management** such as payroll discrepancies, mental or physical abuse, or illegal transshipment activities; management then investigates the violation, resolves the issue, and documents the resolution. For example, the facility receives an anonymous phone call on the “worker complaint phone line” claiming that a production supervisor does not allow workers to talk to one another during breaks; evidence of monitoring includes management investigating the claim and documenting a meeting with the supervisor to explain the appropriate work practices that do not inhibit the workers’ right to free association.
- **The facility management corrects noncompliances and documents the corrections on an ongoing basis.** As an example, the facility management discovers during a review of the payroll records that the local minimum wage increase was implemented at the facility two weeks after the change took effect under the local law; evidence of monitoring the practice includes correcting the worker wage calculations going forward and reimbursing workers the wage underpayment.
- **The facility management imposes disciplinary action on the management and workers responsible for violations of the practice, when appropriate.** As an example, a production supervisor is found using corporal punishment (e.g., beating, hitting, slapping); evidence of monitoring the practice would include the facility management explaining why the behavior is wrong, taking any disciplinary action, and continuing to follow up to prevent future behavior.

## 7. WRAP REGISTRATION FEE AND PAYMENT

All facilities must complete a thorough application and provide details of the facility’s information. Such information includes the facility’s name, address, production peak season, and monitoring firm selection. Once the application is complete, a WRAP ID will be generated for [New](#) facilities. [Renew](#) and [Lapsed](#) facilities will continue to use their current WRAP ID. **Please use this number in ALL correspondence with WRAP.**

The registration fee amount is based on the number of workers. Below is the pricing structure for different groups. Based on the number of workers provided by facilities during the registration process, an invoice will be generated with one of the following fees.

New Pricing Structure		
Group	# of Workers	New Fees
Group 1	0 - 100	650 USD
Group 2	101 - 200	950 USD
Group 3	201 - 1,000	1350 USD
Group 4	1,001+	1550 USD

Payment to WRAP for the certification process does not include the fees charged for the audit itself or report writing by the monitoring firms themselves. Additional costs for the audit may be incurred if an interpreter is required to assist in the facilitation of the audit, including conducting interviews with workers.

## 7.1 INVOICING

The system will generate an invoice for the registration fee which can be found in the user's cart. If any updates to the name or address need to be made, contact the [Payment and Registration Department](#). If the facility does not receive a copy of the invoice, it can be obtained upon request to WRAP.

To pay the registration invoice, fees may be remit in one of the following ways:

- **Wire Transfer:** Details to submit a wire transfer are available on the invoice. The facility must include their WRAP ID, facility name, and invoice number as part of the payment instruction detail to avoid delay in applying the payment to the correct facility
- **Check:** Checks are payable to Worldwide Responsible Accredited Production (WRAP) and should include the WRAP ID, facility name, and invoice number on the body of the check
- **Credit Card:** Payment can be made through the system during the checkout process with any major credit cards. This payment method is the fastest way to move to the audit phase

For instructions on how to make a payment, please refer to [Appendix #4](#).

## 7.2 PAYMENT CONFIRMATION

Upon payment of the registration fee, WRAP will issue a Payment Confirmation which the facility will have to show the monitoring firm before the audit window can be scheduled.

WRAP will upload the document under the Facility Dashboard that can be accessed by logging in and going to the 'Documents' tab of your application. Without payment confirmation, monitoring firms cannot schedule an audit, nor can they see the facility under their view. WRAP reserves the right to disregard an audit if it is conducted before payment has been made and confirmed.

## 7.3 APPLYING REGISTRATION PAYMENT

To ensure WRAP applies a registration payment in a timely manner and for the correct facility, it is important to reference the facility's **WRAP ID, facility name, and invoice number** with the payment. Failure to include such information may prevent the payment from being applied in a timely manner, and it will delay the scheduling of the initial audit with the selected monitoring firm. If the facility is paying via check or wire transfer, the payment will take several days to reflect in the platform. Payment by credit card is processed the quickest and will reflect on the platform sooner.

Once the payment is applied, the monitoring firm will receive an automated audit request email from WRAP's platform. The firm will work with the facility and send the audit window. If the facility submitted payment, but has difficulty scheduling the initial audit, please email the [Payment and Registration Department](#) their payment receipt and request assistance.

Facilities have a period of six months to complete the audit and complete any corrections of non-compliances to receive certification. If the facility is not able to finish the audit process within the six-month payment validation period, the facility will have to pay the fee again.

## 7.4 REGISTRATION EXTENSIONS

If the facility does not pass the audit within six months from registration fee payment due to extenuating circumstances, the facility can request an extension. Facilities must contact the [Compliance Administration Department](#) if they wish to



request an extension. Requests for extensions must be made before the initial six-month period concludes and must include the reason for the request.

Registration extensions are granted on a case-by-case basis, and only one extension is granted per certification cycle with WRAP's approval.

## 7.5 MONITORING FIRM SELECTION AND AUDIT FEES

During the application process, facilities are asked to select a monitoring firm. The list of monitoring firms is available in a dropdown window for facilities to choose from. It can also be viewed on WRAP's [website](#). Once the registration payment has been applied by WRAP, a payment confirmation will be emailed to the facility and uploaded to WRAP's platform which the facility can access. At this time, the facility can contact their selected monitoring firm to schedule an audit. Monitoring firms will not schedule an audit without payment confirmation. Make sure to share the WRAP registration payment confirmation with the monitoring firm for a smoother audit booking process. Monitoring firms' audit fees are separate from the WRAP registration fee and the per audit-day rate varies from firm to firm.

Please contact the [Compliance Administration Department](#) if the facility cannot find a monitoring firm in their country or otherwise has trouble engaging a monitoring firm.

Though infrequent, occasionally an interpreter may be required to assist in the communication between auditors and management and/or workers. Should a translator be needed to facilitate the audit and worker interviews:

- WRAP prefers monitoring firms to engage an in-person translator(s) for the entirety of the audit
- Monitoring firms can use a virtual (video) translator from an independent professional translation service for the entirety of the audit
- All translations conducted during the audit must be in real-time
- Facility workers, employees, members of management, or the facility consultant cannot translate during the audit

A facility cannot change their monitoring firm after the initial audit has been completed. If the facility believes there is a significant and compelling reason to change monitoring firms, the facility should contact the Compliance Administration Department to have these circumstances reviewed. There may also be rare occasions when WRAP requests a facility switch monitoring firms.

## 8. THE AUDIT PROCESS

### 8.1 AUDIT WINDOW

Once the registration payment has been received and confirmed by WRAP, the selected monitoring firm will be notified, and they will be able to see the facility and the payment on WRAP's platform. The facility should share the payment confirmation with the monitoring firm, so the chosen monitoring firm can review the facility's information and issue an audit window of four weeks. Monitoring firms may only issue the window after facilities pay the audit fee. The management should be prepared to receive the audit team at any point during this four-week period. No further notice will be given to the facility about the exact audit dates. If the facility wishes to change the audit window, they should contact the monitoring firm. The new window must still fall within the six-month payment validation period.

Facilities must communicate with the monitoring firm if the facility will be closed at any point during the proposed four-week audit window due to holidays or rest days, so auditors do not show up during these days. Should there be issues related to political unrest or security concerns that could affect the safety of the auditor(s), facilities must inform the monitoring firm. In these cases, facilities can work with the firm to adjust the audit window.

Monitoring firms must strive to conduct the audit within the four-week window. If there is a delay caused by the monitoring firm in conducting the audit within the window period, the facility should contact WRAP's [Compliance Administration Department](#) for assistance.

## 8.2 FACILITIES THAT SHARE A LOCATION

If the facility shares a building with another business, the following information must be provided to the audit team prior to the audit, or at the minimum during the initial visit:

- The name of the business(es) that operate in each building
- Whether the facility and the other business(es) share workers, dormitories, and/or [business licenses](#)
- Facilities in Bangladesh must provide evidence that they conduct joint fire drills and risk assessments with the other business(es)

Auditors must disclose a facility's relationship with its sister or group companies in particular if multiple entities are operating on the same site.

## 8.3 FACILITIES WITH MULTIPLE PLANTS

WRAP makes a decision on a case-by-case basis regarding whether facilities with multiple plants should seek certification individually or as one entity. The following elements will be factored into the decision:

- Business license(s)
  - Multiple plants with separate business licenses will require independent registrations with WRAP
  - Facilities with multiple buildings functioning together as one manufacturing unit and have the same business license need a single registration for WRAP and will have all buildings inspected within the scope of the audit
- Separate payrolls
- Physical distance between buildings

A facility's WRAP certificate will include the exact physical address as stated on the business license and inspected in the audit scope, and will apply to only that facility, and not to any other facilities under the same ownership and/or in the same compound.

## 8.4 AUDIT TYPE/AUDIT TIMELINE

All facilities will begin their audit phase with an [initial audit](#) visit. If a facility is in full compliance when the initial audit is completed, then the monitoring firm can proceed with recommendation for certification and a recommendation report is written and submitted to WRAP.

If a facility is found to have noncompliances which are not corrected onsite before the audit's end, a follow-up audit is required. It will either be an [on-site follow-up audit](#) or a [desktop review](#). Depending on the number and nature of the noncompliances raised during the initial audit, an on-site follow-up audit may be required. Major noncompliances raised under Principles 5, 6, and/or 8 will typically require an onsite follow-up audit.

On-site visits cannot take place until 45 days after the facility completes the corrective action plan.



If the noncompliance is minor and does not require onsite verification, it can be closed by desktop review. Facilities are required to send relevant documents, pictures, or any other kind of record for review through email to the monitoring firm within 30 days of the initial audit. If the evidence is submitted 30 days after the initial audit, WRAP will not accept the desktop review. The facilities will have to have an onsite follow-up audit.

## 8.5 AUDIT-DAYS

The minimum number of audit-days needed is based on the number of workers at the facility. It is the facility management's responsibility to provide an accurate count of employees and management staff so that the correct number of audit-days can be scheduled at the facility. The monitoring firm may charge the facility for additional days if more time is needed due to the incorrect number of workers reported to the firm.

## 8.6 AUDIT SCOPE AND PROCESS

WRAP audit scope includes all components of a social compliance audit: opening meeting, facility health and safety tour, document reviews, workers and management interviews, and closing meeting.

WRAP audits are semi-announced with a 4-week window notice issued by monitoring firms to audited facilities prior to the audits. Shortly after auditor's arrival, the opening meeting will take place, marking the start of the audit. The auditors will explain to the facility's responsible person(s) the audit scope, the purpose and process of the visit, agenda for the day and time required, and the documents needed for review. The facility manager(s) and human resources personnel should be present during the opening meeting and be available to assist audits during the entire audit. During the opening meeting, auditors will emphasize to the facility WRAP's audit confidentiality, anti-bribery policy, and [Zero Tolerance Policy](#), in addition to other relevant policies.

The facility health and safety tour should take place right after the opening meeting. The main purpose of the tour is to verify company operations and inspect safety and welfare aspects against WRAP and local law requirements. On-site records will also be selected during the tour and cross-checked against documents provided by facility management and verify for accuracy and consistency.

The time required to conduct the facility tour will vary depending upon the size of the facility. The audit team will assess all areas of the facility and require access to all parts of the facility without exception, including facility-provided living accommodations (both onsite and offsite) to workers or management. Denial of access to any parts of the facility will be noted in the audit report and can potentially be a noncompliance.

The audit team will request consent from facility management to take photographs. The photos will be used to illustrate the facility's production processes, working conditions, and specific findings – particularly situations where the severity or context is better demonstrated visually (versus through record verification). The audit team will not photograph any sensitive information related to business or facility's clients, or workers' faces (faces shown in photos will be blacked out in audit reports). Facilities should inform auditors of sensitive information or areas.

Interviews with workers are fundamental to the success of any audit as they provide a better insight into their working and/or living conditions and wellbeing. To ensure workers speak without interference from the facility and foster confidentiality, individual and group interviews must be conducted in a private room without facility management present in or near the interview room. Auditors must speak a language understood by the worker or else have an independent third-party interpreter present to translate. The information gathered from interviews is kept confidential unless interviewed workers do not mind auditors sharing the information with management. The information will be cross-checked with visual observations, interviews with management, and document review.

During the record review process, auditors triangulate information gathered during the facility tour and interviews against written policies, procedures, various records (such as attendance and wage records), and documents provided by facility management to verify compliance and identify any inconsistencies or compliance issues.

Policies and procedures should be reviewed with facility personnel who manage the processes. It is the responsibility of facility management to produce all necessary records and documents to demonstrate their level of compliance, and auditors may take photocopies or photos of any documents that are relevant to compliance or noncompliance. Denial of access to these records or absence of them will be noted by auditors as noncompliances under the relevant Principle(s).

Information gathered from the facility tour and interviews should be verified against detailed record reviews. For example:

- Collective bargaining agreements and/or interactions between registered unions and management to determine impediments
- Records of grievances or grievance systems, including weekly reviews, in the facility, as well as the outcomes of any grievances reported and/or the appropriate actions taken by the facility

Facility management must produce all necessary records and documents to demonstrate compliance, including, but not limited to, the following:

- Wages and hours records
- Compensation and benefits records, including overtime pay and time off, if applicable
- Management systems
- Collective bargaining agreements and interactions between unions and/or worker committees and facility management
- Valid licenses, certificates and permits related to health, building, environment, business, and fire safety
- Complaints, grievances, and internal investigations
- Insurance policies, including social security payments and social insurance coverage
- Government correspondence, if relevant

## 8.7 CLASSIFICATION OF FINDINGS (NONCOMPLIANCES AND OBSERVATIONS)

All findings are categorized as either a noncompliance or an observation. This is determined by the auditor(s) in accordance with WRAP's guidelines listed in this section. WRAP reserves the right to revise our policy at any time which may include the conversion of issues currently designated as "observations" into "noncompliances," and vice versa.

### **Major noncompliances**

Systematic violations of local/national law or WRAP Principles, and/or any health and safety issues that might pose significant risk to workers' basic rights or wellbeing are classified as "major noncompliances".

- Failure of management systems, including excessive minor noncompliances that reveal underlying dysfunction  
Note: If there are several minor noncompliances against the same Principle, it may warrant a major noncompliance on internal monitoring (i.e. Q1.4a)
- Non-transparency
- Issues that require onsite verification, especially those that can only be fully validated with worker interviews or addressed through worker training
- Failure to address, within the projected completion date, noncompliances raised during the initial or follow-up audits in the current certification cycle

### **Minor noncompliances**

Occasional or isolated violations of local/national law or WRAP principles that do not seriously compromise workers' basic rights or wellbeing are classified as "minor noncompliances".

- Noncompliances that do not require onsite verification, worker interviews, or worker training
- Minor issues that do not affect many workers. For example, emergency evacuation drill photos that are missing date and time stamps, including the photos submitted by facilities for desktop review

### **Observations**

Issues that illustrate inconsistencies or issues of concern that do not expressly violate local/national law or WRAP Principles are classified as "observations." Observations must be listed on the CAP pages.

Examples of observations include:

- Issues that are not currently non-compliances but could potentially become non-compliances if timely actions are not taken
- Inward-opening emergency doors found to be secured open during working hours but that cannot be corrected to be outward-opening
- Rolling or sliding emergency doors found with a mechanism to keep them open during working hours
- Subcontracted security guards (this only applies to facilities in Bangladesh)
- Eligible temporary workers not being converted to permanent status (this only applies to facilities in Indonesia)

A common observation is excessive overtime/working hours (Principle 6: Hours of Work). Though it is not classified as a "noncompliance," facility management will create a plan to reduce the burden of excessive hours on workers using the [Working Hours Action Plan \(WHAP\)](#), which will be reviewed in subsequent certifications.

Note that conducting regular internal monitoring and risk assessments could help facilities identify and address noncompliances or observations in a timely manner and prevent accidents or harms to their employees.

## **8.8 WAGES AND WORKING HOURS RECORDS REVIEW**

[New or lapsed](#) facilities must have at least the preceding three months of consecutive wages and working hours records for review during the initial audit.

WRAP facilities renewing their certification must have the wages and working hours records for the past 12 months available. Auditors will select three non-consecutive months (current, peak and random) to review during the audit.

## **8.9 WORKER INTERVIEWS**

Worker interviews are part of the audit process. Interviews are to be conducted in a private area to foster confidentiality. Management cannot interfere with the interview process in any way and cannot choose who will take part in the interviews. Management must allow the auditor(s) to conduct group and/or individual interviews with the workers that the auditor(s) selected during the facility health and safety tour. If management indicates that certain workers auditors selected do not want to be interviewed, auditors will verify so with the workers. Such information will also be shared with WRAP.

Facility management interviews are part of the audit but will not be counted towards the total number of worker interviews required by WRAP audit protocols.

Onsite subcontracted workers (e.g., [canteen workers](#), security guards) must be selected and included as part of the interview process.

## 8.10 SAMPLE SIZE

WRAP requires a minimum sample size for record reviews and worker interviews. The sample size is determined by the number of workers listed in the application, by referring to the PASA (if provided), or by the auditor on the day of the audit. Whichever is greater is used for the interviews and record reviews.

If facilities are noted to have the incorrect number of workers during the audit, the auditor(s) may charge the facility for additional [audit-days](#) if the number of workers found onsite is greater than that reported by the facility.

## 8.11 WRAP POLICY ON CONSULTANTS

A facility may hire consultants to help them achieve full compliance with the WRAP Principles. If consultants are used, WRAP highly recommends that facility staff work effectively with and learn from consultants, which could result in long-term and sustainable improvements in the facility. **Consultants may be present during WRAP audits, but they cannot be the lead of the facility or represent it. A facility's consultant cannot be the facility's point-of-contact on their certification application on WRAP's platform.** Facility management or responsible person(s) **must** be the lead during the entire audit process. In addition, WRAP also requires auditor(s) to report the presence of consultants in the audit report.

## 8.12 AUDIT REPORTS

Auditor(s) will clearly inform the facility representative of the audit results during the Closing Meeting with the facility management at the end of the last audit-day. The auditors will explain the noncompliances. Facility management must provide the corrective actions to address them, the projected completion date, and the responsible person's name and title. All is recorded by the auditors in the Corrective Action Plan, which requires the signatures of the lead auditor and the facility management, to be included in the final audit report.

Facilities should expect that the monitoring firm will have completed and uploaded the final audit report within ten (10) business days after the last audit day. The final report can be accessed by facility management from the WRAP platform. If the report is not available on the platform within that time frame, the facility should reach out to the firm and inquire about the status of their report.

WRAP has adopted a new Digital Audit Report, which means that your facility's audit report may look different than it has in the past. Note that the new Digital Audit Report document is an authentic WRAP document. If you have any questions regarding the authenticity of your audit report, please contact WRAP's [Compliance Administration Department](#).

## 8.13 AFTER THE INITIAL AUDIT

After your initial audit, the next steps for your facility depend on whether any noncompliances were found during the audit.

If there were no noncompliances, then the facility's report will be submitted to WRAP for review and approval before certification. The certificate will be sent to the facility via email. Facilities will be able to access both their audit report and the certificate via the WRAP platform.

If there were noncompliances found, your chosen monitoring firm will need to schedule a follow-up audit that will take one of two forms:

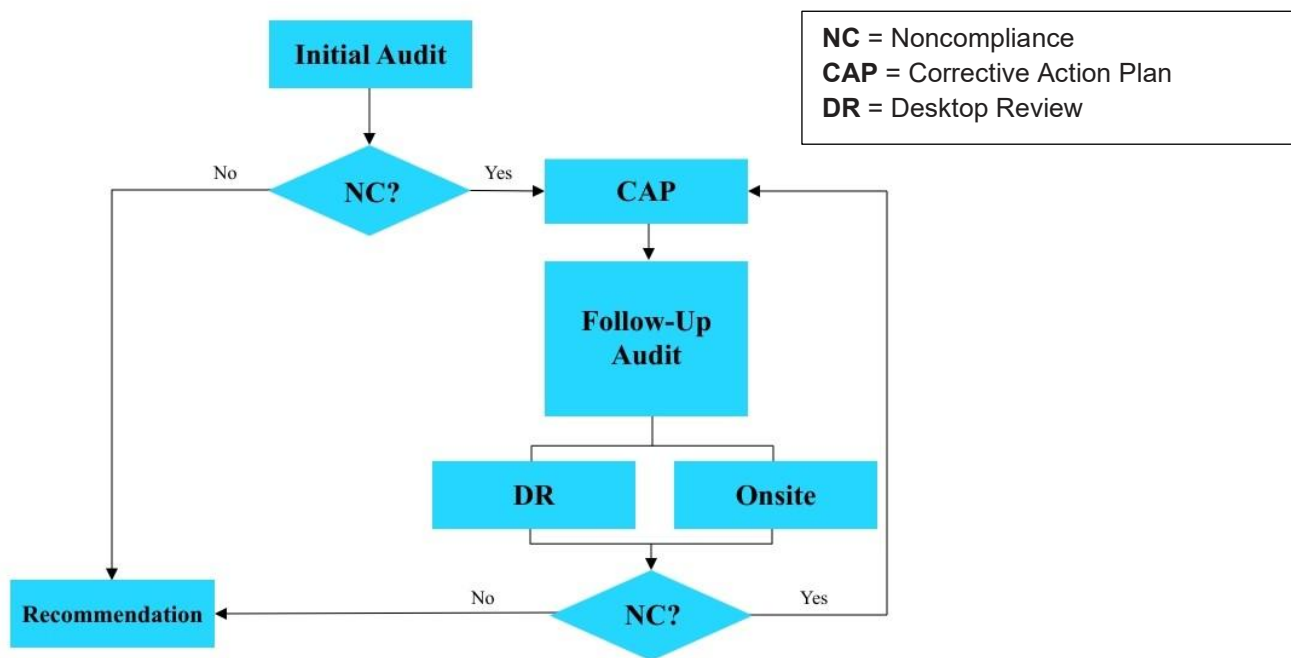
### Desktop Review

This is a remote review of a facility's evidence that confirms that minor noncompliances have been addressed by the facility. Noncompliances closed by a [desktop review](#) will be of note in subsequent audits to ensure appropriate procedures are in place and that the facility remains in compliance.

Desktop reviews must be conducted within **30** days of the initial audit. It is crucial that your facility submits all necessary documents to the monitoring firm who completes the review within the time frame. Otherwise, WRAP may not accept the desktop review which results in your facility needing an onsite follow-up audit to close the noncompliances.

### On-site Follow-Up

An [on-site follow-up](#) visit is required to resolve major noncompliances that were identified in the initial audit report. These visits will be scheduled 45 or more days after the initial audit occurred. A facility's buyer may also request an on-site follow-up to verify of closure of NCs.



## 8.14 AUDIT REPORT REVIEW BY WRAP

Once the monitoring firm submits the audit report to WRAP, it will be reviewed by WRAP staff.

If noncompliances were raised, a [Corrective Action Plan \(CAP\) report](#) will be submitted by the monitoring firm and a [follow-up audit](#) must take place. Once the auditor determines the noncompliances are closed, the facility can be recommended for certification. A recommendation report is submitted to WRAP and reviewed.

If an observation is raised for overtime hours worked above the legal limit under Principle 6: Hours of Work, a WHAP report must be completed by the facility and then submitted to the monitoring firm to review and assess. Once it is completed, it will be submitted to WRAP. It is reviewed together with the Recommendation Report.

A designated team at WRAP reviews WHAP reports.

## 8.15 WORKING HOUR ACTION PLAN (WHAP)

A facility must adhere to the following conditions if they work above the legally allowed overtime hours but want to get WRAP-certified:

- Be fully transparent about their working hours
- Ensure hours are all being worked voluntarily and in conditions that protect worker safety and health
- Compensate all workers fully in accordance with local laws and with WRAP Principle 5: Compensation and Benefits
- Show progress, from one audit to the next, towards meeting the working hour requirements of local laws

Working hours must be evaluated during the initial audit, follow-up audit, and [Post Certification Assessments \(PCAs\)](#). If a Working Hour Action Plan (WHAP) is needed and the facility meets the above criteria, the facility must fill out a WHAP and submit it to the auditors. Auditors must review the WHAP and fill out the “Auditor” portion correctly before submitting it to WRAP. All WHAPs must be submitted with the [Recommendation Report](#). Please refer to the WHAP 3.0 template in [Appendix #7](#).

### WHAP Completion Guidelines:

- **Use the full sample size** if excessive overtime is found during regular audits for all periods. PCAs will continue to use half the sample size
- If no WHAP was required from the initial or follow-up audit, but excessive overtime hours are found during the PCA, a WHAP must be generated. Excessive overtime hours found in PCAs should still be raised as an observation
- Excessive overtime hours found during the PCA that have not been resolved by the next initial audit, will require a new WHAP to be generated during that audit
- Auditors must provide comments under Section III: Question 20 in the WHAP

Facilities should note that even if their national/local law allows for excessive working hours, they should continue working towards their reduction target listed in their WHAP. If the reduction target is not met by the facility over multiple certification cycles, WRAP will consider the failure to meet it when determining the facility’s eligibility for certification.

## 8.16 EVALUATION BY INDEPENDENT REVIEW BOARD

After WRAP’s staff evaluation of the Recommendation Report, a final review is done by WRAP’s independent review board. Based upon the recommendation of the board, WRAP could approve, deny, or request more information on a report. If denied or more information is requested, WRAP will follow up with the monitoring firm and facility management as needed.

## 8.17 APPEALING AUDIT RESULTS

If a facility does not agree with the audit results, whether at the close of the audit or upon release of the report, and wishes to appeal any non-compliance raised, the facility must contact the [Compliance Administration Department](#). WRAP will review the request and provide feedback in a timely manner.

## 9. WRAP CERTIFICATION LEVELS

There are two levels of WRAP certification – Platinum and Gold. The certificate issued to a facility is determined by WRAP and depends on the extent to which the audit indicates full compliance and management commitment to the WRAP Principles.

The certificate issue date for all WRAP facilities is the date a facility is certified by WRAP staff. If your facility's current certificate is set to expire after the date of approval, WRAP will not push out the issue date to match the previous certification expiration date.

WRAP strongly encourages facilities to start the renewal process 90 days prior to their current certification expiration. This will allow time to correct the noncompliances, if any, and prevent any lapse between certification periods.

**WRAP strives to work with facilities if they are found to have noncompliances during their certification period. However, WRAP reserves the right to expire or suspend a facility's certificate if the facility is unwilling to go through the process and refuses to remediate the noncompliances.**

### 9.1 PLATINUM CERTIFICATE

The Platinum Certificate is valid for two years and is awarded to facilities that have demonstrated full compliance with WRAP's 12 Principles for 3 consecutive certification audits. Facilities must successfully pass every audit with no corrective actions and maintain continuous certification with no gaps between certification periods. Observations raised may affect the facility's eligibility for Platinum certification. Facilities that have noncompliance(s) closed through [desktop review](#) or have observations on excessive overtime hours are not eligible.

If a minor noncompliance is raised during the audit but is closed before the Closing Meeting, the facility will still be eligible for Platinum certification.

### 9.2 GOLD CERTIFICATE

The Gold Certificate is valid for one year, and most facilities that successfully complete their audit will receive this certification, demonstrating the facility's full compliance with [WRAP's 12 Principles](#).



9.3 CERTIFICATE OF COMPLIANCE SAMPLE



10. CERTIFIED FACILITIES MAP

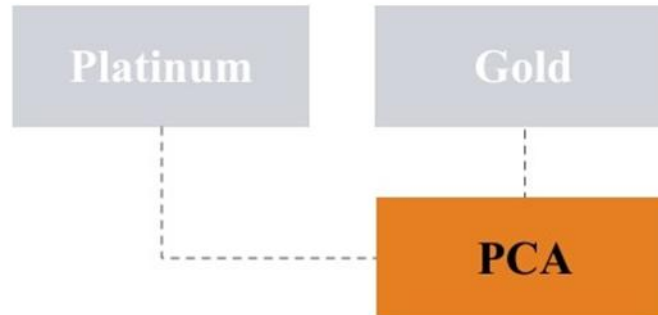
Certified facilities can be found on the [world map on WRAP's website](#) if “to be listed upon certification” was checked during the online application process. Users can search for a facility using its name or WRAP ID.

Facilities are added to the map as early as 48 hours after certification.

When a facility's certificate expires, it is removed from the map. If management cannot find their certified facility, they can log in to WRAP's platform and check “to be listed upon certification” or contact the [Compliance Administration Department](#).



## 11. POST CERTIFICATION ASSESSMENT (PCA)



All certified facilities are subject to a free, unannounced Post Certification Assessment (PCA) conducted by WRAP or a monitoring firm of WRAP's choice at some point during the certification period. Selection of the monitoring firm and date of the PCA is exclusively authorized by WRAP. The facilities selected for a PCA will not be notified ahead of time.

When your facility is selected for a PCA, WRAP's or the monitoring firm's auditor(s) will present an authorization letter upon arrival. Management must fully cooperate with the auditor(s), grant full access to the facility, and demonstrate full compliance with WRAP Principles. If access is denied (failure to allow full or partial access to any physical sections of the facility), WRAP will issue an [Alternative to Decertification \(ATD\) letter](#) to the facility requiring a facility-paid [follow-up audit](#) as part of the remediation process in order for the facility to maintain its certification.

If the PCA is carried out but noncompliances are noted, it demonstrates that the facility is not maintaining full compliance which violates the certification terms and conditions of the WRAP Certification Program. WRAP will issue an ATD letter to the facility requiring a facility-paid follow-up audit as part of the remediation process.

An ATD is a time-bound offer and requires a facility to accept it and have another audit conducted. The facilities must complete the process and demonstrate that they have corrected the noncompliances. These facilities which correct the noncompliances can keep their certification. Failure to accept the ATD, issued either due to denied access or due to outstanding noncompliances, could result in WRAP suspending the facility's certification for one (1) year and notifying buyers of the decertification.

WRAP strives to work with facilities that are found to have non-compliances during their certification period, particularly those with serious issues that put workers' wellbeing in jeopardy. Before decertification, WRAP will make multiple attempts to engage with such facilities. If a facility does not respond to the ATD offer emails within the allotted two weeks from ATD issuance, WRAP local teams will reach out to the facility, by email and by phone, to explain the consequences of not responding to the ATD offer. If communication attempts fail, or the facility declines the ATD offer, WRAP reserves the right to expire or suspend a facility's certificate.

If a facility still has outstanding noncompliances found during the PCA follow-up (ATD), WRAP may require the facility management to attend a relevant WRAP training course, apply for renewal registration, or decertify the facility.

## 12. TRANSPARENCY AND INTEGRITY

WRAP's Transparency and Integrity Statement intends to further promote the understanding of WRAP's policy in this regard. WRAP requires its accredited monitoring partners to share this statement when an audit window is issued, and facility management must review it to fully understand WRAP's policy. During the opening meeting, auditors must explain this statement and have a facility manager sign it ([shown in 12.4](#)).

### 12.1 WRAP'S POLICY ON WORKING HOURS

To promote further transparency, WRAP changed its certification criteria in January 2016 to allow facilities that meet certain conditions to qualify, even if they are not yet in full compliance with limits on working hours set in local laws. Those conditions are:

- Being fully transparent about their working hours
- Ensuring those hours are all being worked voluntarily, in conditions that protect workers' safety and health
- Compensating workers fully in accordance with local laws and [WRAP's Principle 5: Compensation and Benefits](#)
- Showing progress, from one audit to the next, toward meeting the working hour requirements in local law

### 12.2 ZERO TOLERANCE POLICY

Certain noncompliances are subject to WRAP's [Zero Tolerance Policy](#). They are typically deliberate and ongoing human rights violations, such as:

- [Child labor](#) (including slavery, forced labor, trafficking, serfdom, debt bondage, prostitution, pornography, work that involves children in illicit activity, or work that is likely to harm the child physically or morally)
- [Forced labor](#) (including bonded labor, not allowing workers to leave at their own will, and forced overtime)
- Inhumane treatment of workers (including threats of physical harm or extreme intimidation, corporal punishment, and mental or physical coercion)
- Unethical actions that encourage the auditor(s) to compromise their integrity
- Threatening physical harm towards the audit team
- False representation of a certificate or audit report (i.e., altered, forged, or fraudulent documents)
- False representation of production processes (including hiding full or partial production floors and/or operations from an auditor)

WRAP commits to working with facilities to remediate any Zero Tolerance issues. This requires full cooperation from the facilities. If a facility is unwilling to go through the remediation process or refuses to correct the noncompliance, WRAP reserves the right to expire or suspend a facility's certificate as the last resort.

### 12.3 MONITORING FIRM AND AUDITOR CONDUCT

While rare, there are several specific practices that are such a direct violation of audit protocols and the auditors' code of conduct that they transcend the normal channels of documentation, correction, and resolution. In such cases, WRAP's Zero-Tolerance Policy will be applied.

If WRAP learns that any of its monitoring firms or auditors have been or are involved in any of the below issues, WRAP will conduct a full investigation and demand full cooperation of all parties involved.

If an investigation culminates in a reasoned conclusion that a WRAP-accredited monitoring firm or an auditor has or is violating the Zero-Tolerance Policy, WRAP will require the monitor to investigate and offer them a chance to explain their findings. WRAP will review the investigation findings and discuss with the monitoring firm any necessary next steps, including sanctions (if warranted) and a corrective action plan with a dedicated timeline for completion.

Failure to fully cooperate with WRAP may result in the monitoring firm and/or auditor(s) losing credentials and no longer being allowed to conduct WRAP audits. There may be additional consequences to the monitoring firm based on the culpability of the mismanagement of the auditor(s). Individual auditors who have lost accreditation will not be approved to conduct WRAP audits in the future, even if they join another WRAP-accredited monitoring firm.

Further, WRAP will inform APSCA of unethical conduct from an APSCA auditor or an audit firm and WRAP's sanctions against the auditor or the firm.

Zero-tolerance issues for monitoring firm and auditors:

- Unethical actions that encourage facilities, consultants, other auditors, WRAP staff, etc. to compromise their integrity
- Solicitation or receipt of gifts, services, meals, money, or other items of value from persons involved with WRAP audits
- Threatening physical harm to facilities, other auditors, WRAP staff, etc.
- Flagrant oversight of production processes and sections of facility building(s) or an entire building(s)
- Flagrant misreporting of actual times in and out at the facility on audit reports and/or the number and names of auditors attending an audit
- Revealing audit date(s), whether explicitly or implicitly, to a facility, consultant, friend, or anyone who is not involved in the execution of the audit
- Flagrant oversight or misreporting of any zero-tolerance issues in facilities

## 12.4 MANAGEMENT REVIEW AND UNDERSTANDING OF WRAP POLICY

WRAP requires that auditors explain WRAP Transparency and Integrity Statement and have a facility manager sign below during the Opening Meeting of the audit.

WRAP Policy	Facility Management Review & Understanding of WRAP Policy	Facility Management Name & Title	Facility Management Signature & Date
Transparency – Working Hour action Plan	<input type="checkbox"/> Yes		
Zero Tolerance Policy – Facilities	<input type="checkbox"/> Yes		
Zero Tolerance Policy – Auditors/Monitoring Firms	<input type="checkbox"/> Yes		

Monitoring Firm		Lead Auditor Name	
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Lead Auditor Signature		Date	
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## 12.5 FILING COMPLAINTS WITH WRAP

If you would like to report any Zero Tolerance issues or have concerns about the actions of any personnel, WRAP staff, auditors, or facility management, you can email [complaints@wrapcompliance.org](mailto:complaints@wrapcompliance.org) or send your message on WRAP's website under [Contact](#).

## 12.6 WHAT IF THE FACILITY IS FOUND TO HAVE CHILD LABOR?

As indicated in the Zero Tolerance Policy section, the deliberate use of child labor is grounds for serious concerns and facilities could be decertified as a last resort if they do not cooperate fully with WRAP to remediate the issues. But if a facility, despite its best efforts, has employed someone they believed was of working age who was discovered to be a child, the facility is given a chance to address the issue immediately. Even if a facility employs underage workers, it must work with WRAP to remediate the situation.

First and foremost, the child must stop working in the facility immediately and must be paid all wages to which they are entitled. The facility is responsible for contacting a legal guardian and ensuring that the child is claimed by a legal guardian. If the legal guardian cannot present themselves at the facility to collect the child, the facility must permit the child to remain in the dormitory (if applicable) until the legal guardian can present themselves or provide staff to accompany the child back home at the facility's expense.

Steps to remediation:

- Issue wages to the child
- Contact a legal guardian to come and claim the child
- If the legal guardian cannot accompany the child home, the facility must provide staff to accompany the child
- The facility must pay all expenses incurred in sending the child home
- The facility MUST:
  - Review and update its hiring process and train the responsible person(s) to ensure children are not hired in the future
  - Conduct an internal monitoring of the process after new hires to check the effectiveness of the updated process

To verify if the remediation has been completed thoroughly, the facility must submit all relevant evidence (payroll, attendance, train ticket, legal guardian signature of receiving the child, etc.) to WRAP. An unannounced on-site verification will also be conducted.

## 13. CONSECUTIVE WORKING DAYS

Facilities cannot work more than six consecutive working days and the seventh (7<sup>th</sup>) day must be a rest day, except under [Urgent Business Needs \(UBN\)](#). More than six consecutive working days not under UBN must be raised as a noncompliance.

When there is a schedule rearrangement that results in more than six consecutive working days to allow an extra rest day(s) for a longer holiday, a noncompliance should not be raised. However, auditors must note the number of such occurrences in the audit report. In instances of UBN, the facility must provide, at a minimum, one day off after 13

consecutive working days. **If local law for the number of consecutive working days is stricter, facility must follow the local law.**

## 14. URGENT BUSINESS NEEDS

Urgent Business Needs (UBN) are defined as temporary conditions that the facility can demonstrate it has no control over the result of workers working more than what is legally allowed.

WRAP allows facilities to work up to 13 consecutive working days under UBN as long as the following conditions are met:

- Local law allows
- The 14<sup>th</sup> day must be a rest day
- Only one 13-consecutive day occurrence within a 30-day period

The auditor should check other periods to see if the facility worked excessive overtime hours, which would require a WHAP. If the facility is working within the legally allowed working hours, then a WHAP is not needed.

## 15. FACILITY-PROVIDED HOUSING

Facility-provided housing refers to dormitories and apartments provided as housing for workers or management. Housing provided to workers by the facility must be included in the audit scope regardless of its location. If dormitories/apartments provided for management are not on facility premises, they can be excluded from the audit scope.

For housing located on a facility's premises, WRAP requires that it NOT be in the same buildings as the production or warehouse. If they are, they must have separate entrances and meet the local fire and building codes. Rest areas for workers and contracted staff such as security guards or management must be checked during the audit but should not be categorized as dormitories, unless they are used for overnight stays.

## 16. CCTV RECORDS

WRAP's Principle 12: Security is benchmarked with U.S. Customs and Border Protection (CBP)'s [Customs Trade Partnership Against Terrorism \(CTPAT\)](#) "[Guidelines for Foreign Manufacturers Minimum Security Criteria \(MSC\)](#)," which include CCTV requirements. If CBP updates any part of their requirements, WRAP will update the Principle and this handbook accordingly.

The following are WRAP's CCTV requirements:

- CCTV should be in all sensitive areas, entrances and exits, packing areas, cargo handling and storage areas, and yards and storage areas for containers, trucks, and trailers
- A minimum of 30 consecutive days of CCTV records must be available for review during the audit
- CCTV must run 24/7, all production and nonproduction hours, nights, weekends, and holidays

WRAP does not have a requirement for the number of cameras facilities must install to fully collect CCTV records of sensitive areas.

**Non-exporting facilities or facilities located in the United States are not required to have CCTV records. The facility still must provide evidence to the auditor(s) of how the sensitive areas are secured.**

Noncompliances raised for insufficient CCTV records can be closed by a desktop review or an onsite follow-up audit. If CCTV footage of 25-29 consecutive days is available during the audit, a desktop review can close the noncompliance without seeking WRAP's approval. However, if noncompliances are raised for rest day work, then an on-site follow-up audit is required. Less than 25 consecutive days of CCTV footage will need approval from WRAP for a desktop review. Note that repeat offenders of lacking 30 consecutive days of CCTV records will require an onsite follow-up audit to close this noncompliance.

The following documents provided by CBP are resources for both facilities and auditors:

- [CTPAT Minimum Security Criteria — Foreign Manufacturers \(in English\)](#)
  - a. [MSC in other languages](#)
- [CTPAT's Five-Step Risk Assessment](#)

## 17. GRIEVANCE MECHANISMS

Facilities must demonstrate an established grievance system, such as a workers' committee or a union. It is not acceptable to only have a suggestion box.

Policies, procedures, and qualified responsible person(s) should be in place to address worker grievances. During the audit, the audit team must document in the Audit Report the person(s) responsible for addressing worker grievances, how the complaints are reviewed, how frequently they are reviewed, and how they are resolved, as applicable. WRAP requires facilities to review submitted grievances at least once a week.

A representative from the grievance committee can also be part of other committees in the facility, like a health and safety committee, but the existence of other committees does not replace a formal grievance mechanism.

## 18. EMERGENCY EXIT DOORS

Emergency exit doors must open outward for safe and rapid evacuation out of the building in case of an emergency. Inward-opening emergency exit doors are a major noncompliance. Auditors are required to report such issues to WRAP within 24 hours of the audit. Facilities must take all measures to ensure inward-opening emergency exits doors are changed to outward-opening. If inward opening emergency doors are corrected to outward-opening during the audit, auditors must still raise it as a noncompliance but can mark it as closed onsite.

If the inward-opening emergency exit door(s) cannot be changed without compromising the structural integrity of the building, facilities must keep the emergency exit door(s) secured open during working hours. In this case, it will be raised as an observation in the audit report. WRAP auditors are required to verify this during an audit. Doors that are not part of an emergency exit path do not have to be outward-opening or be secured open during business operation hours.

If local law allows emergency exit doors to be rolling/sliding doors, facilities must have a mechanism to keep them secured open during working hours; if a facility fails to do so, it will be raised as a noncompliance.

## 19. EMERGENCY EVACUATION DRILLS

Facilities must conduct emergency evacuation drills at least twice a year for each applicable shift, approximately six months apart (or more frequently, if required by local law) and have a planned date for the next emergency evacuation

drill. A noncompliance must be raised if emergency evacuation drills are not conducted at a minimum of once every six months.

- [New facilities](#) that have been operating for less than 12 months are required to show proof of **one** past emergency evacuation drill and evidence of **two** planned drills.
- New facilities that have been in operation for more than 12 months are required to show proof of the last **two** emergency evacuation drills and evidence of **one** planned future drill date.
- [Renewing](#) facilities that have been in operation for more than 12 months are required to show proof of the last **two** emergency evacuation drill records and evidence of **one** planned future drill date.

Facilities must provide documentation of the past two emergency evacuation drills during each audit. They must maintain proper documentation, including the photos with date and time stamps reflecting the date and time when the drills were conducted. Failing to include date and time stamps on evacuation drill photos will be considered a noncompliance.

WRAP recognizes that the time taken to fully evacuate workers to assembly points outside the facility will vary depending on the size of the workforce and the premises but suggests that the evacuation time for a typical facility should not be longer than four (4) minutes. If a facility fails to achieve the four-minute evacuation time, the audit team must note it in the report and provide the facility's explanation.

If in a shared building, a facility should strive to conduct joint evacuation drills with other tenants as a best practice. Such joint evacuation drills are not required by WRAP, unless local laws mandate so.

WRAP allows for a one-month grace period for conducting emergency evacuation drills. For example, if an emergency evacuation drill was conducted on November 15, 2024, the next drill must take place around May 15, 2025. With the one-month grace period, the facility would have until June 15, 2024, to conduct the emergency evacuation drill.

A noncompliance related to emergency evacuation drills can be closed via [desktop review](#) if the facility conducts a drill within 30 days of the initial audit and submits drill records, which must include photos with date and time stamps. Similarly, noncompliances for failing to include date and time stamps on evacuation drill photos can be resolved via desktop review upon submission.

## 20. LICENSES/PERMITS

Licenses and permits required by local or national laws must be current at the time of audit. Facilities should be in the habit of maintaining the validity of their licenses and renew them in a timely fashion.

The following are a few examples of required licenses/permits:

- [Business licenses](#)
- Building safety-related certificates
- Health and safety-related licenses/certificates/permits
- Environmental permits/licenses
- Canteen health licenses/permits, including license for food preparation and health license for canteen workers
- Machine operating licenses/certificates

For facilities **renewing** their WRAP certification, here are the guidelines to follow:

- All licenses/permits which have been expired for **six months or more** will be raised as noncompliance.
- All licenses/permits which have been expired for **less than six months** will be raised as an observation, based on the auditor's verification that the facility has applied for renewal **before** the audit was conducted.



- For facilities whose licenses/permits have been expired for over six months, but the delay is caused by the government, additional verification will be required by WRAP. The auditor will raise a noncompliance unless approved by WRAP. The facility must still have applied for renewal **before** the audit was conducted and provide evidence to the auditor.
- If the license/permit has expired and the facility has not yet applied for renewal **before** the audit, it will be raised as a noncompliance.

For facilities that are **new** to certification with WRAP, here are the guidelines to follow:

- All licenses and permits required by local or national government must be current.
- Not having the required licenses or permits will be raised as a noncompliance.
- New facilities will not be recommended for certification without all necessary valid licenses/permits.

## 21. CANTEEN

All facilities with an operating canteen must have the necessary licenses as required by law. Facilities that provide canteen services for workers should follow these guidelines at a minimum or as required by local law:

- Conduct a health check-up for canteen workers involved in the preparation and distribution of food
- Maintain a regular cleaning schedule
- Monitor pest control issues
- Maintain adequate health and safety arrangements

## 22. ENVIRONMENTAL BEST PRACTICES

WRAP requires facilities to comply with relevant environmental regulations and standards and encourages facilities to apply environmentally conscious practices to their operations. WRAP specifically mandates that facilities ensure proper waste management and that the environmental impact of their waste is monitored regularly. Other examples of environmentally conscious practices a facility could apply are identifying environmental performance indicators in terms of natural resources, such as reduction in consumption of power and water, and quantifying a reduction in pollution levels.

## 23. HEALTH AND SAFETY RISK ASSESSMENT

A risk assessment is a systematic and comprehensive overview of occupational health hazards and hazardous environments encountered in the industry. It is a methodical tool to ensure a safe and healthy working environment at the facility. WRAP requires all facilities to conduct and document health and safety (H&S) risk assessments for all areas of their facility, with the intention of eliminating or greatly reducing the risk of harm or loss of life in the facility.

The [Risk Management Guide](#) can be downloaded from WRAP's website. The following is a summary of the five steps covered in the Risk Management Guide when performing a risk assessment:

1. Identify the processes and their activities
2. Identify hazards and their risks
3. Identify the severity of the harm caused by a hazard
4. Determine risk rating and necessary controls to mitigate the hazard
5. Review the risk assessment tool periodically to make adjustments as necessary

Please see the [Risk Management Guide](#) for more details on performing a health and safety risk assessment.



## 24. COUNTRY-SPECIFIC ISSUES

For facilities to follow WRAP Principles, it is imperative that all relevant local employment, zoning, environmental and other applicable laws are always followed. There are also several country-specific conditions auditors will be including in their audits that are useful for facility management to be aware of. Questions regarding country-specific conditions can always be directed to WRAP's representative for the region at <https://wrapcompliance.org/en/contact-us/>.

### 24.1 BANGLADESH

In Bangladesh, auditors must verify whether the building(s) in which a given facility operates is(are) approved for industrial use. Facilities must provide full floor plans and all relevant licenses. Structural, fire, and electrical safety reports should be sent to WRAP for review.

Additionally, detailed engineering assessments (DEAs) should be conducted by an accredited engineering company approved by the Accord or Alliance, a legitimate engineering firm approved by the government, or by the Bangladesh University of Engineering and Technology (BUET).

#### **Boilers:**

Each facility must have a valid boiler operator license. The boiler must be located on the ground floor, separate from the production/office space. Should existing boilers be located on the upper level/production floor, the facility must provide a corrective action plan (CAP) to relocate the boiler within 3-6 months.

#### **Security guards:**

Local law requires security guards to be employed directly by facilities. Contracted security guards will be noted as an observation in the Audit Report due to the industry-wide practice. Contracted security firms must have a written agreement with working hours, wages, and benefits meeting the local law requirements. Facilities should take steps to convert subcontracted security guards to permanent workers.

#### **Rooftops:**

At least 25% of the rooftop must be vacant and not covered. Fully covered rooftops must be raised as a noncompliance.

#### **Canteen:**

Must be open during production hours. If not, the auditor(s) will note an observation.

#### **Basements:**

No production activities may occur in a basement. Basement production will be raised as a noncompliance.

#### **Shared buildings:**

Facilities that share a building with other business operations must conduct joint emergency evacuation drills.

### 24.2 CHINA

Facilities must cover 100% of workers for work-injury insurance. It can be the national social insurance, a commercial insurance, or a combination of both.

If a facility elects to expand or to add to its original structure, it must have a permit to do so. In addition, it must obtain a new fire safety completion certificate from the local authority. Without the certification, the facility must provide a third-party structural inspection report for the new structure as proof of structural safety. Instances of these expansions include, but are not limited to, adding an interlayer or a new floor.

### 24.3 JORDAN

Facilities must pay at least the same local minimum wages to foreign migrant workers as they do to Jordanian workers.

## 25. FREQUENTLY ASKED QUESTIONS

### How long does it take to get WRAP-certified?

It depends on the preparedness of the facility at the time of application. It can take as little as 6 weeks to get certified if the facility has an engaged and thorough internal management system that reviews and corrects noncompliances as a continuous practice, but if the facility is unprepared and the audit results in numerous findings of noncompliance, it can take anywhere from 2-6 months, or in rare cases even longer, to correct all noncompliances and receive WRAP certification.

### How much does it cost to get WRAP-certified?

New Pricing Structure		
Group	# of Workers	New Fees
Group 1	0 - 100	650 USD
Group 2	101 - 200	950 USD
Group 3	201 - 1,000	1350 USD
Group 4	1,001+	1550 USD

This is the registration fee and does not include the price of the audit which is set by the individual monitoring firms and paid directly to them by the facility seeking certification. The fees charged by monitoring firms will depend on the size of the facility and its location.

### Can I get a single WRAP certification for multiple facilities?

No. Each unit must undergo the process separately (See section on [Facilities with Multiple Plants](#)).

### How often are facilities audited?

There is no limit on how many times a facility can be audited, meaning that they can be inspected as many times as it takes for them to pass as long as they maintain a valid registration with WRAP. However, successive audits must generally be conducted at least 45 days apart. For certified facilities, the frequency of audits depends on the certification level. Gold facilities are inspected at least every year, and Platinum facilities are inspected at least once every two years. All certified facilities, regardless of certification level, are also subject to random, unannounced [Post-Certification Assessments \(PCAs\)](#) that can occur at any time and have no limit on how often they can be performed. PCAs are conducted at no cost to facilities unless noncompliances that require a [follow-up audit](#) are found.

### Are WRAP audits announced to the facilities?

No. All audits are unannounced. Certification audits take place within a four-week window while [Post-Certification Assessments \(PCAs\)](#) are conducted at random and can occur at any time.

## 26. GLOSSARY OF TERMS

**Adopt:** To make complying with the WRAP Principles a facility policy.

**Alternative to Decertification (ATD) Letter:** In an ATD letter, the facility agrees with the outcome of the PCA audit and will pay for the monitoring firm/WRAP to conduct an onsite follow-up audit.

**Audit-Days:** The number of days the auditor(s) will be at the facility to complete the audit multiplied by the number of auditors conducting the audit. For example, if two auditors conduct an initial audit at your facility that lasts two days, the total number of audit-days at the facility is 4.

**Business License:** A legal document from local government authorities that certifies a facility's permission to operate under their name and at their address.

**Canteen:** A facility's canteen is where food is prepared and served. It must have relevant canteen licenses required by WRAP and by local law.

**Corrective Action Plan (CAP) report:** An audit report submitted to WRAP by the auditor(s) if there were non-compliances found during the audit. A CAP report can be issued before a facility is certified or after a PCA.

**Customs Trade Partnership Against Terrorism (CTPAT):** A voluntary public-private sector partnership program which recognizes that the U.S. Customs and Border Protection (CBP) can provide the highest level of cargo security only through close cooperation with the principal stakeholders of the international supply chain such as importers, carriers, consolidators, licensed customs brokers, and manufacturers. The Security and Accountability for Every Port Act of 2006 provided a statutory framework for the CTPAT program and imposed strict program oversight requirements. [CTPAT: Customs Trade Partnership Against Terrorism | U.S. Customs and Border Protection \(cbp.gov\)](https://www.cbp.gov/ctpat)

**Desktop Review:** A follow-up to an initial audit in which the facility management can send the auditor(s) proof to close non-compliances without the auditor(s) revisiting the facility. This must take place within 30 days of the initial audit date.

**Follow-Up Audit:** Any audit in the current certification cycle that is conducted after an initial audit in which non-compliances were found. Multiple follow-up audits can occur within the six-month period the facility is given before payment expires.

**Implement:** To bring the WRAP Principles into effective action throughout the facility.

**Initial Audit:** In any given certification cycle, the first audit conducted at a facility after they have applied.

**Interim WHAP:** A follow-up conducted six months after the facility submitted a WHAP. WRAP contacts the facility to monitor their progress on reducing working hours according to the plan outlined in the WHAP.

**Lapsed Facility:** Facilities that have been WRAP-certified before but have not had any audit activities take place in the 12 months after their last certificate expired.

**Monitor:** To keep all required practices under periodic, systematic review.

**New Facility:** Facilities going through the certification process for the first time, or that have previously been certified by WRAP but have since moved to a new address/location.

**Objective Evidence:** Proof a facility presents to a monitoring firm to close non-compliances and reasonably assure that the non-compliance will not be raised again. Can be submitted for desktop review as a photo with a date and time stamp or a document. Can be visually assessed by the auditor(s) during an onsite follow-up audit.

**On-site Follow-Up Audit:** A follow-up to an initial audit that requires the auditor(s) to revisit the facility to assess evidence to close the non-compliances raised in the facility's CAP report. It may not occur sooner than 45 days after the initial audit date.

**Post Certification Assessment (PCA):** An unannounced audit that occurs after a facility is certified, led either by WRAP staff or the facility's auditor(s) during the certification cycle.

**Pre-Audit Self-Assessment (PASA):** The Pre-Audit Self-Assessment is a document WRAP makes available to all facilities to complete before their initial audit is conducted. It is used to show that facilities have been implementing

socially compliant practices for a continuous period of time. New facilities are required to demonstrate at least three consecutive months. Renew facilities are expected to have been compliant throughout their preceding certification period.

**Recommendation Report:** An audit report submitted to WRAP by the auditor(s) if there were no non-compliances found during the audit. A recommendation report will be issued before a facility is certified.

**Renew Facility:** Facilities that have previously been certified or audited in the last 12 months. Their current certificates may still be valid while in the process of being audited.

**Urgent Business Needs (UBN):** A temporary situation the facility cannot control (e.g., strike, power outage, flood) that requires workers to work more than six consecutive days to meet production deadlines, not to exceed 13 consecutive days.

**Working Hour Action Plan (WHAP):** A WHAP is a roadmap document that outlines an actionable, verifiable plan for a production facility to gradually come into compliance with their country's local working hour laws.

**Young Worker:** A worker who is between the legal minimum age, not lower than 15, and under the age of 18 years old.

## APPENDIX 1: WRAP CONTACT INFORMATION

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## APPENDIX 2: WRAP'S 12 PRINCIPLES

WRAP's 12 Principles are based on generally accepted international workplace standards, local laws, and workplace regulations, and include the spirit or language of relevant conventions of the International Labor Organization (ILO), the United Nations Guiding Principles on Business and Human Rights, and the Organization for Economic Cooperation and Development (OECD)'s Guidelines for Multinational Enterprises. The principles encompass human resources management, health and safety, environmental practices, and legal compliance including import/export and customs compliance and security standards.

The principles are meant to promote responsible business practices and sustainability in supply chain management and contribute to the advancement of the United Nations Sustainable Development Goals (SDGs), in particular SDG 8 (Decent Work and Economic Growth) and SDG 12 (Responsible Consumption and Production).

The WRAP Certification Program's objective is to independently monitor and certify compliance with these standards, to ensure that sewn products are being produced under safe, lawful, humane, and ethical conditions. Participating facilities voluntarily commit to ensuring that their manufacturing practices will meet these standards, and further commit to passing along, on their part, the expectation that their contractors and suppliers likewise comply with these standards.

### 1. Compliance with Laws and Workplace Regulations

Facilities will comply with laws and regulations in all locations where they conduct business.

All facilities will comply with the legal requirements and standards of their industry under the local and national laws of the jurisdictions in which the facilities are doing business, along with any applicable international laws. This will cover all labor and employment laws of those jurisdictions, as well as laws governing the conduct of business in general, including rules and standards of ethics dealing with corruption and transparency, and any relevant environmental laws.

### 2. Prohibition of Forced Labor

Facilities will not use involuntary, forced, or trafficked labor.

Facilities will maintain employment strictly on a voluntary basis. Facilities will not use any forced, prison, indentured, bonded, or trafficked labor. This will include ensuring that any workers they hire will be under labor contracts that fully comply with all relevant legal requirements and do not impose any form of coercion (including imposing substantial fines or loss of residency papers by workers leaving employment or restricting a worker's ability to voluntarily end his/her employment). In addition, workers should not be employed subject to any financial or collateral guarantee or debt security; any recruitment fees involved should be borne by facilities, not workers. Further, facilities will ensure that the workers' travel documents are not withheld, and that all written contracts are in a language understood by the workers.

### 3. Prohibition of Child Labor

Facilities will not hire any employee under the age of 15 (14 in less-developed countries) or under the minimum age established by law for employment, whichever is greater, or any employee whose employment would interfere with compulsory schooling.

Facilities will ensure they do not engage in any form of child labor, including, but not limited to, the internationally recognized worst forms of child labor.

### 4. Prohibition of Harassment and Abuse

Facilities will provide a work environment free of supervisory or co-worker harassment and abuse, and free of corporal punishment in any form. Facilities will ensure a workplace that is respectful of a worker's rights and dignity. This includes ensuring that no corporal punishment or physical coercion be used. Facilities will not engage in or tolerate – either at the workplace or in residential quarters provided by facilities or labor brokers acting on their behalf – any sexual harassment or abuse, indecent or threatening gestures, abusive tone or language or any other kind of undesired physical or verbal

contact, such as bullying. In particular, facilities will ensure proper training at all levels - including management, supervisors and workers - to secure a workplace free of harassment and abuse.

## **5. Compensation and Benefits**

Facilities will pay at least the minimum total compensation required by local law, including all mandated wages, allowances, and benefits.

Facilities will ensure proper compensation for their employees for all the work done, by providing in a timely manner all the wages and benefits that are in compliance with the local and national laws of the jurisdiction in which they are located. This will include any premiums for overtime work or work done during holidays, as well as any other allowances or benefits, including any mandatory social insurance, required by local law.

## **6. Hours of Work**

Hours worked each day, and days worked each week and each month, should not exceed the limitations of the country's law. Facilities will provide at least one day off in every seven-day period, except as required to meet urgent business needs.

Facilities are required by local law to adhere to any limits set on regular working hours as well as any limits set on overtime work. Long term participation in the WRAP Certification Program is contingent upon meeting the limitations set by local law. WRAP recognizes that this can be a particularly challenging requirement, especially when considering local enforcement norms and customs. In light of this reality, WRAP will permit full compliance with local laws on working hours to be achieved incrementally, provided that a given facility meets the following conditions: is fully transparent about its working hours; ensures that those hours are all being worked voluntarily, in conditions that protect worker safety and health; compensates all employees in keeping with WRAP Principle 5; and shows improvement toward meeting the working hours' requirements from one audit to the next.

## **7. Prohibition of Discrimination**

Facilities will employ, pay, promote, and terminate workers on the basis of their ability to do the job, rather than on the basis of personal characteristics or beliefs.

Facilities will ensure that all terms and conditions of employment are based on an individual's ability to do the job, and not on the basis of any personal characteristics or beliefs. Facilities will ensure that any employment decision - involving hiring, firing, assigning work, paying, or promoting - is made without discriminating against the employees on the basis of race, color, national origin, gender, age, sexual orientation, religion, disability, or other similar factors (pregnancy, political opinion or affiliation, social status, etc.).

## **8. Health and Safety**

Facilities will provide a safe and healthy work environment. Where residential housing is provided for workers, either directly by facilities or through labor brokers, facilities will ensure it is safe and healthy housing.

Facilities will provide a safe, clean, healthy, and productive workplace for their employees. Facilities shall prioritize worker health and safety above all else, and proactively address any safety issues that could arise. This will include a wide variety of requirements, such as, ensuring, among other things, the availability of clean drinking water (at no charge to workers), adequate medical resources, fire exits and safety equipment, well-lighted and comfortable workstations, clean restrooms. Further, facilities shall adequately train all their workers on how to perform their jobs safely.

## **9. Freedom of Association and Collective Bargaining**

Facilities will recognize and respect the right of employees to exercise their lawful rights of free association and collective bargaining.

Facilities will respect the freedom of each employee to choose for him- or her-self whether or not to join a workers' association. Facilities cannot discriminate against workers based on whether or not they choose to associate. Both the

facility and the workers shall ensure they conduct themselves in accordance with all relevant laws in this regard. Facilities will ensure an effective mechanism is in place to address any workplace grievances.

## **10. Environment**

Facilities will comply with environmental rules, regulations, and standards applicable to their operations, and will observe environmentally conscious practices in all locations where they operate.

Facilities will ensure compliance with all applicable legally mandated environmental standards and should demonstrate a commitment to protecting the environment by actively monitoring their environmental practices. Facilities will ensure proper waste management, including monitoring the disposal of any waste material - whether solid, liquid, or gaseous - to ensure such disposal is done safely and, in a manner, consistent with all relevant laws. Facilities are encouraged to minimize their impact on the environment by applying the principles of reduce, reuse, and recycle throughout their operations.

## **11. Customs Compliance**

Facilities will comply with applicable customs laws, and in particular, will establish and maintain programs to comply with customs laws regarding illegal transshipment of finished products.

Facilities will ensure that all merchandise is accurately marked or labeled in compliance with all applicable laws. In addition, facilities will keep records for all materials and orders, as well as maintain detailed production records.

## **12. Security**

Facilities will maintain appropriate procedures to ensure proper corporate security, transportation security, and people and physical security at the facility.

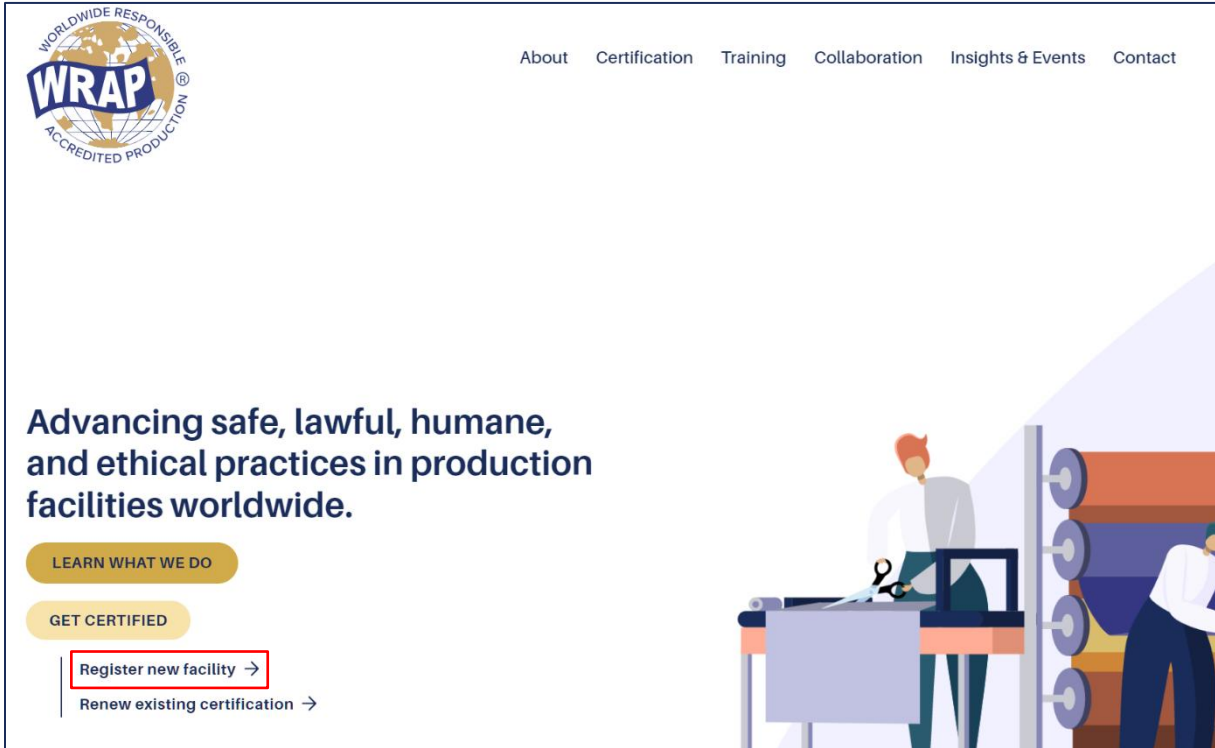
Facilities will ensure adequate controls are in place to safeguard against introduction of any non-manifested cargo. In this regard, WRAP recognizes the United States Customs and Border Protection (CBP)'s CTPAT Guidelines for Foreign Manufacturers as minimum requirements and has adopted those guidelines under this principle.



## APPENDIX 3: FACILITY REGISTRATION INSTRUCTIONS

*These instructions are to be followed only if you do not have a WRAP facility account. If you already have one, please follow the renewal instructions.*

From the website [wrapcompliance.org](https://wrapcompliance.org), click **Get Certified** button and click **Register new facility** to start the registration process



Fill out the information then create a facility account

### Create A User Account

- If you already have a user account with WRAP, please login [here](#).
- If you do not have a user account with WRAP, please create one using this form. Once your account has been created, you can use the platform to inform your compliance program and stay abreast of your facility's WRAP certification status. This includes being able to:
  - Register a new facility with WRAP
  - Renew an existing certification (within 90-days of your certificate's expiration date)
  - View your certification status
  - View your audit report
  - Manage billing and payments
- If your company already has an account, but your representative or contact information has changed, you can use this form to create a new user account. After entering your updated contact information, please reach out to [info@wrapcompliance.org](mailto:info@wrapcompliance.org) using your new email address to alert us of this change and we will grant you access to your company's dashboard. Feel free to reach out with any other questions using the [general inquiries form on our website](#).

Email Address \*

Please enter a valid email address

Password \*

Please create a password with a combination of characters and numbers

Confirm Password \*

Please confirm your password

First Name \*

Last Name \*

Business Phone

Company \*

Job Title


City \*

Country \*

[See All](#)

**CREATE FACILITY ACCOUNT**

After creating an account, the menu at the top right-hand side will appear, click on **Dashboard**.



MY DASHBOARD | SEARCH MY FACILITIES | MY PROFILE | LOGOUT

**Dashboard** Documents Training Orders Invoices Cart

You will see the welcome message below along a yellow button saying '**Register New Facility**', click it.

Welcome to your Dashboard!

Use this platform to inform your compliance program and stay abreast of your facility's WRAP certification status. Scroll down to view your registered facilities.

If you would like to certify multiple production units, please note that you must register and submit a separate application for each individual facility. To register a new facility, please click [here](#) or use the "Register new facility" button below.

WRAP-certified facilities may apply to renew their existing certifications within 90 days of their current certificate's expiration date. If you would like to renew your facility's certification, please select the "Renew existing certification" button below.

My Facilities

**Register New Facility**

This will open the application questionnaire, fill out all the required fields.

## WRAP Application

"\*" indicates required fields

**Email \***

**Phone \***

**Your Name \***

First  Last

**Company Name \***

Please enter the full name of your company here, in English only

**Name in Local Language**

If you have a name in the local language of your country, you may enter it here.

**Address \***

Street Address

Address Line 2

City  State / Province

ZIP / Postal Code  Country ▼

**Has this new facility ever been WRAP Certified?**

— Select — ▼

Upon completing all questions, click proceed to checkout button at the bottom of the page.

**PROCEED TO CHECKOUT**

You will be redirected to the checkout page where you will be asked for billing information.

Fill out the information and if a **service contract** is required for wire transfers in your country, make sure you fill out the **bank name** and **tax code**, these will be added to the service contract once you complete your order.

If the company name on the application is different than the company name on your billing information, please note the facility name you are paying for under **notes**. This helps WRAP identify your payment faster.

☐ Have a coupon? [Click here to enter your code](#)

### Billing details

First name \*

John

Last name \*

Smith

Company name \*

Worldwide Responsible Accredited Production

Country / Region \*

United States (US)

Street address \*

4201 Wilson Blvd

335

Town / City \*

Arlington

State \*

ZIP Code \*

22203

Phone (optional)

+1-703-945-1086

Email address \*

nbdriouich@wrapcompliance.org

☐ Create an account?

### 其他信息

Order notes (optional)

(Facility name as typed on the application)  
WRAP ID (if available)

### Additional Information

Bank Name (optional)

HSBC

Tax Code (optional)

0000000000

### Your order

Product	Subtotal
Application Group 1 at \$650 × 1	\$650.00
Subtotal	\$650.00
Tax	\$0.00
Total	\$650.00

☒ Direct bank transfer

After you print your invoice and place your order, please use the Order Number and your company name as the payment reference. WRAP will not be able to identify your payment if you do not use the Order Number as your reference. If you have any questions please email us at [info@wrapcompliance.org](mailto:info@wrapcompliance.org)

☐ Popular payment methods

☐ Alipay

PLACE ORDER

Once you choose the payment method, click **PLACE ORDER**

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# Order received

Thank you. Your order has been received.

DOWNLOAD CONTRACT

ORDER NUMBER:  
2335864

DATE:  
August 20, 2024

EMAIL:  
[redacted]

TOTAL:  
\$650.00

PAYMENT METHOD:  
Direct bank transfer

## Our bank details

Worldwide Responsible Accredited Production:

BANK:  
HSBC Bank USA

ACCOUNT NUMBER:  
263007928

ROUTING NUMBER:  
021001088

BIC:  
MRMDUS33RTL

## 订单详情

Product	Total
<a href="#">Application Group 1 at \$650 × 1</a>	\$650.00
Subtotal:	\$650.00
Tax:	\$0.00
Payment method:	Direct bank transfer
Total:	\$650.00
Note:	(Facility name as typed on the application) WRAP ID (if available)

PRINT INVOICE


DOWNLOAD INVOICE

## 账单地址

John Smith  
Worldwide Responsible Accredited Production  
4201 Wilson Blvd  
335  
Arlington, VA 22203  
📞 +1-703-945-1086

Once the order has been placed, you will be able to download your **invoice** and **service contract**. Make note of your **order number**, in case you are wiring your WRAP Application fees, be sure to include this **order number** on your bank transfer reference.

If you choose to make payment afterwards with a credit/debit card or Alipay, [login to your WRAP account](#), click [orders](#)



MY DASHBOARD | SEARCH MY FACILITIES | MY PROFILE | LOGOUT

Dashboard Documents Training Orders Invoices Cart

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then click **Pay** next to your order:

# Orders

<div>DashboardOrdersLog out</div>						
Order	Date	Order Status	Total	Service Contract	Client Name	Actions
<a href="#">#2335864</a>	August 20, 2024	Pending payment	\$650.00 for 1 Item	DOWNLOAD CONTRACT	John Smith	<div>PAYVIEWCANCELPRINT INVOICE</div>

If you are unable to see the **Pay** button under your order, it is likely because the order was **cancelled** or **on hold**. Check the order status and contact WRAP team to unlock your order.

## APPENDIX 4: HOW TO PAY BY CREDIT CARD

**Step 1:** Login [here](#)

Once you login to your WRAP account, click on '[Orders](#)'



## Step 2:

Click **'Single Sign On'**

## Login



### Step 3:

Click **Orders**

## My account



From your account dashboard you can view your [recent orders](#).

### Step 4:

<div> <div>Dashboard</div> <div>Orders</div> <div>Log out</div> </div>						
Order	Date	Order Status	Total	Service Contract	Client Name	Actions
<a href="#">#2336303</a>	September 21, 2024	Pending payment	\$1,350.00 for 1 item	<div>DOWNLOAD CONTRACT</div>		<div> <div>PAY</div> <div>VIEW</div> <div>CANCEL</div> <div>PRINT INVOICE</div> </div>

**Step 5:** Choose a payment method and enter your card information.

**Note: If you do not see your order under the '[Orders](#)' tab, please contact WRAP to link the order to your account!**

## APPENDIX 5: UPLOADING THE PASA

If the document was not uploaded during the initial application process, click on the company name from the 'My Dashboard' page.

My Open Invoices  
My Paid Orders

FACILITY).

**(2) Existing Facility - Renew Application**  
If you have already registered a Facility (its name appears in your list below) and want to submit an Application for Certification, please begin by selecting your existing Facility from the list below and then click **Apply for Certification** under the Application Tab on the Facility's Dashboard page.

A Facility will only be available to RENEW their certification - - 90 days prior to the current Certification End Date.

*If your Facility already has an application in process, you cannot submit a new Application until after it has been Certified.*

**My Facilities**  
[Register New Facility](#)

Company	WRAP ID	Certification Status	Expiration
Company A	12345		

Page 1 of 1 20 View 1 - 1 of 1

Under the 'Applications' tab, there is a column labelled 'Self-Assmnt?'. If the document was not successfully uploaded, the field will display a 'No.' Click on 'No' and the upload screen will appear.

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**Facility Summary**

Facility Name: [Redacted]  
WRAPID: [Redacted]  
Parent Company: [Redacted]  
Full Address: [Redacted]  
Contact: [Redacted]  
Business Phone: [Redacted]  
Email Address: [Redacted]  
Website: [Redacted]

**Certification Information**

Status:  
Type:  
Issued:  
Expires:

[EDIT](#)


**Applications** Non-Compliances Contacts Addresses Notes Orders

Type	Status	Appl Date	Paymnt Exp Date	Appl Exp Date	Monitoring Firm	Cert Exp Date	Self-Assmnt?
<a href="#">New</a>	Auditing	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	No

Page 1 of 1 20 View 1 - 1 of 1



Once the file is selected, click 'Submit Document'



## UPLOAD SELF-ASSESSMENT

Documents for Audits

My Info

My Profile

My Training

Orders

My Cart

My Open Invoices

My Paid Orders

*You may upload your Self-Assessment from this form. If you are ready to submit, select Yes for "Is Self-Assessment Complete?". You will then be allowed to Upload Attachment. Once you've attached your document, click the Submit Document button below. You will be returned to your Facility Dashboard.*

Document Type SELF-ASSESSMENT

**Self-Assessment Complete \*** Yes

Self-Assessment Complete?

Upload Attachments

**SUBMIT DOCUMENT** **CANCEL**

## APPENDIX 6: WRAP'S NAME-ADDRESS CHANGE FORM

The Facility Name Change Form is now an online form. It is housed on WRAP's website:  
<https://wrapcompliance.org/en/certification/wrap-facility-name-change-form/>.

### WRAP Facility Name Change Form

Any facility whose name has changed in the past year must submit this form to WRAP's compliance team in order to renew their certification. A valid business license reflecting the new address must be provided, as well. Once approved, the facility will be issued a new certificate.



#### Current Information

Facility name (on current certificate)		
WRAP ID		
Is your facility currently certified?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Address	Street:	
	City:	State/Province:
	Zip/Postal Code:	Country:
Contact information	Name:	
	Title:	Phone:
	Email:	

#### New Information

Facility's new name	
---------------------	--

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

## APPENDIX 7: GUIDELINES TO COMPLETE A WHAP

### [WHAP 3.0 Guidelines on WRAP's Website](#)

#### **Guidelines to Working Hours Action Plan 3.0 (Effective date July 20, 2020)**

**Working Hours Action Plan (WHAP)** is a tool to help facilities that experience challenges with excessive working hours define an action plan to systematically reduce overtime hours. The overall goal is to work towards attaining full compliance with the local laws.

**The Guidelines** to WHAP 3.0 help facilities fill out Sections I & II and auditors assess them and provide comments in Section III. Compared with WHAP 2.0, WHAP 3.0 no longer requires having **average** weekly hours as a target. Instead, facilities set a target for the observation raised. If there is more than one observation, the facility has the freedom to choose whichever one as the target.

#### General Guidelines

1. All WHAPs shall be submitted in **WORD** format. Auditors upload the WHAP to WRAP's Certification Management Platform when submitting a Recommendation Report.
2. All numbers reported in WHAP shall be either a whole number or rounded up to the **FIRST decimal point**, e.g., 13.5.
3. If a facility has more than ONE observation in Section I, the facility **ONLY** needs to choose **ONE** to set a reduction target to achieve over the next 12 months.
4. When setting a new reduction target(s) in **Column e** of **Section I**:
  - a. For a new/lapsed facility, the target must show improvement from the current hours;
  - b. For a renew facility, if it has reached its last year's target, its new target must be lower than its current hours. If the facility has not achieved its target, they must demonstrate that they have taken the improvement actions proposed in last WHAP. Their new target must show improvement from the current hours.
5. The reduction target(s) should be realistic and achievable. This is the target facility must aim to reach by next certification cycle, so the target **should** be reasonable.

NOTE: When proposing improvement actions, the facility should be very careful not to make any discriminating statements, such as "hire more male employees", "will not hire employees over 50 years old", etc.

6. **Auditors** must review Sections I to II and provide assessment in Section III. Refer to those sections for the detailed instructions on how to assess a WHAP.

Note that WRAP assesses WHAPs based on many factors, e.g. whether a target is realistic, whether the improvement plans are detailed and specific, whether the facility achieves the target set the previous year (if not, is it by a big margin), etc.

**Instructions to Fill out and Assess WHAP 3.0**

<b>1. Facility name:</b>			
<b>2. Facility WRAP ID #:</b>		<b>3. Country:</b>	
<b>4. Facility type:</b>	<input type="checkbox"/> New certification A facility applies for WRAP certification for the first time.	<input type="checkbox"/> Renew A returning facility that is/was certified within the past 12 months.	<input type="checkbox"/> Lapsed Certificate expired for more than 12 months and no audit activities took place during the period.
<b>5. Latest onsite audit date(s):</b> e.g.: June 1 - 2, 2020	The most recent WRAP onsite audit date.	<b>6. WHAP from prior certification:</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No If your facility has submitted a WHAP before, check Yes. Otherwise, check No.

**Section I. Working Hours, Observations Noted, and Reduction Target**

Facility must fill out **Column a** through **d** below and set a reduction target in **Column e**. If there is more than one “Yes” in **Column c**, the facility has the freedom to choose whichever one to set a reduction target in **Column e** to achieve in the next 12 months. When choosing a target, consider which one the facility feels most confident to make an improvement on. The target will be used to measure the facility’s success in reducing hours during the next certification audit.

- “Yes” Observation(s) found
- “No” No observation(s) found
- “N/A” No applicable local laws

Below is an example of a facility with both daily and weekly working hours exceeding the limits set by the local laws. The facility has the freedom to choose ONE as a target to reduce its working hours. The facility chooses daily working hours of 13 as the target to achieve in the next 12 months.

	<b>a. Legal regular working hours</b>	<b>b. Legally allowed overtime hours</b>	<b>c. Any excessive overtime hours raised as observation (Yes, No or N/A)</b>	<b>d. Highest hours observed (Taken from Principle 6 Initial Audit report)</b>	<b>e. Reduction target (fill ONE only)</b>
<b>7. Daily:</b>	8	4	Yes	13.5	13
<b>8. Weekly</b>	48	24	Yes	75	
<b>9. Monthly:</b>		N/A	N/A		
<b>10. Quarterly:</b>		N/A	N/A		
<b>11. Yearly:</b>		N/A	N/A		
<b>12. Others:</b>		N/A	N/A		

In this example, the facility has two observations but chooses **daily** hours as their target. The facility then used the daily target to fill out Section II A Column b **Highest** Working Hours.

**Section II A. List Top Three (3) Main Processes with HIGHEST Working Hours**  
**(No need to list the processes if their hours do not exceed legal limit.)**

The purpose of this section is to help facility identify “bottle neck” in its production processes. Facility provides the top three (3) processes that have observations raised under Principle 6 Hours of Work (e.g., sewing, linking, or packing). If less than 3 processes have excessive hours, put “N/A” in the rest of **Column a**.

“Highest Working Hours” of the processes refers to **Section I e** above.

	<b>a. Processes</b>	<b>b. HIGHEST working hours of the target chosen in <b>Section I e</b> above:</b>	<b>c. Two periods with highest working hours in b:</b>
<b>13. Process 1:</b>	Cutting	Daily 13.5	Jan 24, 2020 Feb 28, 2020
<b>14. Process 2:</b>	Sewing	Daily 13.5	Jan 25, 2020 Feb 18, 2020
<b>15. Process 3:</b>	N/A		

**Section II B. Root Causes for Excessive Hours and Improvement Actions**

Analyze the root causes of excessive overtime in your facility and list them one by one below in the left column. In the right column, there should be a respective improvement action(s) for each root cause to help achieve the reduction target set in **Column e** of **Section I**. Your improvement actions must be **SMART (S=Specific, M=Measurable, A=Achievable, R=Reasonable and T=Target Oriented)**. For example, if you are planning to upgrade machines, list what type(s) and how many you are planning to upgrade.

Maintain related documents and records so that WRAP auditors can verify them during next recertification audit.

<b>16. Root Causes</b>	<b>17. Improvement Actions</b> (Actions must be specific. e.g., management will hire about 15 sewing workers within 30 days to reduce the hours in sewing department.)
a.	
b.	
c.	
<b>18. Facility responsible person(s)' name &amp; date:</b>	

**Section III. Recertification Status**  
**(TO BE COMPLETED BY AUDITOR ONLY)**

<b>19. Has facility achieved the recertification target(s) set in last WHAP, if applicable?</b>  Refer to the last WHAP submitted by facility. If last certification audit was conducted by another Monitoring Firm, contact WRAP to obtain the previous WHAP before conducting the audit.		a. Target Set in Last WHAP	b. Target achieved (Yes, No or N/A)
	Daily		
	Weekly		
	Monthly		
	Quarterly		
	Yearly		
<b>20. a. Provide any comments on the improvement actions taken by facility (as compared with last WHAP), if applicable:</b>	Review and comment if new improvement actions proposed in last year's WHAP have been implemented. Request the facility provide evidence to substantiate that the improvement actions have been taken.  For recertification facilities, review and comment if this year's proposed improvement actions are acceptable.		
<b>b. If this is the facility's first WHAP, are the improvement actions proposed in Q17 acceptable?</b>	<input type="checkbox"/> Yes Provide reasons:  <input type="checkbox"/> No Provide reasons:  Review and comment if this year's proposed improvement actions are acceptable.		
<b>21. What is the facility's average weekly working hours (data should be taken from Principle 6 in initial audit report)?</b>			
<b>22. Auditor's name and date reviewed:</b>	By printing his/her name and date reviewed here, auditor is confirming that they have reviewed Sections I through III thoroughly and found them to be in accordance with WRAP Guidelines.		

**Section IV. Interim WHAP Status**  
**(TO BE COMPLETED BY FACILITY 6 MONTHS AFTER CERTIFICATION)**

**Column a** below is the highest working hours of all departments over the last six months. The purpose is to update WRAP on your progress towards achieving the reduction target. Choose whichever highest daily/weekly/monthly/quarterly/yearly hours applicable to your facility.

The date in **Column b** is the date your facility completes and submits this interim WHAP to WRAP.

Complete whichever that applies	a. Interim status on highest working hours during the past 6 months (whichever applies)	b. Date of Reporting
23. Daily		
24. Weekly:		
25. Monthly:		
26. Quarterly:		

27. Yearly:		
28. Other:		