

# Sample Code of Conduct Provisions and Auditable Standards

Preventing Forced Labor and Protecting Migrant Workers

---

JULY 2025



# Acknowledgements

The Farm Labor Due Diligence Toolkit is a publication of the Verité Farm Labor Due Diligence Initiative (FLDDI), which develops practical human rights due diligence guidance and associated tools tailored to global agricultural supply chains.



Schweizerische Eidgenossenschaft  
Confédération suisse  
Confederazione Svizzera  
Confederaziun svizra

**Swiss Agency for Development  
and Cooperation SDC**

Verité is grateful to have received financial support from the Swiss Agency for Development and Cooperation (SDC) of the Federal Department of Foreign Affairs (FDFA) through the Protecting Migrant Workers in the Cocoa Sector of Côte d'Ivoire and Ghana project to develop and pilot the Embed and Assess elements of Verité's Farm Labor Due Diligence (FLDD) Toolkit and First Mile Toolkit in the West African cocoa sector.

# Considerations for Using This Tool

---

This tool is designed for companies that source agricultural commodities from around the world. These sample provisions are meant to be used in Codes of Conduct or other documents that lay out companies' human rights requirements for their suppliers, and in guidance documents and tools used by monitors or auditors to check conditions on farms.

This model is tailored for clear, concise communication of company policy requirements to multiple tiers of the supply chain, including first mile agricultural operations. Companies in other sectors may benefit from including additional details within their Codes and associated standards.

## **Scope of Requirements**

While this sample code presents requirements under two headings, Forced Labor and Migrant Worker Protections, companies may also consider integrating these provisions into their Codes wherever they fit best.

Readers should note that other Code of Conduct provisions not included in this guidance document also address risks of forced labor. For example, common code provisions on wages and benefits require that wages are not delayed or withheld; wage withholding is also a risk of forced labor.

These requirements are envisioned to be accompanied by related requirements and guidance outlining a due diligence approach for preventing, detecting, and mitigating forced labor and broader labor and human rights risks faced by migrant workers.

## **Cascading Requirements Down the Supply Chain**

Requirements should clearly apply to other actors within the supplier's value chain, including sub-suppliers and labor intermediaries. Codes and auditable standards should also include clear expectations that suppliers ensure legal compliance in their operations and value chains.

# Forced Labor

## Sample Code of Conduct Provisions and Auditable Standards

---

### **Code provision:**

All work shall be voluntary. Suppliers shall not use, benefit from, or tolerate any form of forced labor, including bonded, indentured, or prison labor.

### **Auditable standards:**

- Workers are provided clear, accurate, and timely information about the terms and conditions of employment, verbally and in writing, before agreeing to work.
- Workers hold their own original identity documents and personal belongings.
- Workers have freedom of movement and communication, including at the workplace, employer-provided transportation, and housing.
- The employer pays all recruitment fees and related costs necessary for the recruitment and employment of workers, and adequately compensates any labor agents used such that costs are not passed on to workers.
- Workers do not pay fees or deposits or make financial guarantees to secure or retain employment. Where this is not possible or workers are legally required to pay fees directly, the employer reimburses the workers.
- Workers are free to terminate their employment at any time without penalty, upon giving reasonable notice.

# Migrant Worker Protections

## Sample Code of Conduct Provisions and Auditable Standards

---

### **Code provision:**

Suppliers shall conduct due diligence and have management systems in place to ensure that any migrant workers are recruited, hired, and employed responsibly.

### **Auditable standards:**

- The employer verifies that any labor agents used for recruitment, hiring, or during employment meet legal and code of conduct requirements. Labor agents do not charge fees to workers or deceive or coerce workers to work.
- Terms and conditions provided to migrant workers are no less favorable to those provided to locals and country nationals, including wages, benefits, and accommodations.
- Migrant workers have access to an effective complaint process throughout recruitment and employment.
- Housing provided or arranged by the employer is clean, safe, provides reasonable living space, and meets the basic needs of workers, as well as minimum housing standards set by local authorities.