

# Rules of Procedure

April 2025

**amfori Speak for  
Change**



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# Chapter 1: Introduction

amfori Speak for Change is amfori's global supply-chain grievance mechanism. It adds an extra, non-judicial layer of support on top of the operational grievance processes that companies already run; it does not replace those local channels. Together, they offer individuals and communities a straightforward way to raise and resolve concerns about possible human-rights impacts linked to amfori members' operations or supply chains.

This document outlines the Rules of Procedure that govern how grievances are received, reviewed, and addressed through amfori Speak for Change. It sets out the principles, roles, and process steps that apply to all parties involved, from complainants and business partners to amfori members and partner organisations.

amfori Speak for Change aims to align with the UN Guiding Principles on Business and Human Rights and is informed by the OECD Due Diligence Guidance for Responsible Business Conduct, underscoring amfori's commitment to providing meaningful access to remedy and supporting its members in meeting their human-rights due-diligence responsibilities.

Together, the Rules of Procedure and the Participation Standards constitute the publicly accessible normative framework of the amfori Speak for Change programme. They establish how the programme operates and apply to all cases within its scope. More detailed operational guidance is available through internal protocols, case handler manuals, and implementation tools.

# Chapter 2: General Principles

The amfori Speak for Change grievance mechanism is grounded in practical principles that guide how grievances are handled. These principles reflect how the mechanism works in practice and what complainants, members, and stakeholders can expect at every step of the process.

## 2.1 Independence

amfori Speak for Change is designed to operate independently from the commercial interests of amfori members or their business partners. Case handlers are not involved in any related business activities. If a conflict of interest is identified, the case is reassigned or escalated to ensure a neutral process.

## 2.2 Confidentiality

Personal information is only shared if it is essential for resolving the case and with the clear consent of the person concerned. amfori Speak for Change offers anonymous channels for grievance submission and ensures that communication is conducted in a way that protects complainants' privacy and security.

## 2.3 Protection from Retaliation

Each case is screened for retaliation risks. Where concerns are identified, measures such as anonymous handling, delayed disclosure, or restricted communication are applied. [The Retaliation Guidance](#) outlines expectations for all parties and defines what actions will be taken if retaliation occurs.

## 2.4 Transparency

Complainants and members receive regular updates throughout the case process. amfori Speak for Change also publishes anonymised summaries of complaints and outcomes on its website, including data on the types of issues raised and how they were addressed. Individual identities or personal data are never disclosed in this context.

## 2.5 Shared Responsibility and Collaboration

When multiple amfori members are connected to a business partner involved in a case, they are expected to coordinate their response and work jointly toward resolution. amfori Speak for Change facilitates this collaboration and ensures that all relevant actors are informed and engaged.

## 2.6 Complementary Role

amfori Speak for Change does not replace existing grievance mechanisms, whether local, company-level or other operational-level schemes, but steps in where those avenues are unavailable, not trusted or ineffective. Where appropriate, complainants may be referred to such mechanisms or to external partners.

## **2.7 Focus on Practical Outcomes**

The goal of each case is to find a resolution that addresses the harm raised. This may involve changes in company practice, worker reinstatement, compensation, or other corrective actions agreed between the parties. amfori Speak for Change helps coordinate and follow up on these actions.

## **2.8 Inclusive Access**

The mechanism is designed to be accessible for impacted stakeholders regardless of language, literacy level, or access to technology. Special attention is given to individuals or groups who may face additional barriers, and adjustments are made where needed to ensure safe and meaningful participation.

# Chapter 3: Governance

amfori Speak for Change leads the resolution of grievances submitted through the mechanism. While amfori members remain responsible for implementing outcomes, the amfori Speak for Change team acts as the lead coordinator and technical expert throughout the process. It proposes resolution strategies, manages collaboration between parties, and ensures the process remains fair, timely, and aligned with the mechanism’s standards.

The level of member involvement varies depending on the complexity and impact of the case. For routine cases, amfori Speak for Change may take decisions independently to ensure efficient handling. For more complex or sensitive cases, member approval is required at key stages.

## 3.1 Role of amfori Speak for Change

The amfori Speak for Change team is responsible for:

- **Case Leadership:** Leading the process from start to finish. This includes coordinating communication, managing timelines, and acting as a central point of contact for all parties.
- **Proposing Resolution Strategies:** Developing concrete proposals to resolve cases, based on the facts of the grievance, stakeholder input, and relevant standards. In routine cases, these proposals may be implemented directly. In complex cases, member approval is required before proceeding.
- **Efficient Case Handling:** For lower-risk cases or those with clear resolution pathways, amfori Speak for Change may handle the case autonomously, including engaging the business partner and coordinating the implementation of corrective actions.
- **Joint Handling of Shared Cases:** When a grievance involves a business partner linked to multiple members, amfori Speak for Change facilitates a joint process, ensuring alignment and shared responsibility across members.
- **Collaborative Protocols:** If a business partner is shared with another grievance mechanism or initiative, amfori Speak for Change may establish a Collaboration Protocol to ensure coordinated handling. amfori remains in the lead unless another arrangement is agreed.

## 3.2 Role of Members

Members are expected to engage actively in cases with which they are linked, with a level of involvement proportionate to the case’s complexity and their available resources. By doing so, they demonstrate their duty of care, honour their commitments under the amfori BSCI Code of Conduct, and strengthen their reputation.

Their responsibilities include:

- Reviewing and approving amfori proposals, where required
- Engaging with their business partners to support resolution
- Collaborating with other members when more than one is involved in a case
- Implementing agreed remediation actions, in line with their due diligence obligations

Where needed, members may designate a lead respondent among themselves to act as their main liaison in the case.

The division of roles and responsibilities is further detailed in the Participation Standards.

## Chapter 4: Admissibility Criteria

Not all complaints submitted to amfori Speak for Change fall within the scope of the grievance mechanism. This chapter outlines who can submit a complaint, what types of complaints are eligible, and how admissibility is determined.

All complaints are reviewed by the amfori Speak for Change team based on the criteria described below. If a complaint is deemed admissible, it proceeds to the next phase of the process.

### 4.1 Who Can Submit a Complaint

amfori Speak for Change accepts complaints from any individual, group, or organisation that has been negatively affected by the actions of an amfori member or their business partners. This includes:

- Workers (current or former)
- Trade unions and worker associations
- NGOs and civil society organisations
- Community members
- Employers' organisations
- amfori members or business partners

The complainant does not need to be currently employed by the business partner. If the original complainant passes away during the process, a legitimate representative or close relative may continue the case.

Complaints may also be submitted anonymously, as long as they contain enough information to assess admissibility.

### 4.2 What Types of Complaints Are Admissible

A complaint is considered admissible if it meets all of the following conditions:

1. It relates to recognised amfori standards, specifically:  
The amfori BSCI Code of Conduct, which includes 13 Performance Areas.
2. It involves a business partner linked to an amfori member, verified through amfori's sustainability platform.
3. The issue occurred during the membership period of the involved amfori member. Ongoing or unresolved issues that began earlier may still be considered.
4. The complaint is submitted in good faith, meaning it is sincere and not abusive, defamatory, or politically or commercially motivated.

## 4.3 What Complaints Are Outside the Scope

A complaint will not be admitted if:

- There is no connection to an amfori member or their business partners
- The issue falls outside the thematic scope of amfori standards
- The complaint refers to events outside the member's participation period, unless the impact is ongoing
- The complaint is a duplicate of a previously resolved case without new or relevant evidence
- A final decision has already been made by amfori Speak for Change on the same issue
- The complaint is already being handled by legal authorities, unless amfori's involvement would add value to the outcome
- The submission lacks the minimum required information, even after follow-up attempts by the case handler

When a complaint is out of scope, the complainant will be informed and, if possible, referred to a more suitable organisation or mechanism.

## 4.4 Geographic Scope

amfori Speak for Change currently operates in a selected number of countries and regions. These locations are chosen based on member needs, available resources, and the scale-up strategy of the grievance mechanism.

Complaints from outside these regions may still be accepted on a case-by-case basis if:

- The business partner is linked to an amfori member
- Local conditions make it possible to process the complaint effectively

The current list of participating countries is available on the [amfori Speak for Change webpage](#) and updated regularly.

Chapter 5: Complaint Submission This chapter outlines how complaints can be submitted to amfori Speak for Change, what information is required, and how the admissibility of each complaint is assessed.

## 5.1 How to Submit a Complaint

Complaints may be submitted by impacted individuals or their legitimate representatives (e.g. unions, NGOs, community organisations) through one of the official access channels:

- Online form (preferred)
- Secure chat application
- Dedicated phone lines

Current access options are listed on the amfori Speak for Change webpage and are also communicated through local access partners, where available.

## 5.2 Minimum Information Required

To be reviewed, a complaint must include the following:

- Contact method  
A way for the amfori Speak for Change team to follow up (email, phone, or messaging app). Anonymous complaints are accepted but must still provide enough detail to proceed.
- Identification of the business partner  
The name, location, or other identifying information about the facility involved (e.g. factory, farm, recruitment agency). If unclear, the approximate location and nature of the business should be included.
- Description of the issue  
A clear explanation of what happened, when and where it occurred, detailed enough for the team to link the case to amfori standards.

## 5.3 Additional Information

Complainants may include supporting documents, describe previous efforts to resolve the issue, or indicate whether they are submitting the complaint on behalf of another person or group. These details are not required but can help accelerate the process.

## 5.4 Language and Accessibility

amfori Speak for Change accepts complaints in English and in relevant local languages. Follow-up communication will be conducted in the complainant's preferred language whenever local resources allow. All communication materials are adapted to local contexts and literacy levels to ensure that the submission process is as inclusive and barrier-free as possible.

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## 5.5 Confirmation and Case Reference

Upon successful submission, the complainant will receive a four-digit case reference number. This number allows them to:

- Follow up with the amfori Speak for Change team
- Access updates on their case (where appropriate)
- Submit additional information after the initial intake

If the complaint was submitted anonymously, follow-up can only occur if a safe, anonymous communication channel was selected (e.g. secure chat).

## 5.6 How Admissibility Is Assessed

The case handler reviews each complaint to determine whether it meets the admissibility criteria (see Chapter 4), including:

- Relevance to amfori BSCI or RPP standards
- Connection to a business partner linked to an amfori member
- Whether the events occurred during the member's participation period
- The complaint is made in good faith
- The case has not already been resolved by amfori Speak for Change

The case is also assessed using the internal triage framework, which helps determine complexity and level of member involvement. A retaliation risk assessment is conducted in parallel and flagged if relevant.

## 5.7 Follow-up and Incomplete Complaints

If the complaint lacks essential information (such as issue description or business partner identification), the case handler will reach out to the complainant to request clarification. At least two follow-up attempts will be made.

If the complainant does not respond, the complaint will be closed as incomplete, and the complainant will be informed accordingly.

## 1.1. Admissibility Decision and Next Steps

A final decision on admissibility is made within 5–7 business days after submission. The complainant is informed of the outcome:

- If accepted: the case proceeds to resolution and linked members are notified.
- If rejected: the complainant receives a clear explanation, and where possible, a referral to another appropriate mechanism or an invitation to re-submit if new information becomes available.

## 1.2. Informal or External Submissions

If a complaint is received outside the standard access channels (e.g. via email, partner referral), the complainant will be asked to re-submit through an official channel. If he or she unable to do so due to

accessibility barriers, safety concerns, or other risks, the case handler may log the case manually and proceed, based on the available information.

# Chapter 6: Case Handling and Resolution

Once a complaint is deemed admissible, it enters the case handling and resolution phase. amfori Speak for Change coordinates this phase, which includes fact-finding, remediation planning, implementation, and closure. The process is adjusted based on the complexity and nature of the case and is supported by clear roles and timelines.

## 6.1 Roles and Responsibilities

- amfori Speak for Change leads the case process, coordinates communication, and proposes resolution strategies.
- amfori members are expected to engage actively, approve key decisions, and contribute to remediation.
- Business partners are informed of the complaint and expected to cooperate fully during investigation and remediation.
- Remediation or investigation handlers (internal or third-party) may be appointed depending on the complexity and needs of the case.

## 6.2 Process Overview

The case follows these core stages:

### 1. Admissibility

The complaint is declared admissible and will be further dealt with on substance

### 2. Initial Coordination

amfori contacts the linked members and relevant local teams. Members confirm their sourcing link and are jointly engaged in the case handling process, with amfori coordinating alignment and next steps.

### 3. Assessment of the complaint

This may involve a formal investigation or a simplified verification process. The need for investigation depends on the nature of the complaint.

- For complex cases, amfori may invite members to review and align on proposed steps, including the investigation approach and selection of investigation handlers.
- For simpler cases, amfori may proceed directly to resolution based on existing documentation and fact verification.

### 4. Remediation Planning

Based on findings, a resolution plan is proposed including:

- Corrective actions
- Business partner responsibilities
- Retaliation safeguards
- Monitoring steps
- Timeline and budget (if applicable)

## 5. Implementation and Monitoring

The remedial plan is executed by members, amfori, or a designated third party. Progress is tracked and shared with members and, where possible, the complainant.

## 6. Closure and Outcome Classification

amfori assesses the remediation outcome and assigns a closure status:

- Fully Remediated
- Partially Remediated
- Not Remediated

## 6.3 Fact-Finding and Information Gathering

amfori Speak for Change uses a proportionate approach to understanding the facts of each case. Depending on the complexity, available information, and level of dispute, this may involve a formal investigation or a simplified verification process.

### A. Without Formal Investigation

For lower complexity complaints where the facts are already documented or not contested, amfori may proceed without a formal investigation. In such cases:

- Evidence may include existing BSCI audit reports, Corrective Action Plans (CAPs), Continuous Improvement (CI) activities, or information from prior grievance cases.
- amfori engages directly with the business partner to clarify the situation and request supporting evidence, where needed.
- The resolution strategy is built using verified facts, member input, and dialogue with the business partner or complainant.

This path is typically used when:

- The violation is clearly grounded in existing records
- The business partner acknowledges the issue and agrees to cooperate
- The complainant's allegations are supported and not disputed

### B. With Formal Investigation

When the facts are unclear, contested, or when the issue is complex or systemic, a formal investigation is initiated. This may involve:

- amfori proposing an investigation plan and identifying suitable investigators
- Member review and alignment on the proposed approach
- Assignment of either:
  - A member compliance team (supported by amfori), or
  - An independent third-party investigator

The investigator conducts interviews, site visits, and document reviews. A draft report is delivered within 25 business days and a final version 15 business days later. Reports are shared with members, and, where safe and appropriate, the complainant and business partner.

## 6.4 Remediation Execution Models

Depending on the case, remediation may be:

**Member-led:** A member takes the lead in engaging the business partner with support from amfori.

**amfori-led:** amfori coordinates the remediation plan with the business partner through local resources.

**Third-party-led:** An independent expert or organisation executes the remediation plan in coordination with amfori and the members.

All approaches must include:

- Clear deliverables
- Proof of completion (e.g. documentation, interviews, monitoring visits)
- Retaliation prevention measures

## 6.5 Final Assessment and Communication

Upon completion:

- The remediation handler provides a final report to amfori
- amfori reviews the report and proposes an outcome classification
- Members review and approve the final outcome
- The complainant is informed of the result, where possible
- The complainant (or their representative) confirms receipt of the remedy via the Post-Resolution Form. If unreachable or anonymous, the case closes on documented evidence after 15 days.

If there is disagreement, amfori may issue an expert recommendation to guide closure or further action.

## 6.6 Case Outcome Categories

Cases are closed under one of the following statuses:

- **Fully Remediated:** All key harms were addressed. Case closed with endorsement from amfori and members.
- **Partially Remediated:** Some key issues resolved. Members may be encouraged to follow up or revise the plan.
- **Not Remediated:** No action was taken, the process was blocked, or parties disengaged.

Where necessary, amfori may recommend:

- Further member action
- Supplier disengagement
- Referral to external authorities

## 6.7 Escalation Committee (EC)

In particularly complex or sensitive cases, amfori Speak for Change may consult the **Escalation Committee (EC)**. This internal advisory body supports strategic decision-making when a case involves heightened risks, systemic issues, or reputational impact.

The EC is not involved in daily case handling or standard resolution procedures. Instead, it provides independent internal advice to ensure consistency, fairness, and alignment with amfori's principles and grievance standards.

The committee typically includes amfori staff from relevant departments such as the grievance team, sustainability and social programmes, and audit coordination. Other internal experts may be invited depending on the nature of the case.

# Chapter 7: Appeal Procedure

amfori Speak for Change offers an appeals process to ensure fairness, accountability, and trust in its grievance mechanism. Appeals may be submitted by eligible parties when there are valid concerns about how a complaint was handled or decided.

## 7.1 Who Can Appeal

An appeal may be submitted by:

- The original complainant
- An amfori member directly involved
- A business partner engaged in the case

Appeals submitted by third parties on someone else's behalf must include a clear explanation and, if requested by amfori, proof of representation.

## 7.2 Valid Grounds for Appeal

An appeal must be based on one or more of the following grounds:

- Procedural error: A mistake or omission during the handling of the complaint that affected the outcome
- New evidence: Relevant information that was not available at the time of the original review
- Bias or conflict of interest: Reasonable concern that a decision-maker lacked impartiality
- Misapplication of rules: The case was not handled in line with these Rules of Procedure

Disagreement with the outcome is not accepted as a ground for appeal, unless if one or more of the four above-mentioned grounds are present.

## 7.3 How to Submit an Appeal

Appeals must be submitted:

### 1. **Via the Post-Resolution Satisfaction Form**

After a case is closed, the complainant (if reachable) will receive a **resolution form**. This form includes a question on satisfaction with the outcome and an opportunity to raise concerns or request a formal appeal. Completing the form is the fastest way for the complainant to initiate the appeal process.

### 2. **Via Email**

Alternatively, an appeal can be submitted by sending an email to **speakeforchange@amfori.org**. This option is open to complainants, members, and business partners directly involved in the case.

Regardless of the channel, the appeal must:

- Be submitted within **15 business days** of the case closure notice. Extensions may be granted if the appealing party provides valid justification (e.g., delays due to language barriers or unforeseen circumstances)
- Clearly state the ground(s) for appeal (see Section 7.2)
- Include any new evidence or supporting information, if applicable

Appeals may be submitted in English or in a relevant local language.

## 7.4 Review and Decision Process

- **Acknowledgement:** Appeal receipt confirmed within three (3) business days.
- **Review Pathways:**
  - **Process Consistency** – The reviewer verifies that all steps of the original procedure were followed (procedural error, bias or conflict of interests, misapplication of rules, see Section 7.2).
  - **New Information** – The reviewer evaluates evidence that surfaced after the initial decision.
- **Depth of Review:** The reviewer limits the examination to the specific procedural issue or new evidence raised.
- **Independence:** Review is carried out by an amfori staff member (or external expert) who had no prior involvement in the case.
- **Decision:** A final written decision is issued within fifteen (15) business days, outlining the review pathway, findings, and determination (see Section 7.5).

## 7.5 Possible Appeal Outcomes

### **Appeal accepted – case reopened**

The case is reopened for review, either partially or in full. A new resolution strategy may be proposed.

### **Appeal accepted – resolution modified**

Adjustments are made to the remediation plan or outcome status.

### **Appeal rejected**

The original decision is upheld. The party is informed and may still submit a new complaint if new evidence arises.

# Chapter 8: Transparency, Reporting, and Learning

amfori Speak for Change is committed to transparency and continuous improvement. This chapter outlines how information about cases is reported, how confidentiality is safeguarded, and how insights are used to strengthen the grievance mechanism and inform responsible business practices.

## 8.1 Public Transparency and Accountability

To promote public trust, amfori Speak for Change publishes anonymised data and insights through:

- An **annual public report**, which includes:
  - Number and types of complaints received
  - Status and outcomes (e.g. full, partial, or no remediation)
  - Trends by region or topic (e.g. working hours, wage issues, freedom of association)
  - Examples of good practice (with permission and anonymisation)

All public reporting strictly protects the confidentiality of individuals and business actors involved. No names, facility identifiers, or traceable details are ever shared.

## 8.2 Case-Based Communication

After each case:

- The complainant is informed of the outcome, where possible and safe to do so.
- The business partner receives relevant findings and expectations for improvement.
- Linked members receive a case summary, including remediation status and any follow-up actions.

Feedback is collected through a post-resolution satisfaction survey, which invites complainants to share their experience with the process — including clarity of communication, perceived fairness, and satisfaction with the outcome. The results are used to strengthen the quality of engagement and improve future handling of cases.

## 8.3 Internal Evaluation and Learning

amfori Speak for Change regularly reviews case outcomes, member engagement, and business partner responsiveness to:

- Identify patterns or recurring issues
- Assess effectiveness of investigation and remediation approaches
- Flag risks for early action or strategic escalation
- Update training materials and process documentation

Internal evaluations are conducted:

- After complex or high-risk cases
- Annually (internal performance review)

## 8.4 Driving Systemic Improvement

Lessons from grievance cases are used to strengthen:

- amfori's own grievance procedures
- The BSCI monitoring and improvement system
- Member guidance on stakeholder engagement
- Business partner engagement and training

amfori may also share insights with peer initiatives under a collaboration protocol, always maintaining confidentiality.

Where systemic risks are identified (e.g. repeated cases linked to the same actor or practice), amfori may:

- Recommend escalation to members
- Trigger a zero-tolerance process
- Propose joint remediation efforts at sector level

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