



During these challenging times of dealing with the COVID-19 pandemic, we at WRAP share with all the facilities in our certification program the common goal of protecting the health of the workers as the top priority. We strongly encourage facility managers to take all necessary measures required by relevant local authorities to make sure they continue to put the health of everyone working in their facilities first.

We are also keenly aware of the disruptions to normal life that COVID-19 is causing and recognize that the ability to conduct on-site social compliance audits is one of the activities being impacted by this pandemic. Even as things start to improve in China, they are getting worse in other countries. The travel and interpersonal contact restrictions being set by governments responding to the crisis are making it difficult, if not impossible, to conduct facility visits.

As such, WRAP is putting in place some temporary changes to our procedures (we plan to have these changes in effect until June 30, 2020; we will re-assess the situation at that point). With that in mind, we are issuing the following information/guidance for facilities seeking to obtain WRAP certification during these challenging times:

Paid Registration Period

- Because we recognize that the process may take longer than usual this year, the paid registration period (which is usually six months) for ALL facilities who have registered, or plan to register, this year for WRAP certification will be extended until December 31, 2020. This applies to all registrations received before June 30, 2020; thereafter, registrations will expire six months from the date received.

Certifications & Conducting Audits

- For locations where audits can be conducted per the standard on-site process, then facilities and monitoring firms can proceed as usual.
- Some facilities may have completed an on-site initial audit in 2020 resulting in a CAP report, with non-compliances that require an on-site follow-up audit to close. If it is no longer possible to conduct an on-site follow-up audit, monitoring firms should contact WRAP to request a desktop review.
- **For facilities whose certificates are going to expire (or have expired) in 2020 and who are in locations where on-site initial audits cannot be completed due to circumstances related to COVID-19:**
 - WRAP is offering an alternative process to address this unprecedented situation and help facilities extend their current certifications by four months upon the successful completion of a desktop audit.

- Since this is an extension of a current certificate, such facilities will not be issued a new WRAP certificate but will receive a letter from WRAP via email, notifying them that a four-month extension to their certificate has been granted.
- Upon the end of that four-month extension, facilities can apply to renew that certificate in the standard way, and as long as they do so before December 31, 2020, they will not have to pay another registration fee, since their existing registration will remain valid.
- As noted, this alternative process will only be available to recertification facilities whose certificates expire or have expired in 2020. This is not applicable to facilities new to WRAP or facilities whose certificates expired prior to 2020. These facilities must undergo a full on-site initial audit, which may be delayed due to restrictions resulting from COVID-19 (as noted above, registration periods will be extended to December 31, 2020 to allow more time for such facilities).
- WRAP will send detailed information about this alternative process to all facilities that may be eligible and to all monitoring partner firms.

Working Hours

- Under the current circumstances, we anticipate many facilities may need to work extra hours to make up for lost time. We understand the reasons for this and want to assure facilities that they will still be eligible for WRAP certification, provided they work those hours in a manner consistent with WRAP's transparency policy - i.e., fully and transparently report them to us and meet the requirements on overtime hours being voluntary, paying workers the overtime premium rate, and keeping good health and safety conditions. Such facilities will remain eligible for WRAP certification upon the development of a Working Hours Action Plan (WHAP), setting improvement targets to be met before the next audit cycle.
 - **For facilities who already had a WHAP from their last audit:** The current conditions may make it impossible for facilities that had set a target during their last certification period to meet that target; in such cases, the facilities will need to set a new target in their next audit.
- Facilities should know that the circumstances caused by the coronavirus qualify as Urgent Business Needs under our definitions. We understand that one consequence of this situation may be that facilities will need to operate consecutive working days to catch up. Ordinarily, facilities can only work one block of 13 consecutive days under Urgent Business Needs and are not allowed to have another block immediately following it (after a day off). Until June 30, 2020, WRAP will allow a 13 consecutive days period to be followed by one more (there will still need to be one day off in between, of course).

We wish everyone the best of health and urge you all to stay safe. If you have any questions, please feel free to contact us at any (or all!) of the following email addresses:

bweedeman@wrapcompliance.org

lwatrobsky@wrapcompliance.org

ssharma@wrapcompliance.org

Warm regards,

The WRAP Team