



# AFi Communications and Claims Policy

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DISCLAIMER: This work product is intended to be advisory only and is not intended to serve as a legal opinion or legal advice on the matters treated. The reader is encouraged to engage counsel to the extent required.

This resource is provided by the Accountability Framework initiative (AFi) to help companies and other users apply the Accountability Framework to achieve ethical supply chains. It is based on the full Accountability Framework version 1.0 (released in June 2019), which was created through a consultative process following applicable good practices for multi-stakeholder initiatives and which represents the consensus of the AFi Steering Group members that participated in its development. Current AFi Steering Group members (as of the publication date) include:



Plus independent experts:  
Gita Syahrani - Indonesia  
Silas Siakor - Liberia

The AFi Backbone Team (secretariat) is co-led by the Rainforest Alliance and the Meridian Institute.



The AFi is funded by:



For more information on the AFi's governance and a full list of partners, please visit [www.accountability-framework.org](http://www.accountability-framework.org)

# Overview

The Accountability Framework initiative (AFi) partners encourage companies to publicly communicate their support for the AFi and their use of the Accountability Framework to guide how they set, implement, and monitor their supply chain commitments. The AFi partners also welcome NGOs, governmental entities, other supply chain sustainability initiatives, and other stakeholders to publicly communicate their support for and use of the Accountability Framework. Clear and truthful communication by those using the Framework can help accelerate its adoption and demonstrate its value to all parties working to mainstream ethical supply chains.

The AFi provides guidance on two different types of communications and claims, which are distinct and complementary:

- This policy clarifies when and how companies and others may communicate about their use of, alignment with, or support for the Accountability Framework. For companies, such communications may pertain to the company's commitments as well as their implementation and monitoring systems and practices, as elaborated below. However, such communications should not speak to the performance of specific products or services of the company, nor to specific social or environmental outcomes.
- Separately, the AFi also specifies principles and guidance for companies to make credible claims about progress toward or fulfillment of their supply chain commitments; for this material, please see the Accountability Framework [Core Principle 12](#) and [Operational Guidance on Reporting, Disclosure, and Claims](#). This guidance specifies good practice for companies to make claims about the actions they are taking toward fulfilling commitments as well as the resulting progress toward or fulfillment of such commitments. Such claims may be made in relation to specific products (e.g., consumer goods or product lines), services, supply chains, or the company overall. They may pertain to the company's practices and systems and/or to the social and environmental outcomes associated with the company's operations and supply chains. Please see the above-referenced Framework sections for further detail.

For instance, if a company wishes to claim that its chocolate bars or palm oil supply chain are deforestation-free, it should consult Core Principle 12 and Operational Guidance on Reporting, Disclosure, and Claims for information on how to formulate and substantiate such claims in a credible manner. If a company wishes to communicate or make claims regarding the rigor of its commitments or its systems or practices for implementation or monitoring – in relation to the norms and guidance of the Accountability Framework – it should follow this policy.

# Communications and claims by companies

Companies that have applied or aligned with the Accountability Framework in their commitments, policies, initiatives, systems for supply chain management, monitoring, reporting, or other elements of managing an ethical supply chain are encouraged to communicate this publicly. To ensure truthful and well-substantiated statements and avoid ambiguity, any such communications should:

- explain, specifically, how the Framework has been applied and which aspects of the company's commitments, initiatives, or systems are aligned with it;
- include references to the relevant commitments, initiatives, or systems so that the nature of this alignment is evident and can be confirmed;
- specify the scope of the application or alignment – for instance whether the company's use of the Framework pertains to its entire business or only to specific sectors, regions, business units, functions, or other components; and
- follow the additional guidelines for the applicable scenario(s) outlined below.

Companies should follow these guidelines for all communications about the Accountability Framework, including statements within published company documents (e.g., company supply chain commitments or sustainability reports) as well as communications through any other means (e.g., company websites, public statements, press releases, social media, presentations, etc.).

## Communications and claims about company commitments

Core Principles 1-3 specify the elements of a strong company commitment on the topics within the AFi scope. If a company's commitment aligns with all of these elements, the company may communicate that its commitment follows or is aligned with the Accountability Framework. Such communication should be accompanied by an explanation of how these Framework elements have been adopted. Use of the AFi's [commitment self-assessment tool](#) for this purpose is highly recommended. Example of permissible communication:

- [Company] is proud to release its new ethical sourcing policy, which aligns with the Accountability Framework's best practices for setting commitments related to deforestation, conversion, and human rights. See how [link to the filled-in self-assessment tool with references to the parts of the company's policy that align with each element of Core Principles 1-3].

If the commitment adheres to a portion of Core Principles 1-3 for one or more specific topics (i.e., 1.1: no-deforestation, 1.2: no-conversion; 2.2: rights of indigenous peoples and local communities; and/or 2.3: workers' rights) the company may communicate that its commitment aligns with the Accountability Framework for those specific topic(s), provided that: a) the commitment aligns with all of the elements for that topic; b) if the communication pertains to

the company's commitment on the rights of indigenous peoples and local communities or workers' rights, then the commitment also aligns with Core Principle 2.1, which specifies key commitment elements for all human rights topics; and c) the commitment also follows Core Principle 3. Such communication should be accompanied by an explanation of how the given elements have been adopted. Use of the AFI's [commitment self-assessment tool](#) for this purpose is highly recommended. Example of permissible communication:

- [Company's] strong workers' rights policy applies to all of its plantations and mills and follows the Accountability Framework's best practices for setting commitments on this topic. See how [link to the filled-in self-assessment tool with references to the parts of the company's policy that align with each element of Core Principles 2.1, 2.3, and 3 – i.e., those applicable to a workers' rights commitment].

## Communications and claims about company systems or processes used to implement commitments

The Accountability Framework is intended to be used by companies to guide a variety of specific functions related to responsible production, sourcing, and investment. These include: supply chain mapping and traceability, supplier management, smallholder engagement, land acquisition and development, restoration and remediation, and engagement of a bank's borrowers, among others. Companies that follow the Accountability Framework for one or more such functions may communicate publicly about this, provided that they substantiate such communications with appropriate evidence, references, or links to additional detail. Examples of permissible communication:

- [Bank] follows responsible lending practices to protect forests, natural ecosystems, and human rights as part of any investment in agricultural development. We require our borrowers to follow the Accountability Framework (Core Principles 7, 8, and associated guidance), as well as the High Carbon Stock Approach (HCSA) where applicable, for any new land acquisition, plantation development, or infrastructure development. These requirements are stated in our ESG loan criteria and their fulfillment is independently verified.
- [Company] uses its buying power to help respect the rights of indigenous peoples and local communities by requiring its suppliers to follow effective FPIC processes as specified in the Accountability Framework. These requirements are specified in Section 7 of our supplier code, which informs all procurement decisions.
- [Company] is investing substantially in the 22,000 smallholders who supply 70% of our natural rubber latex. Between 2018 and 2020, we supported local NGOs to organize these producers into smallholder groups following the guidance of the Accountability Framework. These groups monitor compliance with [Company's] commitments to no deforestation and respect for human rights while helping our smallholder suppliers to improve productivity and land management.

# Communications and claims about systems or practices for monitoring, verification, reporting, or disclosure

Companies that monitor, verify, or report about their supply chain commitments in accordance with the relevant sections of the Accountability Framework may communicate this publicly. Similarly, companies that disclose information about their supply base and suppliers as specified in Section 3 of the [Operational Guidance on Reporting, Disclosure, and Claims](#) may communicate this publicly. Any such communication should be accompanied by an explanation of how the company’s monitoring, verification, reporting, or disclosure adheres to the applicable sections of the Framework. Examples of permissible communication:

- [Company] monitors and verifies compliance of its cattle suppliers with our no-deforestation commitment in accordance with the Accountability Framework. Please visit this page for further explanation, verification terms of reference, and audit report summaries.
- [Company] reports progress toward its supply chain commitments in accordance with the Accountability Framework. See our latest sustainability report for further details.
- [Company] is committed to clear and transparent reporting on the environmental and social performance of its agricultural supply chains. We report annually in accordance with the applicable GRI reporting standards and in alignment with the Accountability Framework’s reporting guidance. We also disclose forest-related risks, management activities, and impacts through CDP Forests.
- [Company] is a leader in transparency in the forestry sector. Since 2018, we have disclosed the boundaries of all company land holdings and the location of all company processing mills in Brazil, as well as other information disclosures specified in the Accountability Framework.

## ***Important note: do not claim certification, verification, or compliance related to the Accountability Framework***

The Accountability Framework is not a compliance standard or a certification scheme, and it does not have an assurance mechanism for auditing organizations’ adherence to the Framework. Accordingly, companies should not claim or imply that they are certified or verified against the Accountability Framework by any certification/verification body, service provider, or other entity. To avoid potential confusion, companies should not use the word “comply” or “compliance” in describing how they use the Framework or how their commitments, systems, or initiatives relate to it. Rather, compliance claims should be made in relation to the company’s own commitments and/or to external standards or policies that are intended to support certification/verification. Claims made in relation to the company’s commitments should be specified and substantiated in accordance with [Core Principle 12.3](#) and the [Operational Guidance on Reporting, Disclosure, and Claims](#).

Finally, companies should not claim or imply that the AFi or its partners have assessed the organization or its programs, operations, supply chains, or products. Examples of *impermissible* communications or claims:

- [Company] complies with the Accountability Framework.
- [Auditing firm] has verified that [Company] follows the Accountability Framework.
- According to the Accountability Framework initiative, [Company] is a supplier of ethically produced soybeans.

## Communications by organizations other than companies

Organizations other than companies – such as NGOs, community groups, producers’ associations, government agencies, and other supply chain sustainability programs or initiatives – are also invited to communicate their support for or use of the Accountability Framework. Specifically:

- Such organizations are encouraged to communicate their support for or endorsement of the Accountability Framework and to encourage its use by companies or others with whom they work.
- If such organizations have applied to Framework in specific ways, this may also be communicated, provided that the communication is truthful and the ways in which the Framework were applied are clearly described and substantiated (if necessary), for instance by including references to the policies, methodologies, initiatives, or other mechanisms by which the Framework was applied.

Examples of permissible communication by organizations other than companies include:

- [Certification standard] follows internationally accepted norms, definitions, and good practices by incorporating key references and requirements from the ILO, HCSA, HCV Resource Network, and the Accountability Framework. Please see this document for a summary of these key areas of alignment.
- [Civil society organization] endorses the Accountability Framework as a roadmap for effective implementation of supply chain commitments related to deforestation, conversion, and human rights and urges companies involved in the soy, beef, palm oil, cocoa, rubber, and pulp and timber sectors to apply it fully.
- [Reporting initiative] is actively working to align its reporting standard with the Accountability Framework’s elements on setting commitments, implementation, monitoring, and verification. Please click here to see a crosswalk analysis between the 2019 reporting standard and the Accountability Framework.

# Oversight of communications and claims by the AFi

The AFi does not intend to review or approve communications from companies or other organizations regarding the Accountability Framework or its use prior to the publication of such communications. Rather, organizations should follow this policy to communicate about their use of or support for the Framework in a clear, truthful, and credible way.

To help ensure such clarity and credibility as the Framework is brought into wider use, the AFi may review published claims and communications related to the Accountability Framework and will take action if necessary to address claims or communications that are spurious, misleading, or contrary to this policy. Such actions will typically begin with direct private contact with the organization issuing the communication to help clarify how the communication may be adjusted to reflect this policy. However, actions may also include, or escalate to include, public identification of organizations that are believed to be communicating or making claims in bad faith or have been unresponsive to requests to follow the AFi's communications and claims policy. Such actions may be taken by the AFi, its partner organizations, or both. Stakeholders are invited to contact the AFi ([contact@accountability-framework.org](mailto:contact@accountability-framework.org)) if they are concerned about a particular published claim or communication related to the Accountability Framework and would like to bring it to the AFi's attention.

***Important note:*** *do not use the logo of the AFi or its partner organizations*

The logo of the AFi or its partner organizations may not be used without the express written permission of the AFi or each respective partner organization.