




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 408821949.	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS:408850240.
Business name (Company name):	Agropecuaria Produza SA.		
Site name:	Agropecuaria Produza SA.		
Site address: <i>(Please include full address)</i>	Colonia San Francisco, Distrito de Itakyry, Alto Paraná, Paraguay.	Country:	Paraguay.
Site contact and job title:	Mr. Lucas Villalba / Quality Responsible.		
Site phone:	+595 982 395123	Site e-mail:	calidad@produza.com.py
SMETA Audit Type:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety	<input checked="" type="checkbox"/> Environment SMETA Audit Type:
Date of Audit:	22/03/2023.		

Audit Company Name & Logo: 	Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i> Agropecuaria Produza SA
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact grievance@sedex.com.

To confirm the validity of this report, please visit <https://www.sedex.com/audit-verifier/>

Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

(2) The audit scope was against the following reference documents

2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
 - Universal rights covering UNGP
 - Management systems and code implementation,
 - Responsible Recruitment
 - Entitlement to Work & Immigration,
 - Sub-Contracting and Home working,

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)

(3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.

(4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

SMETA Declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Best Practice Guidance and SMETA Measurement Criteria.

- (1) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (2) Any Non-Compliance against customer code alone shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Any exceptions to this must be recorded here (e.g. different sample size): None.

Auditor Team (s) (please list all including all interviewers):

Lead auditor: Nicolás Byczko, Senior Social Auditor. APSCA number: CSCA 21701236.

Lead auditor APSCA status:

Team auditor: NA.

APSCA number:

Interviewers: Nicolás Byczko, Senior Social Auditor. APSCA number: CSCA 21701236.

Report writer: Nicolás Byczko, Senior Social Auditor. APSCA number: CSCA 21701236.

Report reviewer: Maria Ivory Motus, Report Reviewer

Date of declaration: 22/03/2023.

Note: The focus of this ethical audit is on the ETI Base Code and local law. The additional elements will not be audited in such depth or scope, but the audit process will still highlight any specific issues.

This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		0	0	<ul style="list-style-type: none"> Non observed.
0B Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> Non observed.
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> Non observed.
2. Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> Non observed.
3. Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	6	0	0	<ul style="list-style-type: none"> During the document review, there was no evidence of a risk analysis of the jobs. During the document review, no lighting measurement was evidenced. During the document review, there was no evidence of noise measurement in each workplace. During the facility tour, workers without hearing protectors, eye protectors and gloves were seen in the workshop sector, carrying out tasks with a grinder. During the document review, it was evidenced that an evacuation drill was not carried out.

									<ul style="list-style-type: none"> During the document review, it was evidenced that a measurement of particulate matter was not carried out.
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> Non observed.
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> Non observed.
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> Non observed.
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> Non observed.
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> Non observed.
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> Non observed.
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> Non observed.
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> Non observed.
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> Non-Applicable.
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> Non observed.
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> Non observed.

General observations and summary of the site:

The audit was conducted by Nicolás Byczko, from Intertek. The auditor assessed and verified the facility's operations against the SMETA 4-Pillar standard and the applicable local legislation on a sampling basis in 1 day.

Overview of opening meeting, factory management responses.

On Wednesday 22/03/2023 at 8:00 hours, the auditor was allowed to enter to the factory at the above-mentioned address, in the meeting office, where the opening meeting was held with the participation of main managers of the site: Mr. Lucas Villalba – Quality Manager.

The audit process was explained following Intertek and SMETA best practice guidance, by the auditor. Audit schedule was agreed.

The closing meeting was held with the participation of people mentioned above in the opening meeting. The facility accepted all findings and all documents were signed.

- The products manufactured at this site are chia seeds and chia oil.
- Overall responsibility for meeting the standards is taken Mr. Lucas Villalba / Quality Responsible.
- There was a total of 14 employees on site, all of them were local.
- The youngest employee on site was 22 years old.
- Site has peak season between July and October.
- There were not a worker committee and a worker representative at this facility.
- Site does not use a subcontractor.
- 10 employees were selected for interview, they were interviewed as 1 group of 4 employees and the balance of 6 employees was interviewed individually.
- Payrolls and attendance records for the period of February 2023, November 2022 and July 2022 were request.
- Based on the provided attendance records, standard working hours in this facility were 48 hours per week. The working hours are from 7:30 to 11:30 and from 13:00 to 17:30 (lunch, from 11:30 to 13:00).

Issues Found

NC's

6 NC was evidenced, about Safety and hygienic Conditions:

- During the document review, there was no evidence of a risk analysis of the jobs.
- During the document review, no lighting measurement was evidenced.
- During the document review, there was no evidence of noise measurement in each workplace.
- During the facility tour, workers without hearing protectors, eye protectors and gloves were seen in the workshop sector, carrying out tasks with a grinder.
- During the document review, it was evidenced that an evacuation drill was not carried out.
- During the document review, it was evidenced that a measurement of particulate matter was not carried out.

Observation

None.

GE

None.

Additional Auditor Remark:

None.

**Please note the table above records the total number of Non-compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.*

Site Details

Site Details											
A: Company Name:	Agropecuaria Produza SA										
B: Site name:	Agropecuaria Produza SA										
C: GPS location: (If available)	GPS Address: NA.	Latitude: -24.8427207015. Longitude: -55.029277154									
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Issued by Itakyry Municipality under File N° 215/19. RUC 80032060-3										
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Chia seeds and chia oil.										
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>The industry is located in Itakyry, near to Ciudad del Este. Alto Paraná district. In the east of Paraguay.</p> <p>There is one main building:</p> <table border="1"> <thead> <tr> <th>Production Building no 1</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground floor</td> <td>Administrative offices and production area.</td> <td>Size: 2.400 square meters.</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>None.</td> </tr> </tbody> </table> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details:</p> <p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F4: Please give details: Constructive Materials: Concrete floor, brick walls and sheet metal roof. The building construction year is 2015.</p>		Production Building no 1	Description	Remark, if any	Ground floor	Administrative offices and production area.	Size: 2.400 square meters.	Is this a shared building?	No	None.
Production Building no 1	Description	Remark, if any									
Ground floor	Administrative offices and production area.	Size: 2.400 square meters.									
Is this a shared building?	No	None.									
G: Site function:	<input type="checkbox"/> Agent <input type="checkbox"/> Factory Processing/Manufacturer <input checked="" type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker										

	<input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
<p>H: Month(s) of peak season: (if applicable)</p>	<p>Site has peak season between July and October.</p>
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>The main product manufactured by the facility are cleaned chia seeds and chia oil. The main production processes are listed as follows: reception, cleaning, classification of seeds, packaging, stored and despatch. For chia oil, a pressing, filtration, storage and packaging stage is also added. The main machine list of the factory is as following: 2 vibrating sifters, two classifiers, 6 silos, 1 packaging machine and 1 forklift. An oil extraction line (press, filter, tanks, packaging machine).</p>
<p>J: What form of worker representation / union is there on site?</p>	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input checked="" type="checkbox"/> None
<p>K: Is there any night production work at the site?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes approx. % of workers in on site accommodation
<p>M: Are there any off site provided worker accommodation buildings</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes approx. % of workers
<p>N: Were all site-provided accommodation buildings included in this audit</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If No, please give details

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 8:00 A2: Day 1 Time out: 16:00	A3: Day 2 Time in: NA. A4: Day 2 Time out: NA.	A5: Day 3 Time in: NA. A6: Day 3 Time out: NA.
B: Number of auditor days used:	1 (1 auditor in 1 day).		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If No, why not: Unknown requirement by the company.		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Lucas Villalba / Quality Responsible.		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	09/02/2022.		
J: Previous audit type:	SVA 4P		
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives

A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	There are no worker representatives (Not required by law).		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	There are no union representatives (It is not required by law).		

Worker Analysis

The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity.

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	13	0	0	0	0	0	0	13
Worker numbers – female	1	0	0	0	0	0	0	1
Total	14	0	0	0	0	0	0	14
Number of Workers interviewed – male	9	0	0	0	0	0	0	9
Number of Workers interviewed – female	1	0	0	0	0	0	0	1
Total – interviewed sample size	10	0	0	0	0	0	0	10

A: Nationality of Management	Paraguayan.	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: Paraguay</p>	<p>Was the list completed during peak season?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: NA</p>
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1: 100 %.	
D: Worker remuneration <i>(management information)</i>	<p>D: 0 % workers on piece rate</p> <p>D1: 0 % hourly paid workers</p> <p>D2: 100 % salaried workers</p> <p>Payment cycle:</p> <p>D3: 0 % daily paid</p> <p>D4: 0 % weekly paid</p> <p>D5: 100 % monthly paid</p> <p>D6: 0 % other</p> <p>D7: If other, please give details: NA.</p>	

Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	1 group of 4 employees.
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	Male: 5. Female: 1.
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If N, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	It is an orderly and serious company to work. The employees have direct communication with the owner. It is a family business.
I: What did the workers like the most about working at this site?	Wages are always paid on time. The facility management was kind to them.
J: Any additional comment(s) regarding interviews:	Most employees enjoyed working at this facility.
K: Attitude of workers to hours worked:	Good.
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>If Yes, please give details: NA.</i>	
M: Attitude of workers:	

(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk

Audit Results by Clause

0A: Universal Rights covering UNGP

[\(Click here to return to summary of findings\)](#)

0.A. Guidance for Observations

0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.

0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights

0.A.3 Businesses shall identify their stakeholders and salient issues.

0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.

0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.

0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.

Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- The facility had a policy, endorsed at the highest level, covering human rights impacts and issues, and it is communicated to all appropriate parties, including its own suppliers.
- The manager was responsible for implementing standards concerning human rights.
- The facility measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- Where businesses have an adverse impact on human rights within any of their stakeholders, they address these issues and enable effective remediation.
- The facility has a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter (suggestion mailbox and web site).

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Employee Handbook.
- Code of ethics and Supplier Code of Conduct.

Any other comments:

- None.

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: it stipulates complying with respect human rights.</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Mrs. Estefanny Duarte. Job title: HR Manager.</p>
<p>C: Does the businesses have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: suggestion mailbox and web site.</p>
<p>D: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All employees' private information such as personal identity information managed by HR manager.</p>

Findings	
<p>Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/></p> <p>Description of observation: None observed.</p> <p>Local law or ETI/Additional elements / customer specific requirement: Not applicable.</p> <p>Comments: Not applicable.</p>	<p>Objective evidence observed: Not applicable.</p>

Good examples observed:	
<p>Description of Good Example (GE): None observed.</p>	<p>Objective Evidence Observed: Not applicable.</p>

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	Last year: 2022: 0	This year: 2023: 0.
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	0.	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year / 2] * number available workdays in the year	Last year: 2022: 0.	This year: 2023 0.
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month	0.	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Accidents records were provided to review.	
F: Annual Number of work related accidents and injuries per 100 workers: [Number of work related accidents and injuries * 100) / Number of total workers]	Last year: 2022. Number: 0.	This year: 2023. Number: 0.
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [Number of work related accidents and injuries * 100) / Number of total workers]	0.	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	Last year: 2022 0.	This year: 2023. 0.
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	6 months 0.	12 months 0.
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	6 months 0.	12 months 0.

0B: Management system and Code Implementation

[\(Click here to return to summary of findings\)](#)

- 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
- 0.B.2 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with
- 0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
- 0.B.4 Suppliers are expected to communicate this Code to all employees.
- 0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- The facility implements and maintains systems for delivering compliance to this Code.
- The facility had set up policy and pointed one staff to update labor law requirements.
- The company conducts training at the beginning of the employment relationship and annually of the integrated management system, quality, environment, occupational safety and social responsibility.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Audit interviews.
- Documents Review.
- Facility tour.

Any other comments:

- None.

Management Systems:

A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe: NA.
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Conduct code. Policy states that the facility will never employ and use any child labor.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	During the facility tour and document review no child labor was found.

D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe: when the worker enters, the manual of behavior is explained to him.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: training records were provided.
F; Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). <i>Please detail (Number and date).</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe: NA.
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Mrs. Estefanny Duarte / HR Manager.
H: Is there a senior person /manager responsible for implementation of the Code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Mr. Lucas Villalba / Quality Responsible.
I: Is there a policy to ensure all worker information is confidential	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: The worker documentation is stored in HR office.
J: Is there an effective procedure to ensure confidential information is kept confidential	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: All employees' private information such as personal identity information is managed by HR office.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: annual audits of each sector of the company are carried out.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: annual audits of each sector of the company are carried out.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: NA.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	Details: the site has all required land rights, licenses and permission such as house property certificate.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Internal legal audit.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, how does the company obtain FPIC: NA.
Q: Is there evidence that facility site compensated the owner/lessor for the land prior to the facility being built or expanded. Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: the facility acquired and used the land according the legal procedure and project's requirement.
R. Does the Facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: Not applicable, the facility did not have plan of land acquisition.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: no illegal appropriation of land for facility building or expansion of footprint.

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code: None observed.</p> <p>Local law and/or ETI requirement Not applicable.</p> <p>Recommended corrective action: Not applicable.</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>Not applicable.</p>

Observation:	
<p>Description of observation: None observed.</p> <p>Local law or ETI requirement: Not applicable.</p> <p>Comments: Not applicable.</p>	<p>Objective evidence observed: Not applicable.</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed.</p>	<p>Objective evidence observed: Not applicable.</p>

1: Freely Chosen Employment

[\(Click here to return to summary of findings\)](#)

ETI

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- During the audit, there were no apparent violations noted regarding employment conditions. There was no evidence of forced, bonded or prison labour.
- Moreover, during interviews and document review it was noted that employees are not required to lodge any kind of deposit or their identity papers with their employer and are free to leave their employer.
- No work of forced, bonded or involuntary imprisonment was observed. The factory did not require any payment for work tools, PPE, IC/staff card, training, etc.
- The company did not use prison labour.
- The above was confirmed in management and employee interview.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Personnel files.
- Management and employee interview.
- Facility tour.

Any other comments:

- None.

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes please give details and category of workers affected</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes please give details and category of worker affected</p>
<p>C: Is there Any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes please give details and category of worker affected</p>
<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding: NA.</p>

<p>E: If any part of the business is UK based / registered & turnover is 36m+ there is a requirement to publish a 'modern day slavery statement.' F: Is there a modern day slavery statement published</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please describe finding:</p> <p><input checked="" type="checkbox"/> Not applicable</p>
<p>G: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please describe finding: NA.</p>
<p>H: Does the site understand the risks of forced / trafficked / bonded labour in it's supply chain</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes please give details and category of workers affected:</p> <p><input checked="" type="checkbox"/> Not applicable</p>
<p>I: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please describe finding: No forced / trafficked labour. There is good work environment.</p>

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code: None observed.</p> <p>Local law and/or ETI requirement Not applicable.</p> <p>Recommended corrective action: Not applicable.</p> <p>Action By: Not applicable. Recommended completion timescale: Not applicable. Verification method: Not applicable.</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>Not applicable.</p>

Observation:	
<p>Description of observation: None observed.</p> <p>Local law or ETI requirement: Not applicable.</p>	<p>Objective evidence observed:</p> <p>Not applicable.</p>

Comments: Not applicable.	
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Good Examples observed:	
Description of Good Example (GE): None observed.	Objective evidence observed: Not applicable.

2: Freedom of Association and Right to Collective Bargaining are Respected

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

ETI

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- No apparent violations noted. There are policies or procedures regarding freedom of association, no findings were observed at the time of the audit.
- There are not union representatives (It is not required by law).

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Social compliance system program and procedure.
- Employee interview and management interview.

Any other comments:

None.

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (None). <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input checked="" type="checkbox"/> None
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Is there any other form of effective worker/management communication channel? (Other	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Describe: Direct communication with the different managers.

than union/worker committee) e.g. H&S, sexual harassment	Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No NA	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input type="checkbox"/> Yes <input type="checkbox"/> No Details: NA.	
F: Name of union and union representative, if applicable:	NA.	Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If no union what is parallel means of consultation with workers e.g. worker committees?	NA.	Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
I: Were worker representatives freely elected?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Date of last election: NA.
J: Do workers know what topics can be raised with their representatives?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA.	
K: Were worker representatives/union representatives interviewed	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: NA.	
L: State any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	NA.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)	<input type="checkbox"/> Yes <input type="checkbox"/> No NA.	
N: If Yes what percentage by trade Union/worker representation	0 % workers covered by Union CBA	0 % workers covered by worker rep CBA
O: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay	<input type="checkbox"/> Yes <input type="checkbox"/> No NA.	

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed.</p> <p>Local law and/or ETI requirement: Not applicable.</p> <p>Recommended corrective action: Not applicable.</p> <p>Action By: Not applicable. Recommended completion timescale: Not applicable. Verification method: Not applicable.</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>Not applicable.</p>

Observation:	
<p>Description of observation: None observed.</p> <p>Local law or ETI requirement: Not applicable.</p> <p>Comments: Not applicable.</p>	<p>Objective evidence observed:</p> <p>Not applicable.</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed.</p>	<p>Objective evidence observed: Not applicable.</p>

3: Working Conditions are Safe and Hygienic

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

ETI

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- The facility has a health & safety system directed by Mr. Lucas Villalba.
- Sufficient clean toilets segregated by gender were available always to employees.
- Ventilation and temperature were adequate for the production processes.
- During the facility tour was observed that the company has smoke detectors, fire alarms and fire extinguishers in each area. No evidence of fire history was found.
- Firefighting equipment was adequate, and checks were up to date. Maintenance and recharge of 36 fire extinguishers.
- Employees had the proper PPE, such as face mask and glove, according to the working risks.
- Emergency Plan PO-004 V03.
- Training: 03/10/2020. Firefighting training. First aid and abandonment of the area. 05/13/2022 Risk in the mechanical manipulation of forklifts.
- The fire drill was performed on 29/11/2019. Duration: 00:02:42 min. Meeting point: entrance.
- Pest control: Ecolatino. Register N° 0100 0046 EF-RE Senave.
- Drinking water: Sienco Analisis especializados. 24/11/2022. Microbiological and Physicochemical Controls OK. Lic. Natalia Glardina MP 1302.
- 6 NC was evidenced, about Safety and Hygienic Conditions:
 - During the document review, there was no evidence of a risk analysis of the jobs.
 - During the document review, no lighting measurement was evidenced.
 - During the document review, there was no evidence of noise measurement in each workplace.
 - During the facility tour, workers without hearing protectors, eye protectors and gloves were seen in the workshop sector, carrying out tasks with a grinder.
 - During the document review, it was evidenced that an evacuation drill was not carried out.
 - During the document review, it was evidenced that a measurement of particulate matter was not carried out.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Training records and certificates.
- Fire equipment maintenance records.
- Interviews with the Manager.
- Interviews with employees.
- Facility tour.

Any other comments:

- None.

<p>A: Does the facility have general Health & Safety and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: the facility have general Health & Safety and occupational Health & Safety policy. All employees receive regular and recorded health & safety training.</p>
<p>B: Are the policies included in worker's manual?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: the policies are included in worker's manual.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Details: NA.</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: EPPs are given to visitors when they enter in the production area.</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: yes, the company has a contracted medical service.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Details: the company has a contracted medical service.</p>
<p>G: Where facility provides worker transport - it is fit for purpose, safe and maintained and operated by</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Details: No transport provided to employees.</p>

competent persons e.g. buses and other vehicles	
H: Secure personal storage space is provided for workers in their living space and is fit for purpose	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: lockers
I: H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and there are controls to reduce identified risk	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: one per year.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: the facility has obtained the environment impact assessment report approval.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: All employees receive regular and recorded health & safety training.

Non-compliance:	
<p>1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>During the document review, there was no evidence of a risk analysis of the jobs.</p> <p>Local law and/or ETI requirement Decree N° 14390/92, art. 249: For the choice of the most appropriate personal protective equipment to be used in a specific job, the following conditions will be basically met: a) Location of the existing risk or risks and definition of their characteristics and origin (Risks of physical, chemical and biological origin). b) Part or parts of the body that must be protected (skull, face, visual apparatus, hearing apparatus, trunk, upper extremities, lower extremities, respiratory apparatus, etc.). c) Protective equipment that is necessary.</p> <p>ETI code 3.1.: A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Recommended corrective action: Please carry out a risk analysis by job position.</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>Document review.</p>

<p>Action By: Mr. Lucas Villalba – Quality Responsible. Recommended completion timescale: 30 days. Verification method: Desktop</p>	
<p>2. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>During the document review, no lighting measurement was evidenced.</p> <p>Local law and/or ETI requirement Decree N° 14390/92, art. 225: Minimum levels of lighting in industrial environments. The minimum illumination intensities according to the different jobs and industries will be those observed in the following table: 20 luxes: Hall, courtyards and passageways, operations in which the distinction is not essential. 50 luxes: such as material handling, packaging waste, hygienic services. 100 luxes When it is necessary a slight distinction of details such as manufacture of iron and steel products, textile workshop and manufacturing industries, machine rooms and boilers, elevators. 200 luxes: If a moderate distinction of detail is essential, such as: assemblies, media, machine works, sewing, canning industry, printing, carpentry. 300 luxes Where essential is the distinction of medium details, such as: assembly work, spray painting, typography, accounting, shorthand and office work in general. 500 luxes In work in which a fine distinction of details is indispensable under conditions of contrasts, such as: correction of proofs, milling, turning, drawing. 1000 luxes: Works that demand an extremely fine distinction or under difficult contrast conditions, such as: color or art work, delicate inspections, precision assemblies, fine print jobs, etc.</p> <p>ETI code 3.1.: A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Recommended corrective action: Please perform a lighting measurement.</p> <p>Action By: Mr. Lucas Villalba – Quality Responsible. Recommended completion timescale: 30 days. Verification method: Desktop</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>Document review.</p>
<p>3. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>During the document review, there was no evidence of noise measurement in each workplace.</p> <p>Local law and/or ETI requirement</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>Document review.</p>

<p>Decree N ° 14.390/92, art 232: the maximum tolerance limits allowed in workplaces without the use of personal protection devices, such as plugs, headphones, helmets, etc., are established, in relation to the times of exposure to noise, in the following: Continuous or intermittent noises. Duration Sound level in per day (hours) decibels "a" of (a) (A)</p> <p>8:00 85 7:00 86 6:00 87 5:00 88 4:30 89 4:00 90 3:30 91 3:00 92 2:40 93 2:15 94 2:00 95 1:45 96 1:15 98</p> <p>ETI code 3.1.: A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Recommended corrective action: Please perform a noise measurement.</p> <p>Action By: Mr. Lucas Villalba – Quality Responsible. Recommended completion timescale: 30 days. Verification method: Desktop</p>	
<p>4. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>During the facility tour, workers without hearing protectors, eye protectors and gloves were seen in the workshop sector, carrying out tasks with a grinder.</p> <p>Local law and/or ETI requirement Decree N° 14390/92, art. 249: For the choice of the most appropriate personal protective equipment to be used in a specific job, the following conditions will be basically met: a) Location of the existing risk or risks and definition of their characteristics and origin (Risks of physical, chemical and biological origin). b) Part or parts of the body that must be protected (skull, face, visual apparatus, hearing apparatus, trunk, upper extremities, lower extremities, respiratory apparatus, etc.). c) Protective equipment that is necessary.</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>Document review.</p>

<p>ETI code 3.1.: A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Recommended corrective action: Please train the staff and deliver the corresponding PPE to the workers.</p> <p>Action By: Mr. Lucas Villalba – Quality Responsible. Recommended completion timescale: 30 days. Verification method: Desktop</p>	
<p>5. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>During the document review, it was evidenced that an evacuation drill was not carried out.</p> <p>Local law and/or ETI requirement Decree N ° 14.390/92, art 69: Alarm and fire drills. To check the proper functioning of the prevention systems and the training of the firefighting teams, and so that the workers, in general, know and participate in them, alarms and fire drills will be carried out periodically by order or under the direction of the Chief. Team or Fire Brigade, which will only warn of them to people who must be informed in order to avoid damage or unnecessary risks.</p> <p>ETI code 3.1.: A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Recommended corrective action: Please carry out an evacuation drill with all the workers.</p> <p>Action By: Mr. Lucas Villalba – Quality Responsible. Recommended completion timescale: 30 days. Verification method: Desktop</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>Document review.</p>
<p>6. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>During the document review, it was evidenced that a measurement of particulate matter was not carried out.</p> <p>Local law and/or ETI requirement Decree N ° 14.390/92, art 244: In all workplaces where irritating or toxic substances are used, handled or manufactured, the preventive measures established in article 162 of this Regulation for their handling and storage will be adopted, as well as the application provisions contained in This chapter.</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>Document review.</p>

<p>The workers will be informed verbally and by means of written instructions, of the risks inherent to their activity, measures to be taken for their own protection and means provided for their defense.</p> <p>ETI code 3.1.: A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Recommended corrective action: Please perform a particulate matter measurement.</p> <p>Action By: Mr. Lucas Villalba – Quality Responsible. Recommended completion timescale: 30 days. Verification method: Desktop</p>	
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Observation:	
<p>1. Description of observation: None observed.</p> <p>Local law or ETI requirement: Not applicable.</p> <p>Recommended corrective action: Not applicable.</p>	<p>Objective evidence observed: Not applicable.</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed.</p>	<p>Objective Evidence Observed: Not applicable.</p>

4: Child Labour Shall Not Be Used

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

ETI

- 4.1 There shall be no new recruitment of child labour.
- 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- There is an informal procedure for checking ages of employees at application stage, and this includes checking ID's.
- Once employees have joined, their original ID's are copied and given back to them whilst copies only are kept in their personnel file.
- Checks of all employees' files showed that the youngest employee present was age 22 years old.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Personnel files of all employees.
- Latest list of employees.
- Facility tour.

Any other comments:

- None.

A: Legal age of employment:	15 years old.
B: Age of youngest worker found:	22 years old.
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details: NA.

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed.</p> <p>Local law and/or ETI requirement: Not applicable.</p> <p>Recommended corrective action: Not applicable.</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>Not applicable.</p>

Observation:	
<p>Description of observation: None observed.</p> <p>Local law or ETI requirement: Not applicable.</p> <p>Comments: Not applicable.</p>	<p>Objective evidence observed: Not applicable.</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed.</p>	<p>Objective Evidence Observed: Not applicable.</p>

5: Living Wages are Paid

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key information\)](#)

ETI

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- All employees are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- All social insurance payments were given on to the relevant authorities in a timely manner.
- All employees' wages were calculated by hours.
- All employees are paid monthly (bank). Employees sign and receive their pay slip.
- Through document review and facility tour, no inconsistency was found between production records and provided attendance records.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Employee interview.
- Local and national laws.
- Local legal minimum wage documents.
- Payroll records and attendance records.
- Social insurance and payment receipts from the local labor department.
- Pay slips of all employees interviewed.

Any other comments:

- None.

Non-compliance:

<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed.</p> <p>Local law and/or ETI requirement: Not applicable.</p> <p>Recommended corrective action: Not applicable.</p>	<p>Objective evidence observed: (where relevant please add photo numbers) Not applicable.</p>
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Observation:	
<p>Description of observation: None observed.</p> <p>Local law or ETI requirement: Not applicable.</p> <p>Comments: Not applicable.</p>	<p>Objective evidence observed: Not applicable.</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed.</p>	<p>Objective Evidence Observed: Not applicable.</p>

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 48 hours/week.	A1: 48 hours/week.	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 3 hours per day, 9 hours per week and 36 hours per month.	B1: No overtime hour was observed.	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum:	C1: 2.639.568 Gs per month,	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	2.550.307Gs. per month, 98.089 Gs per da	101.522 Gs per day.	
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 150 % on regular days and 200 % on rest days and holidays.	D1: No overtime hour was observed.	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Wages analysis: (Click here to return to Key Information)	
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A1: If No , why not?	NA.
B: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	10 samples from February 2023 (current month). 10 samples from November 2022 (random month). 10 samples from July 2022 (peak month).
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If Yes , please give details: NA.
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A D1: If No , please give details: NA.
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> 2.639.568 Gs per month, 101.522 Gs per day
F: Please indicate the breakdown of workforce per earnings:	F1: 0 % of workforce earning under minimum wage. F2: 0 % of workforce earning minimum wage. F3: 100 % of workforce earning above minimum wage.
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i> NA.
H: What deductions are required by law e.g. social insurance? Please state all types:	Social insurance fee.

I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made.	1. IPS (Retirement and Social insurance fee). Please describe: NA.
		I2: Please list all deductions that have not been made.	1. 2. Please describe: NA.
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	L1: Please give details: all time worked was paid.	
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	M1: Please specify amount/time: NA.	
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: not applicable, there is no a defined living wage.		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: Please give details: HR office updates the wages according to the law.	
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	P1: Please give details: payroll records review and employee's interviews. It was confirmed that equal rates are being paid for equal work.	

Q: How are workers paid:

- Cash
- Cheque
- Bank Transfer
- Other

Q1: If other, please explain:

6: Working Hours are not Excessive

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[\(Click here to return to Key Information\)](#)

ETI

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where **all** of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- During this audit, auditor had randomly selected production record, such as: Material in/out records, daily production reports, and crosschecked these records with payroll records and attendance records, no inconsistency was noted. In addition, through employee interview, no inconsistency was noted either.
- During employees' interviews, they stated that they worked overtime hours on voluntary basis
- Employees work from 7:30 to 11:30 and from 13:00 to 17:30 (lunch, from 11:30 to 13:00).

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Employee interview.
- Management interview.

- Local and national laws.
- Facility policy on working hours.
- Time book.
- Sample pay slips with recorded hours all employees interviewed.

Any other comments:

- None.

Non-compliance:

1. Description of non-compliance:

NC against ETI NC against Local Law NC against customer code:

None observed.

Local law and/or ETI requirement:

Not applicable.

Recommended corrective action:

Not applicable.

Objective evidence observed:

(where relevant please add photo numbers)

Not applicable.

Observation:

Description of observation:

None observed.

Local law or ETI requirement:

Not applicable.

Comments:

Not applicable.

Objective evidence observed:

Not applicable.

Good Examples observed:

Description of Good Example (GE):

None observed.

Objective Evidence Observed:

Not applicable.

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)			
Systems & Processes			
A. What timekeeping systems are used: time card etc.	Describe: finger print.		
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details: NA.		
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: NA.	
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:	
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> 0 hrs
		If "Other", Please define:	
		NA	
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: NA.	
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
		Maximum number of days worked without a day off (in sample):	
		6 days.	

Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency: NA.
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details: NA.
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 0 hours/ month, 0 hours/week and 0 hours/day in February 2023 (current month). 0 hours/ month, 0 hours/week and 0 hours/day in November 2022 (random month). 0 hours/ month, 0 hours/week and 0 hours/day in July 2022 (peak month).	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	NA.	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: worker interviews.
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of standard wages: 150 % on regular days, 200 % rest days and holidays.
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: 100 % of employees.

<p>O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p>	<p> <input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other NA. </p>
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<p> <input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify) </p>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details: </p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Employees work overtime hours voluntarily. </p>
<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>	<p>NA.</p>
<p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p>	<p>NA.</p>

7: No Discrimination is Practiced

[\(Click here to return to summary of findings\)](#)

ETI

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- As informed by interviewed employees, most employees spoke highly of the facility owner.
- Equal pay for equal job in the facility.
- No employee was required to do the examination of the hepatitis B virus and HIV.
- There was no evidence of harassment.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Facility tour.
- Interviews.
- Document review.

Any other comments:

- None.

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male 93 % A2: Female 7 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	0.
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found C1: Please give details: NA.

Professional Development

A: What type of training and development are available for workers?
 Human rights training, safety, occupational health and quality.

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?
 Yes
 No
 If no, please give details: NA.

Non-compliance:

1. Description of non-compliance:
 NC against ETI NC against Local Law NC against customer code:
 None observed.

Local law and/or ETI requirement:
 Not applicable.

Recommended corrective action:
 Not applicable.

Objective evidence observed:
(where relevant please add photo numbers)
 Not applicable.

Observation:

Description of observation:
 None observed.

Local law or ETI requirement:
 Not applicable.

Comments:
 Not applicable.

Objective evidence observed:
 Not applicable.

Good Examples observed:

Description of Good Example (GE):
 None observed.

Objective Evidence Observed:
 Not applicable.

8: Regular Employment Is Provided

[\(Click here to return to summary of findings\)](#)

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ETI

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Additional Elements: Responsible Recruitment

8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.

8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.

8.5 Employment agencies must only supply workers registered with them.

8.6 Workers pay no recruitment fee at any stage of the recruitment process.

8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- During the audit, there were no apparent violations noted regarding regular employment practices. The work is performed based on the recognition of the employment relationship established through national law and practice. The facility hires its employees through a selection and interview mechanism, based on employee's abilities.
- All employees were recruited by the facility directly. No labor agency was used to hire employees.
- No subcontractors were used.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Facility tour.
- Personal files.
- Payroll records were provided for review.

Any other comments:

- None

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed.</p> <p>Local law and/or ETI requirement: Not applicable.</p> <p>Recommended corrective action: Not applicable.</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>Not applicable.</p>

Observation:	
<p>Description of observation: None observed.</p> <p>Local law or ETI requirement: Not applicable.</p> <p>Comments: Not applicable.</p>	<p>Objective evidence observed:</p> <p>Not applicable.</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed.</p>	<p>Objective Evidence Observed: Not applicable.</p>

Responsible Recruitment

All Workers	
<p>A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?</p>	<p><input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: NA.</p>
<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>B1: If yes, please describe details and specific category(ies) of workers affected: NA.</p>

<p>C: If yes, check all that apply:</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – <p>C1: If other, please give details:</p>
<p>D: If any checked, give details:</p>	<p>NA.</p>

<p>Migrant Workers:</p> <p><i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i></p>			
<p>A: Type of work undertaken by migrant workers:</p>	<p>NA. There are no migrant workers.</p>		
<p>B: Please give details about recruitment agencies for migrant workers:</p>	<p>B1: Total number of (in country recruitment agencies) used: 0</p> <p>B2: Total number of (outside of local country) recruitment agencies used: 0</p>		
<p>C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?</p>	<table border="1" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <ul style="list-style-type: none"> <input type="checkbox"/> Yes <input type="checkbox"/> No <p>C1: Please describe finding:</p> </td> <td style="width: 50%; vertical-align: top;"> <p>C2: Observations:</p> </td> </tr> </table>	<ul style="list-style-type: none"> <input type="checkbox"/> Yes <input type="checkbox"/> No <p>C1: Please describe finding:</p>	<p>C2: Observations:</p>
<ul style="list-style-type: none"> <input type="checkbox"/> Yes <input type="checkbox"/> No <p>C1: Please describe finding:</p>	<p>C2: Observations:</p>		
<p>D: Are Any migrant workers in skilled, technical, or management roles</p> <p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	<ul style="list-style-type: none"> <input type="checkbox"/> Yes <input type="checkbox"/> No <p>D1: If yes, number and example of roles: NA.</p>		

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other B1 – If other, please give details: NA.
C: If any checked, give details:	Not applicable, no fees required.

Agency Workers (if applicable) <i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	A1: Names if available: Not applicable, site does not use agencies.
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details:

<p>E: Does the site have a system for checking labour standards of agencies? If yes, please give details.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details:</p>
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Contractors: <i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
<p>A: Any contractors on site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>A1: If yes, how many contractors are present, please give details: NA.</p>
<p>B: If Yes, how many workers supplied by contractors?</p>	<p>NA. No contractor on site.</p>
<p>C: Do all contractor workers understand their terms of employment?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please describe finding: NA.</p>
<p>D: If Yes, please give evidence for contractor workers being paid per law:</p>	<p>NA.</p>

8A: Sub-Contracting and Homeworking

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

8A.1 There should be no sub-contracting unless previously agreed with the main client.

8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.

Note to auditor on homeworking:

Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.

Note to auditor on subcontracting: auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- A facility tour showed that all production processes were present in the unit.
- There were no subcontractors or homeworking used by the facility.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- Facility tour (Calculation on total production and estimated capacity).
- Materials in/out records.
- Management interview.
- Worker interview.

Details:

- None.

Non-compliance:

1. Description of non-compliance:

NC against ETI/Additional Elements

NC against Local Law

NC against customer code:

None observed.

Local law and/or ETI /Additional Elements requirement:

Not applicable.

Recommended corrective action:

Not applicable.

Objective evidence observed:

(where relevant please add photo numbers)

Not applicable.

Observation:	
<p>Description of observation: None observed.</p> <p>Local law or ETI/Additional elements requirement: Not applicable.</p> <p>Comments: Not applicable.</p>	<p>Objective evidence observed: Not applicable.</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed.</p>	<p>Objective Evidence Observed: Not applicable.</p>

Summary of sub-contracting – if applicable <input checked="" type="checkbox"/> Not Applicable please x	
<p>A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe:</p>
<p>B: If sub-contractors are used, is there evidence this has been agreed with the main client?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No B1: If Yes, summarise details:</p>
<p>C: Number of sub-contractors/agents used:</p>	
<p>D: Is there a site policy on sub-contracting?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No D1: If Yes, summarise details:</p>
<p>E: What checks are in place to ensure no child labour is being used and work is safe?</p>	

Summary of homeworking – if applicable <input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If Yes , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?			
F: What processes are carried out by homeworkers?			
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

9: No Harsh or Inhumane Treatment is Allowed
[\(Click here to return to summary of findings\)](#)

ETI

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Additional elements:

9.2 companies should provide access to a confidential grievance mechanism for all workers

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Suggestion mailbox and web site (produzafoods.com).
B: If Yes , are workers aware of these channels and have access? Please give details.	NA.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	NA.
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: Suggestion mailbox and web site (www.produza.com.py).
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details: NA.
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: If no, please give details: There is not an anonymous reporting mechanism.
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain: NA.
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details: NA.

<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>II: If yes, please give details: NA.</p>
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Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- During the audit, there were no signs of physical abuse or discipline or any other type of intimidation.
- The company has an anonymous reporting mechanism for all workers such as suggestion mailbox and web site (www.produza.com.py).

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Facility tour.
- Audit interviews.
- Document review.

Any other comments:

- None.

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed.</p> <p>Local law and/or ETI requirement: Not applicable.</p> <p>Recommended corrective action: Not applicable.</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>Not applicable.</p>

Observation:	
<p>Description of observation: None observed.</p> <p>Local law or ETI requirement: Not applicable.</p> <p>Comments: Not applicable.</p>	<p>Objective evidence observed:</p> <p>Not applicable.</p>

Good Examples observed:

Description of Good Example (GE):
None observed.

Objective Evidence Observed:
Not applicable.

10. Other Issue areas: 10A: Entitlement to Work and Immigration

[\(Click here to return to NC-table\)](#)

Additional Elements

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.

10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- Per document review, facility management representation and employee interviews, all employees had the proper legal rights to work in this region. The youngest was 22 years old. All of them were recruited directly by the facility and no agency was involved in facility's recruitment processes.
- IPS, RUC. 80002269/6. February 2023. 21.153.810 Gs. Payment Atlas Bank.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Audit interviews.
- Personal ID Documentation.

Any other comments:

- None.

Non-compliance:

1. Description of non-compliance:

NC against ETI/Additional Elements

NC against Local Law

NC against customer code:

None observed.

Local law and/or ETI /Additional Elements requirement:

Not applicable.

Recommended corrective action:

Not applicable.

Objective evidence observed:

(where relevant please add photo numbers)

Not applicable.

Observation:	
<p>Description of observation: None observed.</p> <p>Local law or ETI/Additional Elements requirement: Not applicable.</p> <p>Comments: Not applicable.</p>	<p>Objective evidence observed: Not applicable.</p>

Good examples observed:	
<p>Description of Good Example (GE): None observed.</p>	<p>Objective Evidence Observed: Not applicable.</p>

10. Other issue areas 10B4: Environment 4–Pillar

[\(Click here to return to summary of findings\)](#)

To be completed for a 4–Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar

B.4. Compliance Requirements

10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.

10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.

10B4.3 Businesses shall be aware of their end client’s environmental standards/code requirements

10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.

10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details).

10B4.7 Businesses shall make continuous improvements in their environmental performance.

10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation

10B4.9 Businesses should have a nominated individual responsible for co–ordinating the site's efforts to improve environmental performance.

B4. Guidance for Observations

10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.

10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in place. Following this assessment, the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- The facility management maintained all legally required environmental documents in place which proved that the production of the factory followed the related environmental regulations.
- Most of the legally required certificates including the registration form of environmental impacts of the construction. Approval of environmental impact assessment document and the environmental protection check, and acceptance were available and valid during this audit.
- Responsible for the environmental system: Eng Agr. Odila Gimenez Reg SEAM CTCA N° I-566.
- Certificate of environmental aptitude. MADES DGCCARN N° 1022/2021.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Environmental policy.
- Worker and management interview.
- Facility walkthrough.
- Document review.

Any other comments:

- None.

Non-compliance:

1. Description of non-compliance:

NC against ETI/Additional Elements

NC against Local

NC against customer code:

None observed.

Local law and/or ETI/Additional Elements requirement:

Not applicable.

Recommended corrective action:

Not applicable.

Action By: Not applicable.

Recommended completion timescale: Not applicable.

Verification method: Not applicable.

Objective evidence observed:

(where relevant please add photo numbers)

Not applicable.

Observation:

Description of observation:

None observed.

Local law or ETI/Additional elements requirements:

Not applicable.

Comments:

Not applicable.

Objective evidence observed:

Not applicable.

Good examples observed:

Description of Good Example (GE):

None observed.

Objective Evidence Observed:

Not applicable.

Environmental Analysis <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Mr. Lucas Villalba / Quality Responsible.
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: environmental impact assessment.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: NA.
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, is it publicly available? Yes.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: yes, it establishes the reduction of the key impacts from their operations and their commitment to improvement.
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please gives details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: NA.
H: Have all legally required permits been shown? Please gives details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: All legally required environmental documents were provided for review.
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Details: Stock control.
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: legal advisor to the company.
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: water, energy and waste.

L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: The company manages its waste (batteries, oil, domiciliary, etc.) properly.
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: monthly measurements (energy).
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The administration controls the documentation of each provider.

Usage/Discharge analysis

Criteria	Previous year: Please state period: 01/2022.	Current Year: Please state period: 01/2023.
Electricity Usage: Kw/hrs	6.536	10.894
Renewable Energy Usage: Kw/hrs	Not used	Not used
Gas Usage: Kw/hrs	Not used	Not used
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes , please state result	NA	NA
Water Sources: Please list all sources e.g. lake, river, and local water authority.	Artesian well.	Artesian well.
Water Volume Used: (m ³)	5	5
Water Discharged: Please list all receiving waters/recipients.	Water box	Water box
Water Volume Discharged: (m ³)	No data	No data
Water Volume Recycled: (m ³)	No data	No data
Total waste Produced (big bags)	1	1
Total hazardous waste Produced: (kg)	50	50

Waste to Recycling: (big bags)	glass bottles, gallon, aluminium can and pet bottles.	glass bottles, gallon, aluminium can and pet bottles.
Waste to Landfill: (kg)	No data	No data
Waste to other: (kg)	No data	No data
Total Product Produced (t)	1.100	1.800

10C: Business Ethics – 4-Pillar Audit

[\(Click here to return to summary of findings\)](#)

To be completed for a 4-Pillar SMETA Audit

10C. Compliance Requirements

10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.

10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.

10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.

10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.

10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,

10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics

10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

10C. Guidance for Observations

10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.

10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

Note for auditors and readers. This Business Ethics section is intended to take not more than 0.25 auditor days. It is an assessment not an audit.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- The company proved to comply with the listed requirements without violations noted during the audit regarding business practices.
- The manager was the designated person responsible for implementing standards concerning Business Ethics, and that site practices were conducted without any corruption and/or bribery.
- The company established a business ethics code which was communicated to workers through Communication board.
- The site had received and read the Business Ethics Policy of the audit company.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Intertek business practices policies.
- Supplier Ethics Policy

Any other comments:
None.

Non-compliance:

1. Description of non-compliance:

- NC against ETI/Additional Elements NC against Local
 NC against customer code:

None observed.

Local law and/or ETI/Additional Elements requirement:
Not applicable.

Recommended corrective action:
Not applicable.

Action By: Not applicable.
Recommended completion timescale: Not applicable.
Verification method: Not applicable.

Objective evidence observed:
(where relevant please add photo numbers)

Not applicable.

Observation

Description of observation:
None observed.

Local law or ETI/Additional elements requirement:
Not applicable.

Comments:
Not applicable.

Objective evidence observed:

Not applicable.

Good examples observed:

Description of Good Example (GE):
None observed.

Objective Evidence Observed:
Not applicable.

<p>A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy <input type="checkbox"/> Policy for third parties including suppliers</p> <p>Please give details: Ethics and conduct code.</p>
<p>B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues</p>	<p>Yes.</p>
<p>C: Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: It is reviewed annually and if necessary modified.</p>
<p>D: Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: NA.</p>

Other findings

Other Findings Outside the Scope of the Code

None observed.

Community Benefits

(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)










None.

Appendix 1

Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."

Not Applicable please x

Photo Form

		
<p>1. Industry.</p>	<p>2. Emergency exit.</p>	<p>3. Lockers.</p>
		
<p>4. First aid kit.</p>	<p>5. Water dispenser.</p>	<p>6. Fire Extinguisher.</p>
		
<p>7. Fire alarm.</p>	<p>8. Canteen.</p>	<p>9. Electrical box.</p>



10. Workshop.



11. Recycling waste



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Your feedback on your experience of the SMETA audit you have observed is extremely valuable. It will help to make improvements to future versions.

You can leave feedback by following the appropriate link to our questionnaire:

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](#)

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw_3d_3d

[Click here for Supplier \(B\) members:](#)

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d

[Click here for Auditors:](#)

<https://www.surveymonkey.co.uk/r/BRTVCKP>