

Sedex Members Ethical Trade Audit Report





	Au	Jdit D	etails					
Sedex Company Reference: (only available on Sedex System)	ZC: 1086341		Sedex Site Reference: (only available on Sedex System)			ZS: 1071048		
Business name (Company name):	Industrias Borja INBC	ORJA S	SA					
Site name:	Industrias Borja INBC	ORJA S	SA					
Site address: (Please include full address)	22), 2.5 Km Vía	Barbones - Santa Cruz, El Guabo, El Oro,			Ecuad	dor		
Site contact and job title:	Marta Borja Perez –	Gene	eral Manager					
Site phone:	+593 3704000		Site e-mail:		inborj	a@inborja.com.ec		
SMETA Audit Pillars:	□ Labour Standards □	Health & Safety (plus Environment 2-Pillar)		Environn 4-pillar	nent	⊠ Business Ethics		
Date of Audit:	March 29-31, 2022							

Audit	Company	Mama	Ω.	1 000.
Audit	Company	name	Ō.	LOGO:

International Compliance Group



Report Owner (payer):

(If paid for by the customer of the site please remove for Sedex upload)

Industrias Borja INBORJA S A

Audit Conducted By								
Affiliate Audit Company		Purchaser		Retailer				
Brand owner		NGO		Trade Union				
Multi– stakeholder			Combined Audit (select all that appl	у)			

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):

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

Lead auditor: Nery Rodulfo Castañeda Larios APSCA number: RA21705334

Lead auditor APSCA status: In Good Standina

Team auditor: None APSCA number: None

Interviewers: Nery Rodulfo Castañeda Larios RA21705334

Report writer: Nery Rodulfo Castañeda Larios RA21705334

Report reviewer: Karla Tapia – CSCA 21700911

Date of declaration: March 31, 2022

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 (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing		Area of Non-Conformity (Only check box when there is a non- conformity, and only in the box/es where the non-conformity can be found)			Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)	
	e audit report, hyperlinks are retained.	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Universal Rights covering UNGP					0	0	0	NC: None Obs: None GE: None
OB	Management systems and code implementation					0	0	1	NC: None Obs: None GE: 1. The facility has the following certificates: • Global Standard for Food Safety • Swiss Bio International Certification • National Customs Service of Ecuador • FAIRTRADE • HALAL • KOSHER CERTIFICATE • US National Organic Program (NOP) 7 CFR Part 205 • Organic Production Standard equivalent to • Article 29(1) of Regulation (EC) No. 834/2007 • JAS • RAINFOREST ALLIANCE

1.	Freely chosen Employment			0	0	0	NC: None Obs: None GE: None
2	<u>Freedom of Association</u>			0	0	0	NC: None Obs: None GE: None
3	Safety and Hygienic Conditions			0	0	0	NC: None Obs: None GE: None
4	<u>Child Labour</u>			0	0	0	NC: None Obs: None GE: None
5	Living Wages and Benefits			0	0	1	NC: None Obs: None GE: 1. The facility provides services at no cost to employees, such as: Bus transportation Bood at lunch Accident insurance Tablet for virtual classes One day of extra salary at the time of the Employee's birthday Coexistence with employees at the end of the year
6	Working Hours			0	0	0	NC: None Obs: None GE: None
7	<u>Discrimination</u>			0	0	0	NC: None

Obs: None GE: None NC: None 8 Regular Employment 0 0 0 Obs: None GE: None 8A Sub-Contracting and 0 0 NC: None **Homeworking** Obs: None GE: None \Box 9 Harsh or Inhumane Treatment 0 0 NC: None Obs: None GE: None \Box П NC: None Entitlement to Work 0 0 10A 0 Obs: None GE: None П 10B2 **Environment 2-Pillar** 0 0 0 NC: None Obs: None GE: None 10B4 Environment 4-Pillar 0 0 NC: None Obs: None GE: 1.The facility has made changes to its structure to contribute to the environment, the changes have been: Change of Diesel for Natural Gas for machinery operation 50% switch from gas to electric forklifts Placement of led lamps Change of lamp that are activated with solar light



10C	Business Ethics					0	0	0	NC: None Obs: None GE: None
The Fa	al observations and sumn cility is located at Av. Milt y and the facility has its o	on Borja (Calle 22), 2.							ador. Access to the facility is guarded by 24/7 tion.
	cility is dedicated to the rentractors.	eception of bananas,	ripening	g, peeling, m	ashing and	d shipping	g, curre	ently the	facility does not have production
	The facility has a one-story building with a mezzanine, on the ground floor the processes of receiving raw material, maturation, peeling, pureeing and shipping are carried out, on the upper floor there are administrative offices								
	The factory has a production line. The monthly production capacity of the factory is 2,000 tons of puree per month.								
	ctory has working hours fro production peaks, overtin	•	m. from <i>N</i>	Monday to Fr	iday with c	a half hou	ur break	k for lund	ch for the employees. 4:30 pm. at 8:30 p.m.
Currer	itly this factory does not sh	nare a building.							

^{*}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:	Industrias Borja INBORJA S A					
B: Site name:	Industrias Borja INBORJA S A					
C: GPS location: (If available)	GPS Address: Latitude: -3.166139 Longitude: -79.839031					
D: Applicable business and other legally required licence numbers and documents, for example, business	Municipal Operating Patent, Nu 1, 2021 to June 2, 2022	ımber 10860, valid from January				
license number, liability insurance, any other required government inspections	Environmental License Code Ma valid from June 24, 2015 to June	AE-SUIA-RA-DPAEO-2015-200413, e 30, 2050				
	RUC: 0790060288001, registered date	6/16/1982 without expiration				
	Social security code: 079006028	8001				
	Internal work regulations: Endorsed by the dated December 17, 2018					
	Internal Hygiene Regulation: Endorsed by the Ministry d August 26, 2020					
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Products: Banana puree Activities: Reception of banana and shipping	s, ripening, peeling, mashing				
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The Facility is located at Av. Milt Barbones - Santa Cruz, El Guabo the facility is guarded by 24/7 se own security guard. The facility the same location.	o, El Oro, Ecuador. Access to ecurity and the facility has its				
	The facility is dedicated to the reception of bananas, ripening, peeling, mashing and shipping, currently the facility does not have production subcontractors.					
	The facility has a one-story build ground floor the processes of re maturation, peeling, pureeing a the upper floor there are admin	ceiving raw material, and shipping are carried out, on				
	The factory has a production lin The monthly production capaci puree per month.					



	For below, please ac	ld any extra rows if a	ppropriate.			
	Production Building no	Description	Remark, if any			
	Floor 1	the reception of raw material, maturation, peeling, puree and shipment is carried out	36 years			
	Floor 2	administrative offices	36 years			
	Is this a shared building?	No				
	building? F1: Visible structural integrity issues (large cracks) observed? ☐ Yes ☐ No F2: Please give details: No visible structural integrity issues observed during the visual inspection, the building looks in good conditions. F3: Does the site have a structural engineer evaluation? ☐ Yes ☐ No F4: Please give details: The factory has a structural evaluation of the building internally, inspections are carried out every month, there are records of the inspections					
G: Site function:	Agent Factory Processing Finished Product S Grower Homeworker Labour Provider Pack House Primary Producer Service Provider					
H: Month(s) of peak season: (if applicable)	January - May					
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Process: Banano Pure Main equipment use Production lines: 1					
J: What form of worker representation / union is there on site?	Union (name) Worker Committe Other (specify) None	е				
K: Is there any night production work at the site?	☐ Yes ⊠ No					



L: Are there any on site provided worker accommodation buildings e.g. dormitories	Yes No L1: If yes, approx. % of workers in on site accommodation NA- No dorms
M: Are there any off site provided worker accommodation buildings	Yes No M1: If yes, approx. % of workers NA- No dorms
N: Were all site-provided accommodation buildings included in this audit	Yes No N1: If no, please give details NA- No dorms



	Audit Parameters								
A: Time in and time out	A1: Day 1 Time in: 8:30 am A2: Day 1 Time out: 16:30 hrs A3: Day 2 Time in: 8:30 am A4: Day 2 Time out: 16:00 hrs A5: Day 3 Time in: 8:30 am A6: Day 3 Time out: 13 hrs								
B: Number of auditor days used:	1 Auditor: 20 hours / 8 = 2	.5 man-days							
C: Audit type:	Full Initial Periodic Full Follow-up Partial Follow-Up Partial Other If other, please define								
D: Was the audit announced?	□ Announced □ Semi – announced: Wi □ Unannounced	indow detail: weeks							
E: Was the Sedex SAQ available for review?	Yes No E1: If No, why not?								
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes ☑ No If Yes , please capture de	tail in appropriate audit by	/ clause						
G: Who signed and agreed CAPR (Name and job title)	Marta Borja Perez – Gene	eral Manager							
H: Is further information available (If yes, please contact audit company for details)	☐ Yes ☑ No								
I: Previous audit date:	NA								
J: Previous audit type:	NA								
K: Were any previous audits reviewed for this	☐ Yes ☐ No								
audit	⊠ N/A								



Audit attendance	Management		Worker Repr	esentativ	ves	
	Senior management		Worker Committee representatives		Union representatives	
A: Present at the opening meeting?	⊠ Yes	□No	☐ Yes	⊠ No	☐ Yes	⊠ No
B: Present at the audit?	⊠ Yes	□No	☐ Yes	⊠ No	☐ Yes	⊠ No
C: Present at the closing meeting?	⊠ Yes	□No	☐ Yes	⊠ No	Yes	⊠ No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	The factory does not have a union or workers committee; however, it does have a worker representative who was present throughout the audit process					
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	This factory	has not u	nion			



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*			Total			
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers				
Worker numbers – Male	96	58	0	0	0	0	0	154			
Worker numbers – female	43	28	0	0	0	0	0	71			
Total	139	86	0	0	0	0	0	225			
Number of Workers interviewed – male	6	6	0	0	0	0	0	12			
Number of Workers interviewed – female	7	7	0	0	0	0	0	14			
Total – interviewed sample size	13	13	0	0	0	0	0	26			





A: Nationality of Management	Ecuadorian	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. Please add more nationalities as applicable to site. Add more rows if required.	Nationalities: B1: Nationality 1: _ Ecuadorian B2: Nationality 2: B3: Nationality 3:	Was the list completed during peak season? ☐ Yes ☐ No If no, please describe how this may vary during peak periods:
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1100% C1: approx % total workforce: Nationality 2 C2: approx % total workforce: Nationality 3	
D: Worker remuneration (management information)	D:% workers on piece rate D1:% hourly paid workers D2:100% salaried workers Payment cycle: D3:% daily paid D4:% weekly paid D5:% monthly paid D6:100% other D7: If other, please give details: biweekly	

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Worker Interview St	ummary	
A: Were workers aware of the audit?	⊠ Yes □ No	
B: Were workers aware of the code?	⊠ Yes □ No	
C: Number of group interviews: (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)	Four groups of five emp	loyees each group
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 3	D2: Female: 3
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. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	∑ Yes ☐ No If no, please give details	3
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	⊠ Yes □ No	
G: In general, what was the attitude of the workers towards their workplace?	☐ Favourable☐ Non-favourable☐ Indifferent	
H: What was the most common worker complaint?	None	
I: What did the workers like the most about working at this site?	The facility provides servemployees, such as:	rices at no cost to
	Bus transportation Bood at lunch Accident insurance Tablet for virtual classes One day of extra salary Employee's birthday Coexistence with employear	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	The facility has better po other facilities	ayments compared to



L. Is there any worker survey information available?
☐ Yes ☐ No L1: If yes, please give details:
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
For the interview, 26 workers were selected, including 13 men and 13 women, who were interviewed in four groups of 5, and 6 workers were interviewed individually. During the interviews, the workers were assured of the confidentiality of the information, they were also told that the interviews are voluntary, and they confirmed their participation.
The workers commented that at the time of their hiring, the factory described in detail the working conditions, and these are based on legal requirements, the factory gave them an employment contract and a copy of the contract. They also mentioned that the factory pays fortnightly, payments are always punctual, in addition, the factory sends them a payment receipt by email, specifying what they are paying and discounting, payments always coincide with the deposits made.
In general, the workers are happy to work in this factory as the management shows interest in attending and solving problems.
N: Attitude of worker's committee/union reps: (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
No worker's committee nor union
O: Attitude of managers: (Include attitude to audit, and audit process. Both positive and negative information should be included)

The factory showed a transparent attitude during the audit, facilitating the free access of the auditor to the facilities and documentation.



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:

A.1. Policies and Procedures on human rights.

The center has a written human rights policy based on local legislation and the ETI Basic Code, 1 Pol DH, made on March 15, 2022

The policy signed by the worker is kept in the worker's file and is displayed for workers and visitors to see on the production floor.

The ETI code is published through screens in the dining room that display information about company policies and the ETI code.

0.A.2. Responsible for human rights regulations.

The facility has appointed to María Gabriela Maldonado Borja, according to minute No. 1 May 12, 2018 - ACT-NR.SMETAto implement standards related to human rights.

0.A.3/4/5 Impacts on human rights

The facility has policies and procedures based on local and national law to ensure that providers work with the requirements of local law.

0.A.6 Transparent system to communicate human rights impacts.

The facility has implemented several systems that allow workers to report any human rights impact transparently and confidentially:



- A complaint box in the plant and a written procedure for its use, the procedure is communicated during the induction process to all workers.
- An open-door policy, which is published and communicated to all workers during induction.

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

Details:

Policies and procedures on human rights.

Training of workers in human rights- During the induction process.

Policy for use of the complaints box: signed by the employee and filed.

Communication of the ETI code to suppliers and interested parties.

Employee files (selected sample 26)

Open Door Policy - Signed by the employee and kept in the worker's file.

Data privacy policy: signed by employee, records available in each employee's file.

Procedure – PRO.TAH.004, Use of mailbox for complaints, suggestions, reports and concerns in food safety, safety, health, environment and business ethics

Any other comments: None

A: Policy statement that expresses commitment to respect human rights?	Yes No A1: Please give details: The facility has a human rights policy. This policy is based on the ETI Base Code and local and national laws.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	 ☐ Yes☐ No Please give details: Name: Maria Gabriel Maldonado Job title: HR Manager
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	Yes No C1: Please give details: The center has implemented a complaints and suggestions mailbox and a procedure for using the complaints mailbox, open door policy
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rightscompatible, a source of continuous learning and based on stakeholder engagement)	☐ Yes ☐ No D1: If no, please give details
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	☐ Yes ☐ No E1: Please give details: The factory has a Data Privacy policy which is signed and protected in the files of the workers. This policy is posted on the production floor, at the time of conducting interviews with employees they confirm that they are aware of the policys



Findings		
Finding: Observation Company NC Description of observation:	Objective evidence observed:	
None	None	
Local law or ETI/Additional elements / customer specific requirement: None		
Comments: None		
Good examples observed:		
Description of Good Example (GE): None	Objective Evidence Observed:	



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)	A1: Last year: 29.83 %	A2: This year 7.72%
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	7.81%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: _6.49%	C2: This year _2.51 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	2.51%	
E: Are accidents recorded?	Yes No E1: Please describe: The factory has an accident registration and monitoring system, to establish corrective and prevention actions, those registered are reported to the Ecuadorian Institute of Social Security -IESS- as a national legal requirement.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total worke rs]	F1: Last year: Number: 4.06%	F2: This year: Number: 0.37%
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]	0.37%	
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]	H1: Last year: 39.43%	H2: This year: 2.6%
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 68% workers	I2: 12 months63% workers



J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:

J1: 6 months _5.15_____% workers J2: 12 months __11___% workers

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:

0.B.1. ETI code compliance system.

The facility conducts internal audits every 6 months to verify site performance. The facility has written policies and procedures based on the ETI code and local law.

0.B.2 Legal permits and operating licenses

Municipal Operating Patent, Number 10860, valid from January 1, 2021 to June 2, 2022

Environmental License Code MAE-SUIA-RA-DPAEO-2015-200413, valid from June 24, 2015 to June 30, 2050

RUC: 0790060288001, registered 6/16/1982 without expiration date

Social security code: 0790060288001

Internal work regulations: Endorsed by the Ministry of Labor dated December 17, 2018

Internal Hygiene Regulation: Endorsed by the Ministry dated August 26, 2020

0.B.3 Responsible for compliance with the code within the facility

The facility has appointed to María Gabriela Maldonado Borja, according to minute No. 1 May 12, 2018 - ACT-NR.SMETAto implement standards related to human rights.

0.B.4 Communication of the ETI code to employees

The facility has communicated the ETI base code to workers during the induction process. The ETI code is posted on the shop floor. The factory provided the workers with an additional leaflet identifying them with the content of the ETI code.

0.B.5 Communication of the ETI code to suppliers



Any other comments: None

The facility has communicated the content of the ETI code to its suppliers and interested parties. Evidence of the information provided is on file with each provider

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

Details:

Human rights policies and procedures / ETI base code.

Training of workers in human rights- During the induction process.

Policy and procedures based on the ETI code.

Data privacy policy

Communication of the ETI code to suppliers.

Management	Systems:
A: In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	Yes No A1: Please give details: No fines / persecutions for non-compliance to any regulations
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	Yes No B1: Please give details: Facility documents policies, employees know policies
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	The facility has adopted the ETI Base Code management system to ensure compliance with ethical standards. This information was verified in the interviews with the employees
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	Yes No D1: Please give details: All factory workers and supervisors have been trained on this policy during the induction process. Additionally, worker-signed policies are available in each employee's file. Supervisors receive constant training in the ETI code for the correct application in their work areas.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	Yes No E1: Please give details: The policies subscribed by the workers are available in the file of each employee. Workers know the content of the ETI code. This was verified in interviews with the worker.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	Yes No F1: Please give details: The facility has other certificates, not related to social audits



G: Is there a Human Resources manager/department? If Yes, please detail.	 ∑ Yes ☐ No G1: Please give details: Facility has a human resources department and a responsible person of the department in charge of ensuring that human rights are respected within the facilities
H: Is there a senior person / manager responsible for implementation of the code	Yes No H1: Please give details: The facility has designated to Maria Grabriela Maldonado / HR Manager
I: Is there a policy to ensure all worker information is confidential?	Yes No I1: Please give details: The factory has a data privacy policy which is signed by the workers and saved in the worker's file
J: Is there an effective procedure to ensure confidential information is kept confidential?	Yes No J1: Please give details: The records of the workers are kept in the office of the HR manager and only that person has access to that information
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	Yes No K1: Please give details: Internal audits are conducted by the facility every 6 months
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	Yes No L1Please give details: The audits include the non-compliances found, the solution or tentative date of compliance the degree of severity and an action plan.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	Yes No M1: Please give details: In the files of each supplier, the facility keeps the evidence of the communication of the company policies and the ETI code
Land rigi	hts
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	Yes No N1: Please give details: Municipal Operating Patent, Number 10860, valid from January 1, 2021 to June 2, 2022
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?	Yes No O1: Please give details: The facility has owned the land where it has been located for 36 years



	-	
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	Yes No P1: If yes, how does the NA – There are no disple communities	
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	∑ Yes ☐ No Q1: Please give details: process of build or expo	ansion. The facility has a
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	Yes No R1: Please give details: the process of acquiring	NA - The facility is not in g new land.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	Yes No S1: Please give details: land where it has been	The facility has owned the located for 36 years
Non-compl	iance:	
1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code:	inst Local Law	Objective evidence observed: (where relevant please add photo numbers)
None		None
Local law and/or ETI requirement: None		
Recommended corrective action: None		
Observa	tion:	
Description of observation: None		Objective evidence observed:
Local law or ETI requirement: None		None
Comments: None		140110
Good Examples	observed:	
Description of Good Example (GE):		Objective evidence observed:
1. The facility has the following certificates:		Interview with employees,
 Global Standard for Food Safety Swiss Bio International Certification National Customs Service of Ecuador 		interview with management



- FAIRTRADE
- HALAL
- KOSHER CERTIFICATE
- US National Organic Program (NOP) 7 CFR Part 205
- Organic Production Standard equivalent to
- Article 29(1) of Regulation (EC) No. 834/2007
- JAS
- RAINFOREST ALLIANCE
- SSGF

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:

1.1 No forced labour.



The center has developed written policies and procedures on forced labor, involuntary imprisonment or bonded labor.

The facility has a written policy to ensure that all work performed on the site is voluntary, this information was confirmed during the worker interview and verification of the employee file.

During the hiring process, the facility requests original documents and copies to validate the applicant's information, once the facility validates the information, the original documentation is returned to the applicant and copies of the documents are kept in each employee's file.

Currently, the facility maintains an employee file with all relevant documentation and the contract signed by both parties.

This facility does not have hired immigrants.

1.2 Voluntary work

The facility does not resort to practices such as deposits or retain original documents of workers, only copies of documents are kept on file as part of the hiring documents.

The PPE, work tools, uniforms, and training, is provided to workers at no cost.

There are no restriction clauses in the contracts.

Employees are free to leave the factory during their lunch break and at the end of their workday.

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

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I)	Δ t	α	ılc

Employees Files (Sample of 26).

Internal Work Regulations

Employment Contracts.

Policies and procedures based on the ETI codes

Training records on ETI code-During the induction process

Hiring procedure

Employees Interviews.

Manger interview.

Revision on-site.

Any other comments: None

A: Is there any evidence of retention of original documents, e.g. passports/ID's	☐ Yes ☐ No A1: If yes, please give details and category of workers affected: NA
B: Is there any evidence of a loan scheme in operation	☐ Yes ☐ No B1: If yes, please give details and category of worker affected: NA
C: Is there any evidence of retention of wages /deposits	☐ Yes ☐ No C1: If yes, please give details and category of worker affected: NA
D: Are there any restrictions on workers' freedom to terminate employment?	Yes No D1: Please describe finding: No restrictions on workers' freedom to terminate employment were found, this was confirmed with the workers during interviews.



		The state of the s
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	☐ Yes ☐ No ☑ Not applicable E1: Please describe finding: Facility is not ba	sed in the UK
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	Yes No F1: Please describe finding: No restriction cla contracts. Employees can leave the factory their shift, this was confirmed during employ	rfreely at the end of
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	Yes No Not applicable G1: If yes, please give details and category During the tour of the facility, no evidence of	
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	Yes No H1: Please describe finding: The facility has i prohibiting forced labor and it was commur suppliers.	
	Non–compliance:	
1. Description of non-compliance: NC against ETI NC against Local Law: NC against customer code:		
□ NC against ETI □ NC again code:	nst Local Law: NC against customer	Objective evidence observed: (where relevant please add photo numbers)
☐ NC against ETI ☐ NC again	nst Local Law: NC against customer	observed: (where relevant please
□ NC against ETI □ NC again code:		observed: (where relevant please add photo numbers)
□ NC against ETI □ NC again code:	lone	observed: (where relevant please add photo numbers)
NC against ETI NC again code: None Local law and/or ETI requirement: N	lone	observed: (where relevant please add photo numbers)
NC against ETI NC again code: None Local law and/or ETI requirement: N	lone	observed: (where relevant please add photo numbers)
NC against ETI NC again code: None Local law and/or ETI requirement: N	lone None	observed: (where relevant please add photo numbers)
NC against ETI NC again code: None Local law and/or ETI requirement: N Recommended corrective action: N	lone None	observed: (where relevant please add photo numbers) None Objective evidence observed:
NC against ETI NC again code: None Local law and/or ETI requirement: N Recommended corrective action: N Description of observation: None	lone None	observed: (where relevant please add photo numbers) None Objective evidence
NC against ETI NC again code: None Local law and/or ETI requirement: N Recommended corrective action: N Description of observation: None Local law or ETI requirement: None	lone None	observed: (where relevant please add photo numbers) None Objective evidence observed:
NC against ETI NC again code: None Local law and/or ETI requirement: N Recommended corrective action: N Description of observation: None Local law or ETI requirement: None	lone None	observed: (where relevant please add photo numbers) None Objective evidence observed:
NC against ETI NC again code: None Local law and/or ETI requirement: N Recommended corrective action: N Description of observation: None Local law or ETI requirement: None	Observation: Good Examples observed:	observed: (where relevant please add photo numbers) None Objective evidence observed:
NC against ETI NC again code: None Local law and/or ETI requirement: N Recommended corrective action: N Description of observation: None Local law or ETI requirement: None Comments: None	Observation: Good Examples observed:	observed: (where relevant please add photo numbers) None Objective evidence observed: None Objective evidence



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:

2.1 Freedom of Association.

The facility has a written policy on freedom of association and collective bargaining based on the ETI code and a local law that is communicated to workers in the induction process, published at the entrance of the facility

2.2 Attitude of the employer in the right to freedom of association.

The facility has adopted an open attitude towards freedom of association.

The facility has implemented a transparent and confidential system for making complaints and suggestions, the facility has a complaints box available to workers.

The procedure is communicated to workers during the induction process and published in view of the workers.

2.3-2.4 Union or worker's committee.

The facility does not have a union or workers' committee, the facility has a workers' representative elected by the workers.

In Ecuador, having a union is not a legal requirement.

The plant also has a workers' committee made up of plant workers, the workers' committee called the Occupational Safety and Health Committee, which holds monthly meetings of which the minutes of the meetings are kept as a record.

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

Details:

Written policy and procedure on freedom of association.

ETI code training records.



Open door policy. Policy on the use of the complaint and suggestions box. Minutes of meetings workers committee Employee interviews. Interview with representatives of the workers committee. Manager Interview. Revision on-site Any other comments: None					
A: What form of worker representation/union is there on site?	☐ Union (name) ☐ Worker Committee ☐ Other (specify) ☐ None				
B: Is it a legal requirement to have a union?	☐ Yes ☐ No				
C: Is it a legal requirement to have a worker's committee?	☐ Yes ☐ No				
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	 Yes No D1: Please give details: The facility has implemented a transparent and confidential systems in place to do complaints and suggestions, the facility has a grievance box available to the workers. D2: Is there evidence of free elections? Yes No 				
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	Yes No E1: Please give details: Meetings are held in the boardroom, the factory has photographic evidence of the meetings and written minutes of those meetings. This information was confirmed in interviews with workers and workers' representatives.				
F: Name of union and union representative, if applicable:	NA - No union	F1: Is there evidence of free elections? Yes No N/A			
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	This factory does not have a union; however, the workers elected a worker representative, during the audit the elections were confirmed.	G1: Is there evidence of free elections? ☑ Yes ☐ No ☐ N/A			
H: Are all workers aware of who their representatives are?	⊠ Yes □ No				



I: Were worker representatives freely elected?	⊠ Yes □ No	11: Date of 2021	of last election: September 28,
J: Do workers know what topics can be raised with their representatives?	⊠ Yes □ No		
K: Were worker representatives/union representatives interviewed?	∑ Yes □ No If Yes, please state how many: The workers' representative was interviewed during the audit.		
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The facility does not have a workers' union. The facility has a workers' committee called the Occupational Health and Safety Committee. The last meeting was held on February 28, 2022, dealing with issues related to personnel evacuation drills and training planning for the year 2022.		
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ⊠ No		
If Yes , what percentage by trade Union/worker representation	M1: _0% workers cove Union CBA	ered by	M2:0% workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	☐ Yes ☑ No NA - No CBA		
	Non-compliance:		
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code:			Objective evidence observed: (where relevant please add photo numbers)
None			None
Local law and/or ETI requirement: No			
Recommended corrective action: No	ne		
	Observation:		
Description of observation: None			Objective evidence observed:
Local law or ETI requirement: None	Local law or ETI requirement: None		
Comments: None			None
Comments. None			
Comments. None	Good Examples observ	/ed:	



None



3: Working Conditions are Safe and Hygienic

(Click here to return to summary of findings) (Click here to return to Key Information)

FTI

- 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:

3.1 General Health and Safety management

The facility has a written health and safety policy based on local law.

The establishment has implemented a Health and Safety system to prevent the transmission of the COVID-19 disease, the program has been implemented in accordance with the legal provisions of Ecuador

The facility conducted an annual assessment of fire risks, use of PPE, noise, and lighting.

The facility has a business license issued by the authority.

The facility conducts monthly inspections of fire extinguishers, first aid kits, smoke detectors, fire alarms, emergency exits, the electrical system, and emergency lighting.

Currently, the facility has carried out evacuation drills, in accordance with legal provisions.

The H&S team maintains an accident register with all the relevant information about incidents and accidents at work.

The plant delivers the PPE to the Workers at no cost, this was verified during the interviews and the minutes of delivery of the PPE.

The facility has an Environmental Operating License

3.2 Health & Safety training

Facility has members trained on Evacuation, Firefighting, Search and Rescue and First aid.

The policies and relevant procedures are communicated to all employees during the induction process.

3.3 Services

The facility provides restrooms by gender, they are clean and safe. Toilet paper, hand drying devices, soap, hand sanitizer, and water are provided free of charge and sufficient for the number of workers. During interviews, employees said they can use the restrooms at any time.

The factory has a medical service that attends to the workers.

The facility conducts daily testing of drinking water.

The establishment provides a cafeteria service.



3.4 Dorms

Facility does not provide dorms; it is not a legal requirement.

3.5 Responsibility

The facility has designated to Julio Toro / Compliance Manager

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

Details:

Records:

Fire extinguisher and first aid training. March 17, 2021 carried out by Lieutenant Roberto Rodriguez, from the SR Fire Department. Peter Cojitambo, next training will be held on April 4, 2022 proof of payment number 4956

Training in chemical management carried out on November 27, 2021, by Ing Julio Toro Costa

Training in the proper use of PPE, will take place on January 28, 2022, by Ing Julio Toro Costa

Training in Safe Operation of Forklifts held December 14, 2021 valid until December 21, 2022

Training in accident management held from March 4 to 11, 2022

Fire/Emergency Evacuation Drills:

Daytime drill held on October 29, 2021, hours 8:50 pm -8:55 pm, 169 employees evacuated

Night drill November 30, 2021, hours 19:00-19:04. 123 employees evacuated.

Upcoming Drills, July 2022

Security controls:

-ABC fire extinguishers: 32 -CO2 fire extinguishers: 36 -Mobile Fire Extinguisher: 4 -Smoke detection: 35

-Fire alarm: 19
-Doctors: 1
-Enfermera: 1
-First aid kit: 2
-First Aid Squad: 9
-Evacuation Squad: 7

-Search and Rescue Brigade: 8

-Emergency exit: 4 -Meeting point: 1 -Evacuation Plans: 4 -Emergency lights: 20

Services:

-Women's restrooms: 7

-Men's bathrooms: 3 + 3 urinals.

Any other comments: None



A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	 ∑ Yes □ No A1: Please give details: The facility has written policies and procedures on health and safety issues based on ETI Code and local law.
B: Are the policies included in workers' manuals?	 ∑ Yes No B1: Please give details: The policies are included during the Induction process to workers and the evidence sign by workers are archived in the employee file
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	Yes No C1: Please give details: There are not any structural additions
D: Are visitors to the site informed on H&S and provided with personal protective equipment	 ☐ Yes ☐ No D1: Please give details: The facility provides the necessary personal protective equipment, such as earplugs, rubber boots, Due to the declaration of a pandemic by COVID-19, the factory takes security measures that are transmitted to visitors and provides gel alcohol to employees and visitors, masks for employees, take the temperature upon entering the facilities and at noon by the medical service.
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.	Yes No E1: Please give details: The factory has 1 medical room for the attention of the workers. For the medical service they have 1 doctors
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	Yes No F1: Please give details: For the medical service they have 1 doctor. The facility has a first aid brigade. The last training was held on march 17, 2021, next training will be held on April 4, 2022 proof of payment number 4956
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	 ∑ Yes ☐ No G1: Please give details: The establishment provides transportation for shifts, transportation has vehicle insurance
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	☐ Yes ☐ No H1: Please give details: This facility has not dorms
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	 ☐ Yes ☐ No I1: Please give details: The facility has an evaluation to determine the most effective PPE according to the work area of each employee



J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	Yes No J1: Please give details: Environmental License Code MAE-SUIA-RA-DPAEO-2015-200413, valid from June 24, 2015 to June 30, 2050				
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	Yes No K1: Please give details: There are no banned chemicals at site				
	Non-compliance:				
Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None		Objective evidence observed: (where relevant please add photo numbers)			
NOHE					
Local law and/or ETI requirement: None		None			
Recommended corrective action: None					
Observation:					
Description of observation: None		Objective evidence observed:			
Local law or ETI requirement: None	None				
Recommended corrective action: None					
Good Examples observed:					
Description of Good Example (GE): None		Objective Evidence Observed: None			



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:

4.1 Child labour.

The facility has developed written policies and procedures to prevent child labor, based on the ETI Code and local and national laws.

The establishment has a written hiring procedure that guarantees that minors are not hired.

The plant maintains an employee file with all the documents required by law: Age Identification, Social Security number, job application, etc. that validate the age and nationality of the workers.

4.2 Development programs for minors.

Currently this facility does not hire under 18 years.

4.3 Working conditions for minors

Currently this facility does not hire under 18 years.

4.4 Policies and procedures on child labour.

The youngest worker is 19 years old, his date of birth is February 15, 2003 and he was hired on January 19, 2022

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

Details:

Worker's file (sample of 26). Contracts based on legal provisions. Employees Interviews. Manager interview. Revision on-site.

Any other comments: None

A: Legal age of employment:	Over 18 years old.
-----------------------------	--------------------



B: Age of youngest worker found:	19s years old.			
C: Are there children present on the work floor but not working at the time of audit?	☐ Yes ☑ 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)	☐ Yes ☑ No E1: If yes, give details: NA			
	Non compliance			
	Non–compliance:			
Description of non-compliance: NC against ETI NC against Loccode:	cal Law NC against customer	Objective evidence observed: (where relevant please add photo numbers)		
None		None		
Local law and/or ETI requirement: None		None		
Recommended corrective action: None				
	Observation:			
Description of observation: None		Objective evidence observed:		
Local law or ETI requirement: None				
Comments: None		None		
Good Examples observed:				
Description of Good Example (GE):		Objective Evidence Observed:		
1. The facility provides services at no cost	to employees, such as:			
Bus transportation Bood at lunch Accident insurance Tablet for virtual classes One day of extra salary at the time of the Coexistence with employees at the end o		Interviews with employees and record of payments do not show deductions for services		
	- ,			



5: Living Wages are Paid

(Click here to return to summary of findings) (Click here to return to Key information)

FTI

- 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:

5.1 Payments and compensation required by law

The local minimum wage according to Executive Decree No. 286, of December 13, 2021 from January 1, 2022 and SALARIES AND MINIMUM SECTORAL SALARIES AND RATES SECTORIAL MINIMUM WAGES 2022 is \$434 US dollars per month

Workers are paid biweekly. Payment is made by bank transfer. The facility maintains payroll records in accordance with local law requirements.

The facility has a fingerprint time registration system

All social security payments were made on time and all workers are registered with the IESS.

The factory delivers the records of payment vouchers to each employee, this information was verified in interviews with the workers.

5.2 Employment conditions

All employees are informed about their benefits and terms of employment during the hiring process. Terms of pay and compensation are written in each employee's contracts. Contracts are signed by employees and employers. The records are available in each employee's file.

5.3 Disciplinary deductions

The deductions made by the establishment are those required by law: IESS
The facility does not make other types of deductions without the authorization of the employee: some authorized deductions are loans from the IESS, purchase of Living in the store
No disciplinary deduction practices were found.

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

Details:



Policy and procedure on payments and benefits.

training records

Social Security payments

employee file.

payment records

Employee vacation pay records

"Thirteenth" payment record paid.

Payroll Records and Time Records:

- 26 payment record samples for March 2022 from 1 to 15 paid on March 15, 2022 (currently High Season).
- 26 payment registration samples of December 2021 from 16 to 31, paid on December 31, 2021 (without high season, random).
- 26 payment record samples from May 2021 from 1 to 15 paid on May 15, 2021 (High Season, random).

Any other comments: None	
Non–compliance:	
Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)
None	None
Local law and/or ETI requirement: None	None
Recommended corrective action: None	
Observation:	
Description of observation: None	Objective evidence observed:
Local law or ETI requirement: None	observed.
·	None
Comments: None	
Good Examples observed:	
Description of Good Example (GE): None	Objective Evidence Observed:
	None



Summary Information

Summary Information			
Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 40 hours per week. 8 hours per day	A1: maximum 70 hours totals per week. Maximum 12 hours per day	A2: Yes No The facility makes an agreement with all employees to perform more hours during the week in the peak production period.
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 4 hours per day 12 hours per week	B1: 5 hours per day 30 hours per week	B2: Yes No The facility makes an agreement with all employees to perform more hours during the week in the peak production period.
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: The local minimum wage according to Executive Decree No. 286, of December 13, 2021 from January 1, 2022 and SALARIES AND MINIMUM SECTORAL SALARIES AND RATES SECTORIAL MINIMUM WAGES 2022 is	C1: The local minimum wage according to Executive Decree No. 286, of December 13, 2021 from January 1, 2022 and SALARIES AND MINIMUM SECTORAL SALARIES AND RATES SECTORIAL MINIMUM WAGES 2022 is	C2: Yes No NA- No CBA



	\$434 US dollars per month	\$434 US dollars per month	
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 125%, 150%, 200% of the base salary per hour as the case may be	D1: According to the review of the pay records, it is evidenced that the facility paid the workers overtime in accordance with the law	D2: ☐ Yes ☑ No NA- No CBA

Wages analysis: (Click here to return to Key Information)					
A: Were accurate records shown at the first request?	⊠ Yes □ No				
A1: If No , why not?	NA				
B: Sample Size Checked (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)	26 payment record samples for March 2022 from 1 to 15 paid on March 15, 2022 (currently High Season). • 26 payment registration samples of December 2021 from 16 to 31, paid on December 31, 2021 (without high season, random). • 26 payment record samples from May 2021 from 1 to 15 paid on May 15, 2021 (High Season, random).				
C: Are there different legal minimum wage grades? If Yes , please specify all.	☐ Yes ☑ No	C1: If Yes , please give details:			
D: If there are different legal minimum grades, are all workers graded and paid correctly?	☐ Yes ☐ No ☑ N/A	D1: If No , please give details:			
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	□ Below legal min ☑ Meet □ Above	E1: Lowest actual wages found: Note: full time employees and please state hour / week / month etc. Highest salary paid in sample: \$161.33 in the period December 16-31, 2021, paid December 31, 2021 (no peak season, random). Lowest wage paid in the sample: \$137.34 in the period March 2022 from 1 to 15 paid on March 15, 2022 (currently High Season).			
F: Please indicate the breakdown of workforce per earnings:	F1:% of workforce earning under minimum wage F2: _100% of workforce earning minimum wage F3:% of workforce earning above minimum wage				
G: Bonus Scheme found:	Bonus Scheme found:				



Please specify details:	Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.			
	All employees are full time. You have the law bonds Thirteenth salary Royalty distribution			
H: What deductions are required by law e.g. social insurance? Please state all types:	IESS IESS loan (Employees who apply)			
I: Have these deductions been made?	⊠ Yes □ No			Social security Grocery store Loans
				Please describe:
				9.45% is deducted from the worker's salary to contribute to social security.
				The grocery store credit is applicable if the worker takes food or drink from the store. The worker agrees to the deduction
				A fee is deducted from the worker's salary if there is a loan (loans are only available under IESS). The workers accepted the deduction.
		12: Please I deduction have not b made.	s that	None Please describe: NA
J: Were appropriate records available to verify hours of work and wages?	⊠ Yes □ No			
K: Were any inconsistencies found? (if yes describe nature)	Yes No K1: Type Poor record keeping Isolated incident Repeated occurrence:NA		ed incident	
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)	Yes No L1: Please give details: The time records reviewed reflect employee time worked and match the paid on paystubs. The meetings are held within the employees' working hours, this was confirmed in interviews.			ch the paid on paystubs.
M: Is there a defined living wage:	☐ Yes			



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.	No M1: Please specify amount/time: NA
M2: If yes, what was the calculation method used.	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage ☐ Figures provided by Unions ☐ Living Wage Foundation UK ☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation Other – please give details: NA
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	Yes No N1: Please give details: The facility has reviewed wages annually as required by law.
O: Are workers paid in a timely manner in line with local law?	Yes □ No
P: Is there evidence that equal rates are being paid for equal work:	Yess No P1: Please give details: No differences in wage paid of equal value observed in the payroll.
Q: How are workers paid:	☐ Cash ☐ Cheque ☑ Bank Transfer ☐ Other Q1: If other, please explain:



6: Working Hours are not Excessive

(Click here to return to summary of findings) (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 <u>all</u> 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:

6.1 Work hours.

The facility has created a working hours policy based on local and national legislation.

The working hours are not excessive in months of low production in the months of December to May there is a work agreement for the performance of overtime and working weekend days

The factory has working hours from Monday to Friday from 8:00 a.m. to 4:30 p.m., with 30 minutes for lunch and on Saturdays, when applicable, from 8:00 a.m. to 4:30 p.m., with 30 minutes for lunch.

All employees have a 30-minute break.

All workers have at least one day off (Sunday).

6.2 Contract Work Hours.

The working hours are defined in the contracts and do not exceed 40 hours per week in low season and 48 hours in high season in the months of December to May, there is an agreement with each worker.



Overtime, working hours and days off are established in contracts and are based on compliance with legal provisions and internal agreements.

Payments and benefits are established in contracts and are based on legal requirements.

6.3 Voluntary overtime.

HR Management team is properly trained; policies and procedures are communicated to all staff who is involved in controlling workers' working hours. Workers confirmed overtime is voluntary

6.4 - 6.5 Hours worked including overtime.

The facility has developed a written overtime pay policy based on local law: 125%, 150%, 200% of the base hourly wage is paid to the employee for overtime hours performed

Currently this facility does not work more than 60 total hours per week, this was verified by time records and employee interviews.

Ecuadorian law has a limit on overtime equal to a maximum of 4 hours per day or 12 hours per week

6.6 Free days.

The working hours of the workers include un days off (Sunday)

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

Details:

Employee's Files.

Internal regulations.

Contracts.

Employees' interviews.

Management interview.

Payroll Records and Time Records:

- 26 payment record samples for March 2022 from 1 to 15 paid on March 15, 2022 (currently High Season).
- 26 payment registration samples of December 2021 from 16 to 31, paid on December 31, 2021 (without high season, random).
- 26 payment record samples from May 2021 from 1 to 15 paid on May 15, 2021 (High Season, random).

Any other comments: None

Non-compliance:		
Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)	
None Local law and/or ETI requirement: None	None	
Recommended corrective action: None		



		Observo	ation:			
Description of observation	: None				-	e evidence
Local law or ETI requireme	ent: None				observed	:
Comments: None					None	
	Goo	d Example	es observed:			
Description of Good Exam	nple (GE): None				Objective Observed	e Evidence I:
					None	
	Please inclu	de time e.g	s' analysis . hour/week/month information)			
Systems & Processes						
A. What timekeeping systems are used: time card etc.	Describe: The factory has a time registration system for employees by fingerprint.					
B: Is sample size same as in wages section?	Yes No B1: If no, please €	give detail:	S			
C: Are standard/contracted working hours defined in all contracts/employment agreements?	⊠ Yes □ No	workers c	, please give deta do NOT have stand s/employment ag ve details:	dard hou	ırs defined	
D: Are there any other types of contracts/employment	⊠ Yes □ No	makes ar	, please complete n agreement with ring the week in th	all empl	oyees to p	erform more
agreements used?		0 hrs	☐ Part time	⊠ Vari	able hrs	Other
		If "Other", Please define:				
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	⊠ Yes □ No	and frequences of all employees peak pro	please detail hou uency ve details: The fa byees to put in mo aduction period. the er to May in the lo	cility readere hours	ches an ac during the d is in the m	greement with week in the nonths from



		of the employees, the areas are reception of raw material, peeled, maserated and packaging
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: 1 in 7 days 2 in 14 days No If 'No', please explain:	F3: Is this allowed by local law? Yes No Ecuador Labor Code, Article 52
	Maximum numbe	er of days worked without a day off (in sample):
	12 days	
Standard/Contracted Ho	ours worked	
G: Were standard working hours over 48	⊠ Yes □ No	G1: If yes, % of workers & frequency:
hours per week found?		The facility reaches an agreement with all employees to put in more hours during the week in the peak production period. this period is in the months from December to May in the last 6 months it has affected 68% of the employees, the areas are reception of raw material, peeled, maserated and packaging
H: Any local waivers/local law or	☐ Yes ☒ No	H1: If yes, please give details:
permissions which allow averaging/annualised hours for this site?	NO NO	
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	41.4 hours in the paid on Decemb	overtime hours above the legal limits in the sample: Deriod of December 2021 from December 16 to 31, 2021, Der 31, 2021 (without high season, random). 1 employee in the saintenance area
J: Combined hours (standard or contracted + overtime hours = total)	⊠ Yes □ No	
over 60 found? Please give details:	during the week from December	nes an agreement with all employees to put in more hours in the peak production period. this period is in the months to May in the last 6 months it has affected 68% of the areas are reception of raw material, peeled, maserated and
K: Approximate percentage of total workers on highest overtime hours:	5.15%	



L: Is overtime voluntary?	☐ Yes ☐ No ☐ Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Communication of the policy; records of acknowledgements kept in workers' personnel files. Employees' handbook. Overtime request form signed by workers. Worker interviews.		
Overtime Premiums				
M: Are the correct legal overtime premiums paid?	Yes No N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of standard wages: 125% night time 150% overtime 200% weekend hours and holidays		
N: Is overtime paid at a premium?	⊠ Yes □ No	N1: If yes, please describe % of workers & frequency: 125% night time 150% overtime 200% weekend hours and holidays		
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.				
where relevant.				
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes	Safeguards ar	bluntary tive bargaining allows 60+ hours/week re in place to protect worker's health and safety constrate exceptional circumstances s (please specify)		
where relevant.	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:			
	a collective barg work more than a hired 2 nurses for shift from 4:30 pm	ntary, according to an interview with the employees, there is gaining agreement with each employee that allows them to 60 hours per week in peak production months, the facility has two shifts, 1 from 8:00 a.m. 4:30 pm and another nurse on the 10:00 pm, these agreements are due to the type of food ana fermentation process is essential for the preparation of		
Q: Is there evidence that overtime hours are being used for extended	Yes No Q1: If yes, please	e give details:		



periods to make up for labour shortages or increased order volumes?	
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	 Yes No The facility is evaluating the implementation of changes in working hours such as 4x4 shifts



7: No Discrimination is Practiced

(Click here to return to summary of findings)

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:

7.1 Discrimination.

The facility has a written policy against discrimination based on ETI base code.

The facility has a written hiring procedure that allows the hiring of all people equally without discrimination. The facility has suggestion boxes to allow the worker to report any impact on human rights in a transparent and anonymous manner. In addition, the facility has a written procedure for using the complaint and

The facility ensures equal pay for workers who perform the same job.

There is no evidence of discrimination on site.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):
Details:
Policy on discrimination. Employee's files. Job profiles. Development plans. Grievance box use.
Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male:42 % A2: Female58 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	10%
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?:	 ☐ Hiring ☐ Compensation ☐ Access to training ☐ Promotion ☐ Termination or retirement ☒ No evidence of discrimination found

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	C1: Please give details: NA		
Professional Development			
A: What type of training and development are available for workers?	r job position that include Development plans discrimination.		
B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	⊠ Yes □ No		
objective, iransparent citienas	If no, please give details:		
	Non-compliance:		
Description of non-compliance: NC against ETI		Objective evidence observed: (where relevant please add photo numbers)	
None		None	
Local law and/or ETI requirement: None			
Recommended corrective action: None			
	Observation:		
Description of observation: None		Objective evidence	
Local law or ETI requirement: None		observed: None	
Comments: None			
Good Examples observed:			
Description of Good Example (GE): None		Objective Evidence Observed:	
		None	



8: Regular Employment Is Provided

(Click here to return to summary of findings)
(Click here to return to Key Information)

FTI

- 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:

8.1. Employment contracts.

All workers are hired directly by the facility.

All employees have a signed contract with the facility where the employment relationship is established. Terms of pay and compensation are written in each employee's contracts and are based on national and local laws and regulations and are also explained during the hiring process.

During the review of the employee file, it was possible to validate that all workers have an employment contract signed by employees and employers.

8.2. Social Security.

The worker's contract includes registration with the Ecuadorian Social Security Institute "IESS" in accordance with the requirements of local law.

All workers are registered in the social security "IESS".

Payments to Social Security "IESS" have been made on a monthly and punctual basis in accordance with legal provisions.

8.3 Legal requirements for hiring/agencies, contractors, subcontractors.

The Human Resources coordinator knows the hiring procedure and relies on it to hire all workers. The facility no subcontracts services



8.4 Management sy	stems for hirina.
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The facility has a system that allows it to ensure documentation of those hired.

8.5 Employment agencies

The facility does not use employment agencies.

8.6 Recruitment fee.

No evidence of recruitment payments was found.

8.7 Terms of payment and hiring

All workers were provided with written and understandable information about their employment conditions with respect to wages before they entered employment and in the induction process. Payment and compensation details are stipulated in the contract according to requirements local and national laws.

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

Details:

Hiring procedure
Social Security Payments.
Employee file.
Internal regulation
Employees interviews.
Interviews with the Human Resources Coordination.
Employees interviews

Any other comments: None

Revision on-site

Non-compliance:			
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)		
None	None		
Local law and/or ETI requirement: None			
Recommended corrective action: None			

Audit company: ICG Report reference: ICG-ZAA418655308 Date: March 29-31, 2022 Sedexglobal.com

Observation:



Description of observation: None	Objective evidence observed:		
Local law or ETI requirement: None	None		
Comments: None	None		
Good Examples observed:			
Description of Good Example (GE): None	Objective Evidence Observed:		

Responsible Recruitment

All Workers			
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?	 ☐ Terms & Conditions presented ☐ Understood by workers ☐ Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: 		
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	Yes No B1: If yes, please describe details and specific category(ies) of workers affected:		
C: If yes, check all that apply:	Recruitment / hiring fees Service fees Application costs Recommendation fees Placement fees Administrative, overhead or processing fees Skills tests Certifications Medical screenings Passports/ID's Work / resident permits Birth certificates Police clearance fees Any transportation and lodging costs after employment offer Any transport costs between work place and home Any relocation costs after commencement of employment New hire training / orientation fees Medical exam fees Deposit bonds or other deposits Any other non-monetary assets Other – C1: If other, please give details: NA		
D: If any checked, give details:	NA		



Migrant Workers: 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			
A: Type of work undertaken by migrant workers:	NA- No migrant workers		
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: NA- No migrant workers B2: Total number of (outside of local country) recruitment agencies used: NA- No migrant workers		
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?	Yes No C1: Please describe finding: NA- No migrant workers	C2: Observations: NA- No migrant workers	
D: Are Any migrant workers in skilled, technical, or management roles Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)	Yes No D1: If yes, number and example of roles: NA- No migrant workers		

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	☐ Yes ☑ No
B: If yes, check all that apply:	Recruitment / hiring fees Service fees Application costs Recommendation fees Placement fees Administrative, overhead or processing fees Skills tests Certifications Medical screenings Passports/ID's Work / resident permits Birth certificates Police clearance fees Any transportation and lodging costs after employment offer Any transport costs between work place and home Any relocation costs after commencement of employment New hire training / orientation fees Medical exam fees Deposit bonds or other deposits Any other non-monetary assets



	_			
	☐ Other			
	B1 – If other, please give details:			
	NA NA			
C: If any checked, give details:	NA			
		ho are r	Workers (if applicable) not directly paid by the site, but paid by the agency, Usually the wages of the individual workers are paid by the agency.)	
A: Number of agencies used (average):		A1: Nar	mes if available: NA- No agency workers	
B: Were agency workers' age / pay / hours included within the scope of this audit?		☐ Yes ☐ No NA- No	agency workers	
C: Were sufficient documents for agency workers available for review?		Yes No NA- No agency workers		
D: Is there a legal contract / agreement with all agencies?		☐ Yes ☐ No		
		D1: Please give details: NA		
		Yes No E1: Please give details: NA- No agency workers		
Contractors: 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,				
A: Any contractors on site?		☐ N A1:	Yes No If yes, how many contractors are present, please give ails: NA- No contractors	
B: If Yes , how many workers supplied by contractors?				
C: Do all contractor workers understand their terms of employment?		1 🔲	res No Please describe finding: NA- No contractors	
D: If Yes , please give evidence for contractor workers being paid per law:		/: NA-	· No contractors	





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:

8A.1 Subcontract production.

No subcontracting or homeworking is used by the facility

Evidence examined – to support system descripti renewal/expiry date where appropriate):	on (Documents examined & re	levant comments. Include	
Details: None			
Non-	compliance:		
1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code: None Local law and/or ETI /Additional Elements require Recommended corrective action: None	NC against Local Law ement: None	Objective evidence observed: (where relevant please add photo numbers) None	
Observation:			
Description of observation: None Local law or ETI/Additional elements requirement Comments: None	: None	Objective evidence observed: None	
Good Examples observed:			



Description of Good Example (GE): None			Objective Evidence Observed: None	
Sun	nmary of sub-contracting Not Applicable p		ble	
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	☐ Yes ☐ No A1: Please describe:			
B: If sub–contractors are used, is there evidence this has been agreed with the main client?	☐ Yes ☐ No B1: If Yes , summarise d	etails:		
C: Number of sub- contractors/agents used:				
D: Is there a site policy on sub- contracting?	Yes No D1: If Yes , summarise d	etails:		
E: What checks are in place to ensure no child labour is being used and work is safe?				
Su	mmary of homeworking Not Applicable p		le	
A: If homeworking is being used, is there evidence this has been agreed with the main client?	☐ Yes ☐ No A1: If Yes , summarise d	etails:		
B: Number of homeworkers	B1: Male:	B2: Female	:	Total:
C: Are homeworkers employed direct or through agents?	☐ Directly ☐ Through Agents		C1: If throagents:	ough agents, number of
D: Is there a site policy on homeworking?	☐ Yes ☐ 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?	☐ Yes ☐ No
	G1: Please give details:
H: Are full records of homeworkers available at the site?	☐ Yes ☐ 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?	Yes No A1: Please give details: The facility has a complaints and suggestions box.
B: If Yes , are workers aware of these channels and have access? Please give details.	Yes, it was confirmed during employee interviews
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Complaints box, complaint box use policy, workers committee
D: Which of the following groups is there a grievance mechanism in place for?	 ✓ Workers Communities Suppliers Other D1: Please give details: The center has a written procedure for using the complaint box.
	Workers are trained on this procedure during the induction process. Additionally, the facility has posted policies and procedures on complaints and suggestions.
E: Are there any open disputes?	Yes 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)	YesNoF1: If no, please give details: NA
G: Is there a published and transparent disciplinary procedure?	
H: If yes, are workers aware of these the disciplinary procedure?	YesNoH1: If no, please give details: NA



I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages	☐ Yes ☑ No
section)?	11: If yes, please give details: NA

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:

9.1 System for the prohibition of harassment or abuse on-site.

There is no evidence of physical abuse or harassment on the premises.

The center has a written policy on prohibiting harassment and abuse.

The establishment has Internal Work Regulations; It is endorsed by the Ministry of Labor of Ecuador

9.2 Claim Mechanism

The facility has suggestion boxes to allow the worker to report any impact on human rights in a transparent and anonymous manner. In addition, the facility has a written procedure for using the complaint and suggestion box.

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

Details:

Communication of the ETI code. Employees Files (selected sample 26). Employee's interviews Manager interview. Revision on-site.

Any other comments: None

Non-compliance:		
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)	
None	None	
Local law and/or ETI requirement: None		
Recommended corrective action: None		
Observation:		



Description of observation: None

Local law or ETI requirement: None

Comments: None

Objective evidence observed:

None

Good Examples observed:	
	Objective Evidence Observed: None



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:

10A.1 Legal rights

The facility has a written hiring process.

The company's hiring process includes validating the nationality and age of the workers; During the hiring process, the facility requests original documents and copies to validate the applicant's information. Once the information is verified, the copies are kept in a worker's file, the file includes the contract signed by both parties.

The factory grants an employment contract to all workers where the conditions of employment are established, these conditions are based on legal requirements. The contracts are signed by the employee and the employer.

10A.2 Employment agency.

No agency employment

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

Details:

Hiring procedure.
Employee's file Sample 26
Employee's contract.
Employees interview.
Hiring procedure.
Manager interview

Any other comments: None

Non-com	pliance:
---------	----------



1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code: NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)
None	None
Local law and/or ETI /Additional Elements requirement: None	
Recommended corrective action: None	

Observation:	
Description of observation: None	Objective evidence observed:
Local law or ETI/Additional Elements requirement: None	None
Comments: None	110116

Good examples observed:	
Description of Good Example (GE): None	Objective Evidence Observed: None



10. Other issue areas 10B2: Environment 2-Pillar

(Click here to return to summary of findings)

To be completed for a 2–Pillar SMETA Audit, and remove the following page which is 10B4 environment 4 pillar

10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.

10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

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.

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10B2.1 Environmental requirements

The facility has a written environmental policy.

The facility has designated an area for hazardous waste generated by the company.

10B2.2Customer environmental requirements

The facility knows the environmental requirements of the clients, the facility provides its clients with a copy of the environmental license issued by the government and the environmental impact study

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

Details:

Environmental License Code MAE-SUIA-RA-DPAEO-2015-200413, valid from June 24, 2015 to June 30, 2050

Any other comments: None

	Non-compliance:	
Description of non-compliance: NC against ETI/Additional Elements None	☐ NC against Local Law	Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI/Additional Elements	requirement: None	None
Recommended corrective action: None		

Observation:



Description of observation: None

Local law or ETI/additional elements requirement: None

Comments: None

Objective evidence observed:

None

Good examples observed:		
	Objective Evidence Observed: None	



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:

10B4.1 Requirements of local and national laws

The facility has environmental operating permits

10B4.2 Legal requirements for waste management

The facility has suppliers for proper waste management

10B4.3 End Customer Requirements

The requirements of the end customer in relation to the environment have been documented.

10B4.4 Environmental Policy



The facility has written an environmental policy.

10B4.5 Environmental impact assessment

The facility has carried out an environmental assessment of the processes it carries out

10B4.6 Use of energy and/or water

The facility has records of water and energy consumption

10B4.7 Improvement of the environment

A plan to reduce water and energy consumption at the facility has been documented.

10B4.8 Environmental Certification

The facility does not have environmental certification, it only has the permits required by national and local legislation

10B4.9 Responsible for Environmental Management

Julio Toro has been appointed responsible for the environment

10B4.10 SAQ Availability

The facility has the SAQ duly completed to

10B4.11 Fines to facilities for environmental issues

The facility has no fines or sanctions in environmental matters and of any other nature

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

Details:

Environmental License Code MAE-SUIA-RA-DPAEO-2015-200413, valid from June 24, 2015 to June 30, 2050

Any other comments: None

Non-compliance:		
1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code: None	□ NC against Local	Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI/Additional Elements requirement: None		None
Recommended corrective action: None		
Observation:		



Description of observation: None

Local law or ETI/Additional elements requirements: None

Comments: None

Objective evidence observed:

None

Good examples observed:

Description of Good Example (GE):

The facility has made changes to its structure to contribute to the environment, the changes have been:

Change of Diesel for Natural Gas for machinery operation 50% switch from gas to electric forklifts
Placement of led lamps
Change of lamp that are activated with solar light

Objective Evidence Observed:

Interview with employees, interview with management, purchase orders.



Environmental Analysis (Site declaration only – this has not been verified by auditor. Please state units in all cases below.)		
A: Is there a manager responsible for Environmental issues (Name and Position):	Julio Toro/ Compliance Manager	
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes No B1: Please give details: The facility documents a risk assessment on environmental issues, the environmental impact is evaluated in all the processes carried out by the facility	
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	Yes No C1: Please give details: The facility does not have an internationally recognized environmental certificate, the facility has the permits as required by national and local law	
D: Does the site have an Environmental policy? (For guidance, please see Measurement criteria)	Yes No D1: If yes, is it publicly available? An environmental policy is documented, a copy of this policy is provided to suppliers and posted in different areas of the facility for employees and visitors to read	
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	Yes No E1: Please give details: The facility has developed a plan to improve the environment, according to the risk assessment carried out in all production processes.	
F: Does the site have a Biodiversity policy? (For guidance, please see Measurement criteria)	⊠ Yes □ 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. (For guidance, please see Measurement criteria)	Yes No G1: Please give details: The facility has the support of the Undersecretary for Environmental Quality of the Ministry of the Environment. for environmental management, does not have the support of other facilities	
H: Have all legally required permits been shown? Please gives details.	Yes No H1: Please give details: Environmental License Code MAE-SUIA-RA-DPAEO-2015-200413, valid from June 24, 2015 to June 30, 2050	
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	☐ Yes ☐ No ☒ N/A I1: Please give details: The facility does not use hazardous chemicals	
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes No J1: Please give details: The facility has designated personnel to ensure compliance with customer requirements and national and local legislation.	



K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	Yes No K1: Please give details: The facility has records of water and electricity consumption on a monthly basis, a project has been carried out to reduce electricity consumption through the implementation of solar panels	
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	Yes No L1: Please give details: The facility recycles cardboard through a licensed recycling company, records are kept of the amount	
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?	∑ Yes ☐ No M1: Please give details: The facility has records of monthly water and electricity consumption	
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?	Yes No N1: Please give details: The recycling company has the operating permits	
Usage/Discharge analysis		
Criteria	Previous year: Please state period: January-March 2021	Current Year: Please state period: _January – March 2022
Electricity Usage: Kw/hrs	1209338	1225659
Renewable Energy Usage: Kw/hrs	None	None
Gas Usage: Kw/hrs	None	None
Has site completed any carbon Footprint Analysis?	☐ Yes ⊠ No	☐ Yes ☒ No
If Yes , please state result	None	None
Water Sources: Please list all sources e.g. lake, river, and local water authority.	Water well	Water well
Water Volume Used: (m³)	22204	21340
Water Discharged: Please list all receiving waters/recipients.	SanitaryHandwashingFire hoses	SanitaryHandwashingFire hoses
Water Volume Discharged:	22204	21340



(m³)		
Water Volume Recycled: (m³)	270.9	275.6
Total waste Produced (please state units)	4519.5 Kg	4428.45 Kg
Total hazardous waste Produced: (please state units)	4519.5 Kg	4428.45 Kg
Waste to Recycling: (please state units)	86.63 Kg	68.45 Kg
Waste to Landfill: (please state units)	4433.20 kg	4360 kg
Waste to other: (please give details and state units)	None	None
Total Product Produced (please state units)	5917.47 Ton	5349.37 Ton



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:

10C.1 Anti-corruption and anti-bribery methods.

The facility has implemented a procedure so that personnel are not subject to bribery or corruption, such as policies, procedures and training.

10C.2 Anti-corruption and anti-bribery laws

In Ecuador there is no national or local anti-corruption or anti-bribery law

10C.3 Tax return

The facility declares the corresponding taxes, no delays are reflected in the tax declaration

10C.4 – 10C.5 Anti-corruption and anti-bribery policy



Interview with managers

Any other comments: None

An anti-corruption and anti-bribery policy has been documented
10C.6 Responsible
Maria Grabriela Maldonado / Human Resources Manager
10C.7 Training of key personnel
Managers, supervisors and purchasing staff have been virtually trained on internal anti-corruption and anti-bribery policies
Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):
Details:
Anti-corruption and anti-bribery policy training Staff Interview

	Non-compliance:	
Description of non-compliance: NC against ETI/Additional Elements NC against customer code:	□ NC against Local	Objective evidence observed: (where relevant please add photo numbers)
None		μ,
Local law and/or ETI/Additional Elements requirement: None		
Recommended corrective action: None		

Observation		
Description of observation: None	Objective evidence observed:	
Local law or ETI/Additional elements requirement: None	None	
Comments: None	None	

Good examples observed:	
Description of Good Example (GE): None	Objective Evidence Observed: None



A: Does the facility have a Business Ethics Policy and is the policy communicated and	 ✓ Internal Policy ✓ Policy for third parties including suppliers 	
applied internally, externally or both, as	23 Folicy for trilla parties incloding suppliers	
appropriate?	A1: Please give details: The facility has a documented	
	anti-corruption and anti-bribery policy, this policy is communicated to all employees and service providers	
B: Does the site give training to relevant	Yes	
personnel (e.g. sales and logistics) on business ethics issues?	□No	
	B1: Please give details: The facility through a digital	
	platform demonstrates the training of all staff on the anti- corruption and anti-bribery policy	
C: Is the policy updated on a regular (as	Yes	
needed) basis?	□No	
	C1: Please give details: The police was made in the year 2021, it is updated	
D: Does the site require third parties	⊠ Yes	
including suppliers to complete their own business ethics training	□No	
bosiness etrics training	D1: Please give details: Cafeteria staff have been trained	
	on the facility's anti-corruption and anti-bribery policy,	
	banana vendors have been notified by email of the policy, vendors confirm receipt of notice by mail policy	
	policy, verticols confirm receipt of florice by fridii policy	
Other findings		
Other Findings Outside the Scope of the Code		
None		
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."



Photo Form







Inside compound



Production process 1: Reception of Raw Materia



Production process 2: Bare



Production process 3: shredded and fill



Production process 4: packaging



Medical room



Dining area









Kitchen/Food preparation area

Grievance/Suggestion box

Stairs 1







Dormitory room/apartment room

PPE (Personal protective equipment) 1

Electrical switch/box with cover & warning signs 1







Fire safety training and First Aid training

Emergency lights

Evacuation route 1









Emergency exit door 1

Emergency exit door 2

Fire extinguishers 1







Fire hose 1

Smoke detector

Fire alarm box







chemical warehouse



eye wash and emergency shower





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

Click here for Buyer (A) & Buyer/Supplier (A/B) members:

 $http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5Iw_3d_3d$

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