



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC421553047	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS421739289	
Business name (Company name):	FILIP AND FAMILY SRL			
Site name:	FILIP AND FAMILY SRL			
Site address:	STR. PRINCIPALA, NR. 22 COM PETRESTI 137350 RO	Country:	RO	
Site contact and job title:	ALINA COMAN / DEPUTY GENERAL MANAGER			
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2023-01-16			

Audit Company Name:
Bureau Veritas Certification

Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

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 (March 2019) 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.

Auditor Team			
Lead Auditor:	Liliana Voicu	APSCA Number:	21701950
Additional Auditors:			
Date of declaration:	2023-01-18		

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.

Site Representation	
Full Name:	ALINA COMAN
Title:	DEPUTY GENERAL MANAGER
Date of declaration:	2023-01-18
Comments:	NONE

Summary of Findings

Issue <small>(please click on the issue title to go direct to the appropriate audit results by clause)</small>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
0B - Management systems and code implementation			0	0	0	
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
3 - Working conditions are safe and hygienic			0	0	0	
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid			0	0	0	
6 - Working hours are not excessive			0	0	0	
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is allowed			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2-pillar			0	0	0	
10B4 - Environment 4-pillar			0	0	0	
10C - Business ethics 4-pillar			0	0	0	

Site Details

Site Details			
Company Name		FILIP AND FAMILY SRL	
Site Name		FILIP AND FAMILY SRL	
GPS location (if available)	GPS Address:	Strada Principală, Nr. 22, Petreti, Jude Dâmbovia, Cod potal 137350, Romania	
	Coordinates:	44.6381752715662, 25.39230332340285	
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections		Trade Register registration no. J15/611 2015 with no expiration date. Fiscal registration code: RO 34988239 with no expiration date. Environmental Authorization no.154/16.09.2021 with annual visa no.112/02.09.2022, valid for 1 year until 16.09.2023.	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc		Production and distribution of clothes for children and adults. Main processes performed are: purchasing of raw materials and accessories, cutting, sewing, ironing, quality control, packing and delivery/distribution of products.	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)		The facility is located in Petresti village, Dambovita County, 80 kilometers far from Bucharest, Romania. Although not new, the building was refurbished in 2018 and all activities are carried out inside this building: offices activities (commercial, administration, accounting, management of human resources, EHS management), production processes (storage of raw materials and accessories, cutting, sewing, finishing, ironing, quality control, packing and temporary storage of finished product).	
Structure and number of buildings	Building Name:		Filip & Family Facility
	Floor	Description	Remark
	ground floor	concrete structure on armed concrete foundation; walls are made of bricks and finished; windows are made of double- glazed windows with a PVC frame.	administrative activities & finished product store & delivery activities & packing activities.
	1st floor	concrete structure (floor and resistance pillars) on armed concrete; walls are made of bricks and finished; windows are made of double- glazed windows with a PVC frame. The roof is made of metallic tiles and is entirely new.	production activities (cutting, sewing, ironing, packing, eating room, locker rooms, toilets, meeting room).

Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Good aspect of the building representing the site of the facility. Although the construction is not a new one, the building was fully refurbished and at the audit time its condition was assessed as a very good one. No structural cracks, no damaged flooring or walls, good condition of the roof, without any marks of leakages.
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Last structural evaluation was performed at the end of the refurbishment in 2021 and is valid for 5 years, considering the level of risk to affect the building integrity through the activities carried out inside. It was available the Inspection Report no.96/BEC/2306 dated 28.11.2021 issued by DCTS Structuri SRL.
Site function	<input type="checkbox"/> Agent <input type="checkbox"/> Factory Processing/Manufacturer <input checked="" type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor
Months of peak season	January to April
Process overview	Production of children and adult garments: softshell overalls, pants, jumpsuits, vests, dresses, hoodies and jackets, blouses and tops, t-shirts, hats, caps and swimwear). The production process is carried out on 5 production sewing lines (2 lines for lohn and 3 lines for iELM). Cutting process is carried out on 4 cutting linear machines and 4 multi-directional cutting machines. Ironing process is carried out on 18 ironing stations. Packing activity is carried out manually.
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None
Please give details:	Workers' representatives have been elected in November 2022 being available Minute of election no.1903/24.11.2022 of the Workers' General Assembly. It has been communicated to top management through Address no.1907/25.11.2022.
Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No accommodation provided by company to its employees.

Audit Parameters						
Time in and time out	Day 1		Day 2		Day 3	
	In	09:00	In	09:00	In	09:00
	Out	17:30	Out	17:30	Out	13:00
Audit type:	FULL_INITIAL					
Was the audit announced?	ANNOUNCED					
Was the Sedex SAQ available for review?	Yes					
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No					
Who signed and agreed CAPR	ALINA COMAN / DEPUTY GENERAL MANAGER					
Is further information available	No					

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	No Trade Union in this company.		
<i>Reason for absence during the audit</i>	No Trade Union in this company.		
<i>Reason for absence at the closing meeting</i>	No Trade Union in this company.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – male	20	0	0	0	0	0	0	20
Worker numbers – female	178	0	0	0	0	0	0	178
Total	198	0	0	0	0	0	0	198
Number of Workers interviewed – male	2	0	0	0	0	0	0	2
Number of Workers interviewed – female	24	0	0	0	0	0	0	24
Total – interviewed sample size	26	0	0	0	0	0	0	26

Nationalities Structure	
Nationality of Management	Swedish
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Romanian approx %: 100%
Was this list completed during peak season?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Worker remuneration	Workers on piece rate: 0%
	Paid hourly: 0%
	Salaried: 100%
Payment cycle	Paid daily: 0%
	Paid weekly: 0%
	Paid monthly: 0%
	Other: 100%
	Details for other: Twice per month: in 25th of the month is paid the advance and in 10th of the next month the rest of payment.

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	4 groups x 5 employees
Number of individual interviews:	Male: 2 Female: 4
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	No complaint was raised during interviews with employees.
What did the workers like the most about working at this site?	Income level, top management attitude towards workers (openness, availability), workplace conditions, assurance of transport free of charge in very good conditions.
Any additional comment(s) regarding interviews:	none
Attitude of workers to hours worked:	No excessive overtime are required and workers are open to perform OT.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:
Appreciative towards top management that treats them with due respect and consideration, being available in case of need of support.
Attitude of worker's committee/union reps:
Good communication level with top management. Open-doors policy is an effective one and any aspect that needs to be discussed is taken into consideration.
Attitude of managers:
Openness and availability throughout the entire audit process.

0A - Universal Rights covering UNGP [Summary of Findings]

0A: Compliance Requirements

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

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

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

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

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

0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined

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

Current Systems:

The company has strong commitment to respect Universal Human Rights and consistent with this attitude the company voluntarily adopted the ETI Base Code as part of their business. ETI Base Code was available on-site translated into Romanian language and employees were trained about its clauses. The company has publicly declared its commitment to respect and support the Ten Principles of the United Nations Global Compact on human rights, labor, environment and anti-corruption and posted this statement dated 05.11.2021 on company's website. All suppliers of the company were notified starting with September 2021 on the fact that the company adopted ETI Base Code in its organization and business and highly recommends them to get aware of it and comply with. The same commitments are also part of the Internal Company Rules - last update in 06.01.2023 and in the Collective Bargaining Agreement no.1/06.01.2023. The person designated to implement the standards concerning human rights was Mrs. Alina Coman, Deputy General Manager (Decision no. 12/27.09.2022). The company identified its interested parties which are relevant and their needs and expectations in 01.09.2022. No adverse impact on human rights within any of stakeholders has been identified during risk assessment carried out in January and finalized in 11.01.2023. Confidential reporting of any kind of deviations from ETI Base Code and/or human rights is ensured by postage of several whistle-blow boxes in areas of workers' relaxation, where cameras do not have access. However, all interviewed workers and their representative confirm that they prefer to directly address any topics to top management and they are confident not only that no repercussions will come but also that the problem will be considered and solved as soon as possible. For stakeholders that do not access the facility the company offered access to an e-mail and a phone number where any interested party can raise concerns or complaints if they consider so.

Evidence examined:

Internal Company Rules - last update in 06.01.2023, Collective Bargaining Agreement no.1/06.01.2023, Letter/05.11.2021 of commitment to the Ten Principles of United Nations Global Compact, ETI Base Code, Job Description for Deputy General Manager, List of stakeholders updated in September 2022, Risk & Opportunities Register/01.09.2022.

Any other comments:

None.

Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Included in Internal Company Rules - last update in 06.01.2023 and in the Collective Bargaining Agreement no.1/06.01.2023. It is also included in the Letter/05.11.2021 addressed to Mr.Guterrez, assuming to comply with the Ten Principles of the United Nations Global Compact on human rights, labor, environment and anti-corruption (posted this statement on company's website www.ielm.ro)..	
Are the policies included in workers' manuals?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No workers manual in place in this facility.	
Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The person designated to implement the standards concerning human rights was Mrs. Alina Coman, Deputy General Manager (Decision no. 12/27.09.2022).	
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Whistle-blow boxes placed in the facility, meetings with Deputy General Director of the company, for discussing ordinary topics. For stakeholders that do not access the facility the company has the website available at www.ielm.ro where any interested party can raise concerns or complaints if they consider so.	
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: GDPR Regulation requirements are fully implemented being the responsibility of the HR department. A training was performed with regards to GDPR Regulation requirements, during which they received and acknowledged by signature the document "Confidentiality Notification for Employees" and a "Consent form". At recruitment time, each candidate receives together with the Application Form the document "Notification of Candidate with regards to Data privacy".	
Measuring Workplace Impact		
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year	8.0%
	This year	5.0%

Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	4.0%
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)	Last year 11.0% This year 7.0%
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)	6.0%
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: According to Romanian legislation all work-related accidents/incidents must be recorded in company's Register of Accidents/Incidents. The company has such Register, maintained at the facility location, and it was available for the auditor.
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year 0.0% This year 0.0%
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)	0.0%
Lost day work cases per 100 workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year 0.0% This year 0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month 0.0% 12 month 0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month 0.0% 12 month 0.0%

0B - Management Systems and code Implementation
[Summary of Findings]

0B: Compliance Requirements

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.

0.B.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.

0.B.3 Suppliers are expected to communicate this Code to all employees.

0.B.4 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.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

Current Systems and Evidence Examined

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

Current Systems:

The company has its internal system to deliver compliance with ETI Base Code and responsibility was allocated as described before. The Code has been communicated to all its employees and also to the suppliers. In their supply chain the company encourages them to have a responsible behavior towards their employees and community. The company operates fully in compliance with Romanian legislation and regulations, having all required authorizations and permits, respecting legislation for any kind of new developments it designs. The land where the facility is placed is the property of the company as well as the building.

Evidence examined:

ETI Base Code, Job Description for Deputy General Manager, List of stakeholders updated in September 2022, postage of ETI Base Code on communication panels throughout the facility, Minutes of training for new employees in 21.11.2022 for M.A. and in 22.11.2022 for a group of 3 new employees, Collective training sheet/18.10.2022 with 3 people from Rocas SRL, Collective training sheet/18.10.2022 with 2 people from ATI Compresoare SRL.

Any other comments:

None.

Management Systems

In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?

☐ Yes ☒ No

Please give details:

All inspections carried out by authorities did not identified failures of compliance with legal and regulatory requirements (1 inspection from Territorial Labour Inspectorate Dambovită and 1 inspection from National Agency for Fiscal Administration, within last 12 months).

Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?

☒ Yes ☐ No

Please give details:

Procedure "Personnel recruitment" code PG12, rev.5/21.06.2022 is applied in HR Department in order to reduce at maximum the risk of forced labor, child labor, discrimination, harassment & abuse. In addition, all these provisions are also included in the Internal Company Regulation/06.01.2023.

If Yes, is there evidence (an indication) of effective implementation? Please give details.	Effective implementation has been confirmed during interviews with workers and administrative personnel. At employment time all candidates must provide identity documents attesting age, qualification documents (diplomas, certificates). Announcement of employment do not have any requirement that could be considered as discriminatory (no requirement of age, gender, religion, nationality, sexual orientation etc.) only requirements of competence and abilities.
Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Induction trainings and on-going training (at least annually) is provided to all employees and managers. Minutes of training for new employees in 21.11.2022 for M.A. and in 22.11.2022 for a group of 3 new employees, Collective training sheet/18.10.2022 with 3 people from Rocas SRL, Collective training sheet/18.10.2022 with 2 people from ATI Compressoare SRL.
If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Confirmed during interviews with workers, managers and activities' responsible.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Certificate no.10433386/14.03.2022 for compliance with ISO 9001:2015 (expires in 13.03.2025), Certificate no.10433388/14.03.2022 for compliance with ISO 14001:2015 (expires in 13.03.2025), Certificate no.10433390/14.03.2022 for compliance with ISO 45001:2018 (expires in 13.03.2025), Certificate no.10438032/04.03.2022 for compliance with ISO 50001:2018 (expires in 03.03.2025).
Is there a Human Resources manager/department?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Mrs. Georgiana Marcu, HR Manager
Is there a senior person /manager responsible for implementation of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Mrs. Alina Coman, Deputy General Manager (Decision no.12/27.09.2022).
Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: GDPR Regulation requirements are fully implemented being the responsibility of the HR department. A training was performed with regards to GDPR Regulation requirements, during which they received and acknowledged by signature the document "Confidentiality Notification for Employees" and a "Consent form". At recruitment time, each candidate receives together with the Application Form the document "Notification of Candidate with regards to Data privacy".

Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All personnel in HR Department that operates with employees' personal and confidential data have signed a Non-Disclosure Agreement according to which no information will be released unless approved by employee itself. All these data are stored in company's premises, in metallic safe closets and access to them is restricted as per internal rules.
Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Top management performs at least annual risk assessment in order to identify if procedures and policies are implemented and effective. Training measures or re-assessment of adequacy of procedures/policies measures are taken each time the effectiveness is found not appropriate.
Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Training measures or re-assessment of adequacy of procedures/policies measures are taken, each time the effectiveness is found not appropriate.
Does the facility have a policy/code which require labour standards of its own suppliers?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The company did not create its own Code of Conduct but adopted the ETI Base Code in its entire business and recommended to all its suppliers to implement this code also.
Land Rights	
Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The company presented to auditor the Purchasing Contract no.599/01.04.2021 according to which Filip and Family SRL bought the land and the building from its previous owner, Oztasar SRL. The company did not change the destination of the building and land, previously being used also for a confection company.
Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All legal and regulatory requirements applicable to the activities of the company were found identified in the List of legal and regulatory requirements, updated in 06.01.2023. the list is under the control of company's legal counsellor which is responsible for legal compliance assurance of all documents and contracts signed by company's management. At the time the company bought the building and the land the legal counsellor made sure all Romanian legal and regulatory requirements are complied with. The same confirmation has been given by the notary that legalized the Contract between parties.

Does the site have a written policy and procedures specific to land rights?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No such policy was considered necessary, as long as Romanian legislation is fully covering all aspects related to ownership and commercial transactions with land/buildings.
Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: As per Purchasing Contract no.599/01.04.2021 the price for the land and building has been paid in full at the time of the Contract enclosure.
Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The company took into consideration the possibility to rent a space for production purposes, but all offers of the market were unsuitable to management/owners wish for organizing the production and materials flows. They also considered to build a new construction, but the available land was agriculture land and to build an industrial facility there should be made diligences to take the land out of agriculture. Consistently the offer of the former owner was accepted, as the destination of the building did not need to change.
Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The Purchasing Contract has been signed in good faith with the owner and the land and building sold to the company is well defined as boundaries. No extension out of these boundaries was done.

1 - Freely chosen Employment

[Summary of Findings]

1: Compliance Requirements

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:

The company forbids forced/bonded/involuntary labor and documented it in the Internal Company Rules/06.01.2023 and the Collective Bargaining Agreement no.1/06.01.2023 (valid for 2 years). No originals of personnel documents are held by company; no money lodge required to workers. Workers and employees are free to leave workplace (direct observation during the audit and feedback from interviews) after announcing the Team Leader of the workplace. For persons willing to leave the company the notice period is of 20 working days for executives and 45 workdays for managers, terms compliant with Labour Code in Romania. All employees are hired with legally compliant forms (individual labor contracts for 26 employees were analyzed), on voluntary basis.

Evidence examined:

Internal Company Rules/06.01.2023, Collective Bargaining Agreement no.1/06.01.2023 (valid for 2 years), ETI Base Code, personnel files for 26 employees, interviews with the HR Manager, Production Manager, team leaders in Production.

Any other comments:

None

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: As category of workers – all types of workers are affected (production operators, warehouse operators). A number Of 14 employees have retentions of wages based on Court Decision. Reason for retentions is for debts to different banks.
Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: According to Romanian legislation freedom to terminate employment is granted, the only condition is to notify the company in advance of termination with 20 days for non-management employees and with 45 days for management employees. However, if it is in the best interest of the employee, the company accepts to renounce to this notification period and allows worker to leave the company when worker desires.

<p>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'?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>Business is not UK located.</p>
<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>At the end of workday, the employee is free to leave the workplace (confirmed by interviews).</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>The company assessed the risks coming from its supply chain and considering that they are working with companies with good reputation (Romanian and international), for which they performed investigations on website to identify if there are issues raised against their suppliers, the company considers that the risk of having forced/trafficked/bonded labor in their supply chain is reduced</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Hiring policy of the company is very clear: selection of candidates is done only based on their demonstrated competence, experience and aptitudes and is not intermediated by others (agencies for example). In their supply chain the company requires its suppliers to proceed in the same manner in order to avoid forced/trafficked/bonded labor. The company encourages each employee to notify the company in case they identify such situation.</p>

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

[Summary of Findings]

2: Compliance Requirements

- 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:

Freedom of association is granted in Romania. Management made all needed due diligences to express their openness for any kind of workers' association (Trade Union, employees' representatives committee); employees elected 2 workers' representatives.

Interviews with employees confirm that, the fact they didn't organized themselves in trade union is not an issue of fear of being stopped by management and supporting repercussions; they just choose (the majority) to be represented by 2 of the employees, the ones they elected for this scope; the collective bargaining agreement was signed by management and employees' representatives.

Personnel training, during induction and on-going, addressing requirements in Internal Company Rules/06.01.2023 make reference to all topics, including rights to associate and bargain collectively if they choose so.

The interview carried out with workers' representative showed that the attitude of management towards their activity in this position was very supportive, encouraging them to identify workers' needs and requirements and openly present them to management so that improvement measures can be taken for workers' satisfaction. No discrimination from management was claimed by workers' representative, this attitude of management being confirmed also by all the other workers interviewed.

Evidence examined:

Internal Company Rules/06.01.2023, Collective Bargaining Agreement no.1/06.01.2023, Call for negotiations/28.11.2022, List of Employees present at Workers' Assembly Meeting in 24.11.2022, Minute of Elections of employees' representatives/24.11.2022, Minute of CBA negotiations no.01/02.12.2022, Minute of CBA negotiations no.02/12.12.2022, Minute of CBA negotiations no.03/20.12.2022, address no.1792/03.01.2023 to Dambovită Territorial Labor Inspectorate to require legal registration of negotiated CBA, interview with 1 workers' representative, interview with Deputy General Manager and HR Manager.

Any other comments:

None.

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)

- ☐ Union ☒ Worker Committee
- ☐ Other ☐ None

Other details:

The employees decided they do not want to form or adhere to a Trade Union and choose to elect their own representatives in order to preserve their rights and negotiate the Collective Bargaining Agreement. Evidence of Free election of workers' representatives was available during the audit process.

Is it a legal requirement to have a union?

- ☐ Yes ☒ No

Is it a legal requirement to have a worker's committee?

- ☐ Yes ☒ No

Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Direct communication or through whistle-blow boxes. OHS Committee is another channel used to communicate workers' needs through their OHS representatives, but topics are related to OHS problems and actions.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Workers' representatives can meet workers and collect feed-back from them on monthly basis and management allows meetings to be held in the eating room.
Name of union and union representative, if applicable:	Not applicable. No Trade Union in this facility.
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Workers' representatives were elected to represent workers' interests and negotiate the Collective Bargaining Agreement.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: During interviews auditors confirmed that all employees participated in the Workers' Assembly Meeting in 24.11.2022 during which their representatives were proposed and finally elected/nominated.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2022-11-24
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	All workers interviewed confirm that they can communicate at any time with their representatives. Meetings are held at least quarterly, the last meeting being held in February 2023 and documented in Minute of Meeting/17.02.2023 – discussed topics: need of PPE, training of personnel for working in the production workshop, risks of OHS related to production line operation, situation of COVID-19 and flue risk for contamination. All Minutes of Meeting are posted on communication panels which are placed at the entrance in the eating area and near the locker rooms; documents are also available for further consultation with workers' representatives.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, what percentage by trade Union/worker representation	0% workers covered by Union CBA. 100% workers covered by worker rep CBA.

If Yes, does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--	---

3 - Working Conditions are Safe and Hygienic [Summary of Findings]

3: Compliance Requirements

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:

At the audit time the company does operate a certified OHS management system and has a good level of compliance with legal and regulatory requirements of Romania and customers' specific requirements. The company performed an OHS risk assessment for all workplaces and defined measures to be implemented for those risks considered as not acceptable. Annual Prevention and Protection Plan was found documented for each of the workplaces in the facility, for 2023 in 12.01.2023, aiming to reduce or eliminate probability of risk occurrence or diminish risk effects. For each activity carried out on-site the company documented OHS work instructions and planned regular trainings of all employees (executive and administrative). Adequate records were found in place, showing that the planned trainings and established thematic were properly respected and addressed. OHS decisions were found documented according to legal requirements in Romania. Both OHS Management System and Internal Company Rules/06.01.2023 have clear provisions for assurance of an adequate workplace for each employee. There is no Worker Manual in place. Personnel training with regards to Internal Company Rules is mandatory at employment time and annually refreshment is carried out; the documents are available for consultation both posted in communication panels and with workers' representatives.

Last OHS risk assessment was carried out and finalized in July 2021 at the end of the refurbishment of the company, for all workplaces. The assessment was made with the support of a specialized company, having related authorizations.

During the complete site tour the auditor noted that indoor and outdoor the spaces are adequate, very clean, not very crowded. All observed employees at work are wearing the specific protection and work equipment, the atmosphere being relaxed and not stressful. Electrical safety is verified annually by an authorized company, last verification of earthing being done in July 2022; during site tour auditor observed a good management of machines/tools used and electric sockets in production area being in good condition. First-aid boxes are located in different areas and their validity was checked being found within term (expiration date November 2024). The chemical substances used in this facility are only sanitation chemicals (detergents, toilet disinfectants and soap) and none of them is in contact with the product, none of them being classified as hazardous. For all of them there were available Material Safety Data Sheets (e.g.:

Universal multi-surface disinfectant Hygienium, Antibacterial liquid hand soap without perfume, 500 ml, Bio-D and Concentrated liquid disinfectant detergent 2in1 - virucidal, Cif Pro Formula). During interviews auditor noted that all employees that are using these chemicals were trained with the content of these MSDSs in order to create awareness on chemicals, their use and risks that might occur.

Adequate OH&S marks (fire extinguishers locations, exit routes) are in place. Evacuation doors were observed, all of them were well marked, opening in the evacuation direction, not locked and access not blocked. Firefighting means were also observed during site tour, being found within validity term (lastly verified in December 2022, valid for 1 year), not blocked access and having the correct marking.

The company plans annually and performs drills for all identified emergency situations. There was available evidence of organization of drills: Report on the applications and intervention exercises carried out in production workshop/08.09.2022 and Report on the applications and intervention exercises carried out on fire incident in warehouse/21.03.2022; these drills addressed all employees of the company.

All equipment/machines were found in good order, maintained as per legal regulation and in compliance with Operation Manuals of them. At least annually each equipment/machine is verified by specialized service (annual revision) from mechanical and electrical point of view. Related Reports were found enclosed. Earthing system is annually verified by third party company, last enclosed document being available on-site (Bulletin for checking the dispersion resistance of the Earth Sockets no. 75/13.07.2022 for Electric Panel 1, Bulletin for checking the dispersion resistance of the Earth Sockets no. 76/13.07.2022 – Electric Panel 2 – both performed by Lasimar Exim SRL).

All OHS Policies and work instructions are available in hard copy formats for all employees, induction training and initial workplace training has strictly defined thematic and topics to be addressed and continuous training (quarterly) is carried out with all employees. All OHS and emergency situation trainings are recorded, as required by Romanian legislation, in Individual Training Books of employees.

The company has an OHS Committee which is constituted as per Decision no.111/20.05.2019 and is formed of 3 management representatives, 3 workers' representatives and the labor medicine doctor. This Committee has quarterly meetings, the last one being documented as per legal requirements in December 2022. Next OHS Committee Meeting is scheduled for March 2023.

No doctor or nurse on site (not mandatory according to local legislation).

All personnel have free access to clean toilets and clean lavatory, a dedicated eating room with a refrigerators and microwave oven for food storage and preparation/heating. Drinkable water is available for all employees free of charge.

For emergency situations the company trained for first-aid a number of 5 employees.

Evidence examined:

Certificate no.10433390/14.03.2022 for compliance with ISO 45001:2018 (expires in 13.03.2025), Quality-Environment-OHS -Energy Policy documented and approved by General Manager in 03.01.2022, Decision no.954/07.07.2021 nomination of the first-aid team formed of 5 employees, Certificate 148/15.06.2021 of participation in the medical first aid course - D.A., Certificate 157/5.06.2021 of participation in the medical first aid course - P.A., Certificate 151/15.06.2021 of participation in the medical first aid course - S.I., Prevention and Protection Plan for 2023 for each of the workplaces were enclosed dated 12.01.2023, OHS risk assessment dated 17.06.2021.

Environmental Authorization no.154/16.09.2021 with annual visa no.112/02.09.2022, valid for 1 year until 16.09.2023.

Plan of Drills in 2022/03.01.2022 and Plan of Drills in 2023/11.01.2023, Report on the applications and intervention exercises carried out in production workshop/08.09.2022 and Report on the applications and intervention exercises carried out on fire incident in warehouse/21.03.2022, List of firefighting means in Filip & Family SRL/12.01.2023, evacuation plans - posted on both floors and in all rooms, including locker rooms and eating room, first aid boxes (8 were identified, 4 at ground floor and 4 at 1st floor), Emergency Situation Training Plan & Thematic for 2023/03.01.2023, Individual Training Book for Emergency Situations - viewed for 26 employees (last training carried out in 09.01.2023 and with topics as scheduled in plan).

Decision no.111/20.05.2019 for OHS Committee constitution, formed of 3 management representatives, 3 workers' representatives and the labor medicine doctor. OHS Committee has quarterly meetings and the last meeting of the OHS Committee was held in 05.12.2022 and well documented (Convocation/28.11.2022, Minute of OHS Committee Meeting/05.12.2022, e-mail/09.12.2022 addressed to Dambovită Territorial labor Inspectorate with Minute of OHS Committee Meeting attached.

List of applicable legal and regulatory requirements/January 2023, Legal Compliance Assessment Form/13.01.2023 - level of compliance (overall) of 92,8%.

Any other comments:

None.

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Quality-Environment-OHS -Energy Policy was documented and approved by General Manager in 03.01.2022. This Policy is subject matter of induction training for all new employees and periodic training at least annually of all the rest of employees. It is also posted on communication panels in the facility so that workers can consult it at any time. Procedures were also found in place: "Nonconformities and corrective actions", "Dealing with risks and opportunities", "Consultation and participation of workers", "Hazard identification and occupational risk assessment", "Preparation for emergency situations and response capacity", OHS Instruction "First aid", OHS Instruction "Forklift operation", OHS Instruction etc.
Are the policies included in workers' manuals?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No practice of having a "worker manual" in this facility.
Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Auditor performed complete site tour based on site plans and noted that no new constructions are in place compared with the original site plan.

Are visitors to the site informed on H&S and provided with personal protective equipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All visitors (including the auditor), before accessing the site, were trained regarding rules and requirements for safety, emergencies, environment and security (presentation video at the gate for 6 minutes) during the visit. All visitors are provided with reflective vest.
Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: According to Romanian legislation it is not mandatory to have a medical room in a company of small and medium size.
Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: According to Decision no.954/07.07.2021 the company nominated the first-aid team formed of 5 employees trained for first aid (e.g.: Certificate 148/15.06.2021 of participation in the medical first aid course - D.A., Certificate 157/5.06.2021 of participation in the medical first aid course - P.A., Certificate 151/15.06.2021 of participation in the medical first aid course - S.I.). Each 2 years the first aiders perform re-training courses.
Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: All workers are from the Petresti village and they do not need transport to arrive at the facility. The company does not provide transport services to its employees.
Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Locker rooms with keys are available for each employee. Otherwise, the company does not provide any of its workers accommodation.
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Last OHS risk assessment was carried out and finalized in 17.06.2021 at the end of the refurbishment of the company, for all workplaces (e.g. maintenance mechanic, adjustor, confection operator, packing operator, cutting operator, administrative personnel, visitors, sensitive groups etc.). Overtime is occasional and it never exceed 2 hours per day (meaning from 15:30 to 17:30). Usually, workers leave the facility and walk back home or travel by public bus, not using personal cars. Prevention and Protection Plan for 2023 for each of the workplaces were enclosed dated 12.01.2023.

<p>Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The company keeps under control and monitors all its consumptions of resources and all its environmental impacts (mainly wastes generation). At the audit time the company has the Environmental Authorization no.154/16.09.2021 with annual visa no.112/02.09.2022, valid for 1 year until 16.09.2023. According to Romanian legislation this is the only authorization needed by company and includes all environmental aspects and monitoring considered by authority.</p>
<p>Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The company does not use any chemicals for the production purposes. The only chemicals in this company are the ones used for sanitation of the spaces (detergents, toilet disinfectants, soap), these do not come in contact with the product and none of them is hazardous.</p>

4 - Child Labour Shall Not Be Used [Summary of Findings]

4: Compliance Requirements

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:

No child and young workers found in place at the audit time. Interviews confirm it never happen such cases of child or young worker since the very beginning of the company. No worker under 18 years old was found on-site or registered as employed. The youngest person found in place is 18 years and 10 months old (employed by the company in January 2023). The organization makes employments only based on identity documents, graduation diplomas/certificates and qualification documents of the applicants, being able to check age of them.

Evidence examined:

Internal Company Rules - last update in 06.01.2023, Collective Bargaining Agreement no.1/06.01.2023, ETI Base Code, personnel files for 26 employees, interviews with HR Responsible and management, observation during site tour carried out.

Any other comments:

None.

Legal age of employment:	15
Age of youngest worker found:	18
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No young workers in this facility.

5 - Living Wages are Paid

[Summary of Findings]

5: Compliance Requirements

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:

Wages paid by company are over the minimum on the economy, as established by Romanian Government (2550 RON/month gross in 2022 and 3000 RON/month gross starting with 01.01.2023); in the sampled months the auditor identified the following minimum wages paid by company: for April 2022 – 2560 RON/month gross (net wage = 2098 RON/month); for July 2022 – 2560 RON/month gross (net wage = 2011 RON/month); for November 2022 – 2560 RON/month gross (net wage = 2218 RON/month). Overtime is paid at the premium rate of 175% of the standard hour and equals the requirement of the Romanian Labour Code (law 53/2003 requires overtime to be paid at min.175% of the standard hour). The company has the practice to calculate a "living wage", by use of an Anker Methodology; the last calculation was carried out in 02.05.2022 and the BNW was calculated at 1759,21 RON/month net. Each month all employees receive written pay slips detailing all information related to salary. According to Romanian Labor Code and Collective Bargaining Agreement no.1/06.01.2023 the company can take disciplinary measures consisting in reduction of salary, between 5 and 15% for 1 month to 3 months long, depending on the deviation. However, as per documented evidence and statements of the workers during interviews, no such disciplinary measure was ever applied. Deductions from salaries are allowed only if legal procedures are satisfied and a Court Decision, communicated officially to company by a bailiff, is in place for a deduction from one worker's salary. No deduction is made however, before the notification of the concerned worker and his/hers formal acceptance.

Evidence examined:

Payment records for 26 employees and 1 workers' representative for the months of April 2022 (slow month), July 2022 (regular month) and November 2022 (current & high month); payment slips for the same employees in the same periods. Individual Labour Contracts for 26 employees.

Any other comments:

"Overtime work is compensated by paid time off in the next 90 calendar days after it is performed. If compensation through paid free hours is not possible within the stipulated period, in the following month, the supplementary work will be paid to the employee by adding an increase to the salary corresponding to its duration. The increase for supplementary work....is determined by negotiations, within the collective bargaining agreement or, as the case may be, the Individual Labor Contract, and cannot be less than 75% of the basic salary" (Romanian Labor Code - law 53/2003). These are the only provisions related to payment of overtime and these provisions are fully respected by company. However, Romanian legislation does not establish minimum wage per day/week/month for Overtime. Overtime is calculated per OT hours worked and the value of it represents min.175% of the standard hour. All evidence observed showed that the company adequately calculates overtime.

Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?

Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 40.0	Actual Per Day: 8.0 Per Week: 40.0 Per Month: 168.0	YES
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: null Per Week: 8.0 Per Month: null	Actual Per Day: 2.0 Per Week: 8.0 Per Month: 32.0	YES
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 2550.0	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 2560.0	YES
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 53.0 Per Week: 121.0 Per Month: 485.0	YES
Wages Analysis:			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
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)	April 2022 - 26 wages sampled (peak season); July 2022 - 26 wages sampled (slow season); November 2022 - 26 wages sampled (current).		
Are there different legal minimum wage grades? If Yes, please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	April 2022 – 2560 RON/month gross (net wage = 2098 RON/month); for July 2022 – 2560 RON/month gross (net wage = 2011 RON/month); for November 2022 – 2560 RON/month gross (net wage = 2218 RON/month).		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found: All employees benefit of the following bonuses: Christmas and Easter bonuses in amount of 200 RON net per employee for each of these holidays; meal tickets in amount of 25 RON/day (gross) for each day worked. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	25% social insurance, 10% salary tax, 10% health insurance - all of them retained from employee's salary and paid by company to state budgets in the name of the employee.		
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Please list all deductions that have been made.	25% social insurance, 10% salary tax, 10% health insurance		

Please list all deductions that have not been made.	NA - all deductions were made according to legislation.
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All recorded hours are hours spent at workplace. No meetings are held out of working hours, as per management and workers' statements.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Net amount was calculated in 02.05.2022 at the amount of 1759,21 RON/month.
If yes, what was the calculation method used.	<input checked="" type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Revision of wages take into account the minimum needs of workers. However, the minimum wage in this facility is higher than the minimum wage in Romania as established by law. At least annual revisions are made, or whenever needed.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The auditor identified 4 cutting operators, working on the same type of cutting machine, in different shifts and verified their salaries. All these workers receive the same salary.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

6 - Working Hours are not Excessive [Summary of Findings]

6: Compliance Requirements

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

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

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

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

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

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:

No records nor workers testimonials demonstrate excessive working hours; there are peak season periods when the overtime equals legal standard requirement (8 hours/week). The company carries out monthly verification of overtime average worked hours for each employee. No overtime exceeding legal requirement was noted for the months of April, July and November 2022; the maximum OT worked in April 2022 was performed by 21 employees and equals the legal requirement (8 hours/week); the maximum OT worked in July 2022 was performed by 13 employees and is below the legal requirement (3 hours/week); the maximum OT worked in November 2022 was performed by 28 employees and equals the legal requirement (8 hours/week). All overtime is voluntary, being properly documented by request of overtime and approvals and being confirmed by all interviewed employees. All employees benefit of at least 1 day off (usually 2 days off) in 7 working days. Working program is 8 hours/day, in only 1 shift, from 07:00 to 15:30, with 30 minutes of break for lunch/meal. Work is organized so that after 5 working days (Monday to Friday) the workers receive 2 days off (Saturday and Sunday). As per Romanian Labour Code, each employee benefits of at least 21 days of annual holiday, which can be scheduled at workers' initiative/request with only one condition holiday can be split within the year but at least one slot of holiday must be of 2 weeks continuously (10 working days one after another).

Evidence examined:

Time sheet records for all employees for the months of April, July and November 2022, 26 pay slips, payroll records for April, July and November 2022 for 26 employees, interviews with 26 workers. The auditor was able also to observe time sheets and payrolls for a time period of 12 months.

Any other comments:

None.

Working hours' analysis

Systems & Processes

What timekeeping systems are used?	Manual timekeeping system is in use; however, the evidence enclosed by Team leaders (attendance sheets) are countersigned and confirmed by each individual worker. No mistakes were claimed during the interviews carried out.)
Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:

Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	5
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	April 2022 - 2 hours/day, 8 hours/week, 28 hours/month; July 2022 - 2 hours/day, 3 hours/week, 8 hours/month; November 2022 - 2 hours/day, 8 hours/week, 32 hours/month.
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Combined hours do not exceed 60 hours/week in sampled months. Wages and attendance sheets verified for April, July and November 2022 and statement of workers confirm this.
Approximate percentage of total workers on highest overtime hours:	18.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: All interviewed 26 workers and the 1 workers' representative stated that overtime is voluntary. Auditor observed Notifications for overtime (e.g. Notification/25.04.2022, Notification/01.11.2022, Notification/14.11.2022).
Overtime premium	

Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium Please give details: All overtime hours are paid at a premium rate of 175% as per Romanian Labour Code. This was established in the Collective Bargaining Agreement no.1/06.01.2023.
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No All overtime is paid at 175% of the standard hour.
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.	<input checked="" type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other
Please give details	NA - overtime must be paid at least 175% of the standard hour, as per Romanian Labour Code.
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	<input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input checked="" type="checkbox"/> Other reasons (please specify)
Please give details	Total worked hours per week in this facility do not exceed 48 hours (including overtime).
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	According to Collective Bargaining Agreement no.1/06.01.2023 and Romanian Labour Code (law 53/2003) the total number of worked hours in one week is 48 hours (including overtime).
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

7 - No Discrimination is Practiced [Summary of Findings]

7: Compliance Requirements

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:

Internal Company Rules - last update in 06.01.2023 and the Collective Bargaining Agreement no.1/06.01.2023 (valid for 2 years) contain explicit provisions of non-discriminatory practices. These documents are consistent with Individual Labour Contracts. Employment and promotion requirements are based only on appropriate qualification, previous experience, abilities, and interview results. The structure per nationality/religion in the company reflects the ethnic structure of the population in Petresti area, as evolved within last years. Interviews with employees confirmed equal treatment of all employees.

Evidence examined:

Collective Bargaining Agreement no.1/06.01.2023 (valid for 2 years), Internal Company Rules - last update in 06.01.2023, personnel files for 26 workers, interviews with 26 workers and 1 workers' representative, HR Responsible and top management, pay slips, payrolls, training minutes.

Any other comments:

None.

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 37.0%Female: 63.0%		
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	32 women (manager, assistant manager, economist, sales, confectioner, designer).		
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement	<input type="checkbox"/> Access to training <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	Workers having same qualification and working in similar workplaces (same type of equipment) receive the same salary. Interviews confirmed that no concern on discrimination is ever raised in this facility.		
Professional Development			
What type of training and development are available for workers?	According to Training Plan for 2022/06.01.2022 and Training Plan for 2023/11.01.2023 there were scheduled and performed professional trainings dedicated to operators, for mechanics, for warehouse operators and for administrative staff. No limitations of professional development of any employee, only their desire to follow it. The Professional Development Plan for 2023 is still in draft, will be approved at management review and includes both executive staff and management staff.		

Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)

☒ Yes ☐ No

8 - Regular Employment Is Provided [Summary of Findings]

8: Compliance Requirements

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:

All employees in this facility are recorded in REVISAL (National Register of Employees) and for each of them the HR maintains also a hard-copy file with one original exemplar of the Individual Labour Contract, signed by employee and employer. The Individual Labor Contract has a standard form, recommended by legislation and for all employees the company enclosed labor contracts for un-determined period of time. This company does not work with sub-contractors, homeworkers or apprentices. No agency workers were identified on site during the audit and interviews with managers and workers confirm that there are no labor-only contracts here. At employment time none of the workers paid a recruitment fee, the company performing itself the process.

Evidence examined:

Personnel files for 26 employees, interviews with 26 employees and 1 workers' representative, interview with HR Manager and other management.

Any other comments:

None.

Responsible Recruitment

All Workers

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

Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)

☐ Yes ☒ No

Migrant Workers

Type of work undertaken by migrant workers:

NA - no migrant workers in this facility

Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: NA - no migrant workers in this facility
Is there any observation on this finding?	NA - no migrant workers in this facility
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	NA - no agency workers in this facility.
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: NA - no agency workers in this facility.
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: NA - no agency workers in this facility.
Contractors (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.)	
Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No contractors working on company's premises.
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: NA - no contractors on site.

8A - Sub-Contracting and Homeworking
[Summary of Findings]**8A: Compliance Requirements**

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

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

Current Systems and Evidence Examined

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

Current Systems:

The company does not sub-contract any of its processes and does not use homeworkers. Auditor interviewed 26 workers, 1 workers' representative and managers, observed all activities on site and concluded that the entire activity is carried out on site, with company's employees only.

Evidence examined:

Complete site tour observation, interviews with 26 workers and 1 workers' representative, interviews with managers, verification of 3 months (April, July and November 2022) of production level versus production capacity and recorded working hours worked.

Any other comments:

None.

Summary of sub-contracting – if applicable

Is there any sub-contracting at this site? ☐ Yes ☒ No

Summary of homeworking – if applicable

Is homeworking used at this site? ☐ Yes ☒ No

9 - No Harsh or Inhumane Treatment is Allowed

[Summary of Findings]

9: Compliance Requirements

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.

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

Included in the Internal Company Rules - last update in 06.01.2023, the Disciplinary Procedure is available to all employees in all communication panels, in the eating room and with their workers' representatives. This document is subject matter of induction training of all new employees and periodic training of all employees. Interviews with 26 workers demonstrated a good knowledge of this Disciplinary Procedure, showing good effectiveness of training carried out. Although harassment is not a concern in this facility, all personnel, including top and mid management, are trained with regards to this topic which is strongly addressed in Internal Company Rules/06.01.2023 but also in the ETI Base Code. No disciplinary measures were taken by company within last 12 months. Abuse, of any kind, or inhumane treatment has not been an issue in the company. Employees feel they are treated with respect and dignity and all their problems can be discussed openly with the senior management of the company, being comfortable with that. No abuse against any minority's workers has been reported, nor claimed during interviews. Interview with workers confirm they are well treated by company and other employees, not discriminated and work conditions are identical with the ones offered to their colleagues.

Evidence examined:

Internal Company Rules - last update in 06.01.2023, Collective Bargaining Agreement no.1/06.01.2023 (valid for 2 years), ETI Base Code, personnel files for 26 employees, interviews with 26 employees, interview with HR personnel.

Any other comments:

None.

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 3rd party?

☒ Yes ☐ No

Please give details:

As per Romanian legislation any interested party can complain related to failure to comply with OHS regulations and/or Labour Standards to interested state authority (Territorial Labour Inspectorate, Environmental Agency etc.)

If yes, are workers aware of these channels and have access? Please give details.

According to declarations of interviewed workers, they are aware of these channels (trainings are carried out annually) and they are confident using them, if the case.

If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.

There are defined clear communication channels: direct discussion with manager/supervisor, direct communication with HR personnel or OHS responsible or other specialized persons, direct approach of senior managers, appeal to whistle-blow boxes.

Which of the following groups is there a grievance mechanism in place for?

☒ Worker ☒ Communities
☒ Suppliers ☒ Other

Please provide grievance mechanism details	All interested parties can complain or raise concerns related to whatever topic they consider as affecting their interests. Usually, they utilize company's website that has a direct link to e-mail address of the company or indicates a phone number. After notification of receipt the company takes adequate steps to solve claimed issue and give a response to the satisfaction of the complainant.
Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The Disciplinary Procedure, included in the Internal Company Rules/06.01.2023, allows fines from wages for disciplinary purposes, being compliant with Romanian Labour Code. However, no such disciplinary measures were applied in this facility.

10A - Entitlement to Work and Immigration

[Summary of Findings]

10A: Compliance Requirements

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

10.A.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:

Sampled workers' files were of Romanian citizens, with full legal right to work in Romania. Employees Register does not contain any foreigner employed at the time of the audit. Workers interviewed confirm that all employees have full right to work and no migrant worker ever worked here. All original documents of the employees are with them, the company maintaining only copies of these documents in their personnel files. Interviews with employees confirm this situation.

Evidence examined:

Internal Company Rules/06.01.2023, ETI Base Code, personnel files for 26 employees, interviews with 26 employees and 1 workers' representative and HR Manager.

Any other comments:

None.

10B4 - Environment 4-Pillar
[Summary of Findings]

10B4: Compliance Requirements

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

10.B4.2 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.

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

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

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

10.B4.6 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).

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

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

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

10B4: Guidance for Observations

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

10.B4.11 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:

There are sufficient evidences showing a good level of environmental awareness, both from management and from workers and a good level of compliance with legal and other regulatory requirements applicable to the company. It is to be mentioned that the operational activity of the company has a low level of pollution, being highly oriented to environmental protection.

At the audit time the company holds a voluntary environmental certification according to ISO 14001:2015, Certificate no.10433388/14.03.2022 for compliance with ISO 14001:2015 (expires in 13.03.2025).

The person which is responsible for the management of the environment in this company is Mrs. Amalia Ion, Innovation Director, as per Decision no.01/01.03.2022.

Quality-Environment-OHS -Energy Policy documented and approved by General Manager in 03.01.2022 was found documented and posted all over the facility, posted at the gate of the facility and communicated to all local authorities; it assumes all environmental impacts generated by company's activity and commits to act in order to reduce at maximum environmental impacts and also to comply with legal and regulatory requirements.

No litigations or fines occurred in connection with environmental issues, including emergency situations. No inspections carried out by environmental authorities within last 12 months. Auditors observed Unique Register of Control and noted that no inspection form Dambovită Environmental Guard or Romanian Waters authority were carried out related to facility. For the activity carried out in the facility the Environmental Agency in Dambovită County issued the Environmental Authorization no.154/16.09.2021 with annual visa no.112/02.09.2022, valid for 1 year until 16.09.2023. The company made all due diligence and filed all required evidence and records in order to obtain the environmental authorization. At the audit time all documents were verified by authority and the last step before issuance of authorization is the performance of the on-site inspection of the Environment Protection Agency Cluj; the company was not yet notified regarding this visit of the authority, waiting to be scheduled. No further actions to speed-up the process is possible at this time.

The company is aware of its environmental impact (which is low as considered by Romanian legislation) and is focused in reducing the quantities of wastes generated, to recycle as much as possible all generated waste and reduce consumption of energy. The most important environmental impacts are related to the generation of waste (most important being: paper and cardboard, plastic, packaging contaminated with chemicals - ink, adhesives - WEEE), the consumption of electricity (used to operate all equipment).

The company keeps track of all applicable legal and regulatory requirements by verification of all up-dates with authorities' websites. However, company's activity does not affect nature and does not cause deforestation.

Moreover, the company holds a FSC certification: Certificate of Registration no. SA-COC-007297, issue no.1.0/30.09.2019 and valid until 29.09.2024 issued by Soil Association Certification Ltd., demonstrating its commitment to use raw materials from sustainable sources only.

Good evidences of waste generation and further management were found available in the company. Waste generated in company is recorded consistently (type of waste and quantities generated) and managed through specialized and authorized third party companies - mainly for recycling purposes, except domestic waste which is eliminated.

Evidence examined:

Certificate no.10433388/14.03.2022 for compliance with ISO 14001:2015 (expires in 13.03.2025), Decision no.01/01.03.2022 - nomination of responsible for the management of the environment company, Mrs. Amalia Ion, Innovation Director; "Environmental aspects and risk assessment" procedure, Register of legal and regulatory requirements/10.01.2023 – environment & OHS & firefighting & ISCIR, Compliance evaluation with legal and regulatory requirements/April 2022, List of Environmental Aspects and Risks/05.12.2022.

Any other comments:

None

Environmental Analysis

Is there a manager responsible for Environmental issues (Name and Position):	Mrs. Amalia Ion, Innovation Director, as per Decision no.1/01.03.2022.
--	--

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: In compliance with internal procedure "Environmental aspects and risk assessment" the company carries at least annually a re-assessment of its environmental aspects, evaluation the impacts and the progress of its environmental performance. If changes occur in layout, equipment, materials used, customers'/interested parties'/legal or regulatory requirements, the organization perform an intermediary re-assessment of the environmental aspects and impacts in the affected area and connected processes only. It was documented the List of Environmental Aspects and Risks/05.12.2022.
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Certificate no.10433388/14.03.2022 for compliance with ISO 14001:2015 (expires in 13.03.2025).
Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The Integrated Policy contains commitment to minimize impact on environment of its products and processes by an effective use of utilities, raw materials and auxiliary materials in all developed activities, by reducing the quantities of wastes and effective and ecological management of recyclable wastes; compliance with all applicable legal and regulatory requirements; prevention of environment pollution and improvement of environmental performance.
Does the site have a Biodiversity policy?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No other sustainability system in place in this facility.
Have all legally required permits been shown?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Environmental Authorization no.154/16.09.2021 with annual visa no.112/02.09.2022, valid for 1 year until 16.09.2023.
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details: No chemicals are used in the manufacturing process. Chemicals are used only in sanitation process and do not get in contact with the product.
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No chemicals are used in production process and this information is communicated to all clients.

Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The production processes do not use water, only electricity and the lines are brand new and modern, with low level of electricity consumption. The targets are related to wastes generated and to increase of the recyclability of the generated waste.	
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Waste management records according to Government Decision no. 856/2002 for: paper and cardboard, plastic, wood and textiles.	
Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The company has accurate systems in place for measurement of utilities consumption. A person is in charge for monitoring electricity consumption, consumption of water and natural gas. All consumptions are monthly recorded and uploaded in electronic database system.	
Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: NA – no sub-contracting agency in place nor business partner operating on its premises.	
Usage/Discharge analysis		
Criteria	Previous year: 2022	Current year: 2023
Electricity Usage: Kw/hrs	3650317	0
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	0	0
Has site completed any carbon Footprint Analysis?	No	No
If Yes, please state result		
Water Sources	Compania de Apa Targoviste-Dambovita SA - water network	Compania de Apa Targoviste-Dambovita SA - water network
Water Volume Used	1242	0
Water Discharged	Compania de Apa Targoviste-Dambovita SA - sewerage	Compania de Apa Targoviste-Dambovita SA - sewerage
Water Volume Discharged	1242	0
Water Volume Recycled	0	0
Total waste produced	298 tons	0
Total hazardous waste produced	0	0
Waste to recycling	279 tons	0
Waste to landfill	19 tons	0

Waste to other	0	0
Total Product Produced	not disclosed by company	not disclosed by company

10C - Business Ethics – 4-Pillar Audit [Summary of Findings]

10C: Compliance Requirements

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

10.C.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.

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

10.C.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.

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

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

10.C.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

10.C.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.

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

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

Current Systems and Evidence Examined

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

Current Systems:

The organization documented a Business Ethics Policy included in the Internal Company Rules/06.01.2023 and allocated the responsibility for implementation of this Policy and ETI Base Code to Mrs. Alina Coman, Deputy General Director of the company. Consistent training is provided to all employees and suppliers, induction and/or on-going on these requirements. All managers, executives and sensitive type of personnel in the company assumed by signature to respect ETI Base Code and are trained on yearly basis to respect it; any deviation from its requirements must be reported without any delay. However, in relation with their clients the risk of failure from business ethics is limited due to the fact that the majority of company's contracts are carried out on-line and their offers launched there. Confidential reporting of any kind of deviations from ETI Base Code and/or human rights is ensured by postage of several whistle-blow boxes in areas of workers' relaxation, where cameras do not have access. However, all interviewed workers and their representative confirm that they prefer to directly address any topics to top management and they are confident not only that no repercussions will come but also that the problem will be considered and solved as soon as possible. For stakeholders that do not access the facility the company has available on company's web address an e-mail form and a phone number where any interested party can raise concerns or complaints if they consider so. This communication path is documented in Suppliers Code of Conduct/19.10.2022 that was indicated to all suppliers as recommendation for compliance. As per management statement, the company has not been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. Auditor made a quick web search on web in order to confirm management's statement and did not identify any information with such topic.

Evidence examined:

Interviews with Mrs. Alina Coman, Deputy General Director, interview with Purchasing Responsible, interviews with part of the employees (4) that have been asked what they have understood about what means ethics in business, if they can recognize an un-ethical behavior and if they know how to report un-ethical behavior if they observe it. Training Minute/20.06.2022 - training of administrative personnel (10 employees), Training Minute/19.09.2022 - training of sensitive personnel (11 employees), e-mails (e.g. e-mail/28.11.2022 to Romcarton SA, e-mail/10.10.2022 to Zip Solution SRL, e-mail/21.10.2022 to Metex Textil production SRL etc.) for communication to suppliers of ETI Base Code and request to comply with its requirements.

Any other comments:

None.

Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	<input checked="" type="checkbox"/> Internal Policy <input checked="" type="checkbox"/> Policy for third parties including suppliers Please give details: Business Ethics Policy/06.01.2023, Internal Company Rules/06.01.2023, ETI Base Code.
Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Training Minute/20.06.2022 - training of administrative personnel (10 employees), Training Minute/19.09.2022 - training of sensitive personnel (11 employees).
Is the policy updated on a regular (as needed) basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Periodic reviews of adequacy of policies is performed in management reviews. Last revision of the Business Ethics Policy was documented in 06.01.2023.
Does the site require third parties including suppliers to complete their own business ethics training	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: e-mail/28.11.2022 to Romcarton SA, e-mail/10.10.2022 to Zip Solution SRL, e-mail/21.10.2022 to Metex Textil production SRL etc. for communication to suppliers of ETI Base Code and request to comply with its requirements.

Attachments



outdoor view.jpg



production workshop.jpg



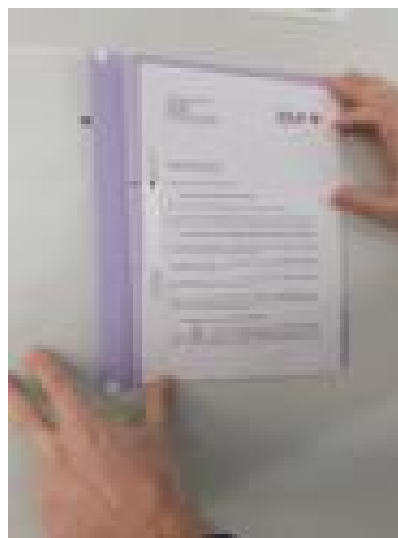
production workshop_1.jpg



storage of semi-finished product & interior hydrant.jpg



finished product store.jpg



postage of ETI Base Code.jpg



postage of Internal Company Rules.jpg



postage of CBA.jpg



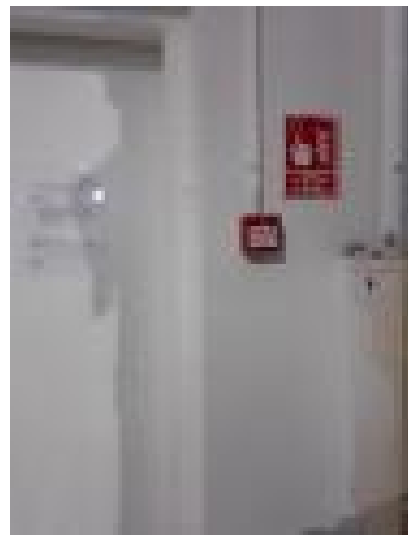
electric cars charging station.jpg



attendance evidences - workers' confirmation.jpg



communication panel & whistle-blow box.jpg



emergency alarm button.jpg



evacuation door.jpg



evacuation door_1.jpg



evcauation plan posted.jpg



fire extinguisher & disinfectant.jpg



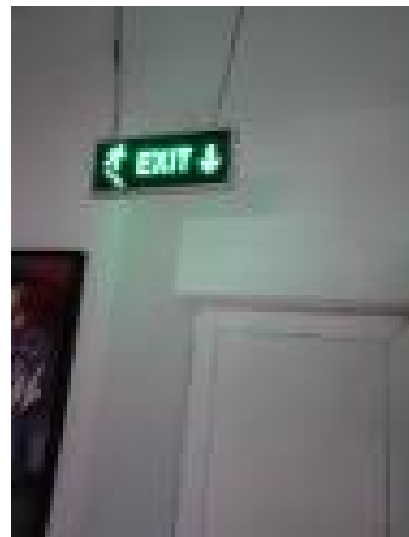
fire extinguisher.jpg



first-aid box in production.jpg



hazard marking.jpg



marking of evacuation routes.jpg



secured lockers for workers.jpg



eating room.jpg



eating room_1.jpg



bathroom.jpg



toilet.jpg



whistle-blow box & fire extinguisher.jpg



waste management.jpg



For more information visit: [Sedexglobal.com](https://www.sedexglobal.com)

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

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

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

[Click here for Supplier \(B\) members:](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)

[Click here for Auditors:](https://www.surveymonkey.co.uk/r/BRTVCKP)

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