

# SMETA Corrective Action Plan Report (CAPR)

Version 6.1





Audit Details						
Sedex Company Reference: (only available on Sedex System)	ZC: 1023535		Sedex Site Reference: (only available on Sedex System)			
Business name (Company name):	IBACEM AGRICOLA COMERCIO E EXPORTACAO LTDA					
Site name:	IBACEM					
Site address: (Please include full address)	Estr Juazeiro/Curaca - s/n GP B- LT411/417, BA, 48900-000		Country:		Brazil	
Site contact and job title:	Angelina Alves Certification Analyst					
Site phone:	55 74 2102-9090		Site e-mail:		seg.a	limentar@nfa.com.br
SMETA Audit Pillars:	∑ Labour Standards	Health & Safety (plus Environment 2- Pillar)		Environi 4-pillar	ment	□ Labour Standards
Date of Audit:	December, 01 <sup>th</sup> , 02 <sup>th</sup> ,03 <sup>th</sup> and 04 <sup>th</sup> 2020					

			Pillar)					
Date of Audit:	Date of Audit: December, 01th, 02th, 03th			4 <sup>th</sup> 2020	0			
Audit Company Name & Logo:			IBA	СЕМ А		port Owner (p DLA COMERO LTDA		XPORTACAO
		Αι	ıdit Conducted	Ву				
Affiliate Audit Company	$\boxtimes$	Purchase	er			Retailer		
Brand owner		NGO				Trade Unior	1	
Multi– stakeholder			Comb	Combined Audit (select all that apply)			у)	
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# **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.

Any exceptions to this must be recorded here (e.g. different sample size):

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

Lead auditor: Luciano Rodrigues Teixeira APSCA number: 21702873
Team auditor: Luciano Rodrigues Teixeira APSCA number: 21702873
Interviewers: Luciano Rodrigues Teixeira APSCA number: 21702873

Report writer: Luciano Rodrigues Teixeira APSCA number: 21702873

Report reviewer: Patrick Sister

Date of declaration: December 04th 2020

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

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



# **Audit Parameters**

Audit Parameters						
A: Time in and time out	A1: Day 1 Time in: 08:00am A2: Day 1 Time out: 05:00 pm	A3: Day 2 Time in: 08:00 am A4: Day 2 Time out: 05:00 pm	A5: Day 3 Time in: 08:00 am A6: Day 3 Time out: 05:00 pm			
		A5: Day 4 Time in: 08:0 A6: Day 4 Time out: 12				
B: Number of auditor days used:	1 Auditor – 3,5 man-c	days				
C: Audit type:	☐ Full Initial ☐ Periodic ☐ Full Follow-up ☐ Partial Follow-Up ☐ Partial Other If other, please define:					
D: Was the audit announced?	Announced Semi – announced: Window detail: weeks Unannounced					
E: Was the Sedex SAQ available for review?	∑ Yes ☐ No E1: If No, why not?					
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	Yes No If <b>Yes</b> , please capture	e detail in appropriate	audit by clause			
G: Who signed and agreed CAPR (Name and job title)	Angelina Santana Certification Analyst					
H: Is further information available (if yes, please contact audit company for details)	☐ Yes ☐ No					
I: Previous audit date:	N/A					
J: Previous audit type:						
K: Were any previous audits reviewed for this audit	Yes No					
TOT THIS GOOT	⊠ N/A					
A Pl II d		Washan Ba				
Audit attendance	Management	Worker Committee	es			

Audit attendance	Management		Worker Representatives			
	Senior management		Worker Committee representatives		Union representatives	
A: Present at the opening meeting?	⊠ Yes	□No	☐ Yes	⊠ No	⊠ Yes	□No



B: Present at the audit?	⊠ Yes	□No	Yes	⊠ No	⊠ Yes	□No
C: Present at the closing meeting?	⊠ Yes	□No	Yes	⊠ No	⊠ Yes	□No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	No worker committee					
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)						

# Guidance

The Corrective Action Plan Report summarises the site audit findings and a corrective, and preventative action plan that both the auditor and the site manager believe is reasonable to ensure conformity with the ETI Base Code, Local Laws and additional audited requirements. After the initial audit, the form is used to rerecord actions taken and to categorise the status of the non-compliances.

N.B. observations and good practice examples should be pointed out at the closing meeting as well as discussing non-compliances and corrective actions.

To ensure that good practice examples are highlighted to the supplier and to give a more 'balanced' audit a section to record these has been provided on the CAPR document (see following pages) which will remain with the supplier. They will be further confirmed on receipt of the audit report.

# Root cause (see column 4)

Root cause refers to the specific procedure or lack of procedure which caused the issue to arise. Before a corrective action can sustainably rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

See SMETA BPG Chapter 7 'Audit Execution' for more explanation of "root cause".

# **Next Steps:**

- 1. The site shall request, via Sedex, that the audit body upload the audit report, non-compliances, observations and good examples. If you have not already received instructions on how to do this then please visit the web site <a href="https://www.sedexglobal.com">www.sedexglobal.com</a>.
- 2. Sites shall action its non-compliances and document its progress via Sedex.
- 3. Once the site has effectively progressed through its actions then it shall request via Sedex that the audit body verify its actions. Please visit <a href="www.sedexglobal.com">www.sedexglobal.com</a> web site for information on how to do this.
- 4. The audit body shall verify corrective actions taken by the site by either a "Desk-Top" review process via Sedex or by Follow-up Audit (see point 5).
- 5. Some non-compliances that cannot be closed off by "Desk-Top" review may need to be closed off via a "1 Day Follow Up Audit" charged at normal fee rates. If this is the case, then the site will be notified after its submission of documentary evidence relating to that non-compliance. Any follow-up audit must take place within twelve months of the initial audit and the information from the initial audit must be available for sign off of corrective action.
- 6. For changes to wages and hours to be correctly verified it will normally require a follow up site visit. Auditors will generally require to see a minimum of two months wages and hours records, showing new rates in order to confirm changes (note some clients may ask for a longer period, if in doubt please check with the client).



# **Corrective Action Plan**

	Corrective Action Plan – non-compliances								
Non- Compliance Number The reference number of the non- compliance from the Audit Report, for example, Discrimination No.7	New or Carried Over Is this a new non- compliance identified at the follow- up or one carried over (C) that is still outstanding	<b>Details of Non-Compliance</b> Details of Non-Compliance	Root cause (completed by the site)	Preventative and Corrective Actions Details of actions to be taken to clear non- compliance, and the system change to prevent re- occurrence (agreed between site and auditor)	Timescale (Immediate, 30, 60, 90,180,365)	Verification Method Desktop / Follow-Up [D/F]	Agreed by Management and Name of Responsible Person: Note if management agree to the non-compliance, and document name of responsible person	Verification Evidence and Comments Details on corrective action evidence	Status Open/Closed or comment
01 - <b>3</b> : Working Conditions are Safe and Hygienic	NEW	Evidenced that some employees were using unspecified glasses, in disagreement with PGSSMATR - Rural Worker Function Harvest process – UVA	Training Systems Costs lack of workers Other please give details:	Provide Use of Overlay Glasses	90	D	Hallyson Feitosa work safety technician		Open
02 - <b>3</b> : Working Conditions are Safe and Hygienic	NEW	Hydrant hoses hydrostatic testing not evidenced	Training  Systems  Costs	Provide the Hydrostatic test	90	D	Hallyson Feitosa work safety technician		Open



			☐ lack of workers ☐ Other – please give details:					
03 - <b>3</b> : Working Conditions are Safe and Hygienic	NEW	Evidenced that vehicles used to transport employees do not have a seat belt.	Training Systems Costs lack of workers Other please give details:	Provide vehicle maintenance	90	D	Hallyson Feitosa work safety technician	Open
04 - <b>3</b> : Working Conditions are Safe and Hygienic	NEW	Not Evidenced of Cleaning and Sanitizing Record of Water Tank of 185000 lts.	Training Systems Costs Costs Iack of workers Other please give details:	Providing the housing Cleaning water tank	90	D	Angelina Alves Certification Analyst	Open



Corrective Action Plan – Observations						
Observation Number The reference number of the observation from the Audit Report, for example, Discrimination No.7	New or Carried Over Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding	<b>Details of Observation</b> Details of Observation	Root cause (completed by the site)	Any improvement actions discussed (Not uploaded on to SEDEX)		
null						

	Good examples					
Good example Number The reference number of the good example from the Audit Report, for example, Discrimination No.7	Details of good example noted	Any relevant Evidence and Comments				
null						



Confirmation

Please sign this document confirming that the above findings have been discussed with and understood by you: (site management)  If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.					
A: Site Representative Signature:		Title Certification Analyst			
		Date December, 04 <sup>th</sup> 2020			
B: Auditor Signature:		Title Lead Auditor			
		Date December, 04 <sup>th</sup> 2020			
C: Please indicate below if you, the site i	management, dispute any of the findings. No ne	ed to complete D-E, if no disputes.			
D: I dispute the following numbered non-compliances:					
E: Signed: (If <u>any</u> entry in box D, please complete a signature on this line)		Title Date			
F: Any other site Comments:					



# **Guidance on Root Cause**

# **Explanation of the Root Cause Column**

If a non-compliance is to be rectified by a corrective action which will also prevent the non-compliance re-occurring, it is necessary to consider whether a system change is required.

Understanding the root cause of the non-compliance is essential if a site is to prevent the issue reoccurring.

The root cause refers to the specific activity/ procedure or lack of activity/procedure which caused the non-compliance to arise. Before a corrective action can rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

Since this is a new addition, it is not a mandatory requirement to complete this column at this time. We hope to encourage auditors and sites to think about Root Causes and where they are able to agree, this column may be used to describe their discussion.

# Some examples of finding a "root cause"

### Example 1

Where excessive hours have been noted the real reason for these needs to be understood, whether due to production planning, bottle necks in the operation, insufficient training of operators, delays in receiving trims, etc.

### Example 2

A non-compliance may be found where workers are not using PPE that has been provided to them. This could be the result of insufficient training for workers to understand the need for its use; a lack of follow-up by supervisors aligned to a proper set of factory rules or the fact that workers feel their productivity (and thus potential earnings) is affected by use of items such as metal gloves.

### Example 3

A site uses fines to control unacceptable behaviour of workers.

International standards (and often local laws) may require that workers should not be fined for disciplinary reasons.

It may be difficult to stop fines immediately as the site rules may have been in place for some time, but to prevent the non-compliance re- occurring it will be necessary to make a system change.

The symptom is fines, but the root cause is a management system which may break the law. To prevent the problem re-occurring it will be necessary to make a system change for example the site could consider a system which rewards for good behaviour

Only by understanding the underlying cause can effective corrective actions be taken to ensure continuous compliance.

The site is encouraged to complete this section so as to indicate their understanding of the issues raised and the actions to be taken.





For more information visit: <a>Sedexglobal.com</a>

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:

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http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5Iw\_3d\_3d

## Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\_2brg\_3d\_3d

# **Click here for Auditors:**

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