




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC 1058177	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS:1050220
Business name (Company name):	FRUTA VIDA PRODUÇÃO IMPORTAÇÃO E EXPORTAÇÃO LTDA		
Site name:	FRUTA VIDA		
Site address: <i>(Please include full address)</i>	BR 304 KM 13 s/n Zona Rural Mossoro RN	Country:	Brazil
Site contact and job title:	Ricardo CHOTTEN Agronomist and Quality system manager		
Site phone:	+55869981885467	Site e-mail:	frutavida@coopfrutas.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety	<input type="checkbox"/> Environment <input type="checkbox"/> Business Ethics
Date of Audit:	11/20-21/2019		

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

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

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

Lead auditor: Mr. Xavier Henri Baudequin APSCA number: ASCA 21703212

Lead auditor APSCA status: In good standing

Auditor observer: APSCA number:

Interviewers: Mr. Xavier Henri Baudequin APSCA number: ASCA 21703212

Report writer: Mr. Xavier Henri Baudequin

Report reviewer: Mrs Silke EIDECKER

Date of declaration: 11/21/2019

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

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

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	•
0B Management systems and code implementation	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1	0	0	• No system in place to keep up-to-date with local and national laws NC1
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	•
2. Freedom of Association	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	1	0	• The workers committee available on site is dealing, according to local Labour laws, with Health and Safety conditions of works only OBS
3. Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	9	0	0	<ul style="list-style-type: none"> • Missing spill kit on manure liquid workstation NC1 • Isolated incidents of inconsistent training records NC2 • Missing MSDS NC3 • No firemen licence NC4 • Missing emergency shower NC5 • Missing PPE required by Law NC6 • Unsafe workplace on manure liquid workstation NC7 • Unsafe workstation for workers NC8 • No adequate escape route on PH NC9

4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	•
5	<u>Living Wages and Benefits</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	0	0	2	<ul style="list-style-type: none"> • Minimum salary on site is higher than legal minimum salary in Brazil (GE1) • Food assistance provided to workers (GE2)
6	<u>Working Hours</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	1	0	0	<ul style="list-style-type: none"> • Overtime on hazardous functions (NC1)
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	•
8	<u>Regular Employment</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1	0	0	<ul style="list-style-type: none"> • Missing copy of working contract of letter of appointment
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				•
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				•
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				•
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				•

General observations and summary of the site:

FRUTA VIDA PRODUÇÃO IMPORTAÇÃO E EXPORTAÇÃO LTDA is a farm of 573 ha located in the region of Mossoro, Brazil, which is dedicated to the production of melon on an average production area of 300ha. The company is member of a producer group named COOPYFRUTAS, COOPERATIVA DOS FRUTICULTORES DA BACIA POTIGUAR in which are included four others local fruits growers who are working upon the same quality management system. The company begun its activities in 2010.

During the audit days, the staff was composed of 199 workers out of which 193 are production workers and 6 are from the management of the farms. There is only one shift on site, from Monday to Friday, working from 06:30 am to 4:30 pm with two unpaid hours for lunch (from 11 am to 01:00 pm). On Saturday the working shift is from 06:30am to 10:30 am.

Workers are paid on a monthly base with a partial payment on each day 15th of the payment period. Payments and overtime rates are defined in a local CBA annually bargained and updated with local Unions.

9 NC related to Health and safety conditions of works, 1 related to management system, 1 to Working hours and 1 related to Regular appointment were pointed out during the audit process.

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

Site Details

Site Details			
A: Company Name:	FRUTA VIDA PRODUÇÃO IMPORTAÇÃO E EXPORTAÇÃO LTDA		
B: Site name:	FRUTA VIDA		
C: GPS location: (If available)	<table border="1"> <tr> <td>GPS Address:</td> <td>Latitude: 4°59'50.07"S Longitude: 4°59'50.07"S</td> </tr> </table>	GPS Address:	Latitude: 4°59'50.07"S Longitude: 4°59'50.07"S
GPS Address:	Latitude: 4°59'50.07"S Longitude: 4°59'50.07"S		
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Environmental licence: 2014-076269 valid until 04/13/21 issued by IDEMA</p> <p>Operational local licence: 013.966.1 valid to 12/31/2019</p> <p>ITR (Rural Property Tax): 3.062.414.2 (land registry number)</p> <p>Water licence: #1: licence 138/2016 issued by IGARN on 30/03/2016 valid 30/03/2020</p> <p>#2: licence 0474/2016 issued by IGARN on 12/19/2016 valid through 12/19/2020</p> <p>#3: licence 139/2017 issued by IGARN on 05/05/2017 valid through 05/05/2021</p>		
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Growing and packing of melons		
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>The site begun its activities in 2010. It is located on BR 304 KM 13 s/n Zona Rural Mossoro RN at about 25km from downtown</p> <p>Main facilities on site are 1 packing house 1450 m², 1 mechanical area 150m², 1 fertilizers warehouse and annex 183m², 1 Bio Fabric and chemicals storage 458m², 1 gas Station area 8 m², Warehouse and boxes deposits 250 m², 1 Canteen 160 m², Office 94 m², Water Pumping station 48 m², 3 Irrigation workstation 400m², 1 Garage 800m²</p> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: non observed</p> <p>F3: Does the site have a structural engineer evaluation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F4: Please give details: not required</p>		
G: Site function:	<input type="checkbox"/> Agent <input type="checkbox"/> Factory Processing/Manufacturer		

	<input type="checkbox"/> Finished Product Supplier <input checked="" type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input checked="" type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
H: Month(s) of peak season: (if applicable)	September to December
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Planting, weeding, spraying, irrigation, pruning and harvesting as fields operations, then reception of fruit, classification, packing, palletizing, quality control and final shipping to clients
J: What form of worker representation / union is there on site?	<input checked="" type="checkbox"/> Union (name): SINTRAFRUT & STLM <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details: no accommodations are provided on site

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 08h30 A2: Day 1 Time out: 17h30	A3: Day 2 Time in: 07h30 A4: Day 2 Time out: 16h30	A5: Day 3 Time in: A6: Day 3 Time out:
B: Number of auditor days used:	1 auditor / 2 man-days		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Reinaldo CHOTTEN Agronomist and Quality system manager		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	12/12-13/2018		
J: Previous audit type:	Periodic		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A		

Audit attendance	Management		Worker Representatives			
	Senior management		Worker Committee representatives		Union representatives	
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

<p>D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i></p>	<p>N/A</p>
<p>E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i></p>	<p>There is no Union Representative on site</p>

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	192	0	0	0	0	0	0	192
Worker numbers – female	7	0	0	0	0	0	0	7
Total	199	0	0	0	0	0	0	199
Number of Workers interviewed – male	25	0	0	0	0	0	0	25
Number of Workers interviewed – female	1	0	0	0	0	0	0	1
Total – interviewed sample size	26	0	0	0	0	0	0	26



A: Nationality of Management	Brazilian	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: Brazilian</p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p>	<p>Was the list completed during peak season?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: N/A</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 100%_</p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: _____% workers on piece rate</p> <p>D1: _____% hourly paid workers</p> <p>D2: 100 % salaried workers</p> <p>Payment cycle:</p> <p>D3: _____% daily paid</p> <p>D4: _____% weekly paid</p> <p>D5: 100 % monthly paid</p> <p>D6: 100 % other</p> <p>D7: If other, please give details: 40% of salary is pre-paid on day 15th</p>	



Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	4 groups of 5 men	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 5	D2: Female: 1
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	General comment was made about a new system of work that possibly could be available on site and through which the staff should be reduced but the volume of work should remain the same. Complain was also made upon chemicals or fertilizers sprayings on fields	
I: What did the workers like the most about working at this site?	Regularity of payment	
J: Any additional comment(s) regarding interviews:	none	
K: Attitude of workers to hours worked:	Workers complained that they do not perform any more Overtime	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes		

<input checked="" type="checkbox"/> No L1: If yes, please give details: N/A
M: Attitude of workers: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>
26 workers were interviewed. Worker attitude was positive and showed general well-being in regard with relationship with management and working conditions. But they also mentioned that communication of general news and notice between management and workers is not so good.
N: Attitude of worker's committee/union reps: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>
Committee members for H&S which were interviewed and informed that the periodic meetings are set on site but when asked about mandatory trainings on site they did not provide a clear answer
O: Attitude of managers: <i>(Include attitude to audit, and audit process. Both positive and negative information should be included)</i>
Cooperative throughout the audit works. All necessary documents were provided as required and just in time for reviewing exams.

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Mr Reinaldo CHOTTEN has been assigned as the responsible person on site for implementation of the ETI code of conduct.

ETI code of conduct is published on announcement boards throughout the site and communicated to all newcomers.

A grievance mechanism is available on place but, although communicated to worker during induction training, the internal procedures wasn't documented.

During interviews it was identified that workers feel comfortable approaching either management or their representatives but due to absence of feedback, do not always know if the suggestion box channel is fully effective and efficient.

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

Details:

Policies & Procedures,

Worker and Management interviews

Any other comments: None

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: inserted in POLÍTICA DE ÉTICA E RESPONSABILIDADE SOCIAL COD: POL 01 Versão: 01 issued on 06/08/2019</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Mr. Reinaldo CHOTTEN Job title: Agronomist and Quality system manager</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: A anonymous claim box system is available on site. All grievance is registered in a log which has restricted access by few persons from administrative unit and management</p>
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: All worker files are maintained under restricted access area</p>

Findings none		
<p>Finding: Observation <input type="checkbox"/></p> <p>Description of observation:</p> <p>Local law or ETI/Additional elements / customer specific requirement:</p> <p>Comments:</p>	<p>Company NC <input type="checkbox"/></p>	<p>Objective evidence observed:</p>

Good examples observed: none	
<p>Description of Good Example (GE):</p>	<p>Objective Evidence Observed:</p>

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: ___8.92_ %	A2: This year ___9,18_ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	3,10%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: ___2,08_ %	C2: This year ___1,31_ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	1,35%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: maintained log according to law	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: Number: 0	F2: This year: Number:0
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year:0	H2: This year: 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months ___0_ % workers	I2: 12 months ___0_ % workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ___0_ % workers	J2: 12 months ___0_ % workers

0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

The company showed a good management system in order to implement the ETI requirements on site. Other procedures and good agricultural practices were reviewed.

A Health and safety risk analysis (PGSSMA issued by Leonardo Lacerda Barros, Medics and Sarah Christina Rodrigues dos Santos Silveira, Work Safety Engineer (issued on July 2019 through July 2020) as well as another risk analysis for conditions of works (LTCAT issued and signed by Sarah Silveira on October 2018) are available on site.

Mr. Reinaldo CHOTTEN is the person in charge responsible for the implementation of ETI code

All mandatory legal license such as Business License, Water licence or Environmental Legal register (CAR) are available on site.

No evidence of land conflict was verified: the company justified its land property through ITR (Brazilian Tax upon Land property).

The ETI code of conduct is displayed on various place over the site although when knowledge of ETI code by workers was verified only around basic elements.

One issue was verified upon consistence of the management system when it was verified during the audit day that no formal process available on site to permanently verify if the company remains up-to-date with local and national laws around such issues as labour or normative technical instructions.

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

Details:

- Internal Procedures
- Worker interviews
- Management interviews
- HR records
- Licenses

Any other comments: No

Management Systems:	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details:
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: inserted in POLÍTICA DE ÉTICA E RESPONSABILIDADE SOCIAL COD: POL 01 Versão: 01 issued on 06/08/2019
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	The HR department showed clear examples of procedures for selection and hiring of workers. These procedures were verified when reviewed the worker's files
D: 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 D1: Please give details: Training minute issued on 10/10/2019
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Verified during the worker's interviews and the review of training records
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: the site is certified Rainforest Alliance (reference number IBD-G-101998)
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Mrs Maria Vanessa de Mello
H: Is there a senior person / manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Mt Reinaldo CHOTTEN
I: Is there a policy to ensure all worker information is confidential?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No I1: Please give details:
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: worker's data are maintained in a restricted access area
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	K1: Please give details:
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: Please give details:
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please give details:
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Environmental licence: 2014-076269 valid until 04/13/21 issued by IDEMA Water licence: #1: licence 138/2016 issued by IGARN on 30/03/2016 valid 30/03/2020 #2: licence 0474/2016 issued by IGARN on 12/19/2016 valid through 12/19/2020 #3: licence 139/2017 issued by IGARN on 05/05/2017 valid through 05/05/2021
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No O1: Please give details:
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC:
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: Please give details:
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No R1: Please give details:
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details:

Non-compliance: one	
<p>1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>During the review of the MS records and through management interviews, it was verified that no procedure is available to ensure that the site is always up-to-date with local, national laws or regulatory standards and norms.</p> <p>Local law and/or ETI requirement: ETI Ob10</p> <p>Recommended corrective action: The site must ensure that it always remains up-to-date with all labour laws and others regulatory standards and maintain a procedure of periodic control of internal procedures and labours calculations.</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>document review Management interview</p>

Observation: none	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

Good Examples observed: none	
<p>Description of Good Example (GE):</p>	<p>Objective evidence observed:</p>

1: Freely Chosen Employment
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ETI

- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined

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

Current systems:

According to workers interviews, there is no forced labour on site. Workers are free to leave and go. A large majority of workers are employed on site then leaves after a few months of works and then come back to works again. Some workers stated they are coming back since various years.

No complain upon any retained documents or fees to pay when workers are hired was verified.
 No taxes payment evidences during hiring selection was verified during the pay roll review.

As stated by workers PPE are freely provided by the company. A Hiring commitment policy is included in the POLÍTICA DE ÉTICA E RESPONSABILIDADE SOCIAL COD: POL 01
 Versão: 01 issued on 06/08/2019

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

Details:

- Site tour
- Workers interviews
- Employee records

Any other comments: None

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:</p>
<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding:</p>

<p>E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding:</p>
<p>F: 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 F1: Please describe finding:</p>
<p>G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected:</p>
<p>H: 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 H1: Please describe finding: The has an internal HR procedure in place which was reviewed and found compliant with legal requirements. No intermediate is used during the hiring process to avoid any illegal working contract.</p>

<p style="text-align: center;">Non-compliance: none</p>	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>

<p style="text-align: center;">Observation: none</p>	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

<p style="text-align: center;">Good Examples observed: none</p>	
<p>Description of Good Example (GE):</p>	<p>Objective evidence observed:</p>

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

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ETI

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

Current Systems and Evidence Examined

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

Current systems:

No union representatives were found on site but freedom of Association was verified during workers interviews and the review of the MS documentation: workers are free to contribute or not to Union, through a written declaration.

Workers also said that Unions are sometimes used to enter the site and promote meetings.

A CBA was reviewed on site. It is annually bargained with local Unions representants and then validated by the Labour authority of control.

2 Unions are available on place: SINDICATO DOS TRABALHADORES NA LAVOURA DE MOSSORO- STLM (for fields workers) and SINTFRUIT (for other). 1 CBA for each Union was Both of CBAs were validated by the Brazilian Ministry of Labour.

An internal worker committee was also verified on site. According to National Brazilian Labour laws, there is a mandatory requirement to maintain an internal committee named CIPA (works prevention committee for workers). This committee must be formally chosen and freely chosen according to Brazilian NR31 (Regulatory norms applied to Agriculture industry)

Two workers representatives and members of the CIPA were interviewed Mrs Katia Cilene N.Souza and Mr Isac Wilten Souza.

Although stated by them that meetings are periodically hold on site, some inconsistencies were verified regarding to mandatory training which must be given to all workers representative prior to the first meeting It was also verified that the worker committee doesn't attend all requirements of the ETI standards when the committee is only dealing with topics related to safety conditions of work.

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

Details:

Workers interviews

Reviews of MS documents

General Manager interview (Current president of the worker committee)
 Pay roll review
 Interviews with CIPA members
 Any other comments: None

<p>A: What form of worker representation/union is there on site?</p>	<input checked="" type="checkbox"/> Union (name): SINTRAFRUT & STTLM <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None	
<p>B: Is it a legal requirement to have a union?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p>C: Is it a legal requirement to have a worker's committee?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: an anonymous reclamations channel is maintained on site D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Workers representative said that meetings are hold on meeting rooms	
<p>F: Name of union and union representative, if applicable:</p>	SINTRAFRUT STTLM	<p>F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A (elections for union representative is an external and independent process performed by the Unions)</p>
<p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p>	Worker committee	<p>G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>H: Are all workers aware of who their representatives are?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Mrs Katia Cilene Nascimento Souza Mr Isac Wilten Souza.
<p>I: Were worker representatives freely elected?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 08/01/2019
<p>J: Do workers know what topics can be raised with their representatives?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: 2	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	Last meeting minute reviewed: Meeting hold on October 2019	
M: 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	M1: __100__% workers covered by Union CBA	M2: ____% workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Non-compliance: none	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: Recommended corrective action:	Objective evidence observed: <i>(where relevant please add photo numbers)</i>

Observation: one	
Description of observation: During the workers interviews as well as the workers representative's interviews or the Committee minute records, the workers committee available on site is only dealing with Health and Safety conditions of works Local law or ETI requirement: ETI 2.19 Comments: this workers committee should also deal with all pillars introduced by the ETI Code of conduct.	Objective evidence observed: General interviews of workers and management Meeting minute records

Good Examples observed: none	
Description of Good Example (GE):	Objective evidence observed:

3: Working Conditions are Safe and Hygienic

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

The company has a H&S management system maintained on site. A H&S risk analysis (LTCAT) issued on 11/2018 by Mrs Sara C.R Santos, H&S engineer (CREA 2103783662/CE) as well as another H&S risk analysis (PGSSMATR) also completed by Mrs Sara C.R. Santos and by Dr. Leonardo Lacerda Barros (CRM 4526/RN) on 07/2019 and valid through 07/2020 were reviewed,

Employee interviews confirm that employees are aware of the evacuation map and confirmed participating in evacuation drills.

Some isolated issues of incorrect evacuation flow or missing escape route signage on one area were although verified during the tour of the premises.

Emergency evacuation drill records were provided for review. Last company drill was conducted on 08/18/2019.

First aid kits were verified on several visited workstation and on the first aid room.

As required by Local Brazilian Labour laws, accident logs must be maintained and correctly completed and analysed on site although the management of the site declared that no accidents were records since the last 2 years

Training records were reviewed for all activities performed on site.

Hazardous chemical storage area is only be accessed by authorized personnel MSDS weren't always accessible where chemicals of fertilizers are stored.

Employees are trained upon hazardous materials and risked practices. All machines were observed to have emergency shut off devices. When interviewed, workers on packing house declared that machine manutention is always and permanently provided by the machine provider when only basic manutention is made by the company.

No electrical hazards were noted on site.

Restrooms were reviewed clean and stocked with soap, toilet paper and hand towels. In the Chemicals preparing mixture workstation, it was although verified that the company doesn't provide towels for workers when this is a mandatory point included in the Brazilian NR 31 (Brazilian Regulatory norm for Agriculture).

One serious issue was also identified when interviewed workers on field. All workers interviewed said that unknown nature sprayings are performed when workers are still working on or near the same plot and that sometimes workers must enter again and work by the morning on plots where remained a hard smell of chemicals. As it was impossible to verify the very nature of such spraying and when risks of spraying drifts are always hazardous for workers health on fields, this point was reported as a NC on the final audit report.

Employees have access to a common canteen area with an excellent disposal. It is also noted that the facility provides a separate rest and recreational area for workers.

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

Details:

Employee interviews

Management interviews

H&S training records

Site tour

H&S Policy Extinguishers

First aid kits

Security and escape route signs posted

Any other comments: None

<p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details:</p> <ul style="list-style-type: none"> • H&S risk analysis (LTCAT) issued on 11/2018 by Mrs Sara C.R Santos, H&S engineer (CREA 2103783662/CE) • H&S risk analysis (PGSSMATR) issued by Mrs Sara C.R. Santos and by Dr. Leonardo Lacerda Barros (CRM 4526/RN) on 07/2019 valid through 07/2020 •
<p>B: Are the policies included in workers' manuals?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: Please give details:</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details:</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details:</p>

<p>E: Is a medical room or medical facility provided for workers?</p> <p>If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details: the site maintains a first aid room and a medical examination room for all medicinal occupational visit</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F1: Please give details: all exams are performed on site by an external medicinal provider of service</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>G1: Please give details: according to workers buses are in good conditions and all passengers are transported in a safe way.</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>H1: Please give details: individuals lockers are provided on several places</p>
<p>I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>I1: Please give details:</p>
<p>J: 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>J1: Please give details:</p> <p>Environmental Licence: 2014-076269 valid until 04/13/21 issued by IDEMA</p> <p>Water licence: #1: licence 138/2016 issued by IGARN on 30/03/2016 valid 30/03/2020</p> <p>#2: licence 0474/2016 issued by IGARN on 12/19/2016 valid through 12/19/2020</p> <p>#3: licence 139/2017 issued by IGARN on 05/05/2017 valid through 05/05/2021</p>
<p>K: 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>K1: Please give details: The Global Gap standards upon which the site is annually certified under n° 4049928377654 is requirements this mandatory point of control.</p>

Non-compliance: nine

<p>1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: During the visit of the premises, it was verified that not safety data sheet (MSDS) are always available on pesticides and fertilizers storages or workstations.</p> <p>Local law and/or ETI requirement ETI 3.3.1</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p>
<p>Recommended corrective action: The site must provide a permanent system of control to verify if all MSDS are always available on all storage point or workstations.</p>	<p>Visit of the premises Pic#9</p>
<p>2. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: During the review of the QSM, it was verified that there is no Firemen licence issued on site</p> <p>Local law and/or ETI requirement: ETI 3.2.23</p> <p>Recommended corrective action: The site must provide all required licences</p>	
<p>3. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: During the visit of the premises it was verified that there is no emergency shower on hazardous chemicals products workstation</p> <p>Local law and/or ETI requirement ETI 3.5.9 Brazilian ABNT 9843-3-2013 which stated upon mandatory requirements for emergency showers and eyes washer</p> <p>Recommended corrective action: The site must provide emergency shower</p>	<p>Review of documents</p>
<p>4. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: During the visit of the premises, it was verified an unsafe workstation in the Manure liquid preparing workstation where there is no protection or signage alert to prevent workers from falling into one of the preparation tanks</p> <p>Local law and/or ETI requirement ETI 3.5.9</p> <p>Recommended corrective action: The site must certify that all hazardous points are safe and well signalized.</p>	<p>Visit of the premises Pic#8</p>
<p>5. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p>	<p>Visit of the premises</p>

<p>During the workers interviews, workers reported there is a risk to work on fields then they several times noticed that chemicals spraying are made on same plots or near the same plots they are working in and that does exist a serious risk of unknown product drift.</p> <p>Local law and/or ETI requirement ETI 3.6.3</p>	<p>See Picture 27</p>
<p>Recommended corrective action: The site must certify that safe conditions of works are maintained on all workstations.</p> <p>6.Description of non-compliance: <input type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: During the visit of the packing house, it was verified that the escape route maintained on site were not compliant with the Brazilian regulatory standards which define the minimal size for escape route</p>	<p>Visit of the site and workers interviews</p>
<p>Local law and/or ETI requirement Brazilian NR 23.2.3: escape routes must have a minimal width of 1,20 meters</p> <p>Recommended corrective action: The company modified the incorrect escape route before the end of the audit</p>	<p>Visit of the site Picture #31</p>
<p>7.Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: During the reviews of the QSM documents records and through workers interviews, it was verified some inconsistencies upon various training records that although the site said all required training had been performed</p>	<p>Review of documents Pic#30</p>
<p>Local law and/or ETI requirement ETI 3.1.8</p> <p>Recommended corrective action:</p>	<p>Review of documents Pic#30</p>
<p>8.Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: During the visit of the premises, it was verified that there were no spillage contention devices to avoid any risk of environmental contamination on the manure liquid workstation</p>	<p>Review of documents Pic#30</p>
<p>Local law and/or ETI requirement ETI 3.3.7</p> <p>Recommended corrective action: The site must secure all workstation to prevent and avoid any risk of spillage end environmental contamination by chemical or fertilizers products</p>	<p>Visit of the premises Picture #26</p>
<p>9.Description of non-compliance: <input type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p>	<p>Visit of the premises Picture #26</p>

<p>During the visit of the premises and through workers interviews, it was verified that no towels are given to workers on chemicals hazardous functions as required by National Labour law</p> <p>Local law and/or ETI requirement Brazilian NR 31.8.9: the company must provide water, soap and towels to workers on hazardous chemicals functions</p> <p>Recommended corrective action: The company must provide the PPE required per law.</p>	<p>Visit of the premises and workers interviews.</p>
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Observation: none	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed:</p>

Good Examples observed: none	
<p>Description of Good Example (GE):</p>	<p>Objective Evidence Observed:</p>

4: Child Labour Shall Not Be Used

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

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

ETI

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined

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

Current systems:

No children are employed on site. No evidences of children presence were seen on audit days.

Works said during interviews that they never saw children on site

A formal commitment against child Labour is available in POLÍTICA DE ÉTICA E RESPONSABILIDADE SOCIAL COD: POL 01 Versão: 01 issued on 06/08/2019

An internal operational process was implemented on site to formal review any hiring process. During the review of workers files, ID copies, Birth certificate, CFP (Brazilian Fiscal IDs) were verified in order to control and prove the age of hired Workers.

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

Details:

Workers interviews

QSM documentation Review

Workers files review

Any other comments: None

A: Legal age of employment:	16
B: Age of youngest worker found:	21
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details

Non-compliance: none	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>

Observation: none	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

Good Examples observed: none	
<p>Description of Good Example (GE):</p>	<p>Objective Evidence Observed:</p>

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

All workers are paid on a monthly base through money transfer on bank accounts. They also receive a pre-payment of 40% on day 15th of each month. Recent hired workers receive their salary by bank cheque. Wages paid on site are defined by 2 Collective Bargain agreement bargain with two workers Unions: SINFRUIT (R\$ 1026) and STTLM (R\$ 1022). These salaries are higher than the Brazilian legal minimum wage (R\$ 998).

All stated by workers during interviews and later verified during the review of the pay roll, wages are all detailed on pay slip and workers are fully aware of their salary, extra hours paid or any deductions.

3 sampled payment were reviewed for each interviewed worker: January 2019 (low activity), August 2019 (regular activity) and October 2019 (peak activity) months.

No inconsistencies on pay roll was identified during the review of the pay roll

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

Details:

Workers interview,

Review of CBA

Review of pay roll

Any other comments: No

Non-compliance: none

1. Description of non-compliance:

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

Objective evidence observed:

(where relevant please add photo numbers)

Local law and/or ETI requirement:	
Recommended corrective action:	

Observation: none	
Description of observation: Local law or ETI requirement: Comments:	Objective evidence observed:

Good Examples observed: two	
Description of Good Example (GE): 1. Minimum salary on site is higher than legal minimum salary in Brazil 2. Food assistance provided to workers	Objective Evidence Observed:

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 8h /day 44h/week 220hmonth	8h /day 44h/week 220h/month	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 2 hours/day 11hours/week 1h/day for emergency purpose	2 hours/day 11hours/week 1h/day for emergency purpose	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: RS 998	R\$ 1022 (STTLM) Or R\$ 1026 (SINTFRUIT)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

<p>D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</p>	<p>Legal minimum: 2 first hours: 1,5% Sunday and Bank holydays: double paid</p>	<p>2 first hours: 1,5% Emergency purpose: 1,65% Sunday and Bank Holydays: Double paid</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
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<p style="text-align: center;">Wages analysis: (Click here to return to Key Information)</p>	
<p>A: Were accurate records shown at the first request?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>A1: If No, why not?</p>	
<p>B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</p>	<p>26 workers sample January 2019 (low activity), August 2019 (regular activity) October 2019 (peak activity and last payment.</p>
<p>C: Are there different legal minimum wage grades? If Yes, please specify all.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: If Yes, please give details: There are two CBA each one for specific activities performed on site and with specific define minimum wage: R\$ 1022 (STTLM) R\$ 1026 (SINTFRUIT)</p>
<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p>D1: If No, please give details:</p>
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<p><input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above</p> <p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> Monthly R\$ 1022 (as defined by STTLM) or Monthly R\$ 1026 (as defined by SINTFRUIT)</p>
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: ___% of workforce earning under minimum wage F2: ___% of workforce earning minimum wage F3: 100 % of workforce earning above minimum wage</p>
<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i> No bonus found on site</p>
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>INSS (SOCIAL INSURANCE) 8% OR 9%</p>

I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made.	1. INSS 8% or 9% 2. Please describe:
		I2: Please list all deductions that have not been made.	1. 2. Please describe:
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type Miscalculation of overtime for workers under hazardous functions <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details:		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time:		
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details:		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Wages are annually reviewed during the CBA		
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: it was verified during the review of the pay slips and through workers interviews		
Q: How are workers paid:	<input type="checkbox"/> Cash		

	<input checked="" type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:
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6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The facility operates with the following shift from Monday to Friday, working from 06:30 am to 4:30 pm with two unpaid hours for lunch (from 11 am to 01:00 pm). On Saturday the working shift is from 06:30am to 10:30 am.

During the employee interviews, it was stated there is very rare overtime hours worked. Later it was verified that overtime is mostly done during low and peak season.

Regular working hours are 220h per month. This volume of working hours is compliant with the National labour laws regulations. When overtime done, no more than two hours extra are performed per day

Lower extra hours verified were 10 extra hours per week for sampled employees. Highest hours verified were 14.5 hours total per week for one employee out of 26 sampled during peak season and pek season.

The management of the farm commented that peak season is August to December. For the purposes of audit works, time details for pay periods (01/01/19 – 01/31/19 (low season), 08/01/19 – 08/31/19 (regular

season), 10/01/19 – 10/31/19 (higher season). were selected for the same sample of 26 interviewed workers.

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

Details:

Time records

Employee interviews

Wage records/payroll

Any other comments: None

Non-compliance: one

1. Description of non-compliance:

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

During the review of the pay roll and of the working hours, it was verified some improper use of overtime for a specific category of worker upon hazardous functions

Local law and/or ETI requirement:

Brazilian CLT art 60: overtime on hazardous function should only be perform with a previous authorization of the Official Labour Authority

Recommended corrective action:

Overtime upon hazardous functions must only be done in accordance with local labour laws (Art 60 CLT - Brazilian labour laws)

Objective evidence observed:

(where relevant please add photo numbers)

Pay roll and working hours records review

Observation: none

Description of observation:

Local law or ETI requirement:

Comments:

Objective evidence observed:

Good Examples observed: none

Description of Good Example (GE):

Objective Evidence Observed:

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

G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 42h00 month 14,5h week 2h day	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	_____ 6 %	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Voluntary overtime was stated by workers during interviews
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of standard wages: Please give details of normal day overtime premium as a % of standard wages: STTLT Regular hour paid: R\$ 4,64 First 2 extra hours: 1,5% R\$6,96 After 2extra hours: 1,65% R\$7,65 Sunday bank holidays: 100% R\$9,28 SINTFRUIT Regular paid Hour: R\$4,66 First 2 extra hours: 1,5% R\$6,99 After 2 extra hours: 1,65% R\$7,68 Sunday Bank Holidays: 100% R\$9,32

<p>N: Is overtime paid at a premium?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>N1: If yes, please describe % of workers & frequency: 100% of workers and always if OT is done</p>
<p>O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p>	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input checked="" type="checkbox"/> Other	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>
	<p>The site doesn't pay less than 125% OT premium</p>	
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)	<p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p>
	<p>No more than 60 hours OT is done per week</p>	
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Q1: If yes, please give details:</p>	
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

7: No Discrimination is Practiced
[\(Click here to return to summary of findings\)](#)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

Workers said that everybody on site is equally treated in rights and opportunities.

ETI code of conduct is displayed on announcement board and workers are induced to report and denounced any kind of discrimination although it was no reported such kind of complain during workers interviews

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

Details:

Workers interviews

Visit of the site

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: ___96 % A2: Female ___4 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	3
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found C1: Please give details:

Professional Development

A: What type of training and development are available for workers?	The company certifies all training related to activities performed on site
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B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details:
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Non-compliance: none	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: Recommended corrective action:	Objective evidence observed: <i>(where relevant please add photo numbers)</i>

Observation: none	
Description of observation: Local law or ETI requirement: Comments:	Objective evidence observed:

Good Examples observed: none	
Description of Good Example (GE):	Objective Evidence Observed:

8: Regular Employment Is Provided

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

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

Workers files reviewed included all required documentation to certify that only regular employment is performed on site.

According to the Collective Bargain Agreement of STLM in its 11th paragraph, "Hiring workers through contract agency is permanently prohibited".

It was although verified that no formal contracts are always signed and delivered to workers when they leave the society and come back later for a new working period. According to local labour laws, the site only registers this new working contract on the workers working handbook (CTPS) but without any details related to due working hours or any kind of additional information.

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

Details:

CBA

Workers interviews.

Any other comments: None

Non-compliance: one	
<p>1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: During the review of the workers files, it was verified that workers are not always given a copy of his workers contract or other letter of appointments. This was also verified during the worker's interviews</p> <p>Local law and/or ETI requirement: ETI 8.2</p> <p>Recommended corrective action: The company must certify that worker received a copy of working contracts or other documents with all detailed conditions of work</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>Review of workers files Workers interviews</p>

Observation: none	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

Good Examples observed: none	
<p>Description of Good Example (GE):</p>	<p>Objective Evidence Observed:</p>

Responsible Recruitment

All Workers	
<p>A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?</p>	<p><input type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: The site is sometimes only delivering some partial details of new hired working contract on the individual workers working handbook (CTPS). All workers are receiving the same partial information when leaving the company and coming back again</p>

<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category(ies) of workers affected:</p>
<p>C: If yes, check all that apply:</p>	<p><input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details:</p>
<p>D: If any checked, give details:</p>	

<p>Migrant Workers: no migrants workers <i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i></p>			
<p>A: Type of work undertaken by migrant workers:</p>			
<p>B: Please give details about recruitment agencies for migrant workers:</p>	<p>B1: Total number of (in country recruitment agencies) used: B2: Total number of (outside of local country) recruitment agencies used:</p>		
<p>C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?</p>	<table border="1"> <tr> <td data-bbox="633 1684 933 1865"> <p><input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:</p> </td> <td data-bbox="933 1684 1501 1865"> <p>C2: Observations:</p> </td> </tr> </table>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:</p>	<p>C2: Observations:</p>
<p><input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:</p>	<p>C2: Observations:</p>		
<p>D: Are Any migrant workers in skilled, technical, or management roles</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, number and example of roles:</p>		

<p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	
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NON-EMPLOYEE WORKERS: no non-employee workers

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other B1 – If other, please give details:
C: If any checked, give details:	

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

<p>D: Is there a legal contract / agreement with all agencies?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: Please give details:</p>
<p>E: Does the site have a system for checking labour standards of agencies? If yes, please give details.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details:</p>

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

8A: Sub-Contracting and Homeworking
[\(Click here to return to summary of findings\)](#)
[\(Click here to return to Key Information\)](#)

8A.1 There should be no sub-contracting unless previously agreed with the main client.
 8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems: no subcontracting on site

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

If any processes are sub-contracted – please populate below boxes

Details: management and worker interviews, document review

Non-compliance: none

1. Description of non-compliance:

NC against ETI/Additional Elements

NC against Local Law

NC against customer code:

Objective evidence observed:

(where relevant please add photo numbers)

Local law and/or ETI requirement:

Recommended corrective action:

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

Good Examples observed: none	
Description of Good Example (GE):	Objective Evidence Observed:

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

Summary of homeworking – if applicable			
<input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If Yes, summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:

<p>C: Are homeworkers employed direct or through agents?</p>	<p><input type="checkbox"/> Directly <input type="checkbox"/> Through Agents</p>	<p>C1: If through agents, number of agents:</p>
<p>D: Is there a site policy on homeworking?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>E: How does the site ensure worker hours and pay meet local laws for homeworkers?</p>		
<p>F: What processes are carried out by homeworkers?</p>		
<p>G: Do any contracts exist for homeworkers?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:</p>	
<p>H: Are full records of homeworkers available at the site?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	

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

ETI

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
 Additional elements:
 9.2 companies should provide access to a confidential grievance mechanism for all workers

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: An anonymous claim box channel is available on site</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>Workers said that they know they can report any kind of issue</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>suggestion box</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details:</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details</p>
<p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain</p>
<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details</p>
<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No I1: If yes, please give details</p>

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 instances of physical or verbal abuse were reported during interviews. Facility maintains a claim box system for any complaints. Employees stated that they are treated with respect and feel free to report any issues without fear of retaliation. They also report they never heard about rude treatments on site

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

Details:
Worker interviews
Employee files

Any other comments: None

Non-compliance: none

1. Description of non-compliance:

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

Local law and/or ETI requirement:

Recommended corrective action:

Objective evidence observed:

(where relevant please add photo numbers)

Observation: none

Description of observation:

Local law or ETI requirement:

Comments:

Objective evidence observed:

Good Examples observed: none

Description of Good Example (GE):

Objective Evidence Observed:

10. Other Issue areas: 10A: Entitlement to Work and Immigration
[\(Click here to return to NC-table\)](#)

Additional Elements

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.
 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined

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

Current systems:

Due to the internal procedures maintained on site and verified during the review of the QSM, only legal workers are hired and can work on site.

All necessary legal documents to verify the legal condition of new workers was verified on worker's files

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

Details:
 Workers file reviews
 documents reviews

Any other comments: None

Non-compliance: none

1. Description of non-compliance:

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

Local law and/or ETI/Additional Elements requirement:

Recommended corrective action:

Objective evidence observed:

(where relevant please add photo numbers)

Observation: none

Description of observation:

Local law or ETI/Additional Elements requirement:

Comments:

Objective evidence observed:

Good examples observed: none

Description of Good Example (GE):

Objective Evidence Observed:

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

As certified Global-Gap, the company demonstrated some solids environmental good procedures of environmental control such as a formal plan again risk of chemical contamination, a water analysis risk assessment, a waste assessment plan, a formal plan for soils and water preservation.

The company also have an Operational process upon empty toxic can: all contaminated wastes are collected by a legally local authorized operator as ACASA. Last minute of collect was verified on July 2019.

Water analysis for human consume was also verified (last water analysis verified on 06/11/2019 by PLENA requirement n°7638183

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

Details:
Internal procedures
Document review

Any other comments: None

Non-compliance: none

1. Description of non-compliance:

NC against ETI/Additional Elements NC against Local Law

Local law and/or ETI/Additional Elements requirement:

Recommended corrective action:

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

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

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

Other findings

Other Findings Outside the Scope of the Code
No other findings

Community Benefits
<i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
No community benefits identified

Appendix 1

<p>Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."</p> <p style="text-align: center;"><input checked="" type="checkbox"/> Not Applicable please x</p>	
<p>NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p>Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>

ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
<p>0.A. Guidance for Observations</p> <p>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.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>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.</p> <p>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.</p>	
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	
ETI 1. Forced Labour	ETI 1. Forced Labour
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>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.</p>	
ETI 2. Freedom of association and the right to collective bargaining are respected	ETI 2. Freedom of association and the right to collective bargaining are respected

<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>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.</p>	
<p>ETI 3. Working conditions are safe and hygienic</p>	<p>ETI 3. Working conditions are safe and hygienic</p>
<p>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.</p> <p>3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p> <p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.</p>	
<p>ETI 4. Child labour shall not be used</p>	<p>ETI 4. Child labour shall not be used</p>
<p>4.1 There shall be no new recruitment of child labour.</p> <p>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.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	
<p>ETI 5. Living wages are paid</p>	<p>ETI 5. Living wages are paid</p>

<p>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.</p> <p>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.</p> <p>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.</p>	
<p>ETI 6. Working Hours are not excessive</p>	<p>ETI 6. Working Hours are not excessive</p>
<p>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.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p> <p>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.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:</p> <ul style="list-style-type: none"> - this is allowed by national law; - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; - appropriate safeguards are taken to protect the workers' health and safety; and - The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies. 	

<p>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.</p>	
<p>ETI 7. No discrimination is practised</p>	<p>ETI 7. No discrimination is practised</p>
<p>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.</p>	
<p>ETI 8. Regular employment is provided</p>	<p>ETI 8. Regular employment is provided</p>
<p>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.</p>	
<p>8A: Sub-Contracting and Homeworking</p>	<p>8A: Sub-Contracting and Homeworking</p>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.</p>	


8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.	
ETI 9. No harsh or inhumane treatment is allowed	ETI 9. No harsh or inhumane treatment is allowed
9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Additional elements: 9.2 companies should provide access to a confidential grievance mechanism for all workers	
10. Other Issue areas: 10A: Entitlement to Work and Immigration	
Additional Elements 10A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.	
10. Other issue areas 10B2: Environment 2-Pillar	
10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits. 10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. <i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i>	


Photo Form

		
Pic#1 General view of the farm	Pic#2 security instructions on fields	Pic#3: Chemicals preparing point

<p>Pic#4 fertilizers storage</p>	<p>Pic#5 Garage</p>	<p>Pic#6: Contaminated PPE washing station</p>
<p>Pic#7: instructions on Chemicals</p>	<p>Pic#8: Chemical preparing NC: no emergency shower</p>	<p>Pic #9: liquid fertilizers storage NC: Missing MDS</p>
<p>Pic#10: Chemicals storage</p>	<p>Pic #11: Canteen for workers</p>	<p>Pic#12: individual lockers for</p>

<p>Pic#13: toilets facilities for workers</p>	<p>Pic#14: Food heater device</p>	<p>Pic#15: time clock machine</p>
<p>Pic #16: ETI code on wall</p>	<p>Pic#17: Gas station</p>	<p>Pic#18: Main entrance of the PH</p>
<p>Pic#19: Fire devices</p>	<p>Pic #20: Fruit intake</p>	<p>Pic#21: Machinery on site</p>

		
<p>Pic#22: General view of the pack</p>	<p>Pic#23: Paper box machine</p>	<p>Pic#24: Mechanic workstation</p>
		
<p>Pic#25: Water pumping station</p>	<p>Pic#26: NC no contention against spillage on manual liquid workstation</p>	<p>Pic#27: NC no secured condition of works on manure liquid workstation</p>
		
<p>Pic#28: Fertilizers main storage</p>	<p>Pic#29: emergency meeting point</p>	<p>Pic#30: NC: inconsistency on training records</p>

	<p>Nil</p>	<p>Nil</p>
<p>Pic#31: NC closed in PH: escape routes are compliant now with legal requirements</p>		



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