




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: 1030885
Business name (Company name):	Agrícola Jardim Prod. e Com. de Frutas Eireili		
Site name:	Agrícola Jardim		
Site address: <i>(Please include full address)</i>	Sítio Jardim loc. Pau Branco Mossoró RN	Country:	Brazil
Site contact and job title:	Reinaldo CHOTTEN		
Site phone:	+558494240051	Site e-mail:	agricolajardim@bol.com.br
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:	11/22 AND 25/2019		

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> Agrícola Jardim Prod. e Com. de Frutas Eireili
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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: Xavier H BAUDEQUIN APSCA number: ASCA21703212

Lead auditor APSCA status: In good standing

Team auditor: APSCA number:

Interviewers: Xavier H BAUDEQUIN APSCA number: ASCA 21703212

Report writer: Xavier H BAUDEQUIN

Report reviewer: Silke Eidecker

Date of declaration: 11/25/2019

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"/>				•
0B Management systems and code implementation	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1	0	0	• Inadequate training for workers upon social and ethical standards (CIPA and ETI training (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 checked="" 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. It should be also associated to discuss other pillars introduced by the ETI Code of conduct (OBS1)
3. Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	3	0	0	• Inadequate registry of medical examinations (NC1) • Missing Collective equipment on hazardous activities point (NC2) • No firemen licence available on site (NC3)

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 type="checkbox"/>		<input type="checkbox"/>	1	0	1	<ul style="list-style-type: none"> • Wages could not be verified due to incorrect working hours control system (NC1) • Minimal salary on site is higher than lower mandatory salary in Brazil (GE1)
6	<u>Working Hours</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	2	0	0	<ul style="list-style-type: none"> • Missing or uncompleted time records (NC1) • Improper overtime on specific activity (NC2)
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	• No copy of working contracts for workers (NC1)
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	•
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	•
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	•
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	•

General observations and summary of the site:

Agricola Jardim is located on Mossoró, state of Rio Grande do Norte, north east of Brazil. The company is fully dedicated to melons growing and packing. Fruits are shipping both on international and domestic market. The growing farm is set up upon a total 361ha area and a 160ha productive area.

In 2018, the final production was 3.289.000 kg of melons of which 60% was shipped to the international market (main client GLOBAL) and 40% was sold on the domestic market (main client POMAGRI). The company is member of a local cooperative of growers named COOPYFRUTAS (COOPERATIVA DOS FRUTICULTORES DA BACIA POTIGUAR) and linked by a same quality system management.

On the day of the audit 132 employees were on site. The company has one shift from Monday to Thursday from 06h30 am to 11h00am and 01:00 pm to 04:30pm with 2 unpaid hours for lunch from 11h00am to 01:00 pm. On Saturday, the shift begins at 06h:30am and workers leave at 10h30am. All workers are paid on a monthly base with bank cheques (or bank transfer for some few workers) and receive a 40% part salary on the 15TH day of the month.

The company was reviewed to have an excellent display and organization.

A sample of 26 workers was interviewed during the audit works. A three months sample was also chosen for payments and working hours review (January 2019 9lower season), August 2019 (regular season) and October 2019 (highest activities and last payment) for the same sample of interviewed workers.

**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:	Agricola Jardim Prod. e Com. de Frutas Eireili		
B: Site name:	Agricola Jardim		
C: GPS location: (If available)	<table border="1"> <tr> <td>GPS Address: no available</td> <td>Latitude: 04°55',09.95" S Longitude: 37°23',07.37" O</td> </tr> </table>	GPS Address: no available	Latitude: 04°55',09.95" S Longitude: 37°23',07.37" O
GPS Address: no available	Latitude: 04°55',09.95" S Longitude: 37°23',07.37" O		
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: 2017-116142 valid until 05/14/24 issued by IDEMA</p> <p>Operational local licence: 015.830.5 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 through 4 years</p> <p>#2: licence 0474/2016 issued by IGARN on 12/19/2016 valid through 4 years</p> <p>#3: licence 139/2017 issued by IGARN on 05/05/2017 valid through 4 years</p>		
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Melons growing and packing		
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>The site is located on Sítio Jardim, Localidade Pau Branco S/N, Zona Rural, 59600-970 Mossoro RN north east of Brazil. The company begun its activities in 2010.</p> <p>Main premises of the facilities are 1 Packing house (1353m²), 1 Mechanical area (150m²), a fertilizers storage and its annex (164m²), 1 biofabric workstation and chemicals preparing point (458m²), a Gas Station area (37m²), various warehouse and boxes deposits (250m²), a rest point and canteen for workers (252m²), a main office area (94m²), 1 Water Pumping station (48m²), various Irrigation workstation (400m²), 1 garage area(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: All premises well maintained and in a very good conditions of conservation and display</p> <p>F3: Does the site have a structural engineer evaluation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>		

	F4: Please give details:
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: <i>(Include products being produced, main operations, number of production lines, main equipment used)</i>	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 type="checkbox"/> Union (name) <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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation: 0,81%
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

Audit Parameters		
A: Time in and time out	Day 1 Time in: 08:00am Day 1 Time out: 05:00pm	Day 2 Time in: 08:00am Day 2 Time out: 05:00pm
B: Number of auditor days used:	2 audit days - 1 auditor	
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 If No, why not	
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause	
G: Who signed and agreed CAPR (Name and job title)	Mr. 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:	12/10-11/2018	
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 type="checkbox"/> No	
B: Present at the audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No	
C: Present at the closing meeting?	<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Yes <input 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>The workers' representative was invited to participate in the closing meeting but did not show up as the meeting took place after the regular working hours</p>
<p>E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i></p>	<p>No Union representative is available 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*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	124	0	0	0	0	0	0	124
Worker numbers – female	8	0	0	0	0	0	0	8
Total	132	0	0	0	0	0	0	132
Number of Workers interviewed – male	23	0	0	0	0	0	0	23
Number of Workers interviewed – female	3	0	0	0	0	0	0	3
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 type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods:</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: _____% other</p> <p>D7: If other, please give details : a pre-payment of 40% of the salary is made on the fifteenth day of the month</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 type="checkbox"/> Yes <input checked="" 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>	3 groups of 5 male workers 1 group of 3 female workers
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 8 D2: Female:
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?	No complain was identified during worker's interviews.
I: What did the workers like the most about working at this site?	The punctuality of payments and the good working atmosphere on team
J: Any additional comment(s) regarding interviews:	none
K: Attitude of workers to hours worked:	Indifferent
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:	
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>	

N/A
<p>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></p>
<p>It is a common practice for the workers to leave the company and to come back after a few rest months. Workers generally said they feel positive to work on site and come back to work again. They said it is a great place to work</p>
<p>O: Attitude of managers: <i>(Include attitude to audit, and audit process. Both positive and negative information should be included)</i></p>
<p>Good involvement and effective participation present before during and after the audit. Good involvement in the audit process present before during and after the audit. Good involvement in the audit process in the audit process.</p>

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:

Policies related to human rights, business analyses risk or processes committed to worker's security and Welfare were reviewed.

Others training records upon these internal procedures were also verified during the audit process.

Mr Reinaldo CHOTTEN is agronomist in charge of the implantation of the ETL code of conduct as well as for others quality or social standards such as HACCP, GlobalGap or Rainforest.

Effective procedures were reviewed to certify that all worker's rights are protected on site such as commitments against children work, right to free association and equality of opportunities, commitments against discrimination or harsh treatments

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

Details:

Documents review

Workers 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: Detailed in POLÍTICA DE ÉTICA E RESPONSABILIDADE SOCIALE 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 ad QSM 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: An internal procedure for suggestion and reclamation report is available on site. This process in on free access and is fully anonymous</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: Worker's information are safely kept in restricted access HR area</p>

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

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: ____8,83_ %	A2: This year ____9,7 %
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]	2,79%	
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: ____2,05 %	C2: This year ____2,63 %
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	1,37%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: it is mandatory per Brazilian Labour laws	
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 site has a good management system in order to apply ETI requirements and other quality standards. The site is certified Globalgap (GGN 4049928377654 with last update on October 2019 issued KIWA) as well as a GRASP Certificate issued on the same date. The site is also certified RAINFOREST (last certification in January 2019) standard through which were verified its good social and environmental practices
 A Health and safety risk analysis (PGSSMA issued by Leonardo Lacerda Barros, Medics and Sarah Christina Rodrigues dos Santos Silveira, Work Safety Engineer was issued on July 2019 with validity until July 2020. Another risk analysis for conditions of works (LTCAT issued and signed by Sarah Silveira on October 2018) is also available on site with a permanent validity.

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

All mandatory legal license such as Business License, Water furnishing contract or Environmental Legal register (CAR) are available and were reviewed on site. Land conflict were not verified when the company justified its land property through Public statement upon and property).

ETI code of conduct is fully displayed around the site.

During interviews workers comments about training upon ETI code of conduct although they showed a very partial knowledge of ETI principles.

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

Details:

- Quality System Management documents review
- Workers interviews
- Visit of the premises.

Any other comments: none

Management Systems:	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 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: The Human resources department is responsible for the survey of the legal requirements and local CBA requirements. A H&S risk assessment also defined internal procedures and training to certify secured and healthy conditions of works on site. Internal procedures are maintained to avoid child works or any kind of discrimination.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Procedures were reviewed and records (i.e. training minute, medical examinations, ids ...) were verified and also reviewed;
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: Last training was set on September 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: training records signed by workers on September 2019
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 upon n° IBD-G-101998 (issued by IBD on 03/28/2019)
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: Ms Jessica Pamela Lopez Garcia is responsible for the HR department
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: Mr Reinaldo CHOTTEN agronomist and QSM manager
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: all workers information are kept in the HR department

<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No K1: Please give details:</p>
<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: Please give details:</p>
<p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please give details:</p>
<p>Land rights</p>	
<p>N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p>Environmental licence: 2017-116142 valid until 05/14/24 issued by IDEMA</p> <p>Water licence: #1: licence 138/2016 issued by IGARN on 30/03/2016 valid through 4 years</p> <p>#2: licence 0474/2016 issued by IGARN on 12/19/2016 valid through 4 years</p> <p>#3: licence 139/2017 issued by IGARN on 05/05/2017 valid through 4 years</p>
<p>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?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No O1: Please give details:</p>
<p>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</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC:</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: Land title issued by Public officer reviewed.</p>
<p>R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No R1: Please give details:</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details:</p>

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 interviews, it was verified a partial understanding of the ETI principles from the workers, as well as a misunderstanding from the workers representative around the real purposes and missions of the workers' committee in charge of worker safety and health issues</p> <p>Local law and/or ETI requirement: ETI 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code</p> <p>Recommended corrective action: All training must be applied on site in such order to certify that workers did really understand what they are dealing with</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>Document review 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>

1: Freely Chosen Employment

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

As verified during workers interviews, no evidences of forced labour exist on site. Workers are free to come and go. No workers live on site. No complain upon any retained documents or fees to pay when workers are hired was verified. No taxes are paid during selection and PPE are freely provided by the company. A formal commitment against forced Labour was identified and reviewed in POLÍTICA DE ÉTICA E RESPONSABILIDADE SOCIALE 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:
 Worker's interviews
 Review of MS documents.

Any other comments: None

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details and category of workers affected:</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details and category of workers affected:</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details and category of workers affected:</p>
<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding: All workers during interviews said they are no limitation to quit the company. It was largely verified that it is a common practice on site to work on site during a few years, then to quit in order to get paid the Unemployment security fund (FGTS) and then to come back after a few months.</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 checked="" type="checkbox"/> No</p> <p>Please describe finding:</p> <p><input checked="" type="checkbox"/> Not applicable</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</p> <p>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</p> <p>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</p> <p>H1: Please describe finding: all workers are directly contract by the company with no intermediaries</p>

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>

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

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

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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 representative was present on site.

During workers interviews, it was stated by workers they can freely join or talk with Union which have free access on site. Workers are also free to contribute financially to Union (a written declaration, when signed, is maintained in the worker's individual files).

A CBA is yearly negotiated with 2 Trade Unions in the region: SINDICATO DOS TRABALHADORES NA LAVOURA DE MOSSORO- STLM (for worker basics activities on fields) and SINTFRUIT (for other activities such as administrative functions or technical functions such as Tractor driver or irrigator).

The last CBA with SINTFRUIT was reviewed on site (legal registry RN000280/2019 issued on 08/19/2019 valid from 09/01/2019 through 08/31/2020). A draft version for the CBA new version for STLM was also reviewed but no legal registry was already issued and this new agreement, although already applied some new conditions of wages for workers was not officially declared the current version by the Brazilian ministry of labour

Other workers representation is also available on site as defined and required by Brazilian Labour laws: CIPA (works prevention committee for workers) is freely chosen on site and included representatives of the site and representatives of the workers. Mr Francisco Paulo Leandro, workers representative was interviewed and stated that workers committee is effective on site.

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

Details:

- Workers interviews
- Reviews of management system
- Interviews with management
- Review of pay roll
- Interview with CIPA member and worker's representative

Any other comments: None

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None	
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Describe: there is an anonymous complain box system which was for example seen in the worker's canteen Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: there is a time schedule plan for meetings. Regulars meetings on site were verified through CIPA member and worker's representative's interview	
F: Name of union and union representative, if applicable:	STTLM SINTFRUIT	F1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Yes	Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Mr Francisco Paulo Leandro was the most voted candidate but all interviewed worker weren't able to name him
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Date of last election: 09/2019
J: Do workers know what topics can be raised with their representatives?	<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: 1	
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>	Worker's committee minutes were reviewed (last minute was issued in October 2019 and mainly commented about the Work accidents prevention weekly program set up on site)	

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	
<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: one	
<p>Description of observation: According to Brazilian national Labour laws, the workers committee available on site is only dealing with Health and Safety working conditions matters or issues.</p> <p>Local law or ETI requirement: 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>Comments: It should be also associated to discuss other pillars introduced by the ETI Code of conduct and a formal communication upon these pillars must exist between workers and the higher management on site</p>	<p>Objective evidence observed:</p> <p>Workers interviews Workers committee minute records Workers representative interviews</p>

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

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

Two H&S risk analysis were reviewed on site:

- 1/LTCAT (Technical Report for working conditions analyse) issued on 11/2018 by Mrs Sara C.R Santos, H&S engineer (CREA 2103783662/CE) with a permanent validity
- 2/ PGSSMATR (Rurak Activities H&S risk analysis) issued by Mrs Sara C.R. Santos and by Dr. Leonardo Lacerda Barros (CRM 4526/RN) on 07/2019 and valid through 07/2020,

Records of Health and Safety training minutes for workers in hazardous activities or upon other activities were identified such as for Tractor driver (august 2019), Pesticides sprayer (August 2019) or Fire drill and Emergency Evacuation drill (October 2019 1) (training and evacuation drill also verified during workers interviews)

All workers are also trained upon general purposes such as PPE use during induction training when hired. All premises are well structured and do not present any visible risks to workers.

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

Details:

- Review of the MS docs
- Workers interviews

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: 1/LTCAT (Technical Report for working conditions analyse) issued on 11/2018 by Mrs Sara C.R Santos, H&S engineer (CREA 2103783662/CE) with a permanent validity 2/ PGSSMATR (Rurak Activities H&S risk analysis) issued by Mrs Sara C.R. Santos and by Dr. Leonardo Lacerda Barros (CRM 4526/RN) on 07/2019 and valid through 07/2020,</p>
<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: visitors are induced to use PPE while on site and accessing to hazardous area</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details:</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 F1: Please give details: 1ST aid kits are available on site as well as trained people upon 1ST aid procedures (members of the workers committee such as Mr Francisco Paulo Leandro)</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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: No transportation is given to workers as all of them are living close to the site</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 H1: Please give details: all rest points are provided with individuals lockers</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 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 J1: Please give details: 3 Water pumping licences were reviewed on site: #1: licence 138/2016 issued by IGARN on 30/03/2016 valid through 4 years</p>

	#2: licence 0474/2016 issued by IGARN on 12/19/2016 valid through 4 years #3: licence 139/2017 issued by IGARN on 05/05/2017 valid through 4 years
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: as required by another certification standard upon which the site is certified (Globalgap 4049928377654 issued by KIWA on 12/18/2018)

Non-compliance: 3

<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:</p> <p>During the review of the MS records and medical examination records, it was verified an inadequate registry of medical examinations and medical examinations not compliant with risk analysis on place when the site did not perform the medical examination for the worker in charge of the chemical preparing according with the time scale defined in the H&S risk analysis.</p> <p>Local law and/or ETI requirement ETI 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>Recommended corrective action: The site must perform all medical examinations for all functions performed on site according to the technical recommendations inserted in the H&S risk analysis</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:</p> <p>When reviewing the MS documents, it was verified that there is no Firemen license available on place</p> <p>Local law and/or ETI requirement: 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.</p> <p>Recommended corrective action: The site must provide all licence required.</p> <p>3. 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>When visiting the site, it was verified that there is no emergency shower in the Chemical preparing workstation</p> <p>Local law and/or ETI requirement:</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>H&S risk analysis Medical examinations records</p> <p>Review of the MS records</p> <p>Visit of the premises</p>
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<p>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.</p> <p>Recommended corrective action: The site must provide secured conditions of works on all workstations on site</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.

Workers commented during interviews that the company do not agree with such practice and that no children are employed on site. No evidences of children presence were seen on audit days and during the review of the MS documents.

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

Operational process in HR is implemented and during the review of workers files, ID copies, Birth certificate, CFP (Brazilian Fiscal IDs) were observed in the workers dossier.

This commitment against Child Labour is also communicated to all workers during induction training as verified during workers interviews

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

- Details:
- Workers interviews
 - Tour of the site
 - Review of the MS documents

Any other comments: none

A: Legal age of employment:	16
B: Age of youngest worker found:	23
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 %

<p>E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details</p>
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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 bank cheque or money transfer on bank accounts. A pre-payment of 40% of the individual salary is also paid on day 15th.

According to working interviews, pay day is always on time never after the 5th day of the month (deadline defined by Brazilian Labour Laws).

Salary on site is paid upon the wages conditions defined in the 2019 Collective Bargain agreements signed by local Unions: SINFRUIT (R\$ 1026) and STTLM (R\$ 1022). These salaries are higher than the current Brazilian legal minimum wage (R\$ 998).

All wages are detailed on pay slip and workers are aware of composition of their salary and of any extra hours paid, when performed. According to workers, no deductions, except legal ones or other fully authorized through a formal authorization, are made.

26 workers were interviewed as well as their pay slips for January 2019 (lower activity), August 2019 (regular activity) and October 2019 (peak season and last payment).

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

Details:

- Workers interviews
- Review of pay roll
- Review of the CBA

Any other comments:

None

Non-compliance: 1

<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: When reviewed the pay roll, it was verified an inadequate procedure in place to control the working hours of one worker (bus driver) in such way that it wasn't possible to calculate the correct payment rates for this employee.</p> <p>Local law and/or ETI requirement: ETI 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>Recommended corrective action: The site must correctly control and register all working hours for all employees in such order to certify the correct calculations of its pay roll</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>Review of the pay roll Review of the time clock machine</p>
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Observation: none

<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>
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Good Examples observed: one

<p>Description of Good Example (GE):</p> <p>Minimum salary on site is higher than mandatory minimum wage in Brazil</p>	<p>Objective Evidence Observed:</p> <p>Review of the pay roll Review of the CBA</p>
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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:	Legal maximum:	2 hours/day	<input checked="" type="checkbox"/> Yes

(Maximum legal and actual overtime hours, please state if possible per day, week, and month)	2 hours/day 11 hours/week 1h/day for emergency purpose	11 hours/week 1h/day for emergency purpose	<input type="checkbox"/> No
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: R\$ 998	R\$ 1022 (STTLM) Or R\$ 1026 (SINTFRUIT)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 2 first hours: 1,5% Sunday and Bank holydays: double paid	2 first hours: 1,5% Emergency purpose: 1,65% Sunday and Bank Holydays: Double paid	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Wages analysis: (Click here to return to Key Information)		
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
A1: If No , why not?		
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	26 workers sample January 2019 (low activity), August 2019 (regular activity) October 2019 (peak activity and last payment)	
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If Yes , please give details: There are two CBA each one for specifics activities performed on site and with specific define minimum wage: R\$ 1022 (STTLM) R\$ 1026 (SINTFRUIT)
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	D1: If No , please give details:
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> Monthly R\$ 1022 (as defined by STTLM) Monthly R\$ 1026 (as defined by SINTFRUIT)

<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: Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc. No bonus found on site</p>		
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>Social insurance 8%</p>		
<p>I: Have these deductions been made?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>I1: Please list all deductions that have been made.</p>	<p>1. Social insurance 8% 2. Please describe:</p>
		<p>I2: Please list all deductions that have not been made.</p>	<p>1. 2. Please describe:</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>		
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input checked="" type="checkbox"/> Repeated occurrence:</p>	
<p>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)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details:</p>		
<p>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></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time:</p>		
<p>M2: If yes, what was the calculation method used.</p>	<p><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:</p>		
<p>N: Are there periodic reviews of wages? If Yes give details (include</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>		

<p>whether there is consideration to basic needs of workers plus discretionary income).</p>	<p>N1: Please give details: Wages are annually reviewed through the 2 CBA signed with Unions</p>
<p>O: Are workers paid in a timely manner in line with local law?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: It was verified through the pay roll review that workers in same activities are paid the same and also verified that there is no different rate of payment between male or female workers</p>
<p>Q: How are workers paid:</p>	<p><input type="checkbox"/> Cash <input checked="" type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:</p>

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:

Working shifts on site are from Monday to Thursday from 06h30 am to 11h00am and 01:00 pm to 04:30pm with 2 unpaid hours for lunch from 11h00am to 01:00 pm. On Saturday, the shift begins at 06h:30am and workers leave at 10h30am.

When occurring, OT is fully paid upon legal Brazilian rate as well as in the CBA. The first 2 extra hours are paid on rate defined on the local Collective bargain agreements (CBA) i.e. 1,50%. Then for any additional hours, workers receive an extra rate of 1,65 % for each hour. Bank holidays and Sunday, if worked are double paid.

According to Brazilian Labour laws as defined in CLT, the regular time worked on site by week is 44h and the max regular volume of working hours by month is 220h.

26 workers were interviewed and for each of them three times records were also checked (January 2019, August 2019 and October 2019) were reviewed.

A systemic error of missing time records registry was reviewed for one worker on site as well as verified some improper periodic overtime upon hazardous activities when the local doesn't permit such overtime without a previous authorization from the local labour authority of control

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

Details:

- Workers interviews,
- CBA
- Pay roll review
- Time clock records

Any other comments: None

Non-compliance: 2

1. Description of non-compliance:

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

During the review of the time clock records, it was verified incomplete time records registry for 1 worker out of 132.

Local law and/or ETI requirement:

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

Recommended corrective action:

The site must certify that all workers hours are correctly registered and computed

2. Description of non-compliance:

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

During the review of the pay roll and the time clock records, it was verified an improper use of overtime upon hazardous activities when, according to the local Brazilian labour law, such overtime must be previously authorized by the Brazilian labour authority of control.

Local law and/or ETI requirement:

Brazilian CLT art 60: any overtime upon hazardous activities must be previously authorized by the local Brazilian Labour authority of control

Recommended corrective action:

The company must be compliant with all Labour laws

Objective evidence observed:

(where relevant please add photo numbers)

Time clock records review

Observation: none

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

Working hours' analysis <i>Please include time e.g. hour/week/month</i> <u>(Go back to Key information)</u>	
Systems & Processes	
A. What timekeeping systems are used: time card etc.	<i>Describe: Time card clock machine</i>
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 D1: 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 E1: 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	
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: 38h30 month 12h week 2,5h 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:	___3_ %	
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: Verified through worker interviews
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal	M1: Please give details of normal day overtime premium as a % of standard wages: STTLT Regular hour paid: R\$ 4,64

	<p>requirement to OT premium</p>	<p>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>
<p>N: Is overtime paid at a premium?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>N1: If yes, please describe % of workers & frequency: 100% of workers and always when OT 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>	<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> <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>	<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> <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>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details:</p>	
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

According to workers interviews, all workers are equally treated in rights and opportunities. It was also verified no complain upon discrimination reported by workers.

Female workers commented that Pregnancy test are only made dismiss process and, if revealed any pregnancy, women are not dismissed and remain working on site.

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

Details:

Workers & management interviews
Document review

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: ___99,2 % A2: Female___0,8 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	2
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?	A full program of training is available for all 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:

All workers on site are local workers and must present regular documentation and sign a formal Labour Contract.

No fees and no taxes for any kind of costs are paid by workers during and after the hiring process.

According to workers, working contracts are given to all newcomers and always detail the right salary to be paid and the hours to be performed by month as well as the function upon which the worker is hired for.

Contracts signed by workers and by the company were reviewed in the worker's files although in some special situation, when for example workers leave the site and come back after a few months off, no formal letters or new contracts were reviewed for them (NC).

The site doesn't work with labour agencies or other intermediaries.

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

Details:

Workers interviews

Review of workers dossier.

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: It was verified during the review of the workers documentations that workers have not always given a copy of new working contracts or of a letter of appointments Local law and/or ETI requirement: ETI 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. Recommended corrective action: The company must certify that all workers receive a full information of new conditions of working contracts at any time they get hired.</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>Review of workers records</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 checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:</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 on site <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>N/A</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" style="width: 100%;"> <tr> <td data-bbox="633 1684 935 1868"> <p><input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:</p> </td> <td data-bbox="935 1684 1501 1868"> <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-employees on site

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

<p>C: Were sufficient documents for agency workers available for review?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<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: N/A</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 sub contracting 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

Process Subcontracted	Process 1	Process 2
Name of factory		
Address		

Details:

Management interview

Document review

Non-compliance: none

1. Description of non-compliance:

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

NC against Local Law

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:</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>Yes, it was verified during workers interviews</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>Comment 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: workers can anonymously report any kind of claim or suggestion</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 type="checkbox"/> Yes <input checked="" 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:

ETI code of conduct is posted in prominent places all over the premises.
 All workers are inducted upon their rights but also their duties.
 During interviews, all workers reported that they never heard about inhuman treatment on site.
 They also said that for sure the management should not permit such acts.

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

Details:
 Workers interview
 Review of internal discipline policy
 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:

Only legal workers can be hired and work on site.

Some specific documents (such as copies of Ids, Individual Federal registry, Individual working handbook...) are required and a copy of each one is maintained in the workers dossier.

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

Details:

Workers interview

Review of workers dossier

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:

The company is also certified upon Global-Gap standard and therefore must always justify an effective environmental plan plus various related operational process such as:

- A waste and pollution management plan
- An energetic efficiency policy
- A Soil protection plan
- An environmental Preservation plan.

It is also a legal mandatory requirement for the company to have an Operational process to manage all empty toxic cans withdraw. An official association ACASE is fully licensed to collect this hazardous waste. Last collect was verified on 08/07/2019 register # 3.236.

The company also presents all required environmental licences as verified when reviewing tehses licences such as:

Water licence:

#1: licence 138/2016 issued by IGARN on 30/03/2016 valid through 4 years

#2: licence 0474/2016 issued by IGARN on 12/19/2016 valid through 4 years

#3: licence 139/2017 issued by IGARN on 05/05/2017 valid through 4 years

Environmental Licence:

2017-116142 valid until 05/14/24 issued by IDEMA

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

Details:

Reviews of the legal documents and of the MS minutes and records

Any other comments:

None

Non-compliance: none	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law</p> <p>Local law and/or ETI/Additional Elements 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/additional elements 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>

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

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><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>
<p>ETI Code / Additional Elements</p>	<p>Customer's Supplier Code equivalent</p>
<p>0.A. Universal Rights covering UNGP</p>	<p>0.A. Universal Rights covering UNGP</p>
<p>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.</p>	
<p>0.B. Management Systems & Code Implementation</p>	<p>0.B. Management Systems & Code Implementation</p>
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code. 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>	
<p>ETI 1. Forced Labour</p>	<p>ETI 1. Forced Labour</p>
<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>	
<p>ETI 2. Freedom of association and the right to collective bargaining are respected</p>	<p>ETI 2. Freedom of association and the right to collective bargaining are respected</p>
<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>	

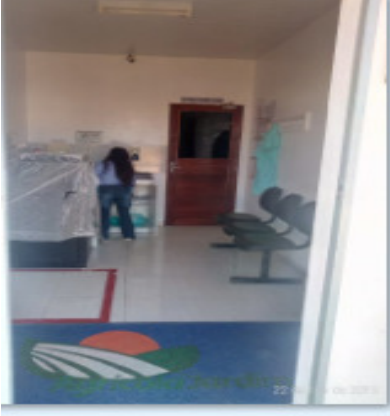








<p>3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.</p>	
<p>ETI 4. Child labour shall not be used</p>	<p>ETI 4. Child labour shall not be used</p>
<p>4.1 There shall be no new recruitment of child labour. 4.2 Companies shall develop 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.</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. 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.</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. 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</p>	

<p>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.</p> <p>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.</p> <p>Additional Elements: Responsible Recruitment</p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p>	

<p>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.</p> <p>8.5 Employment agencies must only supply workers registered with them.</p> <p>8.6 Workers pay no recruitment fee at any stage of the recruitment process.</p> <p>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> <p>8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<p>ETI 9. No harsh or inhumane treatment is allowed</p>	<p>ETI 9. No harsh or inhumane treatment is allowed</p>
<p>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.</p> <p>Additional elements:</p> <p>9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<p>10. Other issue areas: 10A: Entitlement to Work and Immigration</p>	
<p>Additional Elements</p> <p>10A.1 Only workers with a legal right to work shall be employed or used by the supplier.</p> <p>10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
<p>10. Other issue areas 10B2: Environment 2-Pillar</p>	
<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p>10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.</p> <p><i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	

Photo Form

		
<p>Main entrance of the farm</p>	<p>General view</p>	<p>General view</p>
		
<p>Toilets on fields</p>	<p>General view of melon fields</p>	<p>Irrigation workstation</p>
		
<p>First aid kit and H&S instructions on fields</p>	<p>First aid kit and H&S instructions on fields</p>	<p>Water pumping station</p>

		
<p>Main entrance of the PH</p>	<p>Firefighting equipment at PH</p>	<p>Correct secured signage at PH</p>
		
<p>Good disposal and workflow on PH</p>		
		
<p>Emergency exit well marked</p>	<p>All workers with PPE on PH</p>	<p>Fertilizers storage</p>



Chemicals preparing workstation



Segregated Chemical waste

First aid kit at workstation

Gas tank well disposed



Time card clock machine

Canteen for workers

Claim box procedure

		
<p>Individual lockers for workers</p>	<p>Emergency meeting point</p>	<p>Toilets facilities on site</p>



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

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

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

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

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

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

[Click here for Auditors:](#)

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