

# Sedex Members Ethical Trade Audit Report

Version 7



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# Audit content

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Minimum Requirements were applied and the SMETA Auditor Manual was followed. 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.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the following Code Areas:

## Included in a 2-Pillar audit:

1. Labour Standards Code Areas:
  - 0: Enabling accurate Assessment
  - 1: Employment is Freely Chosen
  - 1.A: Responsible Recruitment & Entitlement to Work
  - 2: Freedom of Association and Right to Collective Bargaining are Respected
  - 4: Child Labour Shall Not be Used
  - 5: Legal Wages are Paid
  - 5.A: Living Wages are Paid
  - 6: Working Hours are Not Excessive
  - 7: No Discrimination is Practiced
  - 8: Regular Employment is Provided
  - 8.A: Sub-contracting and Homeworkers are Used Responsibly
  - 9: No Harsh or Inhumane Treatment is Allowed
2. Health & Safety Code Area:
  - 3: Working Conditions are Safe and Hygienic
3. Environment Code Area:
  - 10.A: Environment 2-Pillar

## Included in a 4-Pillar audit:

1. Labour Standards Code Areas
  - As 2-pillar
2. Health & Safety Code Area
  - As 2-pillar
3. Environment Code Area:
  - 10.A: Environment 2-Pillar
  - 10.B: Environment 4-Pillar
4. Business Ethics Code Area:
  - 10.C: Business Ethics

- (2) Where appropriate, non-compliances or non-conformances were raised where either local law or the Base Code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.
- (3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

# Audit and site details

## Audit details

Sedex company reference	ZC5000042664	Auditor company name	QIMA Ltd
Date of audit	2024-11-11	Audit conducted by	Sedex member
Audit pillars	Labour Standards   Health and safety   Environment 4-Pillar   Business ethics		

## Site details

Sedex site reference	ZS1000050211	Site name	BCG Creations ULC
Business name	BCG Creations ULC	Site address	H9R 1A3 167 av Labrosse, Pointe-Claire, CA
Site phone	514-747-8978	Site email	Marie.Kirshenbaum@bcgcreations.com

# Audit parameters

Time in and out	Day 1		Day 2	
	In	09:30	In	09:30
	Out	15:00	Out	13:00
Audit type	Full initial			
Was the audit announced?	Semi announced			
Was the Sedex SAQ available for review?	Yes			
Who signed and agreed CAPR?	Zack Miller / Director			
Any conflicting information SAQ/Pre-Audit Info	No			
Is further information available?	No			

# Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	No	No
B: Present at the audit?	Yes	No	No
C: Present at the closing meeting?	Yes	No	No
Reason for absence at the opening meeting	There is not a union or workers representative.		
Reason for absence during the audit	There is not a union or workers representative.		
Reason for absence at the closing meeting	There is not a union or workers representative.		



# SMETA declaration

## Auditor team

SMETA declaration	<p>I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.</p> <ol style="list-style-type: none"> <li>Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.</li> <li>Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.</li> </ol> <p>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.</p>		
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	None		
Lead auditor	Gerardo Cortes	APSCA Number	21704770
Additional auditor			
Date of declaration	2024-11-12		

## Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Zack Miller
Title	Director
Date of declaration	2024-11-12

## Summary of findings

Code area	Workplace requirement	Local law	Finding
10.B. Environment 4-Pillar	10.B.F Have and communicate policies and proc...		GE <a href="#">ZAF600713557</a>
	10.B.H Record energy use, water use, solid wa...		GE <a href="#">ZAF600713559</a>
	10.B.I Monitor and mitigate the site's impact...		GE <a href="#">ZAF600713562</a>
5.A. Living wages are paid	5.A.B Put in place a wage improvement plan th...		GE <a href="#">ZAF600713558</a>
10.C. Business ethics	10.C.B Assess risks of bribery, corruption or...		GE <a href="#">ZAF600713560</a>
	10.C.F Develop and implement a transparent an...		GE <a href="#">ZAF600713561</a>
	10.C.B Assess risks of bribery, corruption or...		GE <a href="#">ZAF600713563</a>

## Local law issues

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No local law issues

# Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen	✓	✓	✓	✓
1.A. Responsible recruitment and entitlement to work	✓	✓	✓	✓
2. Freedom of association and right to collective bargaining are respected	✓	✓	✓	✓
3. Working conditions are safe and hygienic	✓	✓	✓	✓
4. Child labour shall not be used	✓	✓	✓	✓
5. Legal wages are paid	✓	✓	✓	✓
6. Working hours are not excessive	✓	✓	✓	✓
7. No discrimination is practiced	✓	✓	✓	✓
8. Regular employment is provided	✓	✓	✓	✓



Not addressed



Fundamental improvements required



Some improvements recommended



Robust management systems

	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	✔	✔	✔	✔
9. No harsh or inhumane treatment is allowed	✔	✔	✔	✔
10.A. Environment 2-Pillar	✔	✔	✔	✔
10.C. Business ethics	✔	✔	✔	✔

- ✖

Not addressed
- ⚠

Fundamental improvements required
- i

Some improvements recommended
- ✔

Robust management systems

# Site details

## Company and site details

Sedex company reference	ZC5000042664	
Sedex site reference	ZS1000050211	
Company name	BCG Creations ULC	
Business ownership type	AGENT_OR_RETAILER	
Site name	BCG Creations ULC	
Site name in local language		
GPS location	GPS address	167 Labrosse, Pointe Claire, Montreal, Quebec, Canada
	Coordinates	N 45°28'32.46672" W 73°49'10.27056"
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Marie Kirshenbaum
	Job title	COO DEBCO
	Phone number	514-747-8978
	Email	Marie.Kirshenbaum@bcgcreations.com
Applicable business and other legally required business license numbers and documents	Certificate of Autorizathion from Point Claire, Number 2021-02924	

## Site activities

Site function	Factory Processing/Manufacturer Service Provider
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## Site activities

Site activities	Primary	Manufacture of other non-metallic mineral products n.e.c.
	Secondary	
	Other	
Product type	Importing and exporting from China and manufacturing of wooden ornaments through laser cutting machinery.	
Process overview	Design, laser cutting of wood, conditioning, packaging, and storage. There were just 3 employees during the audit, the interview size is 3.	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

## Site scope

Is the audited site a physically continuous area?	Yes	
What is the area of audited site to its boundary?	400m <sup>2</sup>	
Building 1	Last construction works on site	1981
	If building is shared, provide details	Nota Applicable
	Number of floors	1
	Description of floor activities	Deign offices, laser cutting area, conditioning, packing and warehouse.
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	
Is any activity conducted onsite not included within the scope of the audit?	No	



## Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No
Does the site organise worker transport to the worksite?	Not applicable
	Not Applicable

## Work patterns

Approximate workers on site per month (% of peak)	January	90-95%	February	90-95%
	March	90-95%	April	90-95%
	May	90-95%	June	90-95%
	July	90-95%	August	90-95%
	September	90-95%	October	90-95%
	November	90-95%	December	90-95%

Is there any night or back shift work at the site?	No
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## Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	No
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Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	No
	Not applicable

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	Yes
	The facility has a Human Rights policies.

# Worker analysis

Gender disaggregated data available

Men and women

## Worker totals

	Men	Women	Other	Total
Number of workers	4 (33.3%)	8 (66.7%)	- -	12 (100%)

## Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	4 (33.3%)	8 (66.7%)	- -	12 (100%)
Temporary or fixed term employees	0 (0%)	0 (0%)	- -	0 (0%)
Agency or subcontracted workers	0 (0%)	0 (0%)	- -	0 (0%)
Seasonal workers	0 (0%)	0 (0%)	- -	0 (0%)
Self-employed workers	0 (0%)	0 (0%)	- -	0 (0%)
Informal workers including home workers	0 (0%)	0 (0%)	- -	0 (0%)
Apprentices, trainees or interns	0 (0%)	0 (0%)	- -	0 (0%)

\* % of total workforce

## Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
International migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
Total migrant workers	0 (0%)	0 (0%)	- -	0 (0%)

\* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from

Not Applicable

## Workers by age

	Men	Women	Other	Total
18 - 24 years old	0 (0%)	0 (0%)	- -	0 (0%)
15 - 17 years old	0 (0%)	0 (0%)	- -	0 (0%)
Under 15 years old	0 (0%)	0 (0%)	- -	0 (0%)

\* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit?

Yes

Please list the nationalities of all workers, with the three most common nationalities listed first

Canadian

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Canadian	35%	65%	-	100%

## Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid hourly / daily rate	0 (0%)	0 (0%)	- -	0 (0%)
Salaried workers	4 (33.3%)	8 (66.7%)	- -	12 (100%)

\* % of total workforce

## Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 (0%)	0 (0%)	- -	0 (0%)
Paid weekly	0 (0%)	0 (0%)	- -	0 (0%)
Paid monthly	0 (0%)	0 (0%)	- -	0 (0%)
Other	4 (33.3%)	8 (66.7%)	- -	12 (100%)

\* % of total workforce

If other payment cycle entered, please provide details

Biweekly

## People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	1 (8.3%)	0 (0%)	- -	1
Supervisors or team leaders	0 (0%)	0 (0%)	- -	0
Administrative staff	3 (25%)	5 (41.7%)	- -	8

# Worker interview summary

Gender disaggregated data available      Men and women

Which methods of worker engagement were used?      Individual interviews

## Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?

Was the interview sample representative of all types of nationality and employment types of workers?      Yes

Was the interview sample representative of the gender composition of the workforce?      Yes

Number and size of group interviews      None, There were just 3 employees during the audit, there were not enough employees for a group interview.

Did workers understand the purpose of the audit?      Yes

Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?      Yes

Was there any indication that workers had been 'coached' in how they should respond to questions?      No

What was the general attitude of the workers towards their workplace?      Favorable

## Attitude of workers

In which areas did workers raise significant concerns or complaints?	Communication (e.g. from management)
What did the workers like the most about working at this site?	Hours worked, rest days or breaks Social activities and events Work atmosphere (e.g. treatment by supervisors) Pay Equal opportunities Job security
Additional comments	They showed openness and complete freedom to express themselves at all times. They had good relationships with their supervisors and managers who treated them with respect.
Attitude of workers' committee/union representatives	There are no union or workers representative in the facility.
Attitude of managers	The manager's attitude was respectful and proactive,. The management also showed an openness to the observations detected and expressed an interest in making the necessary improvements.

## Workers interviewed by type

	Total
Permanent workers	3
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	3

## Workers interviewed by group/individual

	Men	Women	Other	Total
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Workers interviewed by group/individual

Workers interviewed in groups	0	0	-	0
Workers interviewed individually	0	3	-	3

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	0	0	-	0

# Measuring workplace impact

Gender disaggregated data available

Men and women

## Annual worker turnover (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	9.0%	-	1.0%
Last full calendar year (2023)	0.0%	9.0%	-	1.0%
Previous full calendar year (2022)	0.0%	9.0%	-	1.0%

\* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

## Rate of absenteeism (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

\* Number of days lost through job absence in the year, calculated as (the number of employees on 1st day of the year + number employees on the last day of the year) / 2)\* number available workdays in the year\*100

Are accidents recorded?

Yes

Use own internal process

## Annual number of work related accidents and injuries (per 100 workers)\*

	Men	Women	Other	Total

## Annual number of work related accidents and injuries (per 100 workers)\*

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

\* Calculated as (number of work related accidents and injuries \* 100) / number of total workers.

## Lost day work cases (per 100 workers)\*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

\* Calculated as (number of lost days due to work accidents and work related injuries \* 100) / number of total workers.

## Percentage of workers that work on average more than 48 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	3.0%	-	3.0%
Last full calendar year (2023)	0.0%	3.0%	-	3.0%
Previous full calendar year (2022)	0.0%	3.0%	-	3.0%

## Percentage of workers that work on average more than 60 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%

## Percentage of workers that work on average more than 60 standard hours in a given week

Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

# 0. Enabling accurate assessment

## Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"><li>- Management and worker interviews</li><li>- Internal handbook covering all internal policies of the company (child labour, forced labour, harassment and abuse and a grievance mechanism)</li><li>- Ethical Code</li><li>- Induction training record</li><li>- Attendance records of the induction process</li></ul>		

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	No

# 1. Employment is freely chosen

## Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1.Policies and procedures: The site has a detailed Employment is freely chosen which includes commitment to all the SMETA requirements, as well as key responsibilities and procedures by which it will be implemented.</p> <p>2.Resources: The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.</p> <p>3.Training: There is a well-established training programme in place and all key persons are aware of their responsibilities of Employment is freely chosen</p> <p>4.Monitoring: Employment freely chosen are effectively monitored, and overall performance is reported to the relevant senior management.</p>

## Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> <li>- Zero Tolerance of Labour Violence Policy</li> <li>- Payroll review</li> <li>- Employee's files</li> <li>- Employee's interviews</li> <li>- Site tour</li> <li>- Internal handbook</li> <li>- Management interviews</li> </ul>		

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Yes <ul style="list-style-type: none"><li>- Employee is freely chosen all times, there is a policy of Human Rights.</li><li>- There was no evidence of forced, bonded, involuntary or prison labor.</li><li>- Employees can leave the site once the shift is over.</li><li>- No deposits are made by workers.</li></ul>
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No



# 1.A. Responsible recruitment and entitlement to work

## Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1.Policies and procedures: The site has a detailed Employment is freely chosen which includes commitment to all the SMETA requirements, as well as key responsibilities and procedures by which it will be implemented.</p> <p>2.Resources: The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.</p> <p>3.Training: There is a well-established training program in place and all key persons are aware of their responsibilities of Employment is freely chosen</p> <p>4.Monitoring: Employment freely chosen are effectively monitored, and overall performance is reported to the relevant senior management.</p>

## Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> <li>- Employee interviews</li> <li>- Management and HR interviews</li> <li>- Employee's contracts</li> <li>- Internal Handbook</li> <li>- Employees files</li> </ul>		

## 1.A. Responsible recruitment and entitlement to work

### Data points

#### Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	Directly
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (including dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

#### Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	0%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	No

#### Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process? Not Applicable

Were recruitment fees or costs identified during worker interviews?

No

No recruitment fees

## 2. Freedom of association and right to collective bargaining are respected

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1.Policies and procedures: The site has a detailed Freedom of association and right to collective bargaining are respected which includes commitment to all the SMETA requirements, as well as key responsibilities and procedures by which it will be implemented.</p> <p>2.Resources: The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.</p> <p>3.Training: There is a well-established training program in place and all key persons are aware of their responsibilities of Employment is freely chosen</p> <p>4.Monitoring: Freedom of association and right to collective bargaining respected are effectively monitored, and overall performance is reported to the relevant senior management.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> <li>- Open Doors Policy</li> <li>- Employee's interviews</li> <li>- Site tour</li> <li>- Internal handbook and COC</li> <li>- Management interviews</li> </ul>		

## 2. Freedom of association and right to collective bargaining are respected

### Data points

Are trade unions allowed by law in the national context?	No
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	No
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	No worker representative bodies
Are the worker representatives freely elected by the workforce as a whole?	Not Applicable
Does union/worker committee membership reflect the gender composition of the workforce?	Not Applicable
Does the membership reflect the nationality composition of the workforce?	Not Applicable
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

## 3. Working conditions are safe and hygienic

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1.Policies and procedures: The site has a detailed policy of Working conditions are safe and hygienic are respected which includes commitment to all the SMETA requirements, as well as key responsibilities and procedures by which it will be implemented.</p> <p>2.Resources: The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.</p> <p>3.Training: There is a well-established training program in place and all key persons are aware of their responsibilities of Working conditions are safe and hygienic,</p> <p>4.Monitoring: Working conditions are safe and hygienic are monitored, and overall performance is reported to the relevant senior management.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> <li>- Site tour</li> <li>- Employee and management interview</li> <li>- Document related to health and safety including (related training records for chemical safety, fire drill, machine safety, chemical safety)</li> <li>- Legal requirement for building/fire safety</li> <li>- fire equipment inspection record</li> <li>- Workers and management interview</li> </ul>		

### 3. Working conditions are safe and hygienic

## Data points

Is someone within the company responsible for health and safety?	Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	Not applicable
Who organises worker transportation between accommodation and worksite?	Not applicable
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes  Building layout plan a certificates are available for review
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

## 4. Child labour shall not be used

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1.Policies and procedures: The site has a detailed policy of Child labour shall not be used which includes commitment to all the SMETA requirements, as well as key responsibilities and procedures by which it will be implemented.</p> <p>2.Resources: The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.</p> <p>3.Training: There is a well-established training program in place and all key persons are aware of their responsibilities of Child labour shall not be used.</p> <p>4.Monitoring:Child labour not be used are monitored, and overall performance is reported to the relevant senior management.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> <li>- Child labor Policy</li> <li>- Hiring &amp; Selection procedure</li> <li>- Site tour</li> <li>- Employee and management interviews</li> <li>- Employee's Record files</li> <li>- Internal Rules document, Ethical Code</li> </ul>		



4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	0%
Enter the legal age of employment	16
Enter the age of the youngest worker identified	32
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

## 5. Legal wages are paid

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1.Policies and procedures: The site has a detailed policy of Legal wages are paid which includes commitment to all the SMETA requirements, as well as key responsibilities and procedures by which it will be implemented.</p> <p>2.Resources: The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.</p> <p>3.Training: There is a well-established training program in place and all key persons are aware of their responsibilities of Legal wages are paid</p> <p>4.Monitoring: Legal wages paid are monitored, and overall performance is reported to the relevant senior management</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> <li>- Employees record files including disciplinary measures and employee's agreements.</li> <li>- Worker and management interviews</li> <li>- The pay stubs and payroll records from December 2023 to November 2024.</li> <li>- Employee and management interviews</li> <li>- The local minimum wage is \$17.20 CAD per hour. The minimum wage paid by the factory is \$24.03 CAD per hour. Labor agreements include workers' wages and benefits.</li> <li>- The factory paid overtime 150% per hour in accordance to the local law.</li> <li>- Payroll records are delivered via e-mail to each worker and easily accessible. No deductions are made for disciplinary measures. Payments are made on time every other Friday.</li> </ul>		



5. Legal wages are paid

Data points

What is the basic wage paid to workers?	Wages are based on job skills and experience
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Only digital payments
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Not applicable
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Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Weekly	
Is actual wage data available on site for any of these options?	Weekly	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	44.0
	Max hours per month	176.0
Actual required working hours	Required hours per day	8.0
	Required hours per week	44.0
	Required hours per month	176.0
Maximum legal overtime hours	Max hours per day	5.0
	Max hours per week	Non applicable
	Max hours per month	Non applicable

Actual overtime hours	Max hours per day	2.0
	Max hours per week	8.0
	Max hours per month	32.0
Minimum legal wage	Min per hour	17.2
	Min per day	137.6
	Min per week	756.8
	Min per month	3027.2
Actual minimum wage	Actual per hour	24.03
	Actual per day	192.24
	Actual per week	1057.32
	Actual per month	4229.28
Minimum legal overtime wage	Min per hour	25.8
	Min per day	129.0
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	36.04
	Actual per day	72.09
	Actual per week	144.18
	Actual per month	576.72

## Wage analysis

Number of workers' records checked	3
Provide the date and details of the records	3 samples' attendance and payroll records each on November-2024, July-2024 and April-2024 were selected as samples. The records shown at the first request.
Are there different legal minimum/ legally recognised CBAs wage grades?	No

For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Above legal minimum
---	---------------------

Indicate the breakdown of workforce per earnings	Equal payment by positions.
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Are there any bonus schemes used?	No
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Were accurate records shown at the first request?	Yes
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Were any inconsistencies found?	No
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## 5.A. Living wages are paid

### Summary of findings

Code area	Workplace requirement	Local law	Finding
5.A. Living wages are paid	5.A.B Put in place a wage improvement plan th...		GE <a href="#">ZAF600713558</a>
Systems and evidence examined to validate this code section		<ul style="list-style-type: none"><li>- Employees record files including disciplinary measures and employee's contracts.</li><li>- Worker and management interviews</li><li>- The pay stubs and payroll records from December 2023 to November 2024.</li><li>- Employee and management interviews</li></ul>	

# Findings: good examples

ZAF600713558

Good example

**Code area**

5.A Living wages are paid

**Workplace requirement**

5.A.B Put in place a wage improvement plan that aims to pay workers a living wage within a stated timeframe.

**Description**

During the paystub review, it was detected that the facility is already paying their employees above the minimum wage, including new employees during the probationary period.



## 6. Working hours are not excessive

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1.Policies and procedures: The site has a detailed policy of Working hours are not excessive which includes commitment to all the SMETA requirements, as well as key responsibilities and procedures by which it will be implemented. All employees have an agreement authorizing them to work more than 40 hours per week.</p> <p>2.Resources: The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.</p> <p>3.Training: There is a well-established training program in place and all key persons are aware of their responsibilities of Working hours are not excessive.</p> <p>4.Monitoring: Working hours not excessive are monitored, and overall performance is reported to the relevant senior management, however The working hours were noted to be excessive.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> <li>- Employees contract</li> <li>- The time records and pay stubs were available from December 2023 to November 2024.</li> <li>- Employee interviews</li> <li>- Internal rules document</li> <li>- Management and HR interviews</li> <li>- Internal handbook</li> </ul>		

## 6. Working hours are not excessive

### Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	101%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	The facility does not pay a premium overtime, that is in accordance to the local law.
Excluding overtime, what are the regular working hours per week for workers at this site?	44.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	48.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	48.0
Maximum number of days worked without a day off in sample	6

## 7. No discrimination is practiced

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1.Policies and procedures: The site has a detailed policy of No discrimination is practiced which includes commitment to all the SMETA requirements, as well as key responsibilities and procedures by which it will be implemented.</p> <p>2.Resources: The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.</p> <p>3.Training: There is a well-established training program in place and all key persons are aware of their responsibilities of No discrimination is practiced</p> <p>4.Monitoring: No discrimination is practiced are monitored, and overall performance is reported to the relevant senior management.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> <li>- Internal rules document</li> <li>- Hire and selection procedure</li> <li>- Ethical code and internal rules</li> <li>- Payroll record review</li> <li>- Employee and management interviews</li> <li>- Site tour</li> <li>- Internal handbook</li> </ul>		

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	45%
Representation of women in managerial roles (ratio of women workers to women managers)	0%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	0%
Three most common nationalities in managerial and supervisory roles	Canadian

## 8. Regular employment is provided

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1.Policies and procedures: The site has a detailed policy of Regular employment is provided which includes commitment to all the SMETA requirements, as well as key responsibilities and procedures by which it will be implemented.</p> <p>2.Resources: The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.</p> <p>3.Training: There is a well-established training program in place and all key persons are aware of their responsibilities of Regular employment is provided</p> <p>4.Monitoring: Regular employment provided is practiced are monitored, and overall performance is reported to the relevant senior management.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> <li>- Employee interviews</li> <li>- Management and HR interviews</li> <li>- Employee's agreements</li> <li>- Internal Handbook</li> <li>- Employees files</li> </ul>		

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

## 8.A. Sub-contracting and homeworkers are used responsibly

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1.Policies and procedures: The site does not subcontract or employ house workers.</p> <p>2.Resources: The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.</p> <p>3.Training: The site does not subcontract or employ house workers.</p> <p>4.Monitoring: The site does not subcontract or employ house workers.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> <li>- Employee interviews</li> <li>- Management and HR interviews</li> <li>- Production records</li> <li>- Site tour</li> </ul>		

8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent? Not applicable

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homeworker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No  
Not Applicable

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No  
Not Applicable

Are any sub-contractors used? No



## 9. No harsh or inhumane treatment is allowed

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1.Policies and procedures: The site has a detailed policy of No harsh or inhumane treatment allowed are used responsibly which includes commitment to all the SMETA requirements, as well as key responsibilities and procedures by which it will be implemented.</p> <p>2.Resources: The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.</p> <p>3.Training: There is a well-established training program in place and all key persons are aware of their responsibilities of No harsh or inhumane treatment is allowed.</p> <p>4.Monitoring: No harsh or inhumane treatment allowed used responsibly is practiced are monitored, and overall performance is reported to the relevant senior management.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> <li>- Employee interviews</li> <li>- Management and HR interview</li> <li>- Attendance training list on company policies</li> <li>- Site tour</li> <li>- Internal handbook</li> <li>- Zero tolerance of labor violence document</li> <li>- Harassment &amp; abuse policy</li> <li>- Complaint mailbox</li> <li>- Grievance procedure</li> </ul>		



9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')? No

## 10.A. Environment 2-Pillar

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1.Policies and procedures: The site has a detailed policy of Environment protection which includes commitment to all the SMETA requirements, as well as key responsibilities and procedures by which it will be implemented. The facility is a member of the 'HPG' group, and as a member, it has implemented a comprehensive sustainability program to continuously improve in environmental and social compliance, as an example the facility has a "0" carbon foot print.</p> <p>2.Resources: The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.</p> <p>3.Training: There is a well-established training program in place and all key persons are aware of their responsibilities of Environment protection.</p> <p>4.Monitoring: Environment protection is practiced are monitored, and overall performance is reported to the relevant senior management.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> <li>- Environment management policy</li> <li>- Management interview</li> <li>- Site tour</li> <li>- Policies to reduce, reuse and recycling of waste</li> <li>- Contract with waste company</li> </ul>		

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	<div>- Environmental permit</div> <div>- Permission for using required energy ( electricity / water )</div> <div>-Safe Food for Canadian</div>
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	No

# 10.B. Environment 4-Pillar

## Summary of findings

Code area	Workplace requirement	Local law	Finding
10.B. Environment 4-Pillar	10.B.F Have and communicate policies and proc...		GE <a href="#">ZAF600713557</a>
	10.B.H Record energy use, water use, solid wa...		GE <a href="#">ZAF600713559</a>
	10.B.I Monitor and mitigate the site's impact...		GE <a href="#">ZAF600713562</a>
Systems and evidence examined to validate this code section	<div>- Environment management policy</div> <div>- Management interview</div> <div>- Site tour</div> <div>- Policies to reduce, reuse and recycling of waste</div> <div>- Contract with waste company</div>		

# Findings: good examples

ZAF600713557

Good example

## Code area

10.B Environment 4-Pillar

## Workplace requirement

10.B.F Have and communicate policies and processes, endorsed at the highest level, that includes commitments to improve environmental performance and an approach to managing environmental impacts on relevant stakeholders

## Description

During the document review, it was detected that the facility already has the EcoVadis Gold Medal as a sustainability program.

## Evidence



[CamScanner 11-11-2024 09:59\\_20.jpg](#)



ZAF600713559

Good example

## Code area

10.B Environment 4-Pillar

## Workplace requirement

10.B.H Record energy use, water use, solid waste, material use, hazardous substance use and waste, and effluent discharge.

## Description

During the document review, it was detected that the facility already has a certification from UPS that certifies the facility mitigated 714074 tons of CO2 during 2023.

## Evidence

ZAF600713559

Good example



[2023\\_UPS\\_Certificate.pdf](#)

ZAF600713562

Good example

Code area

10.B Environment 4-Pillar

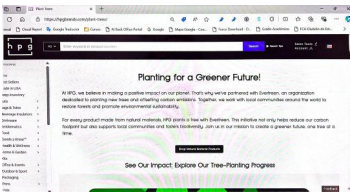
Workplace requirement

10.B.I Monitor and mitigate the site's impacts on biodiversity.

Description

During the document review, it was detected that the facility has a program called "Evertreen," which involves planting tree donations amounting to approximately 2000 CAD. This means 4786 trees have been planted in different locations in the last 2 years.

Evidence



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## 10.B. Environment 4-Pillar

### Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Zero-waste and recycling protocols
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes The Factory various mesures to manage client requirements and comply with environmental and chemical laws
Does the site have reduction targets in place to manage climate related risks?	None
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	Yes The facility has protocols to reduction targets
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Yes The facility share their enviromental policy.

### Usage/discharge analysis

	Last full calendar year (2023)	Previous full calendar year (2022)
Total electricity consumption from non-renewable sources (kWh)	Data not available	Data not available
Total electricity consumption from renewable sources (kWh)	55,800	40,050
Sources of renewable energy used	Utility provider	Utility provider
Types of renewable energy used	Hydroelectric	Hydroelectric
Total natural gas consumption (kWh)	Data not available	Data not available

Usage of other purchased fuels	Data not available	Data not available
Has the site completed any carbon footprint analysis?	Yes	Yes
	Scope 1: 0 (tCO <sub>2</sub> e) Scope 2: 0 (tCO <sub>2</sub> e) Scope 3: 0 (tCO <sub>2</sub> e)	Scope 1: 0 (tCO <sub>2</sub> e) Scope 2: 0 (tCO <sub>2</sub> e) Scope 3: 0 (tCO <sub>2</sub> e)
Water sources	Local water authority	Data not available
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	3,494	Data not available
Water discharged	Local sewer authority	Data not available
Water volume discharged (m3)	3,494	Data not available
Water volume recycled (m3)	Data not available	Data not available
Total waste produced (mt)	22.2	22.2
Total hazardous waste produced (mt)	Data not available	Data not available
Waste to recycling (mt)	1	1
Waste to landfill (mt)	21.2	21.2
Waste to other (mt)	Data not available	Data not available
Total product produced (mt)	Data not available	Data not available

## 10.C. Business ethics

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1.Policies and procedures: The site has a detailed policy of Business ethics which includes commitment to all the SMETA requirements, as well as key responsibilities and procedures by which it will be implemented.</p> <p>2.Resources: The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.</p> <p>3.Training: There is a well-established training program in place and all key persons are aware of their responsibilities of Business ethics</p> <p>4.Monitoring: Business ethics are monitored, and overall performance is reported to the relevant senior management.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
10.C. Business ethics	10.C.B Assess risks of bribery, corruption or...		GE <a href="#">ZAF600713560</a>
	10.C.F Develop and implement a transparent an...		GE <a href="#">ZAF600713561</a>
	10.C.B Assess risks of bribery, corruption or...		GE <a href="#">ZAF600713563</a>
Systems and evidence examined to validate this code section	The facility has a Sustainable program and a COC with policies and procedures.		

# Findings: good examples

ZAF600713560

Good example

## Code area

10.C Business ethics

## Workplace requirement

10.C.B Assess risks of bribery, corruption or any fraudulent or unethical business practices and implement measures to mitigate these.

## Description

During the document review, it was detected that the facility is part of a group of companies committed to the UN Sustainable Development Goals and has already implemented a management system to ensure compliance in Environment, Sustainability, Resources Management, Society, and Governance, with good results during 2023 and total compliance expected in 2025.

## Evidence



[HPG Sustainability Report 2023.pdf](#)



ZAF600713561

Good example

## Code area

10.C Business ethics

## Workplace requirement

10.C.F Develop and implement a transparent and accessible mechanism that effectively allows confidential and anonymous reporting, monitoring and investigation of any fraudulent or unethical business practices without fear of reprisals towards the reporter.

ZAF600713561

Good example

### Description

During the document review, it was detected that the facility already has "engagement initiatives" to improve the working environment, such as:

- Quarterly social events
- Holiday dinners
- Snacks and treats provided
- HPG holiday gift

Also the facility has a Career Growth program and Employee Swag Store.

Additionally, they also have an Employee of the Month program in accordance with their core values.

### Evidence



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[CamScanner 11-11-2024 09:59 55.jpg](#)



ZAF600713563

Good example

### Code area

10.C Business ethics

### Workplace requirement

10.C.B Assess risks of bribery, corruption or any fraudulent or unethical business practices and implement measures to mitigate these.

### Description

During the document review, it was detected that the facility has a Charitable Donations Program for their employees' causes, local community (as a huracan in North Carolina), or through PromoCares.org or PromoKitchen.org.

Additionally, the facility has a "Paid Volunteering Program," which provides PTO (Paid Time Off) for volunteering work.

Additionally, the local facility donates "End Cancer" bracelets to support the fight against cancer.

### Evidence



10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?	No
Provide any certified anti-bribery management systems for the site	The facility has a Code of Conduct and procedures against bribery practices at all levels.

## Attachments



[R-Cloud-24231378-Audit  
Photos.pdf](#)



[R-Cloud-24231378-Signed  
CAP.pdf](#)







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