

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 and 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 code areas below.

2-pillar audits include:

- Labour standards:
 - 0. Enabling accurate assessment
 - 1. Employment is freely chosen
 - 1.A. Responsible recruitment and 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
- Health and safety:
 - 3. Working conditions are safe and hygienic
- Environment:
 - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
 - 10.B. Environment 4-pillar
- Business ethics:
 - 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 details

Site details

Sedex site reference	ZS1000001599	Site name	Best Promotions LLC
Business name	Best Promotions LLC	Site address	75182 201 Clay Rd Suite 200, Sunnyvale, US

Audit details

Sedex company reference	ZC5000001509	Auditor company name	QIMA Ltd
Audit company address	8/F Sino Plaza, 255-257 Gloucester Road, Hong Kong, HK, 1		
Date of audit	2025-07-28	Audit conducted by	Juliana Honda
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		
Time in and out	Day 1	Day 2	Day 3
	In 09:00	In 09:00	In 08:00
	Out 17:00	Out 17:00	Out 12:00
Audit type	Full initial		
Was the audit announced?	Announced		
Was the Sedex SAQ available for review?	Yes		

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Who signed and agreed CAPR? Ron Freeman / Senior Production Manager

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	Facility does not have Union/worker representative		
Reason for absence during the audit	Facility does not have Union/worker representative		
Reason for absence at the closing meeting	Facility does not have Union/worker representative		

SMETA declaration

Auditor team

SMETA declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

1. 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.
2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

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.

Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size) None

Lead auditor	Juliana Honda	APSCA Number	21701471
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Additional auditor

Date of declaration	2025-07-30
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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	Ron Freeman
Title	Senior Production Manager
Date of declaration	2025-07-30

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	Base code	NC ZAF601042204
	3.A Ensure a safe working environment. Put in...	Base code	NC ZAF601042205
	3.B Conduct risk assessments regarding the po...	Base code	NC ZAF601042203
	3.M Ensure all machinery is installed, mainta...	Base code	NC ZAF601042206
	3.N Maintain a log of all hazardous substance...	Base code	NC ZAF601042207
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	Base code	NC ZAF601042208

Management systems

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



Not addressed



Fundamental improvements required



















Some improvements recommended



Robust management systems

[← Summary of findings](#)

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	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



Some improvements recommended



Robust management systems

Site details

Company and site details

Sedex company reference	ZC5000001509	
Sedex site reference	ZS1000001599	
Company name	Best Promotions LLC	
Business ownership type	GOODS	
Site name	Best Promotions LLC	
Site name in local language		
GPS location	GPS address	201 Clay Rd, Suite 200
	Coordinates	32.77344638868158, -96.56267732027429
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Ron Freeman
	Job title	Manager
	Phone number	972-552-3636
	Email	ron.freeman@hpgbrands.com
Applicable business and other legally required business license numbers and documents	commercial certificate of occupancy 240690 issued in 07/08/2025; TAX ID 82-3320408; town of Sunnyvale fire inspection performed in 5/09/2025 (annual inspection)	

[← Management systems](#)

[Worker analysis →](#)

Site activities

Site function	Finished Product Supplier	
Site activities	Primary	Other manufacturing n.e.c.
	Secondary	
	Other	
Product type	Screen printing and dye sublimation decoration of promotional products: beverage insulators, drinkware and cooler bags.	
Process overview	Screen printing and dye sublimation decoration of promotional products: beverage insulators, drinkware and cooler bags. There are 9 work centers/production lines including screen printing, heat/calendar presses, die cutting, digital printing, sewing and packing. Major equipment: laser engraving, flatbed screen printing, cylindrical screen printing, digital transfer printing, calendar press applicators, sewing machines, screen making/reclamation and flat bed die cutting.	
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?	1235600m ²

[← Site details](#)

[Worker analysis →](#)

Site scope

Building 1	Last construction works on site	2025
	If building is shared, provide details	No shared building
	Number of floors	1
	Description of floor activities	Single floor operation, with stencil/screen making and production activities on the main floor

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 provided
Site does not provide worker transport

[← Site details](#)

[Worker analysis →](#)

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	95-100%
	July	95-100%	August	95-100%
	September	95-100%	October	90-95%
	November	90-95%	December	90-95%

Is there any night shift work at the site? No

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? No

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
The site did no assess

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site? No
Human Rights Impact Assessment (HRIA) conducted

[← Site details](#)

[Worker analysis →](#)

Worker analysis

Gender disaggregated data available

Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	24 (20.7%)	92 (79.3%)	- -	116 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	23 (20.7%)	88 (79.3%)	- -	111 (95.7%)
Temporary or fixed term employees	0 -	0 -	- -	0 (0%)
Agency or subcontracted workers	1 (20%)	4 (80%)	- -	5 (4.3%)
Seasonal workers	0 -	0 -	- -	0 (0%)
Self-employed workers	0 -	0 -	- -	0 (0%)
Informal workers including home workers	0 -	0 -	- -	0 (0%)
Apprentices, trainees or interns	0 -	0 -	- -	0 (0%)

* % of total workforce

[← Site details](#)

[Worker interviews →](#)

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	0 -	0 -	- -	0 (0%)
International migrant workers	0 -	0 -	- -	0 (0%)
Total migrant workers	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	4 (33.3%)	8 (66.7%)	- -	12 (10.3%)
15 - 17 years old	0 -	0 -	- -	0 (0%)
Under 15 years old	0 -	0 -	- -	0 (0%)

* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

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 Mexican American

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
American	0%	0%	-	0%
Mexican	0%	0%	-	0%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 -	0 -	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 -	0 -	- -	0 (0%)
Workers paid hourly / daily rate	24 (20.7%)	92 (79.3%)	- -	116 (100%)
Salaried workers	0 -	0 -	- -	0 (0%)

* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 (0%)
Paid weekly	1 (20%)	4 (80%)	- -	5 (4.3%)
Paid monthly	0 -	0 -	- -	0 (0%)
Other	23 (20.7%)	88 (79.3%)	- -	111 (95.7%)

* % of total workforce

If other payment cycle entered, please provide details bi weekly

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	3 (60%)	2 (40%)	- -	5
Supervisors or team leaders	4 (26.7%)	11 (73.3%)	- -	15
Administrative staff	4 (30.8%)	9 (69.2%)	- -	13

[← Worker analysis](#)

[Worker interviews →](#)

Worker interview summary

Gender disaggregated data available Men and women

Which methods of worker engagement were used? Individual interviews
Group 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 4 groups of 5 workers

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

[← Worker analysis](#)

[Measuring workplace impact →](#)

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?

Work atmosphere (e.g. treatment by supervisors)
Work environment – comfort (e.g. temperature, noise or dust levels)

What did the workers like the most about working at this site?

Freedom of movement
Pay

Additional comments

Workers informed that payment is performed on date (biweekly). Overtime is voluntary and there is no restriction in movement inside the factory and employees are free to leave the factory in the end of shift or with previous notice. Workers complained about the hot workplace (production) and in some departments, the lack of good communication of supervisors

Attitude of workers' committee/union representatives

Not applicable. Facility does not have worker's committee/union representatives

Attitude of managers

Management collaborated during the audit process. The documentation was timely provided for review and all areas were visited by auditor

Workers interviewed by type

	Total
Permanent workers	25
Temporary or fixed-term employees	0

[← Worker analysis](#)

[Measuring workplace impact →](#)

Workers interviewed by type

Agency or subcontracted workers	2
Seasonal workers	0
Other workers	0
Total number of workers interviewed	27

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	6	14	-	20
Workers interviewed individually	1	6	-	7

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

Totals only

Facility only monitor the total only

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	-	-	-	11.32%
Last full calendar year (2024)	-	-	-	23.53%
Previous full calendar year (2023)	-	-	-	33.91%

* 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)	-	-	-	-
Last full calendar year (2024)	-	-	-	-
Previous full calendar year (2023)	-	-	-	-

Number of days lost through job absence in the year, calculated as: (Number of days lost through job absence in the year) / [(Number of employees on 1st day of the year + Number of employees on the last day of the year) / 2] * (Number of available workdays in the year).

Are accidents recorded?

Yes

works injury reports

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

	Men	Women	Other	Total
Last full quarter (90 days)	-	-	-	1.4%
Last full calendar year (2024)	-	-	-	4.0%
Previous full calendar year (2023)	-	-	-	4.3%

* 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)	-	-	-	2.1%
Last full calendar year (2024)	-	-	-	0.0%
Previous full calendar year (2023)	-	-	-	156.5%

* 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 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	-	-	-	0.0%
Last full calendar year (2024)	-	-	-	0.0%

[← Worker interviews](#)

[Code area 0 →](#)

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

Previous full calendar year (2023)	-	-	-	0.0%
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Percentage of workers that work on average more than 60 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	-	-	-	0.0%
Last full calendar year (2024)	-	-	-	0.0%
Previous full calendar year (2023)	-	-	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			
Systems and evidence examined to validate this code section	<p>Current System:</p> <p>1, The organization has an employee handbook - January 2024</p> <p>2. Facility has a HR area responsible for ensuring compliance to ETI code requirements and regarding social compliance/human righ</p> <p>3, Facility presented general business and operating licenses.</p> <p>To verify the compliance, the auditor performed interviews with manager and employees and it was noted that facility has an employee handbook proper communicated to all workers. Human rights laws and orientation are posted in 2 differente languages in the breakroom. 86.81% of our employees classify as Hispanic. 12.5% classify as Caucasian</p> <p>Evidence:</p> <ul style="list-style-type: none"> - Employee handbook; - Training Records; - Individual and group interviews - Management interviews - Factory tour - Sedex site profile 		

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

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

Some Improvements Recommended

Explanation for management systems grades

1. Policies and procedures: The site has a employee handbook (January 2024) describing the employment relationship and workplace guidelines.; Labor and Human Rights Policy describing the employee Working Conditions. and defining Responsibilities, Reporting and Reviewing
2. Resources: There is a dedicated person, Ms. Carolyne Guzman (HR manager) that possesses sufficient seniority and authority to implement this policy and ensure adherence to the procedures. Facility also has a Quality and Compliance Manager (John McMahon) in case of HR absence
3. Communication and training: Employees were communicated regarding the issue during the induction period. Furthermore, the rules are defined and communicated through internal regulations (posted on notice board). Interviewes were aware about the procedure and policy. It was also reviewed the training schedule: training name, date and minutes
4. Monitoring: The facility has an active HR team that is responsible for monitoring the employment contracts and ensuring compliance with the aforementioned policies

[← Code area 0](#)

[Code area 1.A →](#)

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
		No findings	
Systems and evidence examined to validate this code section	<p>Current System:</p> <p>Evidenced that the facility complies with the requirements of this clause. Verified during the factory's visit and checked during the interviews with employees, that facility does not allow forced work, bonded or involuntary prison labour. The auditor verified employment contracts, registration forms and pay slips. Workers through interviews confirmed that there is no forced, bonded or involuntary labour in place. The employees are free to leave their employer when is necessary with reasonable notice and in the end of their shift. They were not required to lodge any deposit or original identify papers.</p> <p>Evidence:</p> <ul style="list-style-type: none"> - Employees handbook; - Training Records; - Individual and group interviews; - Management interviews - Factory tour - Employment contracts - Pay slip 		

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
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

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Explanation for management systems grades

1. Policies and procedures: The site has a employee handbook (January 2024) describing the employment relationship and workplace guidelines.; Labor and Human Rights Policy describing the employee Working Conditions and defining Responsibilities, Reporting and Reviewing
2. Resources: There is a dedicated person, Ms. Carolyne Guzman (HR manager) that possesses sufficient seniority and authority to implement this policy and ensure adherence to the procedures. Facility also has a Quality and Compliance Manager (John McMahon) in case of HR absence
3. Communication and training: Employees were communicated regarding the issue during the induction period. Furthermore, the rules are defined and communicated through internal regulations (posted on notice board). Interviewes were aware about the procedure and policy. It was also reviewed the training schedule: training name, date and minutes
4. Monitoring: The facility has an active HR team that is responsible for monitoring the employment contracts and ensuring compliance with the aforementioned policies

[← Code area 1](#)

[Code area 2 →](#)

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current system</p> <p>In order to verify compliance, the auditor performed interviews with both employees and managers and documents were checked as well; a factory inspection was conducted.</p> <p>It was included in audit scope all workers (agency, permanent).</p> <p>No recruitment fees for employees observed.</p> <p>Evidence:</p> <ul style="list-style-type: none"> - Training Records; - Individual and group interviews; - Management interviews - Factory tour - Employment contracts - Pay slip 		

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 Workers are recruited and hired by licensed labour providers Workers can be hired directly or through an agency.
Provide business names for all labour providers and programmes used	Connect staffing (agency workers)
How do the labour providers recruit and hire workers?	Directly Through another labour provider or recruitment agency (please explain) Workers can be hired directly or through an agency.
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	6
Are there any subcontracted workers (excluding 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?	Yes
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Yes

[← Code area 1.A](#)

[Code area 2 →](#)

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	Some Improvements Recommended
Explanation for management systems grades	<p>1. Policies and Procedures: The facility does not have Union/workers committee on site Facility has a Freedom of Association policy described in the HPG Labor and Human Rights Policy that also describes Responsibilities, Reporting and Reviewing ; Code Of Conduct Handbook : 3. Worker Treatment Rights (3.3. Freedom of Association)</p> <p>2. Resources: There is dedicated manager with sufficient seniority, Ms. Carolyne Guzman (HR manager) who is responsible for implementing the company's policies and procedures. Facility also has a Quality and Compliance Manager (John McMahon) in case of HR absence</p> <p>3. Communication and training: Employees are provided with relevant information regarding updates to the local law (posted on notice board). During interviews, workers informed that they are aware of human rights policy. It was also reviewed the training schedule: training name, date and minutes</p> <p>4. Monitoring: Facility has an HR team responsible for monitoring social performance</p>

[← Code area 1.A](#)

[Code area 3 →](#)

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current System:</p> <p>Employees are free for associate to a Union without discrimination. No Union/workers committee on site. HPG Labor and Human Rights Policy: Freedom of Association</p> <p>Evidences:</p> <ul style="list-style-type: none"> - Interview with workers - Interview with managers - employees documentation including employment contract 		

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

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
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)?	Not Applicable
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

[← Code area 2](#)

[Code area 3 →](#)

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	Some Improvements Recommended
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	Fundamental Improvements Required

Management systems

Explanation for management systems grades

1. Policies and Procedures: The site has established comprehensive Safety procedures and a security and safety policy described in employee handbook . Health and safety policy described in HPG Labor and Human Rights that also defines Responsibilities, Reporting and Reviewing. The Health, Safety & Environmental Compliance policy described in the code of conduct.
2. Ms. Carolynne Guzman (HR manager) is responsible for implementing these health and safety procedures. She is a member of health and safety committee but does not have enough knowledge on HS law and requirements. Facility has a third party company responsible for HS issues.
3. Communication and Training: All workers are trained regarding the workplace safety risks (Employee safety handbook) during induction period (confirmed through documents review and interviews with workers). It was also reviewed the following HS trainings (First aid, CPR and AED certified team members issued date: 05/09/2025, renew by 05/2027 (9 members); scissor lift training (7/24/2025); ladder safety, safety awareness 02/14/2025; PPE, Hazard communication, emergency action plan - 06/24/2025; Machine safe guarding - 02/02/2025; Safety compliance training; ergonomics: 02/10/2025; chemical hazard communication: 06/24/2025 emergency action plan: 6/24/2025. It was also reviewed the training schedule: training name, date and minutes.
4. Monitoring: The facility has a responsible for monitoring health and safety performance. But, there is no KPI and it was identified that fundamental improvements in health and safety practices are required.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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[← Code area 2](#)

[Code area 4 →](#)

3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	Base code	NC ZAF601042204
	3.A Ensure a safe working environment. Put in...	Base code	NC ZAF601042205
	3.B Conduct risk assessments regarding the po...	Base code	NC ZAF601042203
	3.M Ensure all machinery is installed, mainta...	Base code	NC ZAF601042206
	3.N Maintain a log of all hazardous substance...	Base code	NC ZAF601042207

Systems and evidence examined to validate this code section

Current System:

During documents review, interviews and factory tour it was noted that facility has good overall conditions regarding occupational health and safety. There are fire extinguishers and emergency exits available in all employee handling; First aid kits available in office and first aid room for use of trained first aiders. Electrical panels in good condition (new building) and chemicals proper identified and handled.

- HPG Labor and Human Rights Policy: Health and Safety Policy

Evidences:

- Town of Sunnyvale fire inspection performed in 5/09/2025 (annual inspection);
 - Safety committee meeting 06/05/2025 (quarterly meetings) - 11 members
 - BEST Limble Maintenance Records;
 - BEST Clay Rd compressed air tank certifications (year 2024);
 - Records of fire drill: 07/25/2025 and tornado drill: 07/18/2025;
 - Safety trainings attendance list: First aid, CPR and AED certified team members issued date: 05/09/2025, renew by 05/2027 (9 members); scissor lift training (7/24/2025); ladder safety, safety awareness 02/14/2025; PPE, Hazard communication, emergency action plan - 06/24/2025; Machine safe guarding - 02/02/2025

Safety compliance training; ergonomics: 02/10/2025; chemical hazard communication: 06/24/2025; emergency action plan: 6/24/2025;

- First aid team certificates;
 - Emergency response procedures

Findings: non-compliances

ZAF601042204

Non-compliance

Due 2025-09-04

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

317 - No medical examinations or regular occupational health checks, including disease checks, of workers in hazardous situations (e.g. exposed to noise or dust) or working with hazardous substances (e.g. chemicals and pesticides)

Area of non-compliance/non-conformance

Base code

Description

Noted that 8 out of 26 workers sampled who work with chemical substances did not perform the medical exams/regular occupational health checks.

Corrective and preventative actions

Facility shall provide that workers who are exposed to hazardous situations undergo the regular occupational exams

* PDF generated at 03:21 (UTC) on 02 Sept 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF601042205

Non-compliance

Due 2025-09-04

Code area

3 Working conditions are safe and hygienic

Status

Open*

[← Code area 3](#)

[Code area 4 →](#)

Workplace requirement	Time given to resolve
3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.	30 days
Issue title	Verification method
297 - Workers exposed to dangerous fumes/dangerous gas levels	Follow up audit
Description	Area of non-compliance/non-conformance
Durint the on site tour, it was verified inefficient exhaust system in the "calendar room" department exposing workers to dangerous fumes	Base code
Corrective and preventative actions	
Facility shall provide an efficient exhaust system in order to ensure a safe working environment	

Evidence



[Inefficient exhaust system at "calendar room".jpg](#)

* PDF generated at 03:21 (UTC) on 02 Sept 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF601042203	Non-compliance	Due 2025-09-04
Code area	Status	
3 Working conditions are safe and hygienic	Closed (2025-09-02)*	

Workplace requirement

3.B Conduct risk assessments regarding the potential hazards arising from work. The risk assessment shall be reviewed whenever processes change and at least annually considering any incidents and findings.

Issue title

151 - No health and safety risk assessment conducted

Description

Noted that facility does not have a health and safety risk assessment in order to recognize and monitor hazards (noise, air quality, temperature, ergonomics)

Corrective and preventative actions

Facility shall have a health and safety risk assessment in order to mitigate the job hazards

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Base code

* PDF generated at 03:21 (UTC) on 02 Sept 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF601042206

Non-compliance

Due 2025-09-04

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.M Ensure all machinery is installed, maintained, and used in a safe manner.

Time given to resolve

30 days

Issue title

273 - Safety functions on machinery not present/not functioning e.g. alarm/safety stop buttons etc.

Verification method

Follow up audit

Description

Noted that 10 out 10 machines in cylinder printing department and 2 out 2 die cutting machines does not have emergency button.

Area of non-compliance/non-conformance

Base code

Corrective and preventative actions

Facility shall provide the emergency button to machines

Evidence

[← Code area 3](#)

[Code area 4 →](#)



[No emergency button in dye cutting machine.jpg](#)

* PDF generated at 03:21 (UTC) on 02 Sept 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF601042207		Non-compliance	Due 2025-09-04
Code area	Status		
3 Working conditions are safe and hygienic	Closed (2025-09-02)*		
Workplace requirement	Time given to resolve		
3.N Maintain a log of all hazardous substances (e.g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.	30 days		
Issue title	Verification method		
242 - No/inadequate eye wash/shower station in hazardous environments including chemical areas	Desktop audit		
Description	Area of non-compliance/non-conformance		
Noted that there is no eye wash available in the digital room department. Reviewed the SDS (safety data sheet) of product: alcohol - 4. First aid measures: eyes: immediately begin to flush eyes with water, remove any contact lens. Continue to flush eyes for at least 15 minutes	Base code		
Corrective and preventative actions			
Facility shall provide the eye wash station in the mentioned area			

* PDF generated at 03:21 (UTC) on 02 Sept 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

[← Code area 3](#)

[Code area 4 →](#)

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, other (please explain) HR manager
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)?	Yes Ink, solvents
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?	No Facility has the certificate of occupancy
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

[← Code area 3](#)

[Code area 4 →](#)

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	Some Improvements Recommended
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	Some Improvements Recommended
Explanation for management systems grades	<p>1. Policies and procedures: The site has a Code Of Conduct Handbook (Fair Labor and Compensation -2.1. No Forced Labor / No Child Labor)</p> <p>2. Resources: There is a dedicated person, Ms. Carolynne Guzman (HR manager) that possesses sufficient seniority and authority to implement this policy and ensure adherence to the procedures. Facility also has a Quality and Compliance Manager (John McMahon) in case of HR absence</p> <p>3. Communication and training: Employees were communicated regarding the issue during the induction period. Furthermore, the rules are defined and communicated through internal regulations (posted on notice board). Interviewees were aware about the procedure and policy. It was reviewed the training schedule: training name, date and minutes</p> <p>4. Monitoring: The facility has an active HR team that is responsible for monitoring the employment contracts and personal documents ensuring compliance with the aforementioned policies</p>

[← Code area 3](#)

[Code area 5 →](#)

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current System:</p> <p>No evidences of child labour found. The youngest employee on site is 18 years old. There are systems in place to check the age of all workers particularly at the point of recruitment.</p> <p>There were no children at facility on the audit date. Auditor performed interviews with employees and management and an installation tour was performed to verify if there were any children or employee who looks young.</p> <p>Evidence:</p> <ul style="list-style-type: none"> - Employee handbook; - Updated roster of employees; - personnel files contain copies of proof of age for each worker - Workers' interview, management interview -Company tour 		

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	10%
Enter the legal age of employment	15
Enter the age of the youngest worker identified	18
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	0.0%
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

[← Code area 4](#)

[Code area 5 →](#)

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
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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
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[← Code area 4](#)

[Code area 5.A →](#)

Management systems

Explanation for management systems grades

1. Policies and procedures: The site has a employee handbook describing the compensation, benefits and leave; Code Of Conduct Handbook: 2.3. Regular and Overtime Wages and 2.4. Compensation . HPG Labor and Human Rights Policy describing the Employee Working Conditions. Facility also has HR procedures defining responsibilities and process.
2. Resources: There is a dedicated person, Ms. Carolynne Guzman (HR manager) that possesses sufficient seniority and authority to implement this policy and ensure adherence to the procedures. Facility also has a Quality and Compliance Manager (John McMahon) in case of HR absence
3. Communication and training: Employees were communicated regarding the issue during the induction period. Furthermore, the rules are defined and communicated through internal regulations (posted on notice board). Interviewes were aware about the procedure and policy. It was also reviewed the training schedule: training name, date and minutes
4. Monitoring: The facility has an active HR team that is responsible for monitoring the payrolls and local law updates, ensuring compliance with the aforementioned policies. Quantitative Goals: 100% of full-time staff are offered healthcare packages by the end of 2025.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

**Systems and evidence examined to
validate this code section**

Current system:

Employees are 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;

There was no evidence of deductions for disciplinary reasons; this was also confirmed during employee interviews;

Payment is performed bi weekly (permanent workers) and weekly (agency workers) there is no payment debts;

- Code Of Conduct Handbook : Fair Labor and Compensation

Evidences examined:

-Federal minimum wage

-Payrolls of 26 sampled employees;

-Employee interviews, management interview;

- Promotion wage scale

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage
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?	Health care Other (provide details) Paid Time Off, Holiday Pay, Vision Insurance , dental care
--	--

Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Not available	
Is actual wage data available on site for any of these options?	Weekly	
Maximum legal working hours	Max hours per day	Non applicable
	Max hours per week	Non applicable
	Max hours per month	Non applicable

[← Code area 5](#)

[Code area 5.A →](#)

Actual required working hours	Required hours per day	10.0
	Required hours per week	40.0
	Required hours per month	Non applicable
Maximum legal overtime hours	Max hours per day	Non applicable
	Max hours per week	Non applicable
	Max hours per month	Non applicable
Actual overtime hours	Max hours per day	Non applicable
	Max hours per week	17.0
	Max hours per month	30.0
Minimum legal wage	Min per hour	7.25
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum wage	Actual per hour	13.25
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable
Minimum legal overtime wage	Min per hour	10.53
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable

Actual minimum overtime wage	Actual per hour	19.87
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	78
Provide the date and details of the records	26 records from June 2025 (last paid month), 26 records of May 2025 (Peak month) and 26 records of November 2024 (non peak month)
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	100% earning above the legal minimum
Are there any bonus schemes used?	No
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current system:</p> <ul style="list-style-type: none"> - Living wasge policy - policy statement: The wage structure and scale are evaluated annually and objectively for all workers – and take into consideration applicable laws, regulations, price inflation, economic growth, average population consumption, etc. - The company complies with all applicable labor laws and regulations related to the payment of wages, including working time, overtime, leave and other obligations. This compliance demonstrates the company’s commitment to living wage and being responsible for the workforce. <p>Evidences:</p> <ul style="list-style-type: none"> - Interview with management and documents review. - In Texas , per local law, there is no living wage; - Company's LIVING WAGE POLICY; - Average Compensation vs. Benchmark (Hourly Employees) 		

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
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	Some Improvements Recommended
Explanation for management systems grades	<p>1. Policies and procedures: The site has a employee handbook describing the work schedule and timekeeping; Code of conduct handbook: 2.2. Hours of Work</p> <p>2. Resources: There is a dedicated person, Ms. Carlyne Guzman (HR manager) that possesses sufficient seniority and authority to implement this policy and ensure adherence to the procedures. Facility also has a Quality and Compliance Manager (John McMahon) in case of HR absence</p> <p>3. Communication and training: Employees were communicated regarding the issue during the induction period. Interviewees were aware about the procedure and policy.</p> <p>4. Monitoring: The facility has an active HR manager that is responsible for monitoring the working hours and ensuring compliance with the aforementioned policies and local law.</p>

Summary of findings

[← Code area 5.A](#)

[Code area 7 →](#)

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current system:</p> <p>Working hours are recorded through a digital time clock with a biometric reader located at worker's main entrance area;</p> <p>Facility operates from Monday to Friday. Employees work 40 hours per week (5 days and have 2 days off in a week);</p> <p>All workers have 3 breaks (10 minutes/30 minutes/10 minutes).</p> <p>- Code Of Conduct Handbook : Fair Labor and Compensation "2.2. Hours of Work The regular work week shall not exceed 48 hours. Except in extraordinary business circumstances, HPG shall not require employees to work more than 60 hours a week, or the maximum number of work hours per week as permitted in their country, whichever is less. Employees must be allowed at least one uninterrupted, 24-hour rest period after every 6 consecutive days worked. "</p> <p>Evidences examined:</p> <ul style="list-style-type: none"> - 26 records from June 2025 (last paid month); 26 records from May 2025 (peak month) and 26 records from November 2024 (random month) were reviewed; -Interview with employees and management; -Employees contracts; - Factory tour; - Employee handbook - Code Of Conduct Handbook 		

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	150%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	NA. The site does not pay less than 125%
Excluding overtime, what are the regular working hours per week for workers at this site?	40.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	43.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	57.0
Maximum number of days worked without a day off in sample	6

[← Code area 6](#)

[Code area 7 →](#)

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

Management systems

Explanation for management systems grades

1. Policies and procedures: The site has a Labor and Human Rights Policy defining Responsibilities, Reporting and Reviewing and describing the Policy Against Harassment, Discrimination, and Retaliation. Facility also has a code of conduct handbook describing the Worker Treatment Rights : 3.1. Non-Discrimination
2. Resources: There is a dedicated person, Ms. Carolyn Guzman (HR manager) that possesses sufficient seniority and authority to implement this policy and ensure adherence to the procedures. Facility also has a Quality and Compliance Manager (John McMahon) in case of HR absence
3. Communication and training: Facility has a code of conduct and human rights policy and workers are properly communicated during induction period. Furthermore, the rules are defined and communicated through internal regulations (posted on notice board). Interviews were aware about the procedure and policy. It was also reviewed the training schedule: training name, date and minutes
4. Monitoring: The facility has an active HR manager and production manager that ensure compliance with the aforementioned policies. Facility also has Quantitative Goals
 - 100% of employees receive annual training on equality, inclusion, and diversity in 2025.
 - Zero incidents of harassment or discrimination in 2025.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section

Current system:

Interviews with employees were performed, and no issues about discrimination of any type were detected.

In order to verify compliance, the auditor performed interviews with employees checked documents (employee's handbook and training records, hiring documents, proof of payments, admission) and carried out installation's tour to verify if employees are equally treated and if they receive the same work condition.

- HPG Labor and Human Rights Policy : Equality, Inclusion and Diversity Policy

Evidences:

1. Employee's handbook
2. Training records: diversity equity inclusion in the workplace: 3/14/2025
3. Hiring documents,
4. proof of payments, admission and contracts
- 5.. Management and worker's interview
6. Company tour

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)?	19%
Representation of women in managerial roles (ratio of women workers to women managers)	2%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	11%
Three most common nationalities in managerial and supervisory roles	American and Spanic

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	Some Improvements Recommended
Explanation for management systems grades	<p>1. Policies and procedures: The site has a employee handbook describing the employment relationship and workplace guidelines. HPG Labor and Human Rights Policy describing the Employee Working Conditions and defining Responsibilities, Reporting and Reviewing</p> <p>2. Resources: There is a dedicated person, Ms. Carolyne Guzman (HR manager) that possesses sufficient seniority and authority to implement this policy and ensure adherence to the procedures. Facility also has a Quality and Compliance Manager (John McMahon) in case of HR absence</p> <p>3. Communication and training: Employees were communicated regarding the issue during the induction period. Interviewes were aware about the procedure and policy. It was also reviewed the training schedule: training name, date and minutes</p> <p>4. Monitoring: The facility has an active HR manager that is responsible for monitoring the employment contracts and ensuring compliance with the aforementioned policies.</p>

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current System:</p> <p>It was noted that facility has only regular employees and presents adequate control of hiring .There are only legally hired workers on the organization.</p> <p>Facility does not have homeworkers.</p> <ul style="list-style-type: none"> - In order to verify compliance, the auditor performed interviews with both employees and managers and documents were checked as well; a factory inspection was conducted. - HPG Labor and Human Rights Policy :Employee Working Conditions <p>Evidences:</p> <ol style="list-style-type: none"> 1. Recruitment process 2. Training records 3. hiring documents 4. proof of payments, admission and Contracts 5. Management and worker's interview 6. Company tour 		

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	95.69%
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	4.31%
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	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

Management systems

Explanation for management systems grades

1. Policies and procedures: The site has well-established procedures for addressing quality issues . Reviewed the code of conduct handbook that describes the Fair Business Practices (6.1. Product and Service Safety and Accessibility) . No homeworkers or subcontracting are used in the process.
2. Resources: Mr. Ron Freeman (Senior Production Manager)holds sufficient seniority and is tasked with implementing these quality policies and procedures. His leadership and experience ensure that the quality management system is effectively upheld and any quality issues are promptly addressed.
3. Communication and training: Employees receive relevant training on quality management during their onboarding process. This training ensures that all staff members understand the importance of quality standards and their role in maintaining these standards throughout the production process.
4. Monitoring: The facility has a dedicated quality team responsible for monitoring the quality of products and an HR manager tasked with monitoring employment contracts.
This dual focus ensures that both product quality and employee welfare are consistently managed and maintained to high standards

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section

Current System:

It was noted that facility has only regular employees and presents adequate control of hiring. There are only legally hired workers on the organization.

Facility does not have homeworkers.

- In order to verify compliance, the auditor performed interviews with both employees and managers and documents were checked as well; a factory inspection was conducted.

Noted that all production process are performed internally.

Evidences:

1. Recruitment process
2. Training records
3. hiring documents
4. proof of payments, admission and Contracts
5. Management and worker's interview;
6. Service orders (production)

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 homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? Information not available
Information not available. Facility imports most of products

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No
No subcontracted process

[← Code area 8.A](#)

[Code area 9 →](#)

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

Management systems

Explanation for management systems grades

1. Policies and procedures: The site has a Labor and Human Rights Policy defining Responsibilities, Reporting and Reviewing and describing the PEquality, Inclusion and Diversity Policy . Facility also has a code of conduct handbook describing the Worker Treatment Rights : 3.2. Harassment or Abuse
2. Resources: There is a dedicated person, Ms. Carolyne Guzman (HR manager) that possesses sufficient seniority and authority to implement this policy and ensure adherence to the procedures. Facility also has a Quality and Compliance Manager (John McMahon) in case of HR absence
3. Communication and training: Facility has a code of conduct and human rights policy and workers are proper communicated during induction period.
Reviewed the training attendance list on diversity equity inclusion in the workplace: 3/14/2025. Interviewees were aware about the procedure and policy. It was also reviewed the training schedule: training name, date and minutes
4. Monitoring: The facility has an active HR manager and production manager that ensure compliance with the aforementioned policies. Facility also has Quantitative Goals
 - 100% of employees receive annual training on equality, inclusion, and diversity in 2025.
 - Zero incidents of harassment or discrimination in 2025.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section

Current system:

Facility has a employee handbook describing the work rules.

Anonymous Complaint Procedure: faceup plataform, call in hot line 1-208-494-1081 suggestion box available in break room.

Employee handbook: CORRECTIVE AND DISCIPLINARY PROCEDURES and EQUAL EMPLOYMENT OPPORTUNITY

- HPG Labor and Human Rights Policy: Policy Against Harassment, Discrimination, and Retaliation

Evidences examined:

-Interviews with employees in order to verify if there is any kind of physical abuse or discipline.;

- Disciplinary procedure;

- Internal rules;

-interview with workers and management;

- Documents review

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')?	The grievance process is available to all workers
What type of grievance mechanism(s) are available?	faceup plataform call in hot line 1-208-494-1081 suggestion box available in break room
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

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	Some Improvements Recommended

Management systems

Explanation for management systems grades

1. Policies and Procedures: The site has an Environmental Policy defining Responsibilities and describing the following issues: Use of Materials, Waste Management, Recycling ; Pollution and Biodiversity; Energy Consumption, Greenhouse Gasses and Water Use; Environmental Advocacy.
2. Resources: Mr. Ron Freeman (Senior Production Manager) is responsible for implementing the Environmental Policy and related procedures. Her expertise ensures that the company adheres to its environmental commitments and complies with relevant regulations. In his absence, Mr. John McMahon (Quality and Compliance Manager) is responsible for those tasks.
3. Communication and Training: Employees are provided with relevant training on environmental practices during their onboarding process. Reviewed the sustainability journey training - 2/10/2025. Interviewers were aware about policy and It was also reviewed the training schedule: training name, date and minutes
4. Monitoring: Facility has a responsible for monitoring environmental practices, and implement all requirements of management system and local law. However, Monitoring in place for the Base Code Area in general but one requirement was overlooked such that there was a NC

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	Base code	NC ZAF601042208

[← Code area 9](#)

[Code area 10.B →](#)

**Systems and evidence examined to
validate this code section**

Current system:

- Environmental policy;
- Facility maintain a list of chemicals;
- HIGG FEM VERIFICATION (2024)

Evidences:

- The auditor performed a site tour in all installations of the facility in order to verify environmental practices and waste storage areas and interviewed workers who handle wastes;

Findings: non-compliances

ZAF601042208

Non-compliance

Due 2025-09-04

Code area	Status
10.A Environment 2-Pillar	Closed (2025-09-02)*
Workplace requirement	Time given to resolve
10.A.B Comply with relevant local, regional and national laws or regulations, and have the correct documentation or permits, including for resource use (e.g. water, energy, material) and waste disposal.	30 days
Issue title	Verification method
598 - The site does not have all legally required permits for use and/or disposal of resources (e.g. energy, water, air emissions, waste etc.)	Desktop audit
Description	Area of non-compliance/non-conformance
Noted that facility does not have the hazardous waste manifest for the correct destination of waste ink/hazardous waste	Base code
Corrective and preventative actions	
Facility shall provide the hazardous waste manifest for the correct destination of waste ink/hazardous waste	

* PDF generated at 03:21 (UTC) on 02 Sept 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

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?

HIGG FEM certification

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

[← Code area 10.A](#)

[Code area 10.B →](#)

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			
Systems and evidence examined to validate this code section	<p>Current system:</p> <ul style="list-style-type: none"> - Environmental policy; - HIGG FEM VERIFICATION (2024); - Facility monitors the energy use, water use, solid waste, material use, hazardous substance; - Quantitative Targets: Use of Materials, Waste Management, Recycling; Pollution and Biodiversity ; Energy Consumption, Greenhouse Gasses and Water Use <p>Evidences:</p> <ul style="list-style-type: none"> - The auditor performed a site tour in all installations of the facility in order to verify environmental practices and waste storage areas; - Interview with management; - Training: the sustainability journey - 2/10/2025 		

[← Code area 10.A](#)

[Code area 10.C →](#)

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?	<p>Zero-waste and recycling protocols</p> <p>Other (provide details)</p> <p>Responsible use and management of water</p> <p>Pollution and Biodiversity</p>
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Not Applicable
Does the site have reduction targets in place to manage climate related risks?	Yes, to increase low-carbon energy consumption or production
Are any of these science-based targets?	No, but we anticipate setting one in the next two years
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))?	<p>Yes</p> <p>Quantitative Targets</p> <ul style="list-style-type: none"> • Eliminate the use of product individual packaging by 50% by 2027. • Reduce waste sent to landfill by 60% by the end of 2028. • 0% waste sent to landfill by end of 2030. <p>Quantitative Targets</p> <ul style="list-style-type: none"> • Continue to plant 10K of trees to offset our carbon emissions in 2025. • Offset 100% of the carbon emissions related to our domestic shipments in 2024. • Increase usage of electricity from non-combustible sources of renewable power to 50% by 2030 • All ocean transportation to be carbon neutral by 2028. • All logistics to be carbon neutral by 2030.

[← Code area 10.B](#)

[Code area 10.C →](#)

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?	<p>Yes</p> <p>All contractors must secure permits, be licensed in the state of TX and carry insurance. Environmental requirements have not been specified but their activity is monitored</p>
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Usage/discharge analysis

	Last full calendar year (2024)	Previous full calendar year (2023)
Total electricity consumption from non-renewable sources (kWh)	838,968	986,407
Total electricity consumption from renewable sources (kWh)	Data not available	Data not available
Sources of renewable energy used	Data not available	Data not available
Types of renewable energy used	Data not available	Data not available
Total natural gas consumption (kWh)	7,031,361	8,120,999
Usage of other purchased fuels	648,000 cu ft- LP gas- old facility used LP gas to power the ovens.	476,308 cu ft- LP gas- old facility used LP gas to power the ovens.
Has the site completed any carbon footprint analysis?	No	No
Water sources	Local water authority	Local water authority
Does the site use mercury or mercury compounds?	No	No

Water volume used (m3)	2,693	1,741
Water discharged	Local authority	Local authority
Water volume discharged (m3)	2,693	1,741
Water volume recycled (m3)	Data not available	Data not available
Total waste produced (mt)	Data not available	Data not available
Total hazardous waste produced (mt)	Data not available	Data not available
Waste to recycling (mt)	Data not available	Data not available
Waste to landfill (mt)	Data not available	Data not available
Waste to other (mt)	Data not available	Data not available
Total product produced (mt)	1,683	1,327

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
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Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
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Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
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Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
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[← Code area 10.B](#)

Management systems

Explanation for management systems grades

1. Policies and procedures: Facility has an Ethics & Business Conduct Policy (Ver:02282025) defining the scope, responsibilities, Monitoring and Review. The policy describes the following content;; Anti-Bribery and Corruption; Business Conduct
(Compliance with Laws, Rules, and Regulations, Insider Trading, Conflicts of Interest, Anti-Competition and Fair Dealing, Money Laundering); Fraud Prevention. The policy undergoes regular reviews, at least annually, and is updated as necessary.
 2. Resources: Facility has a compliance manager (Mr. John Mc Mahon) and also a HR manager responsible for implementing the Ethics & Business Conduct Policy and procedures.
 3. Communication and training: All workers are trained regarding the business ethics during the induction period (confirmed during the interviews with workers). Reviewed the trainings: Ethical business conduct around the world - 2/10/2025; global anti bribery policy - 2/10/2025; compliance in 3 minutes: 2/10/2025. It was also reviewed the training schedule: training name, date and minutes
 4. Monitoring: "Regular monitoring of the policy is imperative to evaluate the company's effectiveness in establishing control over its obligations. Management will continuously monitor the policy to ensure its responsiveness to relevant issues. The following aspects will be subject to ongoing scrutiny:
 - Ensuring that all individuals associated with the company are informed about the policy.
 - Verifying the continued relevance of the policy.
 - Identifying the need for any additions to the policy following changes in circumstances or legislation.
 - Assessing any reported incidents or related occurrences"
- Quantitative Targets
- Zero acts of bribery or fraud were found within the business in 2025.
 - Zero acts of illegal activity found in 2028.
 - 100% of all violations were addressed in accordance with this policy in 2025.
 - Cease partnerships with 100% of third-party partners found to be involved in illegal activity such as bribery, corruption, or other fraud in 2025.

Summary of findings

[← Code area 10.B](#)

Code area	Workplace requirement	Area of NC	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Current system:</p> <p>Facility demonstrate understanding of current and relevant legislation relating to bribery, corruption, unethical, or any type of fraudulent or unethical business practices;</p> <p>No unethical practice during the audit was observed;</p> <p>Facility has all legal licenses and permissions for site operation;</p> <p>Evidences examined:</p> <ul style="list-style-type: none"> - Ethics & Business Conduct Policy - commercial certificate of occupancy 240690 issued in 07/08/2025; - TAX ID; - Interview with management and workers; - Trainings: Ethical business conduct around the world - 2/10/2025; global anti bribery policy - 2/10/2025; compliance in 3 minutes: 2/10/2025 		

[← Code area 10.B](#)

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	No anti-bribery Management Systems

[← Code area 10.C](#)

Attachments



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CAPR.pdf](#)



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