

Sedex Members Ethical Trade Audit Report

Version 7



Contents

[Audit content](#)

[Audit and site details](#)

[Audit parameters](#)

[Audit attendance](#)

[SMETA declaration](#)

[Summary of findings](#)

[Management systems](#)

[Site details and data points](#)

[Site details](#)

[Worker analysis](#)

[Worker interviews](#)

[Measure workplace impact](#)

[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](#)

[3. Working conditions are safe and hygienic](#)

[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](#)

[10.A. Environment 2-Pillar](#)

[10.B. Environment 4-Pillar](#)

[10.C. Business ethics](#)

[Attachments](#)

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	ZC1065420	Auditor company name	QIMA Ltd
Date of audit	2025-03-05	Audit conducted by	Sedex member
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		

Site details

Sedex site reference	ZS1088122	Site name	Debco Bag Distributors ULC
Business name	Debco Bag Distributors ULC	Site address	L4K 4R3 10 Ronrose Drive, Unit 2, Concord, CA
Site phone	9056692247	Site email	marie.kirshenbaum@hpgbrands.com

Audit parameters

Time in and out	Day 1		Day 2		Day 3	
	In	09:40	In	09:30	In	09:30
	Out	16:00	Out	17:00	Out	15:00
Audit type	Full initial					
Was the audit announced?	Semi announced					
Was the Sedex SAQ available for review?	Yes					
Who signed and agreed CAPR?	Marie Kirshenbaum / COO					
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 nor a workers' representative.		
Reason for absence during the audit	There is not a union nor a workers' representative.		
Reason for absence at the closing meeting	There is not a union nor a workers' 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

Gerardo Cortes

APSCA Number

21704770

Additional auditor

Date of declaration

2025-03-05

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	Marie Kirshenbaum
Title	COO
Date of declaration	2025-03-05



































Summary of findings

Code area	Workplace requirement	Local law	Finding
10.B. Environment 4-Pillar	10.B.E Identify and monitor potential negativ...		GE ZAF600842178
5.A. Living wages are paid	5.A.B Put in place a wage improvement plan th...		NC ZAF600842179
10.C. Business ethics	10.C.A Demonstrate understanding of current a...		GE ZAF600842180
8. Regular employment is provided	8.A Provide a written contract or other bindi...		GE ZAF600842181

Local law issues

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
-  Some improvements recommended
-  Robust management systems

Site details

Company and site details

Sedex company reference	ZC1065420	
Sedex site reference	ZS1088122	
Company name	Debco Bag Distributors ULC	
Business ownership type	AGENT_OR_RETAILER	
Site name	Debco Bag Distributors ULC	
Site name in local language		
GPS location	GPS address	10 Ronrose Drive, Unit 2, Concord, Ontario,Canada
	Coordinates	N 43°47'21.13764" W 79°29'38.28084"
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Marie Kirshenbaum
	Job title	COO
	Phone number	9056692247
	Email	marie.kirshenbaum@hpgbrands.com
Applicable business and other legally required business license numbers and documents	Confirmation Registration Number: R-010-31111136695	

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	Primary	Printing
	Secondary	
	Other	

Site activities

Product type	Decoration of promotional products.
Process overview	Digital and screen printing of different kinds of products.
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?	18700m ²	
Building 1	Last construction works on site	2018
	If building is shared, provide details	Not applicable
	Number of floors	1
	Description of floor activities	Receipt of raw materials, receipt of work orders, design, creation of screen printing, printing in screen printing or digital printing, packing and shipping of the finished product.
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
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Worker accommodation and transport

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	95-100%	April	95-100%
	May	95-100%	June	90-95%
	July	90-95%	August	90-95%
	September	95-100%	October	95-100%
	November	95-100%	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
	No such assessment.

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

Worker analysis

Gender disaggregated data available

Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	42 (25.1%)	125 (74.9%)	- -	167 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	41 (25%)	123 (75%)	- -	164 (98.2%)
Temporary or fixed term employees	0 -	0 -	- -	0 (0%)
Agency or subcontracted workers	1 (33.3%)	2 (66.7%)	- -	3 (1.8%)
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

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	1 (33.3%)	2 (66.7%)	- -	3 (1.8%)
15 - 17 years old	0 -	0 -	- -	0 (0%)
Under 15 years old	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	25%	75%	-	100%

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	42 (25.1%)	125 (74.9%)	- -	167 (100%)
Salaried workers	0 -	0 -	- -	0 (0%)

* % of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 (0%)
Paid weekly	0 -	0 -	- -	0 (0%)
Paid monthly	0 -	0 -	- -	0 (0%)
Other	42 (25.1%)	125 (74.9%)	- -	167 (100%)

* % 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	5 (33.3%)	10 (66.7%)	- -	15
Supervisors or team leaders	0 -	0 -	- -	0
Administrative staff	11 (24.4%)	34 (75.6%)	- -	45

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 group 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

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?	Other (provide details) No concern
What did the workers like the most about working at this site?	Equal opportunities Hours worked, rest days or breaks Work atmosphere (e.g. treatment by supervisors)
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	25
Temporary or fixed-term employees	0
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	5	16	-	21

Workers interviewed by group/individual

Workers interviewed individually	3	3	-	6
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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%	2.0%	-	2.0%
Last full calendar year (2024)	2.0%	7.0%	-	9.0%
Previous full calendar year (2023)	5.0%	5.0%	-	10.0%

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

H&S Committee

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)	1.0%	2.0%	-	3.0%
Last full calendar year (2024)	1.0%	4.0%	-	5.0%
Previous full calendar year (2023)	1.0%	4.0%	-	5.0%

* 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 (2024)	2.0%	5.0%	-	7.0%
Previous full calendar year (2023)	2.0%	5.0%	-	7.0%

* 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%	0.0%	-	0.0%
Last full calendar year (2024)	11.0%	36.0%	-	47.0%
Previous full calendar year (2023)	11.0%	36.0%	-	47.0%

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 (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	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	<p>Current System: The factory allows and supports the auditor to carry out and complete the audit without hindrance to all requested documents, interviewees and the facility itself (including outbuildings and accommodation). Provide the auditor with authentic and original records.</p> <ul style="list-style-type: none"> • The factory has not bribed or threatened the auditor or in any way induced the auditor to be dishonest. • The factory has legal business license and all permits required by local authority. • The factory has stated and communicated to all its workers a Human Rights Policy and has assessed the negative impacts on Human Rights. <p>Evidences:</p> <ul style="list-style-type: none"> -Management and worker interviews - Internal handbook covering all internal policies of the company (child labour, forced labour, harassment and abuse and a grievance mechanism) - Ethical Code - Induction training record - Attendance records of the induction process. 		

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?	Yes There is an Agency and the completed information.

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

Management systems

Explanation for management systems grades

1.Policies and procedures:

- It was verified that written policies and procedures for Freely Chosen Employment are clearly stated in the Code of Conduct and Employees Handbook during the document review and interviews with 27 employees and managers, that indicates that those policies are regularly or whenever is necessary updated and enforced.
- It was confirmed that all policies and procedures are documented as identified through triangulation with the interview, observation and document review. This facilitates the application and understanding of the policies and procedures.
- The Freely Chosen Employment policy is approached by the owners and is in accordance with local law and the Sedex requirements.

2.Resources:

- It was verified that the facility already has sufficient seniority personnel assigned to implementation of policies and procedures related to "Freely Chosen Employment".
- There is sufficient commitment to make necessary changes whenever needed or an improvement is detected, in a proactive manner.
- The site manager's responsibilities are clearly defined for the effective implementation of the Management System, ensuring that the policies and procedures related to Freely Chosen Employment are well implemented.
- Procedures are in place for interim responsibility in the case of a position change or absence.

3.Communication and training:

- Interviews and document reviews revealed that there are annual refresher training sessions to ensure that all workers understand the policies and procedures of the Freely Chosen Employment, and for new employees during the orientation.
- During interviews, 27 employees stated that they received training during orientation, the annual refresher, and whenever there is an update of the handbook with all the policies.
- Training on the Freely Chosen Employment policies and procedures is mandatory for all HR staff processing applications or onboarding. A training matrix used by line managers ensures that there is a very low chance of gaps with regard to this training.

4.Monitoring

- The COO and HR Department is Responsibilities for monitoring implementation of Freely Chosen Employment of policies and procedures.
- Through interviews with management representatives, it was detected that records are kept of monitoring activities, the update of the policies and procedures, including legal external support.
- Regular monitoring of the policies and procedures related to the Freely Chosen Employment ensures that the identification of misapplication of procedures, or concerns about application, are escalated for action in the internal audits or checks.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current System:

- The factory had established the effective employment policies & program. Employees could be freely resignation after communication with management in advance 7 days notification.
- The employees obtained their job by friend's recommendation or by the factory recruitment.
- Workers were not required lodging deposits or their Identity papers to the factory at the beginning of employment.
- The terms and conditions of employment in the handbook state that the workers are free to leave the workplace outside of their working hours.
- No forced, bonded, or involuntary prison labour was identified during the audit.

Evidences:

- Management and worker interview.
- Zero Tolerance of Labour Violence Policy
- Payroll review
- Employee's files
- Employee's interviews
- Site tour
- Internal handbook
- Management interviews

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	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:
 - It was verified that written policies and procedures for Responsible Recruitment and Entitlement to Work are clearly stated in the Code of Conduct and Employees Handbook during the document review and interviews with 27 employees and managers, that indicates that those policies are regularly or whenever is necessary updated and enforced.
 - It was confirmed that all policies and procedures are documented as identified through triangulation with the interview, observation and document review. This facilitates the application and understanding of the policies and procedures.
 - The Responsible recruitment and entitlement to work policy is approached by the owners and is in accordance with local law and the Sedex requirements.
2. Resources:
 - It was verified that the facility already has sufficient seniority personnel assigned to implementation of policies and procedures related to "Responsible recruitment and entitlement to work".
 - There is sufficient commitment to make necessary changes whenever needed or an improvement is detected, in a proactive manner.
 - The site manager's responsibilities are clearly defined for the effective implementation of the Management System, ensuring that the policies and procedures related to Responsible Recruitment and Entitlement to Work are well implemented.
 - Procedures are in place for interim responsibility in the case of a position change or absence.
3. Communication and training:
 - Interviews and document reviews revealed that there are annual refresher training sessions to ensure that all workers understand the policies and procedures of the Responsible Recruitment and Entitlement to Work, and for new employees during the orientation.
 - During interviews, 27 employees stated that they received training during orientation, the annual refresher, and whenever there is an update of the handbook with all the policies.
 - Training on the Responsible Recruitment and Entitlement to Work policies and procedures is mandatory for all HR staff processing applications or onboarding. A training matrix used by line managers ensures that there is a very low chance of gaps with regard to this training.
4. Monitoring
 - The COO and HR Department is Responsibilities for monitoring implementation of Responsible Recruitment and Entitlement to Work of policies and procedures.
 - Through interviews with management representatives, it was detected that records are kept of monitoring activities, the update of the policies and procedures, including legal external support.
 - Regular monitoring of the policies and procedures related to the Responsible Recruitment and Entitlement to Work ensures that the identification of misapplication of procedures, or concerns about application, are escalated for action in the internal audits or checks.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current System:

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.

The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.

There is a well-established training program in place and all key persons are aware of their responsibilities of Employment is freely chosen. There are no recruitment fee.

Employment freely chosen are effectively monitored, and overall performance is reported to the relevant senior management.

There is no onsite contractor being used. And no recruitment fee or related cost.

Evidence examined :

- Employee interviews
- Management and HR interviews
- Employee's contracts and agreements
- Internal Handbook
- Employees files

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?	Yes
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Yes

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?

No

No recruitment fee or related cost.

Were recruitment fees or costs identified during worker interviews?

No

No recruitment fee or related cost.

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

Management systems

Explanation for management systems grades

1. Policies and procedures:
 - It was verified that written policies and procedures for Freedom of Association and Right to Collective Bargaining are clearly stated in the Code of Conduct and Employees Handbook during the document review and interviews with 27 employees and managers, that indicates that those policies are regularly or whenever is necessary updated and enforced, however at the facility there is not a Union or Workers representative the facility has an Open Doors Policy and Procedures.
 - It was confirmed that all policies and procedures are documented as identified through triangulation with the interview, observation and document review. This facilitates the application and understanding of the policies and procedures.
 - The Freedom of Association and Right to Collective Bargaining policy is approached by the owners and is in accordance with local law and the Sedex requirements.
2. Resources:
 - It was verified that the facility already has sufficient seniority personnel assigned to implementation of policies and procedures related to "Freedom of Association and Right to Collective Bargaining and Open Doors".
 - There is sufficient commitment to make necessary changes whenever needed or an improvement is detected, in a proactive manner.
 - The site manager's responsibilities are clearly defined for the effective implementation of the Management System, ensuring that the policies and procedures related to Freedom of Association and Right to Collective Bargaining and Open Doors are well implemented.
 - Procedures are in place for interim responsibility in the case of a position change or absence.
3. Communication and training:
 - Interviews and document reviews revealed that there are annual refresher training sessions to ensure that all workers understand the policies and procedures of the Freedom of Association, Right to Collective Bargaining and Open Doors, and for new employees during the orientation.
 - During interviews, 27 employees stated that they received training during orientation, the annual refresher, and whenever there is an update of the handbook with all the policies.
 - Training on the Freedom of Association, Right to Collective Bargaining and Open Doors policies and procedures is mandatory for all HR staff processing applications or onboarding. A training matrix used by line managers ensures that there is a very low chance of gaps with regard to this training.
4. Monitoring
 - COO / HR Department is Responsibilities for monitoring implementation of Freedom of Association, Right to Collective Bargaining and Open Doors policies and procedures.
 - Through interviews with management representatives, it was detected that records are kept of monitoring activities, the update of the policies and procedures, including legal external support.
 - Regular monitoring of the policies and procedures related to the Freedom of Association and Open Doors ensures that the identification of misapplication of procedures, or concerns about application, are escalated for action in the internal audits or checks.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current System:

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 open doors policy, key responsibilities and procedures by which it will be implemented. The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined. There is a well-established training program in place and all key persons are aware of their responsibilities of Employment is freely chosen.

Evidence examined

- Open Doors Policy
- Employee's interviews
- Site tour
- Internal handbook and COC
- Management interviews

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

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

Management systems

Explanation for management systems grades

1. Policies and procedures:

- It was verified that written policies and procedures for Working Conditions are Safe and Hygienic are clearly stated in the Code of Conduct, Health and Safety Manual and Employees Handbook during the document review and interviews with 27 employees and managers, that indicates that those policies are regularly or whenever is necessary updated and enforced.
- It was confirmed that all policies and procedures are documented as identified through triangulation with the interview, observation and document review. This facilitates the application and understanding of the policies and procedures.
- The Working Conditions are Safe and Hygienic policy is approached by the owners and is in accordance with local law and the Sedex requirements.

2. Resources:

- It was verified that the facility already has sufficient seniority personnel assigned to implementation of policies and procedures related to "Working Conditions are Safe and Hygienic".
- There is sufficient commitment to make necessary changes whenever needed or an improvement is detected, in a proactive manner.
- The site manager's responsibilities are clearly defined for the effective implementation of the Management System, ensuring that the policies and procedures related to "Working Conditions are Safe and Hygienic" are well implemented.
- Procedures are in place for interim responsibility in the case of a position change or absence.

3. Communication and training:

- Interviews and document reviews revealed that there are annual refresher training sessions to ensure that all workers understand the policies and procedures of the Working Conditions are Safe and Hygienic, and for new employees during the orientation.
- During interviews, 27 employees stated that they received training during orientation, the annual refresher, and whenever there is an update of the handbook with all the policies.
- Training on the Working Conditions are Safe and Hygienic policies and procedures is mandatory for all HR staff processing applications or onboarding. A training matrix used by line managers ensures that there is a very low chance of gaps with regard to this training.

4. Monitoring

- COO / HR Department / Sr. Production Supervisor is Responsibilities for monitoring implementation of Working Conditions are Safe and Hygienic policies and procedures.
- Through interviews with management representatives, it was detected that records are kept of monitoring activities, the update of the policies and procedures, including legal external support.
- Regular monitoring of the policies and procedures related to the Working Conditions are Safe and Hygienic that the identification of misapplication of procedures, or concerns about application, are escalated for action in the internal audits or checks.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current System:

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.
The H&S manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.
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,
Working conditions are safe and hygienic are monitored, and overall performance is reported to the relevant senior management.

Evidence examined

- Site tour
- Document related to health and safety including (related training records)
- Legal requirement for building/fire safety
- Fire equipment inspection record
- Workers and management interview

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?	No Building layout plan a certificates are available for review, but no additions.
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

Management systems

Explanation for management systems grades

1.Policies and procedures:

- It was verified that written policies and procedures for No Child Labour are clearly stated in the Code of Conduct and Employees Handbook during the document review and interviews with 27 employees and managers, that indicates that those policies are regularly or whenever is necessary updated and enforced.
- It was confirmed that all policies and procedures are documented as identified through triangulation with the interview, observation and document review. This facilitates the application and understanding of the policies and procedures.
- The No Child Labour policy is approached by the owners and is in accordance with local law and the Sedex requirements.

2.Resources:

- It was verified that the facility already has sufficient seniority personnel assigned to implementation of policies and procedures related to "No Child Labour".
- There is sufficient commitment to make necessary changes whenever needed or an improvement is detected, in a proactive manner.
- The site manager's responsibilities are clearly defined for the effective implementation of the Management System, ensuring that the policies and procedures related to No Child Labour are well implemented.
- Procedures are in place for interim responsibility in the case of a position change or absence.

3.Communication and training:

- Interviews and document reviews revealed that there are annual refresher training sessions to ensure that all workers understand the policies and procedures of the No Child Labour, and for new employees during the orientation.
- During interviews, 27 employees stated that they received training during orientation, the annual refresher, and whenever there is an update of the handbook with all the policies.
- Training on the No Child Labour policies and procedures is mandatory for all HR staff processing applications or onboarding. A training matrix used by line managers ensures that there is a very low chance of gaps with regard to this training.

4.Monitoring

- COO / HR Department are Responsibilities for monitoring implementation of No Child Labour of policies and procedures.
- Through interviews with management representatives, it was detected that records are kept of monitoring activities, the update of the policies and procedures, including legal external support.
- Regular monitoring of the policies and procedures related to the No Child Labour ensures that the identification of misapplication of procedures, or concerns about application, are escalated for action in the internal audits or checks.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current System:

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.

The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.

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.

Child labour not be used are monitored, and overall performance is reported to the relevant senior management. There are no child labour in the company.

Evidence examined:

- Child labor Policy
- Hiring & Selection procedure
- Site tour
- Employee and management interviews
- Employee's Record files
- Internal Rules document, Ethical Code

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	1%
Enter the legal age of employment	16
Enter the age of the youngest worker identified	21
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

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	Some Improvements Recommended

Management systems

Explanation for management systems grades

1.Policies and procedures:

- It was verified that written policies and procedures for Legal wages paid are clearly stated in the Code of Conduct and Employees Handbook during the document review and interviews with 27 employees and managers, that indicates that those policies are regularly or whenever is necessary updated and enforced.
- It was confirmed that all policies and procedures are documented as identified through triangulation with the interview, observation and document review. This facilitates the application and understanding of the policies and procedures.
- The Legal Wages Paid policy is approached by the owners and is in accordance with local law and the Sedex requirements.

2.Resources:

- It was verified that the facility already has sufficient seniority personnel assigned to implementation of policies and procedures related to "Legal Wages Paid".
- There is sufficient commitment to make necessary changes whenever needed or an improvement is detected, in a proactive manner.
- The site manager's responsibilities are clearly defined for the effective implementation of the Management System, ensuring that the policies and procedures related to Legal Wages Paid are well implemented.
- Procedures are in place for interim responsibility in the case of a position change or absence.

3.Communication and training:

- Interviews and document reviews revealed that there are annual refresher training sessions to ensure that all workers understand the policies and procedures of the Legal Wages Paid, and for new employees during the orientation.
- During interviews, 27 employees stated that they received training during orientation, the annual refresher, and whenever there is an update of the handbook with all the policies.
- Training on the Legal Wages Paid policies and procedures is mandatory for all HR staff processing applications or onboarding. A training matrix used by line managers ensures that there is a very low chance of gaps with regard to this training.

4.Monitoring

- COO / HR Department are Responsibilities for monitoring implementation of Legal Wages Paid of policies and procedures.
- Through interviews with management representatives, it was detected that records are kept of monitoring activities, the update of the policies and procedures, including legal external support.
- However, it was detected that the facility has not yet developed a living wage assessment.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current System:

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.

The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.

There is a well-established training program in place and all key persons are aware of their responsibilities of Legal wages are paid.

Legal wages paid are monitored, and overall performance is reported to the relevant senior management. Employees record files including disciplinary measures and employee's agreements.

Evidence examined:

- Worker and management interviews
- The pay stubs and payroll records from March 2024 to February 2025.
- Employee and management interviews
- The local minimum wage is \$17.20 USD per hour. The minimum wage paid by the factory is \$17.22 USD per hour. Labor agreements include workers' wages and benefits.
- The factory paid overtime 150% per hour in accordance to the local law.
- 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 in a bi weekly manner.

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage 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?	Mix of digital and other payment methods (give details) Direct Deposit or Check
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?	Not available	
Is actual wage data available on site for any of these options?	Not available	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	44.0
	Max hours per month	Non applicable
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	8.0
	Max hours per week	Non applicable
	Max hours per month	Non applicable
Actual overtime hours	Max hours per day	3.0
	Max hours per week	13.0
	Max hours per month	24.0
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	17.22
	Actual per day	137.76
	Actual per week	757.68
	Actual per month	3030.72
Minimum legal overtime wage	Min per hour	28.8
	Min per day	206.4
	Min per week	1135.2
	Min per month	4540.8
Actual minimum overtime wage	Actual per hour	25.83
	Actual per day	206.64
	Actual per week	1136.52
	Actual per month	4546.08

Wage analysis

Number of workers' records checked	26
Provide the date and details of the records	26 samples' attendance and payroll records each on February-2025, November-2024 and July-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?

Not applicable

Indicate the breakdown of workforce per earnings

Equal payment by positions.

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	Local law	Finding
5.A. Living wages are paid	5.A.B Put in place a wage improvement plan th...		NC ZAF600842179
Systems and evidence examined to validate this code section		<p>Current System: Living wage was satisfactory during payroll review. 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. The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined. There is a well-established training program in place and all key persons are aware of their responsibilities of Legal wages are paid. Legal wages paid are monitored, and overall performance is reported to the relevant senior management. Employees record files including disciplinary measures and employee's agreements. However, it was detected that the facility has not yet developed a living wage assessment.</p> <p>Evidences: - Employees record files including disciplinary measures and employee's contracts. - Worker and management interviews - The pay stubs and payroll records from March 2024 to February 2025. - Employee and management interviews</p>	

Findings: non-compliances

ZAF600842179

Non-compliance

Code area

5.A Living wages are paid

Status

Open*

Workplace requirement

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

Time given to resolve

Verification method

Collaborative action required

Issue title

905 - CAR: A wage improvement plan (with Living Wage as the goal) has not been completed

Area of non-compliance/non-conformance

Base code

Description

During the document review, it was detected that the facility already has a Living Wage determination; however, it still lacks an improvement plan to reduce the gap.

Corrective and preventative actions

Please develop a plan to improve the wage until it reaches the living wage.

* PDF generated at 07:20 (UTC) on 13 Mar 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

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

Management systems

Explanation for management systems grades

1.Policies and procedures:

- It was verified that written policies and procedures for Not Excessive Working Hours are clearly stated in the Code of Conduct and Employees Handbook during the document review and interviews with 11 employees and managers, that indicates that those policies are regularly or whenever is necessary updated and enforced.
- It was confirmed that all policies and procedures are documented as identified through triangulation with the interview, observation and document review. This facilitates the application and understanding of the policies and procedures.
- The Not Excessive Working Hours policy is approached by the owners and is in accordance with local law and the Sedex requirements.

2.Resources:

- It was verified that the facility already has sufficient seniority personnel assigned to implementation of policies and procedures related to "Not Excessive Working Hours".
- There is sufficient commitment to make necessary changes whenever needed or an improvement is detected, in a proactive manner.
- The site manager's responsibilities are clearly defined for the effective implementation of the Management System, ensuring that the policies and procedures related to Not Excessive Working Hours are well implemented.
- Procedures are in place for interim responsibility in the case of a position change or absence.

3.Communication and training:

- Interviews and document reviews revealed that there are annual refresher training sessions to ensure that all workers understand the policies and procedures of the Not Excessive Working Hours, and for new employees during the orientation.
- During interviews, 11 employees stated that they received training during orientation, the annual refresher, and whenever there is an update of the handbook with all the policies.
- Training on the Not Excessive Working Hours policies and procedures is mandatory for all HR staff processing applications or onboarding. A training matrix used by line managers ensures that there is a very low chance of gaps with regard to this training.

4.Monitoring

- COO / HR Department are Responsibilities for monitoring implementation of Not Excessive Working Hours of policies and procedures.
- Through interviews with management representatives, it was detected that records are kept of monitoring activities, the update of the policies and procedures, including legal external support.
- Regular monitoring of the policies and procedures related to the Not Excessive Working Hours ensures that the identification of misapplication of procedures, or concerns about application, are escalated for action in the internal audits or checks.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current system:

The site has a detailed policy of Working hours as well as key responsibilities and procedures by which it will be implemented.

The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.

Evidence examined:

- Employees contracts
- The time records and pay stubs were available from March 2024 to February 2025.
- Employee interviews
- Internal rules document
- Management and HR interviews
- Internal 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?	The facility pay a premium overtime, in accordance to the local law 150%.
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?	57.0
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

Management systems

Explanation for management systems grades

1. Policies and procedures:
 - It was verified that written policies and procedures for No discrimination are clearly stated in the Code of Conduct and Employees Handbook during the document review and interviews with 27 employees and managers, that indicates that those policies are regularly or whenever is necessary updated and enforced.
 - It was confirmed that all policies and procedures are documented as identified through triangulation with the interview, observation and document review. This facilitates the application and understanding of the policies and procedures.
 - The No discrimination policy is approached by the owners and is in accordance with local law and the Sedex requirements, looking at the equity between all employees.
2. Resources:
 - It was verified that the facility already has sufficient seniority personnel assigned to implementation of policies and procedures related to "No discrimination".
 - There is sufficient commitment to make necessary changes whenever needed or an improvement is detected, in a proactive manner.
 - The site manager's responsibilities are clearly defined for the effective implementation of the Management System, ensuring that the policies and procedures related to No discrimination are well implemented.
 - Procedures are in place for interim responsibility in the case of a position change or absence.
3. Communication and training:
 - Interviews and document reviews revealed that there are annual refresher training sessions to ensure that all workers understand the policies and procedures of the No discrimination, and for new employees during the orientation.
 - During interviews, 27 employees stated that they received training during orientation, the annual refresher, and whenever there is an update of the handbook with all the policies.
 - Training on the No discrimination policies and procedures is mandatory for all HR staff processing applications or onboarding. A training matrix used by line managers ensures that there is a very low chance of gaps with regard to this training.
4. Monitoring
 - COO / HR Department are responsible for monitoring the implementation of non-discrimination policies and procedures and ensuring equality among employees.
 - Through interviews with management representatives, it was detected that records are kept of monitoring activities, the update of the policies and procedures, including legal external support.
 - Regular monitoring of the policies and procedures related to the "No discrimination" ensures that the identification of misapplication of procedures, or concerns about application, are escalated for action in the internal audits or checks.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current system:

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.

The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.

There is a well-established training program in place and all key persons are aware of their responsibilities of No discrimination is practiced

No discrimination is practiced are monitored, and overall performance is reported to the relevant senior management.

Evidence examined:

- Internal rules document
- Hire and selection procedure
- Ethical code and internal rules
- Payroll record review
- Employee and management interviews
- Site tour
- Internal handbook

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)?	70%
Representation of women in managerial roles (ratio of women workers to women managers)	8%
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

Management systems

Explanation for management systems grades

1.Policies and procedures:

- It was verified that written policies and procedures for Regular employment are clearly stated in the Code of Conduct and Employees Handbook during the document review and interviews with 11 employees and managers, that indicates that those policies are regularly or whenever is necessary updated and enforced.
- It was confirmed that all policies and procedures are documented as identified through triangulation with the interview, observation and document review. This facilitates the application and understanding of the policies and procedures.
- The Regular employment policy is approached by the owners and is in accordance with local law and the Sedex requirements.

2.Resources:

- It was verified that the facility already has sufficient seniority personnel assigned to implementation of policies and procedures related to "Regular employment".
- There is sufficient commitment to make necessary changes whenever needed or an improvement is detected, in a proactive manner.
- The site manager's responsibilities are clearly defined for the effective implementation of the Management System, ensuring that the policies and procedures related to Regular employment are well implemented.
- Procedures are in place for interim responsibility in the case of a position change or absence.

3.Communication and training:

- Interviews and document reviews revealed that there are annual refresher training sessions to ensure that all workers understand the policies and procedures of the Regular employment, and for new employees during the orientation.
- During interviews, 11 employees stated that they received training during orientation, the annual refresher, and whenever there is an update of the handbook with all the policies.
- Training on the Regular employment policies and procedures is mandatory for all HR staff processing applications or onboarding. A training matrix used by line managers ensures that there is a very low chance of gaps with regard to this training.

4.Monitoring

- COO / HR Department are responsible for monitoring the implementation of Regular employment policies and procedures.
- Through interviews with management representatives, it was detected that records are kept of monitoring activities, the update of the policies and procedures, including legal external support.
- Regular monitoring of the policies and procedures related to the "Regular employment" ensures that the identification of misapplication of procedures, or concerns about application, are escalated for action in the internal audits or checks.

Summary of findings

Code area	Workplace requirement	Local law	Finding
8. Regular employment is provided	8.A Provide a written contract or other bindi...		GE ZAF600842181

Systems and evidence examined to validate this code section

Current system:

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.

The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.

There is a well-established training program in place and all key persons are aware of their responsibilities of Regular employment is provided

Regular employment provided is practiced are monitored, and overall performance is reported to the relevant senior management.

Evidence examined:

- Employee interviews
- Management and HR interviews
- Employee's agreements
- Internal Handbook
- Employees files

Findings: good examples

ZAF600842181

Good example

Code area

8 Regular employment is provided

Workplace requirement

8.A Provide a written contract or other binding agreement that specifies the terms and conditions of employment, that meet all legal requirements, in a language workers can understand.

Description

During the document review, it was detected that the facility already has a program to improve staff engagement initiatives such as:

Pizza lunches, BBQs, Freezies, Ice cream
Employee Engagement Committee
Holiday dinner
HPG Annual Women's Breakfast
Besides other practices.

Evidence

Table of Contents

- 1. Introduction
- 2. Purpose and Scope
- 3. Definitions
- 4. Policy
- 5. Procedures
- 6. Monitoring and Reporting
- 7. Training
- 8. Records
- 9. Review
- 10. Appendix
- 11. Glossary
- 12. Index

Table of Contents

- 1. Introduction
- 2. Purpose and Scope
- 3. Definitions
- 4. Policy
- 5. Procedures
- 6. Monitoring and Reporting
- 7. Training
- 8. Records
- 9. Review
- 10. Appendix
- 11. Glossary
- 12. Index

Table of Contents

- 1. Introduction
- 2. Purpose and Scope
- 3. Definitions
- 4. Policy
- 5. Procedures
- 6. Monitoring and Reporting
- 7. Training
- 8. Records
- 9. Review
- 10. Appendix
- 11. Glossary
- 12. Index

[Handbook rule content.png](#)

[Files of employees.png](#)

[Ethical policy.png](#)

[Ethical policy.png](#)

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	98.2%
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	1.8%
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

Management systems

Explanation for management systems grades

1. Policies and procedures:

- It was verified that written policies and procedures for Regular employment are clearly stated in the Code of Conduct and Employees Handbook during the document review and interviews with 11 employees and managers, that indicates that those policies are regularly or whenever are necessary updated and enforced, however all the employees are directly contracted by the facility and no subcontracting and no homeworkers are used.

- It was confirmed that all policies and procedures are documented as identified through triangulation with the interview, observation and document review. This facilitates the application and understanding of the policies and procedures.

- The Regular employment policy is approached by the owners and is in accordance with local law and the Sedex requirements and all the employees are already directly contracted, and no subcontracting and no homeworkers are used.

2. Resources:

- It was verified that the facility already has sufficient seniority personnel assigned to implementation of policies and procedures related to "Regular employment and no subcontracting and no homeworkers are used".

- There is sufficient commitment to make necessary changes whenever needed or an improvement is detected, in a proactive manner.

- The site manager's responsibilities are clearly defined for the effective implementation of the Management System, ensuring that the policies and procedures related to Regular employment and no subcontracting and no homeworkers are used are well implemented.

- Procedures are in place for interim responsibility in the case of a position change or absence.

3. Communication and training:

- Interviews and document reviews revealed that there are annual refresher training sessions to ensure that all workers understand the policies and procedures of the Regular employment and no subcontracting and no homeworkers are used, and for new employees during the orientation.

- During interviews, 11 employees stated that they received training during orientation, the annual refresher, and whenever there is an update of the handbook with all the policies.

- Training on the Regular employment and no subcontracting and no homeworkers are used policies and procedures is mandatory for all HR staff processing applications or onboarding. A training matrix used by line managers ensures that there is a very low chance of gaps with regard to this training.

4. Monitoring

- COO / HR Department are responsible for monitoring the implementation of Regular employment and no subcontracting and no homeworkers are used policies and procedures.

- Through interviews with management representatives, it was detected that records are kept of monitoring activities, the update of the policies and procedures, including legal external support.

- Regular monitoring of the policies and procedures related to the "Regular employment and no subcontracting and no homeworkers are used" ensures that the identification of misapplication of procedures, or concerns about application, are escalated for action in the internal audits or checks.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current system:

The site does not subcontract or employ house workers.

The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.

The site does not subcontract or employ house workers.

Evidence examined:

- Employee interviews
- Management and HR interviews
- Production records
- Site tour

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

Management systems

Explanation for management systems grades

1. Policies and procedures:

- It was verified that written policies and procedures for No harsh or inhumane treatment are clearly stated in the Code of Conduct and Employees Handbook during the document review and interviews with 11 employees and managers, that indicates that those policies are regularly or whenever is necessary updated and enforced.
- It was confirmed that all policies and procedures are documented as identified through triangulation with the interview, observation and document review. This facilitates the application and understanding of the policies and procedures.
- The No harsh or inhumane treatment policy is approached by the owners and is in accordance with local law and the Sedex requirements.

2. Resources:

- It was verified that the facility already has sufficient seniority personnel assigned to implementation of policies and procedures related to "No harsh or inhumane treatment"
- There is sufficient commitment to make necessary changes whenever needed or an improvement is detected, in a proactive manner.
- The site manager's responsibilities are clearly defined for the effective implementation of the Management System, ensuring that the policies and procedures related to No harsh or inhumane treatment are well implemented.
- Procedures are in place for interim responsibility in the case of a position change or absence.
- The facility has a procedure to ensure that the employees freely, open and confidentially can comply of any topic including harsh or inhumane treatment without any reoresalia.

3. Communication and training:

- Interviews and document reviews revealed that there are annual refresher training sessions to ensure that all workers understand the policies and procedures of the No harsh or inhumane treatment, and for new employees during the orientation.
- During interviews, 11 employees stated that they received training during orientation, the annual refresher, and whenever there is an update of the handbook with all the policies.
- Training on the No harsh or inhumane treatment policies and procedures is mandatory for all HR staff processing applications or onboarding. A training matrix used by line managers ensures that there is a very low chance of gaps with regard to this training.

4. Monitoring

- Jennifer Abbey / People Operations Manager is Responsibilities for monitoring implementation of No harsh or inhumane treatment of policies and procedures.
- Through interviews with management representatives, it was detected that records are kept of monitoring activities, the update of the policies and procedures, including legal external support.
- Regular monitoring of the policies and procedures related to the No harsh or inhumane treatment ensures that the identification of misapplication of procedures, or concerns about application, are escalated for action in the internal audits or checks.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current system:

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.

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.

No harsh or inhumane treatment allowed used responsibly is practiced are monitored.

Evidence examined

- Employee interviews
- Management and HR interview
- Attendance training list on company policies
- Site tour
- Internal handbook
- Zero tolerance of labor violence document
- Harassment & abuse policy
- Complaint mailbox
- Grievance procedure

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')?	Yes, there is a formal grievance process
What type of grievance mechanism(s) are available?	The facility has a Open Doors Policy, suggestion box, QR link and a Hotline
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	Robust Management Systems

Management systems

Explanation for management systems grades

1.Policies and procedures:

- It was verified that written policies and procedures for Environmental and Sustainability are clearly stated in the Code of Conduct and Employees Handbook during the document review and interviews with 27 employees and managers, that indicates that those policies are regularly or whenever is necessary updated and enforced.

- It was confirmed that all policies and procedures are documented as identified through triangulation with the interview, observation and document review. This facilitates the application and understanding of the policies and procedures.

- The Environmental and Sustainability policy is approached by the owners and is in accordance with local law and the Sedex requirements.

2.Resources:

- It was verified that the facility already has sufficient seniority personnel assigned to implementation of policies and procedures related to "Environmental and Sustainability"

- There is sufficient commitment to make necessary changes whenever needed or an improvement is detected, in a proactive manner.

- The site manager's responsibilities are clearly defined for the effective implementation of the Management System, ensuring that the policies and procedures related to Environmental and Sustainability are well implemented.

- Procedures are in place for interim responsibility in the case of a position change or absence.

3.Communication and training:

- Interviews and document reviews revealed that there are annual refresher training sessions to ensure that all workers understand the policies and procedures of the Environmental and Sustainability, and for new employees during the orientation.

- During interviews, 27 employees stated that they received training during orientation, the annual refresher, and whenever there is an update of the handbook with all the policies.

- Training on the Environmental and Sustainability policies and procedures is mandatory for all HR staff processing applications or onboarding. A training matrix used by line managers ensures that there is a very low chance of gaps with regard to this training.

4.Monitoring

- COO / HR Department are Responsibilities for monitoring implementation of Environmental and Sustainability of policies and procedures.

- Through interviews with management representatives, it was detected that records are kept of monitoring activities, the update of the policies and procedures, including legal external support.

- Regular monitoring of the policies and procedures related to the Environmental and Sustainability that the identification of misapplication of procedures, or concerns about application, are escalated for action in the internal audits or checks.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current system:

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 has a program of zero waste of raw material, through management and recycling.

There is a well-established training program in place and all key persons are aware of their responsibilities of Environment protection.

Environment protection is practiced and monitored

Evidence examined

- Environment management policy
- Management interview
- Site tour
- Policies to reduce, reuse and recycling of waste
- Contract with waste company

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?

- Environmental permit
- Permission for waste generation
- Air pollution
- Hazardous waste

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.E Identify and monitor potential negativ...		GE ZAF600842178
Systems and evidence examined to validate this code section		<p>Current system: 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 has a program of zero waste of raw material, through management and recycling. There is a well-established training program in place and all key persons are aware of their responsibilities of Environment protection. Environment protection is practiced are monitored</p> <p>Evidence examined</p> <ul style="list-style-type: none"> - Environment management policy - Management interview - Site tour - Policies to reduce, reuse and recycling of waste - Contract with waste company 	

Findings: good examples

ZAF600842178

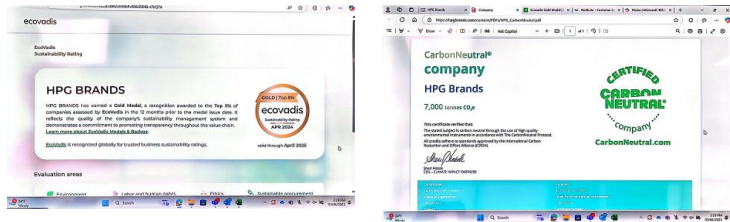
Good example

Code area
10.B Environment 4-Pillar

Workplace requirement
10.B.E Identify and monitor potential negative environment impacts of operations and supply chain and have in place systems that prevent, mitigate or remedy the impacts of their own operations.

Description
During the document review, it was recognized that the facility is already a member of the EcoVadis sustainability program, rated as Gold Top 5%, valid through April 2025. It also has a certification as a company that has a "Carbon Neutral" program to reduce the generation of CO2 until 4/21/2025, and it has the recognition from UPS as a company that stays neutral in the generation of CO2 in 2023.

Evidence



[EcoVadis sustainability program.jpg](#)

[Carbon Neutral program.jpg](#)

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?	Responsible use and management of water Packaging optimization Zero-waste and recycling protocols Sustainable material sourcing
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 reduce scope 1 greenhouse gases (GHGs) Yes, to reduce scope 2 greenhouse gases (GHGs) Yes, to reduce scope 3 greenhouse gases (GHGs)
Are any of these science-based targets?	No, and we do not intend to set 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))?	No
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?	Not Applicable

Usage/discharge analysis

	Last full calendar year (2024)	Previous full calendar year (2023)
Total electricity consumption from non-renewable sources (kWh)	1,669,929	1,669,820
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)	112,892	125,996
Usage of other purchased fuels	112892	125996
Has the site completed any carbon footprint analysis?	No	No
Water sources	Municipal/local water authority	Municipal/local water authority
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	5,332.9	4,057
Water discharged	Municipal/local water authority	Municipal/local water authority
Water volume discharged (m3)	5,332.9	4,057
Water volume recycled (m3)	Data not available	Data not available
Total waste produced (mt)	2,316.1	1,736.1
Total hazardous waste produced (mt)	8.1	8.1
Waste to recycling (mt)	324	296
Waste to landfill (mt)	1,984	1,432
Waste to other (mt)	Data not available	Data not available
Total product produced (mt)	17,000,000	15,000,000

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

Management systems

Explanation for management systems grades

1.Policies and procedures:

- It was verified that written policies and procedures for Business Ethics are clearly stated in the Code of Conduct and Employees Handbook during the document review and interviews with 27 employees and managers, that indicates that those policies are regularly or whenever is necessary updated and enforced.
- It was confirmed that all policies and procedures are documented as identified through triangulation with the interview, observation and document review. This facilitates the application and understanding of the policies and procedures.
- The Business Ethics policy is approached by the owners and is in accordance with local law and the Sedex requirements.

2.Resources:

- It was verified that the facility already has sufficient seniority personnel assigned to implementation of policies and procedures related to "Business Ethics"
- There is sufficient commitment to make necessary changes whenever needed or an improvement is detected, in a proactive manner.
- The site manager's responsibilities are clearly defined for the effective implementation of the Management System, ensuring that the policies and procedures related to Business Ethics are well implemented.
- Procedures are in place for interim responsibility in the case of a position change or absence.

3.Communication and training:

- Interviews and document reviews revealed that there are annual refresher training sessions to ensure that all workers understand the policies and procedures of the Business Ethics, and for new employees during the orientation.
- During interviews, 27 employees stated that they received training during orientation, the annual refresher, and whenever there is an update of the handbook with all the policies.
- Training on the Business Ethics policies and procedures is mandatory for all HR staff processing applications or onboarding. A training matrix used by line managers ensures that there is a very low chance of gaps with regard to this training.

4.Monitoring

- COO / HR Department are Responsibilities for monitoring implementation of Business Ethics of policies and procedures.
- Through interviews with management representatives, it was detected that records are kept of monitoring activities, the update of the policies and procedures, including legal external support.
- Regular monitoring of the policies and procedures related to the Business Ethics that the identification of misapplication of procedures, or concerns about application, are escalated for action in the internal audits or checks.

Summary of findings

Code area	Workplace requirement	Local law	Finding
10.C. Business ethics	10.C.A Demonstrate understanding of current a...		GE ZAF600842180

Systems and evidence examined to validate this code section

Current system:

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.

The HR manager of the site is ultimately responsible for enforcing the compliance at the site and this is well defined.

There is a well-established training program in place and all key persons are aware of their responsibilities of Business ethics

Business ethics are monitored

Evidence examined

The facility has business ethics COC with policies and procedures.

Worker interview and management interview

Factory Tour

Findings: good examples

ZAF600842180

Good example

Code area

10.C Business ethics

Workplace requirement

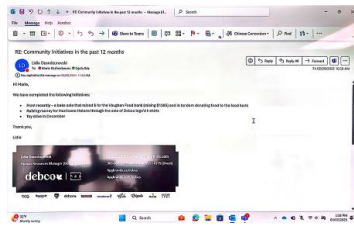
10.C.A Demonstrate understanding of current and relevant legislation relating to bribery, corruption, unethical, or any type of fraudulent or unethical business practices.

Description

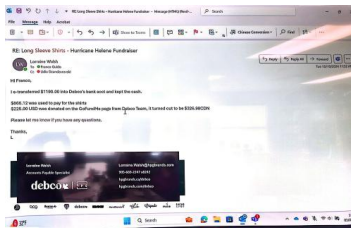
During the document review, it was detected that the facility already has community and social initiatives such as:

- Charitable Donations
- Paid Volunteering Program
- Career Growth
- Employee Swag Store
- Good to Know Program
- Besides other practices.

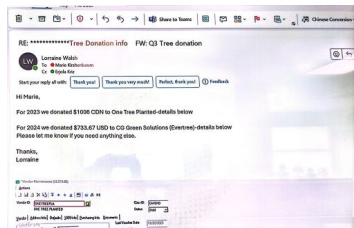
Evidence



CamScanner 06-03-2025
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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, Handbook and procedures against bribery practices at all levels.

Attachments



[R-Cloud-25020374-Signed
CAPR.pdf](#)



[R-Cloud-25020374-Audit
Photos.pdf](#)





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