

# Sedex Members Ethical Trade Audit Report

Version 7



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# Audit content

**(1)** A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA methodology are stated (with reasons for deviation) in the SMETA declaration.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the code areas below.

## 2-pillar audits include:

- Labour standards:
  - 0. Enabling accurate assessment
  - 1. Employment is freely chosen
  - 1.A. Responsible recruitment and entitlement to work
  - 2. Freedom of association and right to collective bargaining are respected
  - 4. Child labour shall not be used
  - 5. Legal wages are paid
  - 5.A. Living wages are paid
  - 6. Working hours are not excessive
  - 7. No discrimination is practiced
  - 8. Regular employment is provided
  - 8.A. Sub-contracting and homeworkers are used responsibly
  - 9. No harsh or inhumane treatment is allowed
- Health and safety:
  - 3. Working conditions are safe and hygienic
- Environment:
  - 10.A. Environment 2-pillar

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

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

**(2)** Where appropriate, non-compliances or non-conformances were raised where either local law or the base code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

**(3)** Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

# Audit details

## Site details

Sedex site reference	ZS1000008529	Site name	MIXIE
Business name	Beacon Promotions Inc DBA MIXIE	Site address	55121 980 Aldrin Dr, Dakota County, US

## Audit details

Sedex company reference	ZC5000008104	Auditor company name	QIMA Ltd
Audit company address	8/F Sino Plaza, 255-257 Gloucester Road, Hong Kong, HK, 1		
Date of audit	2025-09-19	Audit conducted by	Angela-Ines Sanchez
Audit pillars	Labour Standards   Health and safety   Environment 4-Pillar   Business ethics		
Time in and out	<div>Day 1</div> <div>In08:45</div> <div>Out15:00</div>		
Audit type	Full initial		
Was the audit announced?	Announced		
Was the Sedex SAQ available for review?	Yes		
Who signed and agreed CAPR?	Tom Ryan / General Manager		

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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	No union or workers representative, it is not a law requirement.		
Reason for absence during the audit	No union or workers representative, it is not a law requirement.		
Reason for absence at the closing meeting	No union or workers representative, it is not a law requirement.		

# 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)**

NA

### Lead auditor

Angela-Ines Sanchez

### APSCA Number

21701282

### Additional auditor

Mayra-Esperanza Vargas-Baide

### APSCA Number

32200174

### Date of declaration

2025-09-19

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## Site representation





































Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Tom Ryan
Title	General Manager
Date of declaration	2025-09-19



# Summary of findings

Code area	Workplace requirement	Area of NC	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...		GE <a href="#">ZAF601110456</a>

# 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

[← Summary of findings](#)

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



Not addressed



Fundamental improvements required



Some improvements recommended



Robust management systems

# Site details

## Company and site details

Sedex company reference	ZC5000008104	
Sedex site reference	ZS1000008529	
Company name	Beacon Promotions Inc DBA MIXIE	
Business ownership type	GOODS	
Site name	MIXIE	
Site name in local language		
GPS location	GPS address	980 Aldrin Dr, Eagan, MN 55121
	Coordinates	44.83878097509471, - 93.1403293741684
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	John McMahon
	Job title	Compliance Manager
	Phone number	6513228281
	Email	john.mcmahon@hpgbrands.com
Applicable business and other legally required business license numbers and documents	<p>Limited Liability Company (Domestic), Original Filing N°1369295800124, dated 06/04/2023, issued by Office of the Minnesota Secretary of State Certification of Record</p> <p>Hazardous waste Generator License, Generator N°3031, ID MNS0001800, valid from 01/04/2025 to 03/31/2026.</p>	

[← Management systems](#)

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## Site activities

Site function	Finished Product Supplier	
Site activities	Primary	Manufacture of pharmaceuticals, medicinal chemical and botanical products
	Secondary	Manufacture of cocoa, chocolate and sugar confectionery
	Other	Service activities related to printing
Product type	Promotional products supplier	
Process overview	<p>Production Process:</p> <p>Lip Moisturizer: input reception, storage, mixing, filling, storage, labeling, storage, shipping.</p> <p>Mint Flow: input reception, storage, mixing, pressing, filling, coding, sealing, packaging, shipping.</p> <p>Liquid Fill: input reception, storage, mixing, storage, filling, labeling, storage, shipping.</p> <p>On-site facilities include a label printing area, a candy area, a sanitizing product area, a lip moisture area, and a packaging area.</p> <p>Main machines: mixers, fillers, printers, laser printers, industrial pneumatic systems, labeling machines, coding machines, scrapping machines, candy packing machines, transformer/printers, metal detectors, inkcup conveyors, forklifts, pallet trucks, etc.</p> <p>Remark: QIMA audit is scheduled based on full man-day, thus this announced audit is performed on 19-Sep-2025, with two auditors in one day.</p>	
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
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[← Management systems](#)

[Worker analysis →](#)

## Site scope

What is the area of audited site to its boundary?	4645m <sup>2</sup>	
Building 1	<p><b>Last construction works on site</b></p> <p>1998</p> <p><b>If building is shared, provide details</b></p> <p>The building is shared with two other companies; each company is independent and there is no relationship between them. Each company's facilities are separate, as are the utilities (electricity, water, gas, waste). The total area of the building is 21,500 square meters, and the company occupies 4645 square meters. The company has a current lease agreement with the building owner.</p> <p><b>Number of floors</b></p> <p>2</p> <p><b>Description of floor activities</b></p> <p>Floor 1: Label printing area, candy area, sanitizing products area, lip moisture area, packaging area, warehouse, shipping area, ink storage, maintenance warehouse, administrative offices, rest rooms, break area.</p> <p>Floor 2: Supplies warehouse and administrative offices.</p>	
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	

[← Site details](#)

[Worker analysis →](#)

## Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No
Does the site organise worker transport to the worksite?	Not provided  The site does not provide transportation; The facility is located in an urban area with easy access. Worker use their own transportation.

## Work patterns

Approximate workers on site per month (% of peak)	January	95-100%	February	95-100%
	March	95-100%	April	95-100%
	May	95-100%	June	95-100%
	July	95-100%	August	95-100%
	September	95-100%	October	95-100%
	November	95-100%	December	95-100%
Is there any night shift work at the site?	No			

## Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	Other certification  HIGG Fem Certification, worldly ID 164963, 2024, issued by Intertek
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[← Site details](#)

[Worker analysis →](#)

Site assessments

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

Gender disaggregated data available

Men and women

## Worker totals

	Men	Women	Other	Total
Number of workers	32 (38.1%)	52 (61.9%)	- -	84 (100%)

## Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	24 (40%)	36 (60%)	- -	60 (71.4%)
Temporary or fixed term employees	0 -	0 -	- -	0 (0%)
Agency or subcontracted workers	8 (33.3%)	16 (66.7%)	- -	24 (28.6%)
Seasonal workers	0 -	0 -	- -	0 (0%)
Self-employed workers	0 -	0 -	- -	0 (0%)
Informal workers including home workers	0 -	0 -	- -	0 (0%)
Apprentices, trainees or interns	0 -	0 -	- -	0 (0%)

\* % of total workforce

[← Site details](#)

[Worker interviews →](#)

## Migrant workers

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

\* % of total workforce

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

No internal migration. All employees have valid American ID or permanent resident card; and have been living in the USA for years.

## Workers by age

	Men	Women	Other	Total
18 - 24 years old	1 (100%)	0 (0%)	- -	1 (1.2%)
15 - 17 years old	0 -	0 -	- -	0 (0%)
Under 15 years old	0 -	0 -	- -	0 (0%)

\* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

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

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

### Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
American	21%	19%	-	40%
Mexican	16%	44%	-	60%

### 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	21 (34.4%)	40 (65.6%)	- -	61 (72.6%)
Salaried workers	11 (47.8%)	12 (52.2%)	- -	23 (27.4%)

\* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

## 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	32 (38.1%)	52 (61.9%)	- -	84 (100%)

\* % of total workforce

If other payment cycle entered, please provide details      Biweekly

## People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	5 (62.5%)	3 (37.5%)	- -	8
Supervisors or team leaders	0 -	0 -	- -	0
Administrative staff	6 (40%)	9 (60%)	- -	15

[← Worker analysis](#)

[Worker interviews →](#)

## Worker interview summary

Gender disaggregated data available      Men and women

Which methods of worker engagement were used?      Individual interviews  
Group interviews

### Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?

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

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

Number and size of group interviews      1 group of 5 employees

Did workers understand the purpose of the audit?      Yes

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

[← Worker analysis](#)

[Measuring workplace impact →](#)

Was there any indication that workers had been 'coached' in how they should respond to questions?

No

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

Favorable

## Attitude of workers

In which areas did workers raise significant concerns or complaints?

Other (provide details)

No main complaints.

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

Communication (e.g. from management)  
Equal opportunities  
Freedom of movement  
Work atmosphere (e.g. treatment by supervisors)  
Work environment – comfort (e.g. temperature, noise or dust levels)

Additional comments

Employees expressed a high level of support for the company. They highlighted a positive work environment, characterized by constructive relationships with managers, supervisors, and colleagues, as well as effective communication practices. Employees confirmed having access to the company's platform, which provides employment-related and personal information, and demonstrated awareness of the anonymous reporting mechanisms in place. Furthermore, they noted that wages are consistently paid in a timely manner and that pay slips are regularly distributed.

Attitude of workers' committee/union representatives

There are no worker neither union representatives within the site. This is not required by law.

Attitude of managers

The audit included a facility walkthrough of all operative and non-operative areas, confidential interviews, and a document review. The company granted full access to all areas and promptly provided all requested documents. Management and staff were cooperative, transparent, and actively engaged throughout the process, demonstrating a strong commitment to continuous improvement and compliance.

## Workers interviewed by type

	Total
Permanent workers	9
Temporary or fixed-term employees	0
Agency or subcontracted workers	2
Seasonal workers	0
Other workers	0
Total number of workers interviewed	11

## Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	3	3	-	6
Workers interviewed individually	3	4	-	7

## Migrant workers interviewed

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



# Measuring workplace impact

Gender disaggregated data available      Totals only

The company does not discriminate by gender in the turnover rate, although a record of absences is kept, it was not possible to provide the indicator during the audit.

## Annual worker turnover (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	-	-	-	7.0%
Last full calendar year (2024)	-	-	-	17.0%
Previous full calendar year (2023)	-	-	-	26.0%

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

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

Are accidents recorded?

Yes

All incidents and accidents are appropriately investigated, including root cause analysis and correction action; and they are documented. The facility also complies with the local requirements on recording accidents in the OSHA 300 A log.

[← Worker interviews](#)

[Code area 0 →](#)

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

	Men	Women	Other	Total
Last full quarter (90 days)	-	-	-	1.0%
Last full calendar year (2024)	-	-	-	1.0%
Previous full calendar year (2023)	-	-	-	0.0%

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

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

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

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

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

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

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

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

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

# 0. Enabling accurate assessment

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			
Systems and evidence examined to validate this code section	<p>O.A The audit process was completed without obstruction, with full access provided to all areas of the site, including production areas, workers facilities, and relevant outbuildings. Confidential worker interviews were conducted without interference, and all requested documentation was made available in a timely and organized manner. Records reviewed during the audit were authentic and consistent across sources.</p> <p>O.B There were no attempts to influence, bribe, or threaten the auditor, ensuring the integrity of the audit process. The certifier's code of conduct and integrity letter were presented and signed by the company at the opening and closing meetings.</p> <p>O.C The site provide an accurate site description and Sedex site profile declared prior the the audit. SAQ was complete prior the audit and was provided to the auditor for review. Information regarding workforce size, shift arrangements, permits, licenses, and production activities was consistent with documentation and site observations.</p> <p>O.D The company maintains a comprehensive Employee Handbook, a Code of Conduct (rev. 011824), a HPG Labor and Human Rights Policy (rev. 02082025) and policies which clearly outline the organization's commitment to human rights, ethical practices, and compliance with applicable laws. Senior management has endorsed these policies, which are communicated to all employees and accessible in the workplace, supporting an environment of openness and accountability.</p> <p>Evidence examined:</p> <ul style="list-style-type: none"> <li>- Site tour</li> <li>- Site valid licenses</li> <li>- Management interview</li> <li>- Employees interviews</li> <li>- Code of Conduct (rev. 011824)</li> <li>- HPG Labor and Human Rights Policy (rev. 02082025)</li> <li>- Employee Handbook</li> <li>- SQA available</li> <li>- Paystubs and timesheets</li> <li>- Management system internal audit (10/23/2024)</li> </ul>		

[← Measuring workplace impact](#)

[Code area 1 →](#)

0. Enabling accurate assessment

Data points

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

# 1. Employment is freely chosen

## Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

## Management systems

### Explanation for management systems grades

#### 1. Policies and Procedures

The company has established clear policies and procedures to ensure that all employment is freely chosen and free from any form of coercion. These principles are outlined in the Employee Handbook, Code of Conduct and Labor and Human Rights Policy, which explicitly prohibit forced, bonded, or involuntary labor, including practices such as the retention of identification documents or the charging of recruitment fees. Information on labor laws, employee rights, non-discrimination, and anti-harassment is prominently displayed on bulletin boards and TVs in all areas and in languages understood by employees. The Handbook, Code of Conduct and Labor and Human Rights Policy are reviewed periodically and updated as necessary. Opportunities for remain improvement, as hiring and termination procedures are implemented but not formally documented.

#### 2. Resources

Oversight of these policies remains with Human Resources Manager Ms. Amy Wroblewski and Compliance Manager Mr. John McMahon, they are responsible for reviewing, distributing, communicating, and ensuring the implementation of the Employee Handbook, Code of Conduct and Human Rights Policy.

The Human Resources department is responsible for the hiring, termination, training, onboarding, communication and staff development processes.

All managers possess the required seniority and expertise to fulfill their responsibilities.

Labor agencies are responsible for hiring and onboarding temporary workers, with the Human Resources Department monitoring agency compliance. Company keeps signed and updated Service agreements with labor agencies.

#### 3. Communication

Confidential interviews with 10 employees confirmed that labor rights, working conditions, and the contents of the Employee Handbook, Code of Conduct and Labor and Human Rights Policy are communicated during onboarding and reinforced through annual training. Communication boards and TVs located in break rooms and production areas provide continuous access to information. Additionally, employees have access to the company internal website, which hosts company policies, procedures, announcements, and personal employment records.

#### 4. Monitoring

To mitigate risks of involuntary labor, the Human Resources Department monitors turnover rates and verifies the legality and validity of employment documentation. Comprehensive files are maintained for all employees, containing the necessary employment records. All training programs are evaluated.

A confidential, secure, and non-retaliatory grievance mechanism is in place, enabling employees to raise concerns regarding working conditions, rights violations, or coercion.



Management systems

Internal audits of the management system (based on ISO 9001) are conducted annually, and SMETA audits are received every two years to evaluate compliance with the standard and the site has HIGG certification (social and environmental standard in the supply chain).

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

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

1.A and 1.A.1 The Employee's Handbook, Code of Conduct (rev. 011824) and the HPG Labor and Human Rights Policy (rev. 02082025) provides for proper treatment of workers and prohibition of any kind of forced labour.

1.B During site tour and interviews with employees no evidence of forced, bonded, or involuntary prison labor was observed. The Employee Handbook establishes the sanctions procedure.

1.C Worker are free to move within the facility at all times, and employees are free to resign from their employment voluntarily. No dormitories are provided.

1.D The site does not have security guards; worker entry is recorded by biometric system (finger print). The site has a camera system for security purposes, but under no circumstances are these cameras used to control or intimidate workers.

1.E Workers have freedom of movement and communication within the workplace. The Employee Handbook establishes the rules of coexistence and the rights and responsibilities of workers.

1.F The company does not retain workers' original personal documents (such as passports or ID cards), ensuring that employees maintain control over their legal identity and documentation.

1.G Workers have the right to resign at the end of their contract or at any time, without withholding amounts and receiving full payment for their services.

1.H Interviews and document review evidence that wages are paid on time, on a biweekly basis, with no unlawful deductions or delays reported.

1.I From the interviews with the workers and with the HR manager and the review of salary receipts, the full payment of salaries with legal deductions according to local law is evident. Workers are not indebted, no loans or advances are made to workers and no deductions are made for food.

1.J – Workers are not required to pay deposits, post bonds, or repay government levies. Payroll review and interviews confirmed no deductions beyond legally required taxes.

1.K – No evidence of forced savings, withheld payments, or delayed wages was found. All payroll records reviewed were consistent and compliant.

1.L The company guarantees payment of the minimum wage established in the state of Minnesota, USD 11.13 per hour. Currently all worker receive a salary above the minimum wage.

1.M The facility has implemented due diligence to minimize risks of forced labor. Recruitment is handled directly by the company with the exception of temporary workers. The company works with two labor agencies that provides temporary workers, currently there are 24 agency workers. There are signed and valid contracts between the company and the agencies, and the company carries out the necessary controls to ensure compliance. Worker interviews confirmed no recruitment fees or hidden charges.

1.N No prison labor is used, and this is prohibited in the Company's Code of Conduct and HPG Labor and Human Rights Policy.

1.O The company complies with applicable legislation according to documents and records evaluated.

Evidence examined:

- Form I-9
- Management Interviews
- Employees interviews
- Application documents
- Form 941 (Employers quarterly Federal Tax Return), 2024, OMB 1545-0029
- Paystubs and timesheets (August 2025, April 2025 and January 2025)
- Site valid licenses
- Code of Conduct (rev. 011824)
- HPG Labor and Human Rights Policy (rev. 02082025)
- Employee Handbook
- SQA available
- Management system internal audit (10/23/2024)
- Staffing Agreement between Beacon Promotion, INC and Action Management Gropu, dated 07/01/2022
- Staffing Agreement between Beacon Promotion, INC and Paydayz Saffitng Solutions INC, dated 11/08/2024

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	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

[← Code area 1](#)

[Code area 2 →](#)

## Management systems

### Explanation for management systems grades

#### 1. Policies and Procedures

The company has established and implemented policies and procedures to uphold ethical and responsible recruitment practices and to ensure that all workers have a legal entitlement to work in the United States. The recruitment process is designed to be transparent, ethical, and free from discrimination or exploitation. No recruitment fees are charged to workers, and all employment relationships are entered into freely and voluntarily. At present, 72% of employees are directly hired on a permanent basis, while 28% are temporary employees recruited through labor agencies. Opportunities for improvement remain, as the hiring and termination procedures are coded but not formally documented.

#### 2. Resources

The Human Resources Department with the Compliance Department are responsible for reviewing, distributing, communicating, and ensuring the implementation of the Employee Handbook, Code of Conduct and Labor and Human Rights Policy.

Human Resources Department oversees recruitment and selection processes, manages employment relationships, and is responsible for onboarding, training, and staff development. They ensure accurate documentation and secure recordkeeping. HR manager has the necessary seniority and expertise to carry out their responsibilities effectively.

Labor agencies are responsible for hiring and onboarding temporary workers, with the Human Resources Department monitoring agency compliance. Company keeps signed and updated Service agreements with labor agencies.

#### 3. Communication

Confidential interviews with 10 employees confirmed that they had been informed of onboarding procedures, workplace rules, and employment conditions, and all reported voluntarily agreeing to their terms of employment. Company policies and working conditions are communicated when employees start to work and through the different communication channels. Employees also have access to the internal Company website which provides policies, procedures, announcements, and individual employment records. The company has an open-door policy with workers and constantly maintains communication with them in meetings and through different communication channels.

#### 4. Monitoring

To confirm legal entitlement to work, the company verifies employee identity and authorization through government-issued identification and valid permanent residence or work permits. The Human Resources Department maintains comprehensive employee records and liaises with relevant oversight agencies as required. Employee training programs are evaluated for effectiveness. HR maintains regular communication with employees and organizes employee engagement activities to foster a positive workplace environment. Based on findings from these

Management systems

monitoring activities, appropriate action plans are developed and implemented. Internal audits of the management system are carried out annually (based on ISO 9001) and SMETA audits are received every two years, to evaluate compliance with the standard. Additionally, the site has HIGG certification (social and environmental standard in the supply chain).

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

## Systems and evidence examined to validate this code section

- 1.A.A The hiring procedure establishes the validation of workers' identity and their right to work through the official government system.
- 1.A.B The company keeps copies of identification documents and documents that demonstrate their legal right to work in workers' files.
- 1.A.C During the recruitment, onboarding process and annual training sessions, working conditions are clearly established and communicated to workers.
- 1.A.D - No employment of children or young workers was identified. Although not applicable, the company's Code of Conduct and the Labor and Human Rights Policy prohibits child labor. The Code of Conduct and the Labor and Human Rights Policy are part of the service agreements with labor agencies.
- 1.A. All recruitment processes are conducted legally and fairly. The service agreements with labor agencies stipulate that recruitment must comply with applicable laws and uphold principles of fairness. The company also verifies the legal right to work of all agency-provided workers.
- 1.A.F The service agreements specify payments to labor agencies that cover all recruitment-related costs. Workers interviewed confirmed that they were not required to bear any recruitment expenses.
- 1.A.G The fworkers did not pay fees or related costs for recruitment. Company workers and agency workers interviewed consistently reported zero out-of-pocket recruitment costs.
- 1.A.H The service agreements with the agencies clearly stipulate that workers must not be charged recruitment fees or any related costs. Agency workers interviewed confirmed that they had not incurred any such charges.
- 1.A.I No cases were identified where workers paid recruitment fees or related costs.
- 1A.J The facility complies with all applicable laws regarding recruitment and entitlement to work.
- Evidence examined:
- Form I-9
  - Management Interviews
  - Employees interviews
  - Application documents
  - Form 941 (Employers quarterly Federal Tax Return), 2024, OMB 1545-0029
  - Paystubs and timesheets (August 2025, April 2025 and January 2025)
  - Site valid licenses
  - Code of Conduct (rev. 011824)
  - HPG Labor and Human Rights Policy (rev. 02082025)
  - Employee Handbook
  - Management system internal audit (10/23/2024)
  - Staffing Agreement between Beacon Promotion, INC and Action Management Gropu, dated 07/01/2022
  - Staffing Agreement between Beacon Promotion, INC and Paydayz Saffitng Solutions INC, dated 11/08/2024



## 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?	<p>Workers are recruited and hired by licensed labour providers</p> <p>Workers are recruited, selected, and hired directly by our company</p> <p>The company primarily employs permanent employees hired directly and some temporary workers hired through two staffing agencies.</p> <p>Signed and valid Service Agreements are in place with the staffing agencies.</p>
Provide business names for all labour providers and programmes used	<p>Action Managment Gropu LLC, provides temporary employees, currently there are 23 employees.</p> <p>Paydayz Staffing Solutions LLC, provies temporaty employees, currently there is only 1 employee.</p>
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?	1
Are there any subcontracted workers (excluding dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Yes
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Yes

[← Code area 1](#)

[Code area 2 →](#)

## Migrant workers

Do any workers migrate across international borders to work at this site? No

Percentage of workers that are migrant 0%

Do any workers migrate from other states, provinces or regions within the country to work at this site? No

## Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process? No  
No recruitment fees nor costs paid by workers during the recruitment and employment process detected.

Were recruitment fees or costs identified during worker interviews? No  
No recruitment fees or costs identified during worker interviews.

[← Code area 1.A](#)

[Code area 2 →](#)

## 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
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Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
--	---------------------------

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
--	---------------------------

Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
---	---------------------------

## Management systems

### Explanation for management systems grades

#### 1. Policies and Procedures

The company recognizes and respects the right of all workers to freely associate, join worker organizations, and engage in collective bargaining, in accordance with local legislation and international labor standards. These principles are formally established in the Code of Conduct and Labor and Human Rights Policy, which explicitly acknowledges workers' rights to freedom of association and collective bargaining and prohibits any form of discrimination or retaliation against employees who choose to join a trade union, establish a worker committee, or elected representatives. While no union is currently established at the site, the policy framework remains in place to support such rights.

#### 2. Resources

The Human Resources Manager is responsible for implementing company policies related to employee engagement and communication, facilitates internal communication channels and responds to employee feedback.

#### 3. Communication

Interviews with employees and document reviews confirmed that workers are informed of their rights to freedom of association, applicable labor laws, and internal communication mechanisms during onboarding and annual training sessions. Employees also have access to the internal Company web site, which provides updated company policies, procedures, and communication tools. In addition, the company maintains an open-door policy, enabling workers to raise concerns directly with management and organized monthly meetings with workers to encourage open dialogue.

#### 4. Monitoring

Compliance with freedom of association rights is monitored through employee feedback gathered from established communication channels, as well as through meetings with workers. External SMETA audits are conducted annually to assess compliance with this standard and with broader human rights requirements and annually HIGG (social and environmental standard in the supply chain) audits are conducted.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 1.A](#)

[Code area 3 →](#)

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

2.A The facility recognizes and respects the right of all employees to freedom of association and collective bargaining, as communicated through the Code of Conduct, Labor and Human Rights Policy and the National Labor Relations Act. During the interviews, employees confirmed that they understand their right to form or join a union or other form of employee representation, even if they do not currently exercise it at the facility.

2.B The company does not prohibit, discourage, or interfere with workers' right to join a union or elect representatives. During the interviews, workers confirmed that there are no restrictions and that management is open to participation in workers' committees if requested by employees.

2.C Communication with employees takes place through regular meetings; workers can raise their concerns directly to their supervisors or managers. Management has an open-door policy with workers, and there is no restriction on forming unions; this was confirmed during the interviews. Currently, there is no established trade union or worker committee at the facility.

2D As no worker representatives are formally elected, this clause is not applicable. Workers confirmed they are aware they could elect representatives if desired, and management would respect and facilitate this process.

2.E The facility complies with applicable U.S. and Texas State laws regarding freedom of association. There is no legal requirement mandating unionization for workers, and no union is present.

Evidence examined:

- Code of Conduct (rev. 011824)
- HPG Labor and Human Rights Policy (rev. 02082025)
- Training records
- Workers interviews
- Management interviews
- Meeting record
- Report of SMETA internal audit (8/12/25)

## 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)?	No worker representative bodies
Are the worker representatives freely elected by the workforce as a whole?	Not Applicable
Does union/worker committee membership reflect the gender composition of the workforce?	Not Applicable
Does the membership reflect the nationality composition of the workforce?	Not Applicable
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

[← Code area 2](#)

[Code area 3 →](#)

### 3. Working conditions are safe and hygienic

#### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

Management systems

Explanation for management systems grades

1. Policies and Procedures
- The company has established a Health and Safety Management System to ensure safe and hygienic working conditions for all employees. This includes a Quality, Safety and Environment Policy (Management System Manual, Rev. 01, 01/01/2024), documented risk analyses, area performance indicators, operational procedures, site inspection and internal audits. All documents are reviewed periodically based on their criticality or when special situations require updates.
- The company has implemented the management system according to ISO 9001, but not certified.
- It is considered that the system needs some improvements since it is working on risk assessment and the implementation of the safety committee.
2. Resources
- The company has appointed Health & Safety responsible, Mr. John McMahon with the assistance of Mr. Tom Ryan, General Manager. He is responsible for health and safety with the appropriate knowledge and authority to effectively implement health and safety systems and processes. There is a new Safety Committee formed by company representatives and workers representatives from all areas such as candies area, liquid filling area, lip balm area, sanitizing area, maintenance, warehouse and shipping. The committee will be meeting monthly starting September 2025. Since the committee is new, it is considered that the system needs some improvements.
- Training needs are identified, coordinated, and monitored by the Human Resources Department.
3. Communication and Training
- The company implements an annual safety training plan (2025), covering general safety rules, emergency procedures, and workplace hazards. Employee interviews confirmed participation in training and awareness of procedures. Communication on safety matters is reinforced through safety meetings, site inspections and safety audits.
4. Monitoring
- Workplace safety and hygiene are monitored through accident tracking, monthly safety inspections, preventive maintenance plans, safety meetings, and annual third-party safety audits. Records are maintained, results analyzed, and corresponding action and improvement plans developed. Performance indicators, including accident rates and training compliance, are regularly tracked and evaluated.
- Additionally, the site receives biannual SMETA audits, internal audits of the management system (last audit October 2024) and has HIGG certification which is a social and environmental performance standard in the supply chain.



Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

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

- 3.A The company has a Quality, Safety and Environment Policy (Management System Manual, Rev. 01, 01/01/2024), implements a management system to ensure a safe work environment and establishes appropriate controls to prevent accidents and health injuries that occur during work. The site follows and complies with local regulations, basing its work on illness and injuries standards, training and hazards assessment.
- 3.B The company carries out a Job Hazard Analysis for all job positions. Documents are reviewed annually or when necessary. During the tour of the facilities, it was observed that the machines had the necessary protections and that the operators had adequate ergonomic conditions to perform their tasks.
- 3.C The company has appointed Health & Safety Manager, Mr. John McMahon. He is responsible for health and safety with the appropriate knowledge and authority to effectively implement health and safety systems and processes.
- 3.D There is a new Safety Committee formed by company representatives and worker representatives from all areas such as candies area, liquid filling area, lip balm area, sanitizing area, maintenance, warehouse and shipping. The committee will be meeting monthly starting September 2025, There is a record of Safety Committee Meeting Agenda Template and Safety Committee Minutes Template.
- 3.E The company has an annual health and safety training plan for all workers, including new ones, upon employment and annually trainings. The 2025 Training Plan and training records were verified. Employees receive training related to chemical handling, back injury prevention, forklift driving, bloodborne pathogens, fire protection, right to know, accident reporting, hazard control, use of PPE, first aids, CPR and AED use, among others.  
Trainings are evaluated.
- 3.F The company evaluates the effectiveness of health and safety training through training quizzes, safety meetings, annual safety audits, and site inspections.
- 3.G The company provides first aid supplies in the workplace and has first aid personnel trained throughout the workday.
- 3.H The company provides, free of charge, appropriate personal protective equipment (caps, gloves, eye protection, face protection, harnesses).
- 3.I All incidents/accidents are recorded, investigated, and corrective actions are implemented to prevent recurrence. OSHA 300 logs from last year and current year were available for review.
- 3.J The company allows workers to interrupt or leave their work in the event of danger, seek safety, or leave without the threat or fear of retaliation.
- 3.K The company verifies that all facilities are safe. The company has all inspections and authorizations up to date. Company monitors working environment and worker exposure to different scenarios like noise and air quality. A machinery preventive maintenance plan is implemented and documented.  
The site receives a third-party security audit annually.
- 3.L There is an Emergency Response Plan which states how to act in case of fire,

security threats, accidents, severe weather, chemical spills and evacuation. The facility is equipped with appropriate emergency infrastructure, including clearly marked emergency exits, emergency lights, meeting points, first aid kits, fire extinguishers, evacuation alarm and sprinklers throughout the site. Fire equipment is internally monthly checked and externally annually checked, reports were available for review.

Fire and tornado drill are performed annually; records were available for review.

3.M The proper maintenance of all machinery was verified. It is installed, maintained, and used safely. The main machines are the printers, packers, mixers, transfer machines; maintenance is outsourced, and records are available for review. There are some forklifts, drivers are trained annually and have driver's licenses.

3.N The facility ensures proper chemical management. Chemicals are stored correctly, with secondary containment, and Safety Data Sheets (SDS) are available for use. There is a properly equipped ink room, with containment and cabinets for flammable products. The area for filling sanitizing products is a room built with anti-explosive conditions and has a drainage for containment in case of spill. There are emergency eyewash stations that are checked monthly.

3.O Electrical maintenance is performed by the maintenance department, except for important repairs. During the tour no electrical issues were observed, the electrical installations were in good condition and the electrical panels were duly identified.

3.P The company has an Emergency Response which state that fire and tornado drills are performed annually in all shifts, records were available for review. Last fire drills were performed in June 2025.

3.Q The risks associated with extreme weather conditions are verified and actions are taken if necessary.

3.R Employees have access to sanitary facilities clean, tidy and separate for both women and men, and a break room where employees can have lunch/dinner with locker for their belongings and snacks and drinks available for purchase. Drinking water analysis are performed annually, the site uses city water. There are water dispensers all around the site.

3.S No accommodation provided by the facility.

3.T No transport provided by the facility.

3.U The facility is in compliance with relevant legal requirements concerning health & safety.

Evidence examined:

- Site tour
- Management interviews
- Workers interviews
- Quality, Safety and Environment Policy (Management System Manual, Rev. 01, 01/01/2024)
- Job Hazard Analysis (Ex. Tic Machine, 03/21/2019)

- Safety Committee Meeting Agenda Template
- Safety Committee Minutes Template
- Emergency Response Plan Test Log (Procedure 2.1.6.2 IMSP-ERPT)
- Emergency Response Plan (Procedure 2.1.6.2 IMSP-ERPT)
- Flow Lip Moisturizer (Procedure 2.4.3.1 IMSP-HFD)
- Mint flow Procedure (procedure 2.4.3.1 IMSP-HFD)
- Liquid Fill Flow (Procedure: 2.4.3.1 IMSP-HFD)
- Severe Weather drill report (dated 05/01/2025, time 1 pm, duration 4 minutes, 66 participants)
- Fire Drill report (dated 05/0/2025, time 1:30 pm, duration 4 minutes, 63 participants)-
- Presmises and Equipmento Maintenance Procedure (Procedure: 11.2.9 IMSP-PEM)
- Air Sampling Report, dated 02/27/2025
- Noise Report, dated 02/24/2025
- Workplace Inspection checklit, dated 04/14/2025
- Fixed Asset, maintence (Sept 2024)
- Chemical list
- First aid, CPR and AED certificates, issued by American Heart Associations, valid from 09-12-2023 to 09/2025.
- First Report of Injury
- Fire system check, dated 09/08-2025 performed by General Security Corporation.
- Forklift Certification Training Record, dated 08/26-2025
- Fire extinguisher service, company All Safe Global, invoice N° 228333, dated 09/09/2025
- Safety Audit: compnay: OECS, General Industry Safety Audit Report, date 08/26/2025
- OSHAS 300 log 2024/2025
- Procedure for setting up and running Pad Printing machine
- Sprinkler system check: company Gilbert Company, 04/16/2025

### 3. Working conditions are safe and hygienic

## Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	Yes
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	<p>Yes</p> <p>Chemicals are used for cleaning, production and maintenance. Chemicals are stored with secondary contention, anti-spill kits, available safety data sheets and emergency eyes wash stations.</p> <p>The ink tank has its own containment and restricted access.</p> <p>Flammable products are stored in appropriate cabinets.</p> <p>Chemicals: raw materials (bar soap, hand sanitizer, shampoo, conditioner, mineral sunscreen, lotion, alcohol, inks, solvents, etc.), cleaning (detergents, sanitizers, disinfectants), maintenance (adhesives, activators, oils, greases, lubricants, etc.).</p>
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
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?	<p>Not Applicable</p> <p>No additional structures.</p>

[← Code area 3](#)

[Code area 4 →](#)

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

[← Code area 3](#)

[Code area 4 →](#)

## 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
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Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
--	---------------------------

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
--	---------------------------

Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
---	---------------------------

Management systems

Explanation for management systems grades

1. Policies and Procedures
- The company maintains a Child Labor Policy and remediation processes, as outlined in the Code of Conduct and Labor and Human Right Process to ensure strict compliance with national labor laws and international standards. The hiring process requires mandatory age verification, and all employee files must contain supporting documentation. In addition, the company provides a copy of its Code of Conduct and Labor and Human Right Policy to all agencies, contractors, and suppliers, reinforcing its zero-tolerance approach to child labor across the supply chain.
2. Resources
- The HR Manager is responsible for overseeing recruitment practices, including age verification, maintaining secure employment records, and training hiring personnel on child labor laws, verification protocols, and tracking employment agencies
3. Communication
- Policies, labor laws, and employee rights are clearly posted in break rooms and production and are also accessible via the Company internal website. Employees receive annual training under the 2025 training plan, and they are encouraged to raise concerns or report potential violations anonymously through the suggestion box, ethics line or directly to HR manager.
4. Monitoring
- Systematic age verification is conducted during recruitment, using official government-issued documents (e.g., IDs, I-9). Copies of verification documents are retained in employee files. Training participation is tracked, and compliance is regularly reinforced through access to internal resources. Site walkthroughs and employee interviews confirmed that no underage workers were present, demonstrating compliance with all legal age requirements. SMETA external audits are conducted biannually to evaluate compliance with the standard and human rights. Last audit was carried out in September 2023. Additionally, the site has HIGG (social and environmental standard in the supply chain) certification and carries out annual internal audits of the management system based on ISO 9001, with the most recent audit in October 2024.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

[← Code area 3](#)

[Code area 5 →](#)



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

4.A The company has a clear commitment against child labor, which affirms adherence to national labor laws and international standards. Minimum age of employment under national law is 16 for the youth apprentice program, but the company has set the minimum age at 18. There are no underage workers in the company.

4.B The facility implements a recruitment and hiring process that includes age verification procedures to ensure all workers meet the legal minimum working age. The Service Agreement with the labor agencies that states no minor can be hired. The company and the agency maintain secure and confidential files, and documentation reviewed during the audit confirmed that all workers are of legal working age.

4.C, 4.D The company does not hire minors under 18 years of age. The youngest employee identified was 24 years old, and no historical records indicate that minors under the age of 18 have been employed. The Code of Conduct and Labor and Human Rights Policy states that no worker under the age of 18 can be hired.

4.E No accommodation provided.

4.F and 4.G The company has established a clear minimum age requirement for employment. While national law permits the hiring of youth apprentices from the age of 16, the company has set a higher minimum age of 18 for all employment.

4.H The facility is in compliance with all the legal requirements regarding child labor.

Evidence examined:

- Site tour
- Employee files (ID verifications)
- Management Interviews
- Employee interviews
- Application documents
- Hiring procedure
- Code of Conduct (rev. 011824)
- HPG Labor and Human Rights Policy (rev. 02082025)
- Employee Handbook
- Management system internal audit (10/23/2024)
- Staffing Agreement between Beacon Promotion, INC and Action Management Group, dated 07/01/2022
- Staffing Agreement between Beacon Promotion, INC and Paydayz Staffing Solutions INC, dated 11/08/2024

#### 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	18
Enter the age of the youngest worker identified	24
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

[← Code area 4](#)

[Code area 5 →](#)

## 5. Legal wages are paid

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
--	---------------------------

Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
--	---------------------------

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
--	---------------------------

Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
---	---------------------------

Management systems

Explanation for management systems grades

1. Policies and Procedures
- The company is committed to ensuring that all employees receive wages in full compliance with applicable labor laws and standards. This commitment is outlined in the Employee Handbook, Code of Conduct and Labor Human Rights Policy, which defines wage policies covering working hours, breaks, rest days, holidays, and payment procedures. Policies explicitly mandate adherence to minimum wage regulations, payment schedules, and wage transparency. Employees are paid accurately, on time, and without unlawful deductions, and each receives a detailed pay slip reflecting gross wages, deductions, and net pay.
- The company pays above the Minnesota state minimum wage, conducting an annual wage review in addition to a wage gap analysis to ensure workers receive a living wage.
2. Resources
- The Human Resources Manager, Mrs. Amy Wroblewski oversees payroll operations, ensuring timely and accurate payments, salary adjustments, payroll record management, and compliance with legal wage requirements.
3. Communication
- At the time of hiring, employees are informed of their working conditions, including salary structure, pay frequency, and benefits. All employees receive the current version of the Employee Handbook and receive training on company policies and procedures. Updates to wage policies or changes in labor legislation are communicated through meetings, bulletin boards, and the company's internal website. Workers have access to their payroll and time records through the app or the company website, and can also contact HR for any assistance or questions. Interviews with 10 employees confirmed consistent communication and understanding of wage-related policies.
4. Monitoring
- Payroll processes are subject to regular review to ensure accuracy and compliance. Weekly verification of hours worked is performed, annual salary reviews are conducted alongside staff performance evaluations, and a living wage assessment is conducted annually. It is verified that workers are paid at or above the living wage, and if compliance is met, an improvement plan is implemented. Employees are encouraged to raise payroll-related concerns directly with HR without fear of retaliation. Internal SMETA audits are conducted biannually, with the most recent internal audit completed in October 2024.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...		GE <a href="#">ZAF601110456</a>

## Systems and evidence examined to validate this code section

5.A The Employee Handbook outlines clear company policies related to payment terms, salary updates, and employee entitlements, providing transparency and consistency in salary management. Wage levels are in full compliance with legal minimum wage requirements and are aligned with the tasks performed. Average salary paid for sampled employees is USD \$20.68 per hour, which is above the minimum wage established by Minnesota State (USD \$11.13 per hour). Wages are paid by bank transfer. There have been no delays in payments; this was evident in interviews with employees.

5.B The facility provides legally mandated benefits, including social insurance, annual leave, and retirement contributions. All social insurance payments are submitted to the relevant authorities in a timely manner. The company provides economic and leave benefit to employees.

5.C Wage deductions are only made for legally required contributions, such as federal and state taxes, Social Security, and Medicare. No payments in kind are made.

5.D There was no evidence of wage deductions as a form of disciplinary action.

5.E Essential meetings and training are held at no cost for the worker and during paid working hours.

5.F The Employee Handbook details information regarding work hours, payment methods and frequency, deductions, benefits, insurance, breaks, and leave.

Employees receive a copy of the Employee Handbook and Code of Conduct when they start work, documents are available on the internal web site and published on the noticeboard. Worker are informed if any updates.

5.G Employees receive clear and understandable written information regarding their wages and working conditions prior to employment. Pay stubs with wage information are provided for each pay period through company app or internal web site, ensuring transparency and easy access to pay-related information.

5.H The facility is in compliance with all relevant legal requirements about wage and benefits.

Evidence examined:

- Pay stubs and time sheets (August 2025, April 2025 and January 2025)
- Workers files
- Workers Interviews
- Bank transfer receipt
- Hiring procedure
- Code of Conduct (rev. 011824)
- HPG Labor and Human Rights Policy (rev. 02082025)
- Employee Handbook
- Management system internal audit (10/23/2024)
- Staffing Agreement between Beacon Promotion, INC and Action Management Group, dated 07/01/2022
- Staffing Agreement between Beacon Promotion, INC and Paydayz Saffitng Solutions

INC, dated 11/08/2024

- Annual salary monitoring
- Employee benefits
- Form 941 (Employers quarterly Federal Tax Return), 2025, OMB 1545-0029
- Staffing Agreement between Mastronardi Produce -USA, INC and Forge Industrial Staffing, dated 8/8/-2024
- Staffing Agreement between Mastronardi Produce -USA, INC and Staffline LLC, dated 06/05/2020
- Benefits
- Internal web site (Workers and company information)
- Employee Performance Review

# Findings: good examples

Good example

ZAF601110456

Code area

5 Legal wages are paid

Workplace requirement

5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.

Description

The company offers some benefits to its staff such as paid holidays; Medical coverage (medical care, prescription drugs, vision, dental, among others), life insurance, disability insurance, accident insurance, critical illness insurance, pet insurance, employee assistance program (legal, financial, and psychological assistance), gifts and events on special dates, Employee of the Month program (recognition), gifts with company products for new employees, a 401(k) retirement savings plan, a MyCigna app with access to health improvement programs, services offered by Mutual of Omaha (will-making assistance, travel insurance, and theft insurance).

Evidence



Benefits.jpeg





## 5. Legal wages are paid

### Data points

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

### Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Life insurance Health care Disability and invalidity coverage
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### Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Weekly	
Is actual wage data available on site for any of these options?	Weekly	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	40.0
	Max hours per month	160.0

[← Code area 5](#)

[Code area 5.A →](#)

Actual required working hours	Required hours per day	8.0
	Required hours per week	40.0
	Required hours per month	160.0
Maximum legal overtime hours	Max hours per day	Non applicable
	Max hours per week	Non applicable
	Max hours per month	Non applicable
Actual overtime hours	Max hours per day	2.0
	Max hours per week	11.0
	Max hours per month	20.0
Minimum legal wage	Min per hour	11.13
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum wage	Actual per hour	17.0
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable
Minimum legal overtime wage	Min per hour	16.7
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable

Actual minimum overtime wage	Actual per hour	25.5
	Actual per day	51.0
	Actual per week	280.5
	Actual per month	510.0

## Wage analysis

Number of workers' records checked	30
Provide the date and details of the records	10 records for August 2025 (Current period) 10 records for April 2025 (Random period) 10 records for February 2025 (Random period)
Are there different legal minimum/legally recognised CBAs wage grades?	No
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Above legal minimum
Indicate the breakdown of workforce per earnings	100% of employees are paid above minimum wage established in Minnesota State USD 11.13 per hour.
Are there any bonus schemes used?	No
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

## 5.A. Living wages are paid

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>5.A.A The company has a Living Wage Policy (rev. 07102025) that establishes the company's commitment to provide living wages, including benefits, to all full-time employees. Annually the calculation of the living wage is carried out, for the calculation the company uses the defined living wage MIT Living Wage and Livingwage.CA calculator. The Living Wage rate estimates are based on the costs of eight components, each of which represents a basic need: childcare, civic engagement, food, health care, housing, internet &amp; mobile, transportation, and other needs. It also includes relevant income and payroll taxes. HPG is committed to ensuring that all full-time employees receive, including benefits, no less than the living wage as defined by the MIT Living Wage and Livingwage.CA calculator.</p> <p>5.A.B As a result of the living wage analysis, it was determined that the living wage for a production worker in the state of Minnesota is USD 23.64, and the average salary, including benefits, provided by the company is USD 25.81.</p> <p>The calculation is performed annually along with the salary adjustment. In addition to merit, advancement, and inflation-based adjustments, if a full-time employee falls below the updated living wage benchmark, their total compensation will be adjusted accordingly.</p> <p>Evidence examined:</p> <ul style="list-style-type: none"> <li>- Management interviews</li> <li>- Employee interviews</li> <li>- Pay stubs and time sheets (August 2025, April 2025, and January 2025)</li> <li>- Living Wage Policy (rev. 07102025)</li> <li>- MIT Living Wage Calculator &amp; Livingwage.CA</li> <li>- Living Wage Benchmark</li> <li>- Code of Conduct (rev. 011824)</li> <li>- HPG Labor and Human Rights Policy (rev. 02082025)</li> <li>- Employee Handbook</li> </ul>		

## 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	Some Improvements Recommended

Management systems

Explanation for management systems grades

1. Policies and Procedures
- The company is committed to ensuring that working hours comply with all applicable national labor laws and international standards. This commitment is reflected in the Employee Handbook, Code of Conduct and Labor and Human Right Policy, which defines policies governing standard working hours, overtime, breaks, and rest days. The company monitors working hours on a weekly basis and enforces controls to prevent excessive overtime. The facility currently operates in two shifts from 6:00 a.m. to 3:00 p.m. and form 12:00 p.m. to 8:00 p.m. form Monday to Friday. All overtime is voluntary and compensated in accordance with legal requirements. Policies and procedures are reviewed annually and updated as necessary.
2. Resources
- The HR Manager is responsible for monitoring working hours, attendance, and ensuring compliance in payroll processing. Working hours and breaks are tracked through a digital timekeeping system, which records daily and weekly attendance for both company and agency workers.
3. Communication
- Upon hiring, employees are informed of their shift schedules, breaks, rest days, and overtime policies. Overtime is communicated in advance to allow employees to make necessary arrangements. Interviews with 10 employees confirmed that overtime is voluntary and undertaken at workers' discretion. All employees have received the most recent version of the Employee Handbook, and have access to Company policies and procedures through billboards, TVs and the internal Company website, where they can also have access to their paystubs and time registers. Updates to working hour policies are communicated via meetings, bulletin boards, and the Company internal website.
4. Monitoring
- All working hours are logged in the digital system, allowing for real-time tracking. The HR department conducts weekly reviews to ensure employees do not exceed 60 hours per week and that all mandated breaks and rest days are observed. Hours worked are detailed on employees' pay slips, ensuring transparency. External SMETA audits are conducted biannually to verify compliance with the standard, internal audits of the Management system are conducted annually (last audit was performed in October 2024) and has HIGG Certification.
- The system is considered to need some improvements since absenteeism is not tracked.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

## Systems and evidence examined to validate this code section

6.A, 6.B Working hours at the facility are regulated in accordance with local and national legislation, which establishes a standard 40-hour workweek. The facility operates in two shifts from 6:00 a.m. to 3:00 p.m. and from 12:00 p.m. to 8:00 p.m. from Monday to Friday. Each shift includes two 15-minute breaks and one 30-minute break along with unrestricted access to restroom and water breaks. Company employees working hours are recorded through a biometric timekeeping system (fingerprint recognition), while agency workers record their hours using a digital system by entering their file number.

6.C Employees are assured 2 days off every 5 days worked.

6.D Through document review and interviews it was found that working hours (normal + overtime) do not exceed 60 hours per week. This was confirmed through workers interviews.

6.E Normal working hours are 40 per week. The average number of hours worked per week excluding overtime is not more than 40 hours per week, if employees work more than the hours that correspond to the shift those are considered overtime.

6.F Overtime is used to manage changes in demand or in exceptional circumstances and is not used to replace regular employment.

6.G Overtime hours are voluntarily performed, without penalty and paid according to the law, as stated by employees.

6.H Overtime is always compensated at a premium rate, which is not less than 150% of the regular rate of pay.

6.I Time control is carried out by means of the time recording clock and weekly control are done by human resources area. The average weekly working hours is 41 and the highest was 60 hours.

6.J The facility is in compliance with laws regarding working hours.

Evidence examined:

- Pay stubs and time sheets (August 2025, April 2025 and January 2025)
- Workers files
- Workers Interviews
- Manager interviews
- Code of Conduct (rev. 011824)
- HPG Labor and Human Rights Policy (rev. 02082025)
- Employee Handbook
- Annual salary monitoring
- Employee Performance Review
- Employee benefits
- Hour weekly control
- Staffing Agreement between Mastronardi Produce -USA, INC and Forge Industrial Staffing, dated 8/8/-2024
- Staffing Agreement between Mastronardi Produce -USA, INC and Staffline LLC, dated 06/05/2020



## 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 site pays an overtime premium of 150% of the regular rate, which complies with local legal requirements and exceed the ETI Base Code recommendation of 125%.
Excluding overtime, what are the regular working hours per week for workers at this site?	40.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	41.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	51.0
Maximum number of days worked without a day off in sample	5

[← Code area 6](#)

[Code area 7 →](#)

## 7. No discrimination is practiced

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

Management systems

Explanation for management systems grades

1. Policies and Procedures
- The company maintains a comprehensive policy framework to ensure a work environment free from discrimination, harassment, and retaliation. These policies are documented in the Code of Conduct and Labor and Human Right Policy, covering nondiscrimination, equal opportunity, harassment prevention, support for employees with disabilities, and a zero-tolerance stance on mistreatment or retaliation. A confidential, secure, and non-retaliatory grievance mechanism is in place, allowing employees to raise concerns regarding working conditions, rights violations, or coercion.
2. Resources
- Oversight of anti-discrimination policies remains with the Human Resources Manager and Compliance Manager who are responsible for reviewing, distributing, communicating, and ensuring the implementation of the Code of Conduct, Labor and Human Right Policy and Employee Handbook. Human Resources manager manages employment relationships, onboarding, training, and staff development. The suggestion box is managed by the General Manager and the Ethic line is managed by the Company Director and HR Manager. They are responsible for handling, investigating, and communicating all complaints received.
3. Communication
- All employees have received a copy of the Employee Handbook and participate in Code of Conduct and Labor and Human Right Policy training. Policies and applicable laws concerning discrimination, harassment, and workplace abuse are posted in break rooms and production areas and are reinforced during training sessions. Employees are informed of their right to report concerns to supervisors, management, or via designated communication channels without fear of retaliation. Additionally, annual Workplace Violence training is conducted to all workers, most recent session in September 2024.
4. Monitoring
- HR maintains ongoing communication with employees, participates in meetings, and organizes engagement activities to promote a positive workplace environment. External SMETA Audits are conducted biannually to assess compliance with this standard and the site has HIGG certification (social and environmental standard). Grievance mechanisms are correctly implemented and managed. As of the audit, no discrimination-related complaints have been reported. Employee interviews confirmed that the workplace is described as respectful and friendly, with no indications of discrimination or mistreatment. The system is considered to need some improvements since some indicators such as turnover rate is not tracked by gender.

No findings

## Systems and evidence examined to validate this code section

7.A – No evidence of discrimination was found based on race, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliation. Employment is based solely on legal eligibility and labor demand. Worker interviews confirmed equal treatment across the workforce.

7B The company's Code of Conduct and Labor and Human Resources Policy includes a clear and detailed antidiscrimination policy which prohibits discrimination in all stages of employment: recruitment, compensation, training, promotion, termination, or retirement. Document review and interviews confirmed that these policies are effectively implemented.

Human Resources Department is responsible for the hiring and promotion process, the person in charge is Mrs. Amy Wroblewski.

7C. Health checks are not required or permitted for workers during the hiring process or during employment when the results are used to unfairly avoid hiring or retaining workers with certain health problems or medical conditions. Pregnancy tests and HIV/AIDS tests are not performed.

7.D The site has a physical suggestion box and an ethics line available for any type of suggestion or complaint. Both channels have been communicated to employees and are available and posted, as confirmed during the facility tour and interviews. There is a Whistleblower Policy that establishes the scope and management of complaints and suggestions. No complaints have been recorded at the site in the last 12 months.

7.E The facility applies fair and transparent practices in recruitment and training. Induction and health and safety training are provided equally to all workers, regardless of background or personal characteristics.

7.F The facility is in compliance with all laws regarding discrimination.

Evidence examined:

- Management Interviews
- Employee interviews
- Employee files
- Code of Conduct (rev. 011824)
- HPG Labor and Human Rights Policy (rev. 02082025)
- Employee Handbook
- Management system internal audit (10/23/2024)
- Onboarding process
- Employee performance review
- Application documents
- Hiring procedure
- Training records
- Facility tour
- Company internal web site (Workers and company information)
- Whistleblower Policy
- Suggestion box
- Ethics line post (QR code, website (www.faceup.com/c/9xgqnjvy) or by phone (1-

208-494-1081)

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[← Code area 6](#)

[Code area 8 →](#)

## 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)?	17%
Representation of women in managerial roles (ratio of women workers to women managers)	5%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	0%
Three most common nationalities in managerial and supervisory roles	American

[← Code area 7](#)

[Code area 8 →](#)

## 8. Regular employment is provided

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
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Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
--	---------------------------

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
--	---------------------------

Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
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## Management systems

### Explanation for management systems grades

#### 1. Policies and Procedures

The company is committed to establishing stable and legally compliant employment relationships, as documented in the Employee Handbook, Code of Conduct and Labor and Human Right Policy which outline fair hiring practices, employment documentation, and worker rights. Currently, 72% of employees are directly hired on a permanent basis, while 28% are temporary workers recruited through labor agencies. Upon hiring, employees complete job application forms and consent documents confirming they have been informed of their employment terms and working conditions. Labor Agencies are responsible for complete application forms and inform workers on their rights and facility working conditions.

#### 2. Resources

The HR area and Compliance Manager oversee the implementation of the Employee Handbook, Code of Conduct and Labor and Human Right Policy. Human Resources Department manages recruitment and selection, handles employment relationships, coordinates onboarding, training, and staff development. They ensure accurate documentation and secure recordkeeping. Managers have the required seniority and expertise to fulfill their responsibilities effectively. Labor agencies are responsible for hiring and onboarding temporary workers, with the Human Resources Department monitoring agency compliance. Company keeps signed and updated Service agreements with labor agencies.

#### 3. Communication

Interviews with 10 employees confirmed that all hires, permanent and temporary, were processed through a transparent system in compliance with local labor laws and internal procedures. Workers reported that employment terms, workplace rules, and working conditions were clearly communicated and having access to the Company internal web site where all their information is available. Employees also receive comprehensive training covering working conditions, working hours, and job rotation practices to support skill development.

#### 4. Monitoring

The company verifies all employee documentation at the time of hiring, including identification, work permits, and residency cards, with support from an external law firm. Copies of these documents are retained in individual employee files. Training programs are evaluated for effectiveness, and retraining is provided as necessary. HR maintains ongoing communication with employees, participates meetings, and organizes engagement activities to foster a positive work environment. Action plans are developed and implemented based on monitoring outcomes. External SMETA audits are conducted biannually to assess compliance with the standard and human rights requirements, internal annual audit of the Management Systema are performed and the site has HIGG Certification.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

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

8.A All workers are hired At Will. The facility has a hiring procedure to ensure the workers have a legal right to work, as part of the procedure is collected documentation to generate a personnel file and verify identity. The company provides hiring papers in language understood by employees, based on a recognized employment relationship established by law.

8.B The company complies with its legal obligations in cases of dismissal, termination, or redundancy; this was verified in the document review and interview with the HR manager.

8.C The facility hires its employees through a selection and interview process based on qualifications and abilities. When a position needs to be filled, an internal search is first conducted, and if the position cannot be filled, an external search is conducted. The facility seeks to empower its own employees. 72% of the employees are permanent and hired directly by the company, and 28% are temporary employees hired by a labor agency. There are up to date signed staffing service agreements with the labor agencies.

8.D The company does not use apprenticeship, temporary, irregular, subcontracted or non-employment work models avoiding its obligations related to regular employment, regardless of legality.

8.E. The company only hires within the framework of the law.

8.F The company does not restrict those who work from finding other employment.

8.G. Not applicable, as no apprenticeship schemes are in place at the facility.

8.H The facility is in compliance with all law regarding regular employment.

Evidence examined:

- Management interviews
- Employees interviews
- Site tour
- Employees files
- Code of Conduct (rev. 011824)
- HPG Labor and Human Rights Policy (rev. 02082025)
- Employee Handbook
- Management system internal audit (10/23/2024)
- Staffing Agreement between Beacon Promotion, INC and Action Management Gropu, dated 07/01/2022
- Staffing Agreement between Beacon Promotion, INC and Paydayz Saffitng Solutions INC, dated 11/08/2024
- Hiring procedure
- Company internal web site

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	71.43%
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	28.57%
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

The company has established clear procedures and practices to ensure that all work is performed on-site under controlled conditions and that subcontracting or homeworking is not used without prior authorization and oversight. All production processes are completed within the facility. The site maintains full control over its production and maintenance processes, which are planned internally to meet operational demands.

#### 2. Resources

The General Manager, who is responsible for overseeing production activities and managing direct labor, collaborate to identify labor needs in advance, plan workforce allocation, and ensure internal staffing levels are sufficient to meet demand. He coordinated planning and cross-functional team structure ensure that production targets are met without resorting to subcontracting or homeworking arrangements.

#### 4. Communication

All employees receive training on company policies and procedures during onboarding and annual training sessions, which include role-specific content and periodic reviews of work practices. During, interviews employees confirmed that no subcontracted workers or homeworkers are used and that all operations are conducted on-site, under the direct supervision of site management.

#### 4. Monitoring

The site carries out regular monitoring of production and maintenance plans to ensure that all work remains internal and that production schedules are met without the need for subcontracting. Any deviation or labor shortfall is addressed proactively by adjusting shift planning, reallocating internal resources and adding temporary workers. External SMETA audits are conducted annually to verify compliance with the standard and with human rights requirements, internal Management system audits are conducted annually and the site has HIGG certification.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

[← Code area 8](#)

[Code area 9 →](#)

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

8.A.A The facility does not engage in sub-contracting or homeworking. All work is carried out directly on site by facility employees directly hired and temporary employee hired by agency labor. Therefore, no client authorization for subcontracting is required.

8.A.B As no sub-contracted work is performed, there are no records of subcontractors. All production activities, including printing, transferring, mixing, filling, packaging, palletizing, storage, and shipping are conducted directly by company and agency workers.

8.A.C No homeworking arrangements exist at the site. All work is performed on-site facilities. Worker interviews confirmed that no employees perform work at home or off-site.

8.A.D The facility is in compliance with all law regarding sub-contracting or homeworking.

Evidence Examined:

- Management interviews
- Employees interviews
- Site tour
- Employees files
- Code of Conduct (rev. 011824)
- HPG Labor and Human Rights Policy (rev. 02082025)
- Employee Handbook
- Management system internal audit (10/23/2024)
- Time clock records
- Production records
- Maintenance records

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

No homeworkers were used.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?

No

No sub-contrators were used.



Are any sub-contractors used? No

# 9. No harsh or inhumane treatment is allowed

## Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

Management systems

Explanation for management systems grades

1. Policies and Procedures
- The company maintains a zero-tolerance policy against any form of harsh, inhumane, or abusive treatment, as set out in the Code of Conduct and Labor and Human Rights Policy. These documents include clear guidelines on harassment prevention, respectful workplace behavior, and dignified treatment of workers. Policies are formally documented and reinforced through onboarding and annual training sessions. A confidential, secure, and non-retaliatory grievance mechanism is in place to allow employees to report concerns regarding working conditions, rights violations, or coercion.
2. Resources
- The Human Resources Manager and Compliance Manager are responsible for reviewing, distributing, and ensuring the implementation of the Code of Conduct and Human Rights Policy. Human Resources Department manages employment relationships, onboarding, training, and staff development. The suggestion box is managed by the General Manager and the Ethic line is managed by the Company Director and HR Manager. They are responsible for handling, investigating, and communicating all complaints received.
3. Communication
- Interviews with 10 workers confirmed that the work environment is respectful and free from coercion, pressure, or mistreatment. Workers reported full freedom of movement, the right to resign freely, and respectful treatment by supervisors and managers. Policies and applicable laws concerning discrimination, harassment, and workplace abuse are posted in break rooms and production areas and are reinforced during training sessions. Employees are informed of their right to report concerns to supervisors, management, or via designated communication channels without fear of retaliation. Additionally, annual Workplace Violence training is conducted to all workers, most recent session in September 2024.
4. Monitoring
- All training programs are regularly evaluated for effectiveness. HR maintains continuous communication with employees, participate in meetings, and organizes engagement activities to support a positive workplace culture. Worker interviews confirmed that the workplace is respectful and friendly, with no signs of mistreatment. Employee feedback and monitoring activities confirm that the workplace remains safe, respectful, and free from inhumane practices. External SMETA audits are conducted biannually to assess compliance with the standard and human rights requirements, internal annual audit of the Management Systema are performed and the site has HIGG Certification (social and environmental standard).

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

## Systems and evidence examined to validate this code section

9.A No evidence of harsh or inhumane treatment, including gender-based violence or harassment, was identified during the audit. Worker interviews confirmed respectful treatment by supervisors and management.

9.B The company's Employee Handbook, Code of Conduct and Labor and Human Rights Policy includes clear fairness and antiharassment policies, covering the prevention of discrimination, forced labor, and workplace harassment. During the audit, no evidence of harsh, abusive, or inhumane treatment—including physical punishment, verbal abuse, or threats—was observed.

The overall working atmosphere appeared positive, and employees reported good relationships both with each other and with management.

9.C A formal Disciplinary Procedure, included in the Employee Handbook, is implemented and communicated to workers. Procedures are fair, progressive, and do not involve financial penalties or abusive practices. Record of disciplinary action are saved in personal files and under HR custody.

9.D Measures to prevent and control the risks of harassment and inhumane treatment include initial and ongoing training, workplace announcements, anonymous reporting system, and meetings with workers. The site does not provide housing or transportation.

9.E All workers have received and are trained in the Code of Conduct, the Labor and Human Rights Policy and the Employee Handbook. All documents are available on the company's internal website to which all workers have access. Additionally, workers are annually trained in Worker Violence (how to be aware and prepared to the potential violence), with the last training in September 2024.

Supervisors and management were included to ensure understanding of responsibilities. Worker interviews confirmed awareness of the policy.

9.D The company has implemented measures to prevent and control risks of harsh or inhumane treatment, including gender-based violence and harassment, based on the identification of hazards and risks.

9.G The company does not carry out body searches, as evidenced by the visit to the premises and interviews with employees.

9.H The site has a physical suggestion box and an ethics line available for any type of suggestion or complaint. Both channels have been communicated to employees and are available and posted, as confirmed during the facility tour and interviews. There is a Whistleblower Policy that establishes the scope and management of complaints and suggestions. No complaints have been recorded at the site in the last 12 months.

9.I The facility is in compliance with all laws regarding harassment.

Evidence examined:

- Management Interviews
- Employee interviews
- Employee files
- Code of Conduct (rev. 011824)
- HPG Labor and Human Rights Policy (rev. 02082025)

- Employee Handbook
- Management system internal audit (10/23/2024)
- Onboarding process
- Employee performance review
- Application documents
- Hiring procedure
- Training records
- Facility tour
- Company internal web site (Workers and company information)
- Whistleblower Policy
- Suggestion box
- Ethics line post (QR code, website (www.faceup.com/c/9xgqnjvy) or by phone (1-208-494-1081))

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 company has a physical suggestion box and an ethics line that can be accessed via a QR code, website (www.faceup.com/c/9xgqnjvy) or by phone (1-208-494-1081).
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
- The company is committed to minimizing its environmental impact and promoting sustainability across all operations. A Quality, Safety and Environment Policy (Management System Manual, Rev. 01, 01/01/2024) which establishes compliance with applicable legislation and continuous improvement in environmental performance. Environmental risk assessments, goals, resource and energy reduction and waste recycling programs, and procedures are in place, implemented and reviewed periodically, based on their criticality or when special circumstances arise. The site has HIGG certification, which is a social and environmental performance standard in the supply chain.
2. Resources
- Environmental and sustainability management is overseen by Mr. John McMahon, Compliance Manager, who has the authority and expertise to implement effective systems and processes; with the support of Mr. Tom Ryam, General Manager. Human Resources coordinates and monitors environmental training needs and their execution.
3. Communication
- Environmental topics, including emergency procedures and workplace hazards, are part of the annual training plan. Employees confirmed in interviews that they had received training and were familiar with basic environmental procedures. Training effectiveness is monitored through evaluations and safety meetings, which encourage continuous dialogue between workers and management. Policies and procedures are available to all employees on the Company internal website for reference.
4. Monitoring
- The site prioritizes waste reduction, proper waste management, and energy conservation. Consumption of energy, gas, water, waste generation and gas emissions are tracked, and the facility holds valid environmental permits. The company has goals related to energy saving and waste reduction. Environmental practices are regularly reviewed to ensure compliance with legal requirements and client expectations, while progress is monitored through improvements in resource efficiency and reductions in environmental impact.
- External SMETA audits are conducted biannually to evaluate compliance With the standard and human rights, internal audit of the Management System are carried out annually, with last audit in October 2024 and the site has HIGG certification.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

## Systems and evidence examined to validate this code section

10.A.A The facility demonstrates a commitment to environmental responsibility and compliance with applicable local and national environmental regulations. The site has all necessary legal permits to operate in accordance with the nature of its activities. Environmental requirements and updates are communicated internally through policies and procedures, including training sessions on chemical handling, SDS, and waste handling.

10.A.B The site complies with applicable environmental laws and maintains valid permits and documentation. The site does not use water in the process; the water is used for cleaning and worker use. The water used at the facility is city water, and the generated effluent is discharged directly into the sewer system. Waste is managed through structured systems: private collection for common waste; recyclable waste (cardboard and paper, glass, plastic and tin and aluminum) are separated, stored separately and removed by special companies for recycling; Hazardous waste (rags with inks) are stored separately and removed for washing and product recovery by a specialized and authorized company. Environmental improvements include reducing waste generation through improved recycling practices.

10.A.C The company maintains a clear understanding of its customers' environmental requirements and is fully aware of and complies with each customer's specific requirements regarding hazardous substances.

10.A.D The facility maintains a list of chemicals used. At the site chemicals are used for cleaning, maintenance, and production. Cleaning chemicals are correctly stored, SDS, and eye wash stations are available. Maintenance chemicals are stored in cabinets according to their use and flammability. The inks are stored in a specially equipped room, with containment and cabinets according to the flammability of the products.

Workers receive annual training in chemical handling, and the ammonia operator receives appropriate training.

Examined evidence:

- Site tour
- Code of Conduct (rev. 011824)
- HPG Labor and Human Rights Policy (rev. 02082025)
- Employee Handbook
- Management system internal audit (10/23/2024)
- Employee interviews
- Management interviews
- Training records (Chemicals handling – 01/14/2025)
- Chemical SDS

Quality, Safety and Environment Policy (Management System Manual, Rev. 01, 01/01/2024)

- Emergency Response Plan Test Log (Procedure 2.1.6.2 IMSP-ERPT)
- Emergency Response Plan (Procedure 2.1.6.2 IMSP-ERPT)
- Workplace Inspection checklit, dated 04/14/2025

- Chemical list
- Safety Audit: company: OECS, General Industry Safety Audit Report, date 08/26/2025
- Hazardous waste retirement and treatment: Clean and Management Environmental Group Service Agreement # 93374, dates 2/27/25.
- HIGG Fem Certification, worldly ID 164963, 2024, issued by Intertek
- Gas emissions control
- Electricity invoice: Dakota Electricity Association Account Number: 200010074043, Premises ID: 93274, period August 2025
- Minnesota Energy Resources, account N°0506803082-00002, invoice date 05/12/2025
- General waste removal: company Dicks Sanitization INC, Account No. 3460-1023530-001, invoice No. 12357402T460, dated 9/1/2025

## 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?	The site has HIGG certification, which is a social and environmental performance standard in the supply chain. HIGG Fem Certification, worldly ID 164963, 2024, issued by Intertek.
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	No

[← Code area 10.A](#)

[Code area 10.B →](#)

# 10.B. Environment 4-Pillar

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

[← Code area 10.A](#)

[Code area 10.C →](#)

## Systems and evidence examined to validate this code section

10.B.E. The company identifies and monitors potential negative environmental impacts from its operations; tracks resource consumption, waste generation, and gaseous emissions; and establishes programs to reduce energy usage and improve recyclable waste generation. Systems are in place to prevent, mitigate, and remedy impacts, including waste segregation (general waste, recyclable waste (cardboard and paper, glass, tin and aluminum)).

10.B.F There is a Quality, Safety and Environment Policy (Management System Manual, Rev. 01, 01/01/2024), which states company commitments to improve environmental performance. Policies and procedures are communicated to workers through training sessions. The responsibility for coordinating the site's efforts to improve environmental and sustainability performance is Mr. John McMahon, Compliance Manager, who has the necessary competencies.

10.B.G The company has established environmental goals related to improving air quality (air quality measurements), reducing electricity consumption (installing motion-sensing lights in the warehouse, installing 100% LED lighting in the facility, and installing automatic light shutoffs), and reducing water consumption (installing high-efficiency sinks and toilets). In addition, cardboard and hazardous waste are recycled (washing and recovery of solvents, inks, and oils). The production process does not use water, water is only used for cleaning, staff quarters and consumption.

10.B.H The facility monitors and records its resources consumption (electricity, gas, water, ammonia) and waste generation (general, recyclable, hazardous waste).

10.B.I The company monitors and mitigates its biodiversity impacts, they track carbon footprint and works in its reduction and the company has HIGG certification. The company requesting it supplier receives SMETA audits.

Examined evidence:

- Site tour
- Code of Conduct (rev. 011824)
- HPG Labor and Human Rights Policy (rev. 02082025)
- Employee Handbook
- Quality, Safety and Environment Policy (Management System Manual, Rev. 01, 01/01/2024),
- Management system internal audit (10/23/2024)
- Objectives and Targets (Procedure: 6.2 IMSP-OT)
- Employee interviews
- Management interviews
- Training records (Chemicals handling – 01/14/2025)
- Chemical SDS
- Quality, Safety and Environment Policy (Management System Manual, Rev. 01, 01/01/2024)
- Emergency Response Plan Test Log (Procedure 2.1.6.2 IMSP-ERPT)
- Emergency Response Plan (Procedure 2.1.6.2 IMSP-ERPT)
- Workplace Inspection check list, dated 04/14/2025

[← Code area 10.A](#)

[Code area 10.C →](#)

- Chemical list
- Safety Audit: Company: OECS, General Industry Safety Audit Report, date 08/26/2025
- Hazardous waste retirement and treatment: Clean and Management Environmental Group Service Agreement # 93374, dates 2/27/25.
- HIGG Fem Certification, worldly ID 164963, 2024, issued by Intertek
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- Electricity invoice: Dakota Electricity Association Account Number: 200010074043, Premises ID: 93274, period August 2025
- Minnesota Energy Resources, account N°0506803082-00002, invoice date 05/12/2025
- General waste removal: company Dicks Sanitization INC, Account No. 3460-1023530-001, invoice No. 12357402T460, dated 9/1/2025



## 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?	No
What additional specific environmental policies does the site capture?	Other (provide details)  No additional environmental policies.
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?	None
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	Yes  The company has goals related to improving air quality (air quality measurements), reducing electricity consumption (installing motion-sensing lights in the warehouse, installing 100% LED lighting in the facility, and installing automatic light shutoffs), and reducing water consumption (installing high-efficiency sinks and toilets). In addition, cardboard and hazardous waste are recycled (washing and recovery of solvents, inks, and oils).
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

[← Code area 10.B](#)

[Code area 10.C →](#)

	Last full calendar year (2024)	Previous full calendar year (2023)
Total electricity consumption from non-renewable sources (kWh)	623,232	602,208
Total electricity consumption from renewable sources (kWh)	Data not available	Data not available
Sources of renewable energy used	None	None
Types of renewable energy used	Data not available	Data not available
Total natural gas consumption (kWh)	695,758	563,792
Usage of other purchased fuels	Data not available	Data not available
Has the site completed any carbon footprint analysis?	No	No
Water sources	City Water	City Water
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	247,995	235,995
Water discharged	City Utilities	City Utilities
Water volume discharged (m3)	939.9	894.4
Water volume recycled (m3)	Data not available	Data not available
Total waste produced (mt)	102.1	127
Total hazardous waste produced (mt)	0.1	14

[← Code area 10.B](#)

[Code area 10.C →](#)

Waste to recycling (mt)	33	32
Waste to landfill (mt)	69	81
Waste to other (mt)	Data not available	Data not available
Total product produced (mt)	409,953	323,468

# 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

[← Code area 10.B](#)

## Management systems

### Explanation for management systems grades

1. Policies and Procedures
- The company has established a structured framework to ensure ethical conduct and integrity across all operations. These commitments are set out in the Code of Conduct, Labor and Human Right Policy and the Employee Handbook, which cover anticorruption and anti-bribery, fair business practices, conflicts of interest, confidentiality, and responsible communication. Supplier evaluation and monitoring procedures are formalized to ensure compliance with ethical standards. There is an ethical line in place available for workers and stakeholders.
2. Resources
- The General Manager is responsible for implementing and overseeing business ethics procedures.
- the Ethic line is managed by the Company Director and HR Manager. They are responsible for handling, investigating, and communicating all complaints received.
3. Communication
- All employees are aware of the Employee Handbook, Code of Conduct and Labor and Human Rights Policy and have attended the trainings and also confirmed being aware of the Ethic Line.
4. Monitoring
- The company complies with all applicable legislation and maintains transparency in its commercial practices. Risk assessments form part of the supplier approval process. As of the audit, no ethics-related complaints have been reported. External SMETA audits are carried out biannually, and requires its suppliers receive SMETA audits too. Additionally, the site conducts internal Management System audits.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

[← Code area 10.B](#)

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

10.C.A, 10.C.C, 10.C.D According to management interviews, the facility is fully aware of and complies with national laws and regulations related to Business Integrity Standards. Operations are conducted in an ethical manner, with a strict prohibition on bribery, corruption, fraud, or any undue advantage. The facility maintains all required permits and authorizations necessary to operate on-site. Business integrity standards, including policies on conflict of interest and confidential information, are formally established in the Code of Conduct, Labor and Human Rights Policy and the Employee Handbook. These standards are communicated to employees and extended to relevant external stakeholders, including suppliers.

10.C.B, 10.C.F The site has a physical suggestion box and an ethics line available for any type of suggestion or complaint. Both channels have been communicated to employees and are available and posted, as confirmed during the facility tour and interviews. The Ethic line is communicated to third parties and available on the Company website. There is a Whistleblower Policy that establishes the scope and management of complaints and suggestions. No complaints have been recorded at the site in the last 12 months. Additionally, there is a procedure for handling customer complaints.

10.C.G All employee files and supplier-related information are handled in compliance with applicable laws and are maintained under strict confidentiality protocols.

10.C.H During the last year, no charges or prosecutions related to business ethics have been filed against the facility or its personnel. Nonetheless, management has procedures in place to provide immediate support and response should any such issue arise.

10.C.I The facility confirms that it holds and maintains all legally required permits and authorizations necessary to conduct its operations on-site.

Evidence examined:

- Site tour
- Management Interviews
- Employee interviews
- Code of Conduct (rev. 011824)
- HPG Labor and Human Rights Policy (rev. 02082025)
- Employee Handbook
- 5.1.2.1 Customer Complaint Management Procedure.
- Management system internal audit (10/23/2024)
- Training records
- Facility tour
- Company internal web site (Workers and company information)
- Whistleblower Policy
- Suggestion box
- Ethics line post (QR code, website (www.faceup.com/c/9xgqjvvy) or by phone (1-208-494-1081)
- Incoming Goods and Services (Program: 2.4.5 IMSP-IGS), supplier evaluation

[← Code area 10.B](#)

10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?	No
Provide any certified anti-bribery management systems for the site	No anti-bribery Management Systems certification.

[← Code area 10.C](#)

## Attachments



[R-Cloud-25080927 - Audit  
Photos\\_ZAA600157365.pdf](#)



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