SMETA

Sedex Members Ethical Trade Audit Report

Version 6.1

Audit Details			
Sedex Company Reference: *(only available on Sedex System)*	ZC1006394	Sedex Site Reference: *(only available on Sedex System)*	ZS1067812
Business name (Company name):	CTP Srl		
Site name:	CTP s.r.l.		
Site address:	Via Tribolina, 30 Grumello del Monte 24064 IT	Country:	IT
Site contact and job title:	Carla Pagani / QA Manager		
Site phone:	035832555	Site e-mail:	giulia@ctp-srl.it

SMETA Audit Pillars:	☑ Labour Standards	☑ Health and Safety (plus Environment 2-Pillar)	☑ Environment 4-pillar	☑ Business Ethics
Date of Audit:	2024-09-05			

Audit Company Name:
Intertek Italy

Audit Conducted By					
Affiliate Audit Company	☑	Purchaser	☐	Retailer	☐
Brand owner	☐	NGO	☐	Trade Union	☐
Multi-stakeholder	☐	Combined Audit (select all that apply)			

Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

(2) The audit scope was against the following reference documents

2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
  - Universal rights covering UNGP
  - Management systems and code implementation,
  - Responsible Recruitment
  - Entitlement to Work & Immigration,
  - Sub-Contracting and Home working,

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)

(3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.

(4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

SMETA Declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Best Practice Guidance and SMETA Measurement Criteria.

(1) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.

(2) Any Non-Compliance against customer code alone shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Auditor Team			
Lead Auditor:	Eugenio Peluso	APSCA Number:	21701574
Additional Auditors:			
Date of declaration:	2024-09-06		

Note: The focus of this ethical audit is on the ETI Base Code and local law. The additional elements will not be audited in such depth or scope, but the audit process will still highlight any specific issues.

Site Representation	
Full Name:	Carla Pagani
Title:	QA Manager
Date of declaration:	2024-09-06
Comments: *Any exceptions to this must be recorded here (e.g. different sample size):* *Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).* *The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives*	
None	

Summary of Findings

Issue *(please click on the issue title to go direct to the appropriate audit results by clause)*	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP	0.A.6		0	1	0	Obs - ZAF600479552
0B - Management Systems and code implementation	0.B.5		0	1	0	Obs - ZAF600479553
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
3 - Working conditions are safe and hygienic	3.1 3.2	§1 §2	2	0	0	NC - ef2fa1a9-f8c1-4eae-81b9-ac77ccfe2c33 NC - fee5bfe4-7ee6-49c9-bc48-cbe37ecc2cdd
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid			0	0	2	GE - 9c4c0185-6005-428b-8275-dd870db45ba0 GE - 55ca7350-1a76-4b05-8d0c-b84fdda0e9bf
6 - Working hours are not excessive			0	0	0	
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is allowed			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2–pillar			0	0	0	
10B4 - Environment 4–pillar			0	0	0	
10C - Business ethics 4-pillar			0	0	0	

Local Law Issues

Issue	Description
§1	DM 09/2021 requires that doors along evacuation routes can be opened by single push movement
§2	DM 09/2021 requires that all employees participate in an emergency drill at least once a year.

Site Details

Site Details			
Company Name	CTP Srl		
Site Name	CTP s.r.l.		
GPS location (if available)	**GPS Address:**	N/A	
	Coordinates:	Latitude: 45.627231 - Longitude: 9.886709	
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business licence n. BG173238 valid until 31/12/2050 VAT n. 00801610163		
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Production of promotional items in plastic and scented rubber		
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The facility is located in a private area, on 1 concrete building, build from 1980 and 1985, not shared by other companies, in Via Tribolina – Grumello del Monte, near Bergamo and Milan, in North Italy. The facility complete premises were around 11.000 square meters (internal and external areas). Production area and warehouse (on ground floor) are around 6.000 sq. meters. Present 1 apartment on the second floor of the office building granted to 1 employee with guardian duty (with contract of use registered in 2013), not present dormitory. Not present other companies.		
Structure and number of buildings	**Building Name:**	1	
	Floor	**Description**	**Remark**
	Basement	Tumlering departmentr	N/A
	1st	Reception, offices, production area, warehouse, changing rooms, cafeteria	N/A
	2nd	Automatic warehouse and guardian apartment	N/A
Visible structural integrity issues (large cracks) observed?	☐ Yes ☑ No Please give details: None observed		
Does the site have a structural engineer evaluation?	☑ Yes ☐ No Please give details: Included in project approved by Municipality		

Site function	☐ Agent ☐ Factory Processing/Manufacturer ☑ Finished Product Supplier ☐ Grower ☐ Homeworker ☐ Labour Provider ☐ Pack house ☐ Primary Producer ☐ Service Provider ☐ Sub-contractor
Months of peak season	
Process overview	Main products on site manufactured by facility were production of promotional items in plastic and scented rubber of various colours and sizes. Main operations: prototyping, mould construction, purchase of raw materials (polymers, dyes), incoming controls, injection moulding, QC, packaging and shipping Present 1 production line (for production of promotional items in plastic and scented rubber), main equipment was 26 injection moulding machines
What form of worker representation is there on site?	☐ Union ☐ Worker Committee ☑ Other ☐ None
Please give details:	Employees Representative for H&S
Is there any night production work at the site?	☐ Yes ☑ No
Are there any on site provided worker accommodation buildings	☐ Yes ☑ No Please give details:
Are there any off site provided worker accommodation buildings	☐ Yes ☑ No Please give details:
Were all site provided accommodation buildings included in this audit	☐ Yes ☑ No Please give details: N/A

Audit Parameters					
Time in and time out	Day 1		Day 2		
	In	09:00	In	09:00	
	Out	17:00	Out	13:00	
Audit type:	PERIODIC				
Was the audit announced?	ANNOUNCED				
Was the Sedex SAQ available for review?	Yes				
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No				
Who signed and agreed CAPR	Carla Pagani / QA Manager				
Is further information available	No				

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	No Union Representative at this site		
Reason for absence during the audit	No Union Representative at this site		
Reason for absence at the closing meeting	No Union Representative at this site		

Worker Analysis

The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity.

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – male	26	1	1	0	0	0	0	28
Worker numbers – female	17	0	2	0	0	0	0	19
Total	43	1	3	0	0	0	0	47
Number of Workers interviewed – male	4	1	1	0	0	0	0	6
Number of Workers interviewed – female	3	0	1	0	0	0	0	4
Total – interviewed sample size	7	1	2	0	0	0	0	10

Nationalities Structure		
Nationality of Management	Italian	
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Italian approx %: 100%	
Was this list completed during peak season?	☐ Yes ☑ No Please give details: No specific peak period	
Worker remuneration	Workers on piece rate:	0%
	Paid hourly:	0%
	Salaried:	100%
Payment cycle	Paid daily:	0%
	Paid weekly:	0%
	Paid monthly:	100%
	Other:	0%
	Details for other:	N/A

Worker Interview Summary	
Were workers aware of the audit?	☑ Yes ☐ No
Were workers aware of the code?	☑ Yes ☐ No
Number of group interviews:	1 group of 4
Number of individual interviews:	Male: 3 Female: 3
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	☑ Yes ☐ No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☑ Yes ☐ No
In general, what was the attitude of the workers towards their workplace?	☑ Favorable ☐ Non-favourable ☐ Indifferent
What was the most common worker complaint?	None
What did the workers like the most about working at this site?	Working environment
Any additional comment(s) regarding interviews:	None
Attitude of workers to hours worked:	Overtime is voluntary
Is there any worker survey information available?	☐ Yes ☑ No Please give details:

Attitude of workers:
10 workers were interviewed in a private office. All interviewed employees declared to be proud to work with this company and to be treated fairly. All employees have an individual labour contract in place. The hiring contract displays all hiring terms: working rights, hours and rules, compensation, length of the contract, overtime compensations. Interviewed employees were aware of the grievance systems adopted by the company.
Attitude of worker's committee/union reps:
The Employees Representative for H&S was interviewed and confirmed the good relationship between workers and management. He also confirmed that he can conduct its activities as Workers Representative without any obstacle from the Management. No concerns emerged.
Attitude of managers:
The management was receptive during the whole audit process. All the requested documentation was made available for review. The facility walkthrough was performed with no restriction as well as employees' interviews.

0A - Universal Rights covering UNGP [Summary of Findings]
0A: Compliance Requirements 0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers. 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights 0.A.3 Businesses shall identify their stakeholders and salient issues. 0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights. 0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation. 0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
The Company has an Ethic Code dated 15/05/2024 signed by Marco Pagani (Administrator). It is communicated to all employees and suppliers. The Code is posted in bulletin board and on company web site. Each worker receives a copy of the Code. Responsible for implementation is Marco Pagani (Administrator).
Evidence examined:
Social Policies and sector collective agreement containing ethical code and procedure, employees training records and training material, notice board, list of suppliers, contract with external company providing updates on national and international laws on labour standards, Health and Safety and Environment
Any other comments:
None

Policy statement that expresses commitment to respect human rights?	☑ Yes ☐ No Please give details: Included in Ethic Code
Are the policies included in workers' manuals?	☑ Yes ☐ No Please give details: Included in workers' manuals
Does the business have a designated person responsible for implementing standards concerning Human Rights?	☑ Yes ☐ No Please give details: Marco Pagani (Administrator)
Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	☑ Yes ☐ No Please give details: Suggestion box

Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	☑ Yes ☐ No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	☑ Yes ☐ No Please give details: Internal procedures respect European Privacy Law EU GDPR 2016/679.
Measuring Workplace Impact	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 0.0% This year 0.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	0.0%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 0.0% This year 0.0%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	0.0%
Are accidents recorded?	☑ Yes ☐ No Please give details: Accident register maintained
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year 0.0% This year 0.0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%
Lost day work cases per 100 workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year 0.0% This year 0.0%

% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

Observation	Evidence

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Observation	
Status	CLOSED
Reference	ZAF600479552
Clause	0A - Universal Rights covering UNGP
Issue Title	11 - Indication of poor relationship / tension between management and workers
Subcategory	Site's Management systems & Monitoring
New or carried over?	☐ New ☑ Carried Over
Raised by audit	ZAA417023516
Resolved by audit	ZAA600066945
Root cause	☐ Training ☐ System ☐ Costs ☐ Lack of workers ☑ Other
Root cause - Other	N/A
ETI code	0.A.6 - Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.
Explanation to the observation	Based on facility tour and employees' interview, it was noted that there is no present in place transparent and simple system for confidentially reporting human rights impacts, but only verbal exchange.
Actions	The site has adopted a suggestion box
Additional comments	all comunications to the emplyees are sent through email and then attached to the notice board at the facility entrance, so that they are always available. In the images attached are shown the quality and safety organigrams, the company policy, the higienic and cleaning policy, the cleaning products safety sheets, the covid safety measures and the ethical code. The corrective action is adequate

0B - Management Systems and code Implementation [Summary of Findings]
0B: Compliance Requirements 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code. 0.B.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code. 0.B.3 Suppliers are expected to communicate this Code to all employees. 0.B.4 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with. 0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
The Facility has developed adequate procedures to manage the compliance with the Code. The principles of the SMETA Code are included in the Code of Ethics and Policy. All workers have been informed about the contents of the code and the methods of SMETA audit through some training actions. Suppliers have been advised about the principles of the Code. The Supplier Is operating In premises with correct business license and permissions. Responsible for compliance with the Code Is Marco Pagani
Evidence examined:
Sector collective agreement containing ethical code and procedure, Employees training records and training material, Notice board, List of suppliers, Contract with external company providing updates on national and international laws on labour standards, Health and Safety and Environment.
Any other comments:
None

Management Systems	
In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	☐ Yes ☑ No Please give details: According to Management interviews and search on internet the site has not been subject to any fines/prosecutions in the last 12 months.
Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	☑ Yes ☐ No Please give details: Policies exist for all of these areas (Forced labour, Health and Safety, Living Wage, Working Hours, Harsh treatment, Environment and Business Ethics)
If Yes, is there evidence (an indication) of effective implementation? Please give details.	No issues emerged during the audit
Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	☑ Yes ☐ No Please give details: The Code of Ethics is communicated to all employees (posted on notice board and on web site)

If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	☑ Yes ☐ No Please give details: Confirmed during interviews and training records available.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	☑ Yes ☐ No Please give details: ISO 9001 by Eurocertifications srl expiration 30.08.2027 - FS HPC by BV expiration 14.09.2025 - Plastica Seconda Vita by Kiwa Cermet Italia SpA expiration 26.06.2025
Is there a Human Resources manager/department?	☑ Yes ☐ No Giulia Pagani (HR Manager)
Is there a senior person /manager responsible for implementation of the code?	☑ Yes ☐ No Please give details: Marco Pagani (Administrator)
Is there a policy to ensure all worker information is confidential?	☑ Yes ☐ No Please give details: Internal privacy procedures based on EU Reg. 679/2016
Is there an effective procedure to ensure confidential information is kept confidential?	☑ Yes ☐ No Please give details: Based on local law on privacy
Are risk assessments conducted to evaluate policy and procedure effectiveness?	☑ Yes ☐ No Please give details: Internal and external audits are conducted periodically
Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	☑ Yes ☐ No Please give details: During periodical management meetings held at least annually.
Does the facility have a policy/code which require labour standards of its own suppliers?	☑ Yes ☐ No Please give details: The Company requires all suppliers to subscribe its Code of Ethics.
Land Rights	
Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	☑ Yes ☐ No Please give details: Facility has local law license and land rights for processing. Present permission to build and Building license issued by the offices of the Municipality of Grumello sul Monte for the construction of the industrial warehouse, containing the indication of the rights on the ground where the company's production building was built. There are no other forms of land use, there are no other forms of direct management of intensive activities on the territory.

Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	☑ Yes ☐ No Please give details: Legal office at the facility check local law for land rights and management. No detected any inconsistencies. There are no other forms of land use, there are no other forms of direct management of intensive activities on the territory.
Does the site have a written policy and procedures specific to land rights?	☑ Yes ☐ No Please give details: Included in company policies
Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?	☑ Yes ☐ No Please give details: Purchase contract available
Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	☐ Yes ☑ No Please give details: N/A
Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?	☐ Yes ☑ No Please give details: No evidence found

Observation	Evidence

[Back to findings summary]

Observation	
Status	CLOSED
Reference	ZAF600479553
Clause	0B - Management Systems and code Implementation
Issue Title	37 - The ethical Code (i.e. ETI Base Code for SMETA audits) is not communicated to the site's own suppliers
Subcategory	Site's Systems to Manage Supplier Compliance
New or carried over?	☐ New ☑ Carried Over
Raised by audit	ZAA417023516
Resolved by audit	ZAA600066945
Root cause	☐ Training ☐ System ☐ Costs ☐ Lack of workers ☑ Other
Root cause - Other	N/A
ETI code	0.B.5 - Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.
Explanation to the observation	Based on management interview and documents review, it was noted that there was no communication to suppliers of Code of Ethics and labour standard statement.
Actions	The ETI Code has been sent to all suppliers
Additional comments	The code of ethics has been sent to the primary packaging suppliers and the read-confirmations has been archived. The corrective action is adequate

1 - Freely chosen Employment [Summary of Findings]
1: Compliance Requirements 1.1 There is no forced, bonded or involuntary prison labour. 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
Forced, bonded or involuntary prison labor forbidden by law. Through the employees' interviews and documents review, it was noted that employees are working voluntarily, all labor contracts are signed by both parties and maintained on their files. Workers can leave the factory after a prior notice as stated by the National Labor Contract, on role and seniority bases (from a minimum of 15 days). There is no evidence of deposits. Just copies of ID are kept on file by the factory. All the work force is hired on the base of the CBA. The National Workers' Statute Law 300/1970 is respected.
Evidence examined:
Hiring contracts – CBA – Code of rules – Personnel files – Facility policies
Any other comments:
None

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ☑ No Please give details: Confirmed during workers interviews
If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	☐ Yes ☐ No ☑ Not Applicable Please give details: N/A
Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	☐ Yes ☑ No Please give details: Confirmed during workers interviews

Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	☑ Yes ☐ No ☐ Not Applicable Please give details: Confirmed during Management interviews
Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	☑ Yes ☐ No Please give details: The site strictly follows all local Law requirements.

2 - Freedom of Association and Right to Collective Bargaining are Respected [Summary of Findings]
2: Compliance Requirements 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities. 2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace. 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
Through the employees' interview and documents review, it was noted that workers are free to join unions. Interviewed employees declared to feel free to join a Union if they wish and to be aware of their rights of association. There are no union representatives. 3 employees are member of a Union. There is one employees Representative for H&S. All the work force is hired on the base of the CBA (Trading Companies).
Evidence examined:
Hiring contracts – CBA – Code of rules – Personnel files – Facility policies – Union Representatives election report.
Any other comments:
None

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	☐ Union ☐ Worker Committee ☑ Other ☐ None
Other details:	Employees Representative for H&S
Is it a legal requirement to have a union?	☐ Yes ☑ No
Is it a legal requirement to have a worker's committee?	☐ Yes ☑ No
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	☑ Yes ☐ No Please give details: Suggestion box
Is there evidence of free elections?	☐ Yes ☑ No
Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	☑ Yes ☐ No Please give details: Meeting room
Name of union and union representative, if applicable:	N/A
Is there evidence of free elections?	☐ Yes ☐ No ☑ Not Applicable

If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Employees Representative for H&S
Is there evidence of free elections?	☑ Yes ☐ No ☐ Not Applicable
Are all workers aware of who their representatives are?	☑ Yes ☐ No Please give details: Confirmed during interviews
Were worker representatives freely elected?	☑ Yes ☐ No
Date of last election:	2022-06-22
Do workers know what topics can be raised with their representatives?	☑ Yes ☐ No
Were worker representatives/union representatives interviewed?	☑ Yes ☐ No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Last meeting on H&S situation at the factory on 26.07.2024
Are any workers covered by Collective Bargaining Agreement (CBA)?	☑ Yes ☐ No
If Yes, what percentage by trade Union/worker representation	100% workers covered by Union CBA. 0% workers covered by worker rep CBA.
If Yes, does the Collective Bargaining Agreement (CBA) include rates of pay?	☑ Yes ☐ No

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

Current Systems and Evidence Examined
To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.
Current Systems:
The factory work floors areas were found well lit, clean and properly ventilated. Aisles are clear and free of obstructions. There are several emergencies exits strategically located, provided with signs and lights above the doors. The emergency exits are maintained unlocked and open outwards. There are an adequate number of fire extinguishers mounted on walls, marked and checked every six months as required by the local regulations. There is a fire alarm system present in the facility audible throughout all facility departments. Smoke detectors are installed in warehouse. All machineries are provided with emergency buttons shut off and protections on the moving parts. There are several first aid kits available, adequately supplied. All employees are provided with PPEs when needed (safety shoes, gloves, goggles, face masks, uniforms, helmets). All employees received the mandatory H&S trainings (all updated in last 5 years as required by law). There are 6 workers trained on fire fighting procedures (last trainings on 24.06.2022 – valid 5 years) and 6 trained on first aid procedures (last trainings on 27.10.2023 – valid 3 years). The last emergency drill was conducted on 23.07.2024 but involving only the 1st shift (approximately 50% of personnel). Last Check of ground electrical system dated 11/11/2022 (valid 2 years). The factory has Fire Prevention Certificate that is being updated due to the automatic warehouse added in May 2023 (the project has been submitted to Fire Brigades and is being evaluated). All risk assessments have been performed (General one updated on 13.03.2024) all other specific risk assessments were found performed and valid at time of audit. The fork lifts drivers have been regularly trained (last training on 13.03.2024 – valid 5 years). The last check of the fork lifts ropes and chains took place 31.05.2024 (valid 3 months). A doctor has been appointed to keep workers under medical surveillance and heath checks are regularly conducted. The main chemicals used are oil fragrancies and lubricant oils. Boiler, steam generator and all special appliances are regularly checked as per law requirements. The H&S Responsible last training on 05.07.2024. The Employees Representative for H&S received the last annual training on 06.03. 2024.
Evidence examined:
Building certificate, Risk, noise, vibration, chemical and job stress related risk and all other specific risks assessment documents and corrective action plan, Emergency plan and procedure, Local authorities and fire brigade inspection records, PPE issue list, Injury log, Machinery maintenance records, Firefighting equipment maintenance records, Fire drills reports, H&S committee meeting records, Employees training records, Factory H&S representative (RSPP) designation and training records, Workers H&S representative (RLS) designation and training records, Firefighting team designation and training records, First aid team designation and training records, , Workers' insurance payment records, Electric equipment/panels maintenance records, Contract with labour doctor and periodic medical check records.
Any other comments:
None

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	☑ Yes ☐ No Please give details: Included in company policies and general risk assessment
Are the policies included in workers' manuals?	☑ Yes ☐ No Please give details: Included in workers' manuals
Are there any structural additions without required permits/inspections (e.g. floors added)?	☐ Yes ☑ No Please give details: None observed
Are visitors to the site informed on H&S and provided with personal protective equipment?	☑ Yes ☐ No Please give details: Emergency procedures and PPEs provided to visitors.
Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	☑ Yes ☐ No Please give details: Medical room available
Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	☑ Yes ☐ No Please give details: A Doctor has been appointed to take employees under medical surveillance.
Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	☐ Yes ☑ No Please give details: Transport not provided
Is secure personal storage space provided for workers in their living space and is fit for purpose?	☐ Yes ☑ No Please give details: Even though there is no dormitory lockers are available in changing rooms
Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	☑ Yes ☐ No Please give details: All potential risks have been evaluated
Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	☑ Yes ☐ No Please give details: The facility respects all Law requirements
Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	☑ Yes ☐ No Please give details: No specific standards provided by client

Non-Compliance	Evidence

[Back to findings summary]

Non-Compliance			
Status	OPEN		
Reference	ef2fa1a9-f8c1-4eae-81b9-ac77ccfe2c33		
Clause	3 - Working Conditions are Safe and Hygienic		
Issue Title	202 - Fire exits are not adequate to facilitate timely evacuation		
Subcategory	Fire Safety - Fire exits		
New or carried over?	☑ New	☐ Carried Over	
Root cause	☐ Training ☐ Costs ☐ Other	☑ System ☐ Lack of workers	
Root cause - Other			
Local law issue	DM 09/2021 requires that doors along evacuation routes can be opened by single push movement		
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.		
Explanation to the non compliance	During facility tour it was noted that in "MOCA" department (where normally work 2 people) the door to exit is a rolling door with a complex procedure to open in case of emergency and black out.		
Follow up method	☐ Follow up audit	☑ Desktop audit	
Timescale	☐ Immediate ☐ 90 days ☐ 365 days	☐ 30 days ☑ 120 days ☐ Other	☐ 60 days ☐ 180 days
Actions	The Management should find a system to make the exit door in "MOCA" department easy to open in case of an emergency.		

NC - rolling door.jpg

Non-Compliance	Evidence

[Back to findings summary]

Non-Compliance	
Status	OPEN
Reference	fee5bfe4-7ee6-49c9-bc48-cbe37ecc2cdd
Clause	3 - Working Conditions are Safe and Hygienic
Issue Title	219 - Fire drills do not include the evacuation of all occupants of the building
Subcategory	Fire Safety - Fire alarms & Evacuation
New or carried over?	☑ New ☐ Carried Over
Root cause	☐ Training ☑ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
Local law issue	DM 09/2021 requires that all employees participate in an emergency drill at least once a year.
ETI code	3.2 - Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.
Explanation to the non compliance	During document review and interviews it was noted that the site conducted the last emergency drill on 23/07/2024 but involving only the first shift (approximately 50% of the employees).
Follow up method	☐ Follow up audit ☑ Desktop audit
Timescale	☐ Immediate ☐ 30 days ☐ 60 days ☑ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other
Actions	The site should organise enough emergency drills in order to involve all departments and shifts every year.

4 - Child Labour Shall Not Be Used [Summary of Findings]
4: Compliance Requirements 4.1 There shall be no new recruitment of child labour. 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child. 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions. 4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
Each person, before being hired, has to demonstrate age evidence by identity cards or other official document. The data are sent to Local Labour Office in order to be checked before the worker is hired. Through documents review and workers interview, it was stated that no person under 19 years old has been employed at the factory.
Evidence examined:
Personnel files – Contracts – CBA – Employees book
Any other comments:
None

Legal age of employment:	16
Age of youngest worker found:	19
Are there children present on the work floor but not working at the time of audit?	☐ Yes ☑ No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	☐ Yes ☑ No Please give details: N/A

5 - Living Wages are Paid [Summary of Findings]
5: Compliance Requirements 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income. 5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Current Systems and Evidence Examined
To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.
Current Systems:
All the work force is hired on the base of the CBA (Rubber Plastic Industry) containing all the necessary information about the employment conditions, minima wages, working hours and OT regulation and disciplinary procedure. Employees are regularly monthly paid by direct bank transfer. Payrolls review against minima tub established by the National Collective Labour Contract. The payrolls are checked against working hours. Employees have the possibility to check the hours recorded by electronic badge and to ask for clarification if needed. All employees receive wages equal or higher than minimum wages established by CBA. Lowest wage paid by the factory is Euro 1745,90 gross/month for H level employee (minimum wage established by CBA for H level is Euro 1701,02 gross/month). 10 pay slips and time records were reviewed from July 2024 (current), May 2024 (random) and February 2024 (random).
Evidence examined:
CBA – Personnel contracts – Pay slips – Insurance and social security contribution records – Working hours log.
Any other comments:
None

Summary Information			
Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 40.0 Per Month: 173.0	Actual Per Day: 8.0 Per Week: 40.0 Per Month: 173.0	YES
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 8.0 Per Month: null	Actual Per Day: 1.0 Per Week: 5.0 Per Month: 20.0	YES
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 1701.02	Actual Per Day: 80.69 Per Week: 403.48 Per Month: 1745.09	YES

Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 125 Per Week: 125 Per Month: 125	Actual Per Day: 125 Per Week: 125 Per Month: 125	YES
Wages Analysis:			
Were accurate records shown at the first request?	☑ Yes ☐ No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 pay slips and time records were reviewed from July 2024 (current), May 2024 (random) and February 2024 (random).		
Are there different legal minimum wage grades? If Yes, please specify all.	☑ Yes ☐ No From Euro 1529,25 gross/month for "I" level to Euro 2415,59 gross/month for "Q" level		
If there are different legal minimum grades, are all workers graded and paid correctly?	☑ Yes ☐ No ☐ Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	☐ Below legal min ☑ Meet ☑ Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	Euro 1745,90 gross/month		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 75.0% of workforce earning minimum wage 25.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found:Production incentives Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	1. Income tax 2. Health insurance 3. Pension insurance 4. Illness insurance		
Have these deductions been made?	☑ Yes ☐ No		
Please list all deductions that have been made.	1. Income tax 2. Health insurance 3. Pension insurance 4. Illness insurance		
Please list all deductions that have not been made.	N/A		
Were appropriate records available to verify hours of work and wages?	☑ Yes ☐ No		
Were any inconsistencies found? (if yes describe nature)	☐ Yes ☑ No		
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	☑ Yes ☐ No Please give details: Employees are paid for all time spent at the factory.		

Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	☐ Yes ☑ No Please give details:
If yes, what was the calculation method used.	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage ☐ Figures provided by Unions ☐ Living Wage Foundation UK ☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation ☐ Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	☑ Yes ☐ No Please give details: In accordance with CBA updates or on the base of performance or promotions.
Are workers paid in a timely manner in line with local law?	☑ Yes ☐ No
Is there evidence that equal rates are being paid for equal work:	☑ Yes ☐ No Please give details: Based on CBA
How are workers paid:	☐ Cash ☐ Cheque ☑ Bank Transfer ☐ Other

Good Example	Evidence
[Back to findings summary]	

Good Example	
Status	OPEN
Reference	9c4c0185-6005-428b-8275-dd870db45ba0
Clause	5 - Living Wages are Paid
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport
Subcategory	Benefits & Insurance
New or carried over?	☑ New ☐ Carried Over
Explanation to the good example	The Company offers its female employees a free annual breast examination as part of a For Yoy Breast Cancer prevention project
Evidence	Document review and interviews

Good Example	Evidence
[Back to findings summary]	

Good Example	
Status	OPEN
Reference	55ca7350-1a76-4b05-8d0c-b84fdda0e9bf
Clause	5 - Living Wages are Paid
Issue Title	431 - Workers are given private medical insurance which exceeds the statutory minimum
Subcategory	Benefits & Insurance
New or carried over?	☑ New ☐ Carried Over
Explanation to the good example	The site provides health insurance granting to the employees medical checks for free or with discount.
Evidence	Document review and interviews

6 - Working Hours are not Excessive [Summary of Findings]
6: Compliance Requirements 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub–clauses 6.2 to 6.6 are based on international labour standards. 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay. 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below. 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met: 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
Working hour limits are regulated by the CBA and Law. Interviewed workers and management affirm OT hours are rarely worked and always respecting the law limits and on voluntary base. Working hours are recorded by electronic badge by the employees themselves. All employees have at least 2 days off in 7. Office employees work from 8:00 to 17:30 with 90 minutes break, Monday to Friday. Production employees work on 3 shifts (6:00 to 14:00 – 14:00 to 22:00 – 22:00 to 6:00) with 15 minutes break each shift, Monday To Friday.
Evidence examined:
CBA – Working hours log – Pay slips – Personnel contract.
Any other comments:
None

Working hours' analysis	
Systems & Processes	
What timekeeping systems are used?	Electronic badge
Is sample size same as in wages section?	☑ Yes ☐ No Please give details:
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	☑ Yes ☐ No
Are there any other types of contracts/employment agreements used?	☑ Yes ☐ No

If Yes, please complete as appropriate:	☐ 0 hours ☑ Part time ☐ Variable hours ☐ Other
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	☐ Yes ☑ No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	☑ 1 in 7 days ☐ 2 in 14 days ☐ No (please explain)
Is this allowed by local law?	☑ Yes ☐ No
Maximum number of days worked without a day off (in sample):	6
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	☐ Yes ☑ No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	☐ Yes ☑ No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	1 x day - 5 per week - 20 per month
Combined hours (standard or contracted + overtime hours = total) over 60 found?	☐ Yes ☑ No Please give details: Not found
Approximate percentage of total workers on highest overtime hours:	10.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	☑ Yes ☐ No ☐ Conflicting Information Please give details: Confirmed during interviews
Overtime premium	
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	☑ Yes ☐ No ☐ N/A – there is no legal requirement to OT premium Please give details: 125% for overtime in weekdays
Is overtime paid at a premium?	☑ Yes ☐ No 125% for overtime in weekdays

If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	☐ No	☐ Consolidated pay	☐ Collective Bargaining agreements
	☑ Other		
Please give details	N/A		
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	☐ Overtime is voluntary	☐ Onsite Collective bargaining allows 60+ hours/week is voluntary	☐ Safeguards are in place to protect worker's health and safety
	☐ Site can demonstrate exceptional circumstances	☑ Other reasons (please specify)	
Please give details	N/A		
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	N/A		
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ☑ No		
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	☑ Yes ☐ No		

7 - No Discrimination is Practiced [Summary of Findings]
7: Compliance Requirements 7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Current Systems and Evidence Examined
To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.
Current Systems:
No discrimination practice noticed on workers' interviews and documents review. There was no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. The entire employees are treated in the same way.
Evidence examined:
Sector collective agreement with non-discrimination and equal opportunities policies, labour contracts, factory job application form and recruitment policy, training records, time cards, payrolls, dismissal records, notice board and interviews (foreign workers could speak Italian).
Any other comments:
None

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 50.0%		Female: 50.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	1 (QC)		
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	☐ Hiring	☐ Compensation	☐ Access to training
	☐ Promotion	☐ Termination or retirement	☑ No evidence of discrimination found
Please give details	No evidence found		
Professional Development			
What type of training and development are available for workers?	Language		
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	☑ Yes ☐ No		

8 - Regular Employment Is Provided [Summary of Findings]
8: Compliance Requirements 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice. 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour–only contracting, sub–contracting, or home–working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed–term contracts of employment. Additional Elements: Responsible Recruitment 8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements. 8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation. 8.5 Employment agencies must only supply workers registered with them. 8.6 Workers pay no recruitment fee at any stage of the recruitment process. 8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
The whole work force is hired on the base of the CBA. During documents review and workers interview, it was notice that factory provided regular employment. Personal files in factory. No age and contract violations noticed during documents review. All the terms and condition is according to the local laws. All employees are employed in the same way after the submission of applications. Everyone receives the same training instructions plus, employees who have never worked in this kind of production have workstation training. No issues were reported.
Evidence examined:
Labour contracts, Contracts with agency, Social security payment records, Termination records, Leave records.
Any other comments:
None

Responsible Recruitment	
All Workers	
Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	☑ Terms & Conditions presented ☑ Understood by workers ☑ Same as actual conditions
Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	☐ Yes ☑ No
Migrant Workers	
Type of work undertaken by migrant workers:	N/A

Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	☐ Yes ☑ No Please give details: N/A
Is there any observation on this finding?	N/A
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	☐ Yes ☑ No
Non-employee workers	
Recruitment Fees	
Are there any fees?	☐ Yes ☑ No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	2
Please provide the names of agencies if applicable	E-Work SpA - In Job SpA
Were agency workers' age / pay / hours included within the scope of this audit?	☑ Yes ☐ No
Were sufficient documents for agency workers available for review?	☑ Yes ☐ No
Is there a legal contract agreement with all agencies?	☑ Yes ☐ No Please give details: The facility has a written contract with all agencies used.
Does the site have a system for checking labour standards of agencies?	☑ Yes ☐ No Please give details: Periodical evidence of regular payment of social contributions from Agencies is required, along with administration license requested for each Agency.
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)	
Any contractors on site?	☐ Yes ☑ No Please give details: N/A
Do all contractor workers understand their terms of employment?	☐ Yes ☑ No Please give details: N/A

8A - Sub–Contracting and Homeworking [Summary of Findings]
8A: Compliance Requirements 8.A.1 There should be no sub–contracting unless previously agreed with the main client. 8.A.2 Systems and processes should be in place to manage sub–contracting, homeworking and external processing.

Current Systems and Evidence Examined
To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.
Current Systems:
Subcontractors are used for painting, plotter printing, blister packaging and manual assembling. Home workers are not used.
Evidence examined:
Production records
Any other comments:
None

Summary of sub–contracting – if applicable	
Is there any sub-contracting at this site?	☑ Yes ☐ No
Process subcontracted	
Process Subcontracted	Manual assembling
Name of factory	ITS srl
Address	V.le Industria 14 - Castelli Calepio (BG) - Italy
Process subcontracted	
Process Subcontracted	Plotter printing
Name of factory	EGP srl
Address	Via Giuseppe Micca 58 - Grumello del Monte (BG) Italy
Process subcontracted	
Process Subcontracted	Painting
Name of factory	Made Black srl
Address	Via Monte Alben 2 - Chiuduno (BG) Italy

Process subcontracted	
Process Subcontracted	Blister packaging
Name of factory	Valmont srl
Address	Via Carlo Curotti 31/33 - Castelli Calepio (BG) - Italy
Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting?	☑ Yes ☐ No Please give details: Based on production records, workforce and machinery
If sub–contractors are used, is there evidence this has been agreed with the main client? (If yes, please provide details)	☑ Yes ☐ No Subcontractor use is outlined in the quotations
Number of sub–contractors/agents used:	4
Is there a site policy on sub–contracting?	☑ Yes ☐ No Included in QA Manual
What checks are in place to ensure no child labour is being used and work is safe?	The subcontractors are audited annually
Summary of homeworking – if applicable	
Is homeworking used at this site?	☐ Yes ☑ No

9 - No Harsh or Inhumane Treatment is Allowed [Summary of Findings]
9: Compliance Requirements 9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. 9.2 companies should provide access to a confidential grievance mechanism for all workers

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
No physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse found during factory tour and workers' interviews. According to workers' interviews, the factory treated every worker with respect. Interviewed employees confirmed that there is no harsh or inhumane treatment; they are treated fairly and with respect.
Evidence examined:
Sector labour contract with disciplinary provisioning, grievance and appeal procedures, labour contracts, notice board, disciplinary records, payrolls, and interviews.
Any other comments:
None

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	☑ Yes ☐ No Please give details: Suggestion box
If yes, are workers aware of these channels and have access? Please give details.	Confirmed during interviews
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism,comment box etc. Please give details.	Suggestion box
Which of the following groups is there a grievance mechanism in place for?	☑ Worker ☐ Communities ☐ Suppliers ☐ Other
Please provide grievance mechanism details	Workers
Are there any open disputes?	☐ Yes ☑ No Please give details:
Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	☑ Yes ☐ No Please give details:
Is there a published and transparent disciplinary procedure?	☑ Yes ☐ No Please give details:

If yes, are workers aware of these the disciplinary procedure?	☑ Yes ☐ No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	☑ Yes ☐ No Please give details: Allowed by CBA in special circumstances

10A - Entitlement to Work and Immigration [Summary of Findings]
10A: Compliance Requirements 10.A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10.A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined
To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.
Current Systems:
Each person, before being hired, has to demonstrate her/his entitlement to work. The data are sent to Local Labor Office in order to be checked before the worker is hired.
Evidence examined:
CBA – Personnel files – Pay slips – Personnel contracts – Tax, social security system and insurance payments records – DURC (evidence of regular payment of social contributions).
Any other comments:
None

10B4 - Environment 4–Pillar [Summary of Findings]
10B4: Compliance Requirements 10.B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards. 10.B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc. 10.B4.3 Businesses shall be aware of their end client's environmental standards/code requirements 10.B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers. 10.B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 10.B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details). 10.B4.7 Businesses shall make continuous improvements in their environmental performance. 10.B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation 10.B4.9 Businesses should have a nominated individual responsible for co–ordinating the site's efforts to improve environmental performance. 10B4: Guidance for Observations 10.B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor. 10.B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations. Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in place. Following this assessment the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
The factory complies with all local Law environmental requirements. They have Single Environmental Authorization (AUA n. 718 dated 18/04/2016 (valid 15 years) covering air emissions from moulding department. Air emission tests are conducted every year (last one on 14.06.2024). No process waters (water only for domestic use and for jewellery items cooling). Chemicals used are oil fragrances, lubricant oil and detergents. Main waste is packaging material. Hazardous waste is empty chemical containers and exhaust oils. Last waste annual declaration MUD 2023 dated 29.06.2024 n. BG-2705-0011. Responsible for environmental issues is Giulia Pagani (HSE Manager). Usage/discharge analysis refers to 2022 - 2023
Evidence examined:
Environmental authorizations – Periodical environmental analysis reports – waste management documents.
Any other comments:
None

Environmental Analysis

Is there a manager responsible for Environmental issues (Name and Position):	Giulia Pagani (HSE Manager)
Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	☑ Yes ☐ No Please give details: In order to obtain the Environmental authorization
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	☐ Yes ☑ No Please give details: Not certified
Does the site have an Environmental policy?	☑ Yes ☐ No
If yes, is it publicly available?	☑ Yes ☐ No
If yes, does it address the key impacts from their operations and their commitment to improvement?	☑ Yes ☐ No Please give details: Based on environmental laws.
Does the site have a Biodiversity policy?	☐ Yes ☑ No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	☑ Yes ☐ No Please give details: Plastica Seconda Vita certification
Have all legally required permits been shown?	☑ Yes ☐ No Please give details: AUA n. 718 dated 18/04/2016
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	☑ Yes ☐ No ☐ Not Applicable Please give details: Chemical risk assessment
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	☑ Yes ☐ No Please give details: List of laws and regulations and customer requirements, customer's sites and mailing list.
Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	☑ Yes ☐ No Please give details: The site is starting an ESG assessment
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	☑ Yes ☐ No Please give details: Waste register and annual waste declaration

Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	☑ Yes ☐ No Please give details: Monthly bills and meters
Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	☑ Yes ☐ No Please give details: The facility requires all permits mandated by Italian Law.

Usage/discharge analysis		
Criteria	Previous year: 2023	Current year: 2024
Electricity Usage: Kw/hrs	1532126	1504849
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	20500	21104
Has site completed any carbon Footprint Analysis?	No	No
If Yes, please state result		
Water Sources	Wells and local water authority	Wells and local water authority
Water Volume Used	1106	1380
Water Discharged	Sewer	Sewer
Water Volume Discharged	553	690
Water Volume Recycled	553	690
Total waste produced	54680 Kg	82120 Kg
Total hazardous waste produced	3860 Kg	5000 Kg
Waste to recycling	54680 Kg	82120 Kg
Waste to landfill	0	0
Waste to other	0	0
Total Product Produced	50000000 pcs	60000000 pcs

10C - Business Ethics – 4-Pillar Audit [Summary of Findings]
10C: Compliance Requirements 10.C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice. 10.C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices. 10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements. 10.C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter. 10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice, 10.C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics 10.C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area. 10C: Guidance for Observations 10.C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers. 10.C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented Note for auditors and readers. This Business Ethics section is intended to take not more than 0.25 auditor days. It is an assessment not an audit.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
From information gathered, it appeared that the Company conducts its business ethically without bribery, corruption or any other type of fraudulent or unfair business practice. The Company has its business practices standards/code requirements and has a system in place to monitor its performance against these.
Evidence examined:
Code of Conduct, Management and Control
Any other comments:
None

Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	☑ Internal Policy ☑ Policy for third parties including suppliers Please give details: Policies applied internally and externally
Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	☑ Yes ☐ No Please give details: Trainings held to all relevant personnel at time of hire or in case of new job position.

Is the policy updated on a regular (as needed) basis?	☑ Yes ☐ No Please give details: Policies updated on a regular basis (at least annually)
Does the site require third parties including suppliers to complete their own business ethics training	☐ Yes ☑ No Please give details: N/A

Attachments

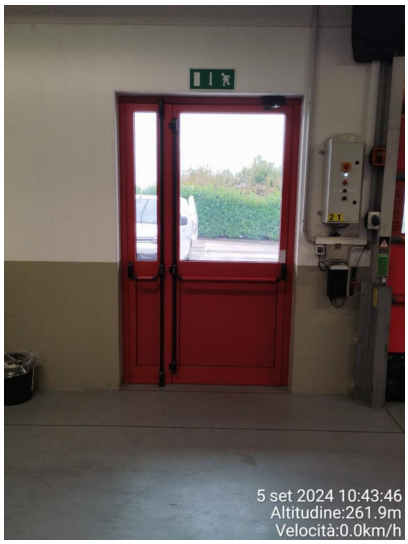
Emergency map.jpg

Emergency alarm.jpg

NC - rolling door.jpg

Sinks.jpg

Building.jpg



Emergency exit.jpg

Electrical panel.jpg

Toilet.jpg

Chemicals storage.jpg

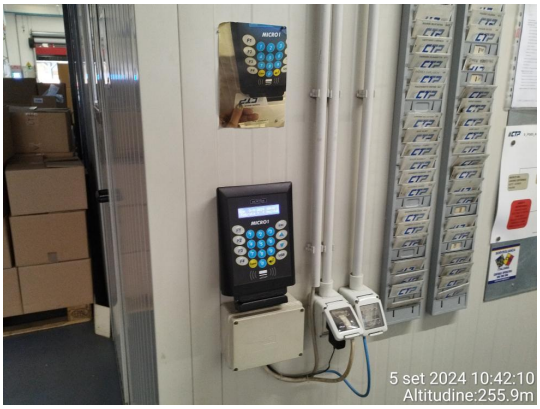
Emergency exit (2).jpg

suggestion box.jpg

Bulletin board.jpg

Chemicals storage (2).jpg

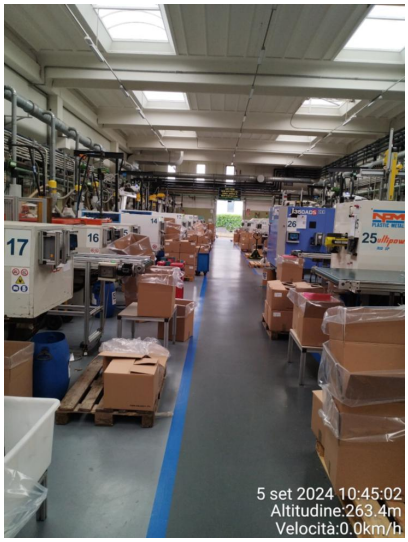
Relax area.jpg



Attendance recorder.jpg

Face mask.jpg

First aid kit.jpg



TimePhoto_20240905_104502.jpg

Cafeteria.jpg

Production floor.jpg

Drinking water.jpg

Eye wash station.jpg

Changing room.jpg

Hose.jpg

Signed CAPR.pdf

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

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Click here for Auditors:

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