




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 407524578	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 419783411
Business name (Company name):	VISUAL PROMOCIONAL C S COMUN VISUAL LTDA		
Site name:	VISUAL PROMOCIONAL C S COMUN VISUAL LTDA		
Site address: <i>(Please include full address)</i>	AV. OSAKA, 60 – CENTRO INDUSTRIAL DE ARUJÁ, SÃO PAULO	Country:	BRAZIL
Site contact and job title:	Flavio Miranda – Governance and ESG coordinator		
Site phone:	+ 55 11 2685-1699	Site e-mail:	flavio@visualpromo.com.br
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar
			<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	23 rd to 25 th November 2022		

Audit Company Name & Logo: 	Report Owner (payer): VISUAL PROMOCIONAL C S COMUN VISUAL LTDA
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact grievance@sedex.com.

To confirm the validity of this report, please visit

<https://www.sedex.com/audit-verifier/>

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 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.

Any exceptions to this must be recorded here (e.g. different sample size): nothing to report

Auditor Team (s) (please list all including all interviewers):

Lead auditor: Igor Viana APSCA number: RA21702870

Lead auditor APSCA status: In good standing

Team auditor: NA APSCA number: NA

Interviewers: Igor Viana APSCA number: RA21702870

Report writer: Igor Viana

Report reviewer: Giuseppina Citro Quiros

Date of declaration: 28th November 2022

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.

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.

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> <i>Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None
0B Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> None
2. Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> None
3. Safety and Hygienic Conditions	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	2			<ul style="list-style-type: none"> NC: facility failures to comply with measurement of the grounding protection system as requested by NBR 5419 and Norma Regulamentadora number 10. Facility has not conducted the measurement of chemical levels (risk assessment) as requested by local Law Instrução Normativa number 77

4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> • None
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> • None
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> • None
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> • None
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	01			<ul style="list-style-type: none"> • Evidenced function deviation: 03 workers conducting activities that are not the one set in the employment contract signed by them •
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> • None
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> • None
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> • None
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	<ul style="list-style-type: none"> • NA
10B4	<u>Environment 4-Pillar</u>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	01			<ul style="list-style-type: none"> • Facility has not provide the environmental permit •
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> • None •

General observations and summary of the site:

A four pillar audit was conducted to verify compliance with ETI CODE and Master Client Code.

Some nonconformities were raised as per table above and most of them is a failure of management/system (please detail main cause of the NC raised)

Facility is located in the city of Arujá and it was founded in 15 years ago. Currently, it is managed by 01 CEO and one director that are also brothers and owners

Company is operating with 1 single building, used to conduct all activities

As per facility tour it was noted great visible integrity and no crack or issues were observed.

The sample chosen has considered the following criteria: hiring age, birth age, gender, position, type of employment contract, nationality. It is important to say that all workers are directly hired by the company and are Brazilian and permanent.

At the company there is a medical room used for small emergencies with first aid kit available for use with qualified first aiders, but in case of serious issues, the worker is sent to the municipal hospital. Also, as per local law, company is not obligated to have a medical room.

At the company there is a canteen for meals with the proper supply and fit for purpose. Basic needs are covered and proper place for food storage is provided to workers as per photo section.

**Please note the table above records the total number of Non-compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.*

Site Details

Site Details																				
A: Company Name:	VISUAL PROMOCIONAL C S COMUN VISUAL LTDA																			
B: Site name:	VISUAL PROMOCIONAL C S COMUN VISUAL LTDA																			
C: GPS location: (If available)	GPS Address: Av. Osaka, 60 - Centro Industrial, Arujá - SP, 07411-750	Latitude: -23.406160449165156 Longitude: - 46.34973398768096																		
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business permit without validity number 08.547.001/0001-62. Municipal permit 23/2022 without validity Fire permit nº 555629 valid until 23-12-2022 These are the applicable permits considering that the last permit is environmental and a NC was raised.																			
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Fished product supplier: facility supplies promotional displays																			
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Facility is located in the city of Arujá, great region of the city of São Paulo and it was founded 15 years ago, but is present at the current work site for 05 months. The built are is around 4,500.00m² and is distributed in one single building. The age of the building is 10 years old</p> <table border="1"> <thead> <tr> <th>Production Building no 1</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor 1</td> <td>All activities are conducted on the first floor</td> <td>Nothing to report</td> </tr> <tr> <td>Floor 2</td> <td>Administrative functions.</td> <td>Nothing to report</td> </tr> <tr> <td>Floor 3</td> <td>Administrative functions.</td> <td>Nothing to report</td> </tr> <tr> <td>Floor 4</td> <td>Administrative functions.</td> <td>Nothing to report</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>Nothing to report</td> </tr> </tbody> </table> <p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>		Production Building no 1	Description	Remark, if any	Floor 1	All activities are conducted on the first floor	Nothing to report	Floor 2	Administrative functions.	Nothing to report	Floor 3	Administrative functions.	Nothing to report	Floor 4	Administrative functions.	Nothing to report	Is this a shared building?	No	Nothing to report
Production Building no 1	Description	Remark, if any																		
Floor 1	All activities are conducted on the first floor	Nothing to report																		
Floor 2	Administrative functions.	Nothing to report																		
Floor 3	Administrative functions.	Nothing to report																		
Floor 4	Administrative functions.	Nothing to report																		
Is this a shared building?	No	Nothing to report																		

	<p>F2: Please give details: during facility tour, no crack was observed. Facility has great integrity</p> <p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F4: Please give details: Facility has engineer evaluation aligned with the fire inspection nº 555629 valid until 23-12-2022</p>
<p>G: Site function:</p>	<input type="checkbox"/> Agent <input type="checkbox"/> Factory Processing/Manufacturer <input checked="" type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
<p>H: Month(s) of peak season: (if applicable)</p>	<p>October to March</p>
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>First step is product creation. After that, the prototype is made, which is approved by the customer. Once approved, the company creates a metal structure using ready-made iron bars cut with saw machines (12) for later assembly through welding. Depending on the finishing process, the printing process can be done using 4 digital presses or 1 flexographic press. After the printing stage, the finishing is carried out using two cutting and creasing machines for subsequent manual assembly of the product. As company has several equipment, for an easy visualization, there are 05 production lines (set by the number of printing machine which is 5).</p>
<p>J: What form of worker representation / union is there on site?</p>	<input checked="" type="checkbox"/> Union (SIndicato dos Trabalhadores nas Industrias Quimicas, Farmaceuticas e de Material Plastico de Suzano) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (safety commission) <input type="checkbox"/> None
<p>K: Is there any night production work at the site?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>L1: If yes, approx. % of workers in on site accommodation</p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>M1: If yes, approx. % of workers</p>

N: Were all site-provided accommodation buildings included in this audit

Yes

No

N1: If no, please give details: accommodation is not provided

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 08:30 A2: Day 1 Time out:17:00	A3: Day 2 Time in: 08:30 A4: Day 2 Time out:17:00	A5: Day 3 Time in: 08:30 A6: Day 3 Time out:12:00
B: Number of auditor days used:	2.5 man day +m 0.5 reporting		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define:		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Flavio Miranda – Governance and ESG coordinator		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	NA		
J: Previous audit type:	NA		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives

A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	NA		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	Union had no availability.		

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	56	00	00	00	00	00	00	56
Worker numbers – female	50	00	00	00	00	00	00	50
Total	106	00	00	00	00	00	00	106
Number of Workers interviewed – male	16	00	00	00	00	00	00	16
Number of Workers interviewed – female	10	00	00	00	00	00	00	10
Total – interviewed sample size	26	00	00	00	00	00	00	26



A: Nationality of Management	Brazilian	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities: B1: Nationality 1: Brazilian B2: Nationality 2: _____ B3: Nationality 3: _____</p>	<p>Was the list completed during peak season? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: even with peak season, facility has alternate ways to meet the demand such as shift changes agree with workers, so, no matter the peak month, the demand is met by the company</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 : 100% C1: approx % total workforce: Nationality 2 : 0% C2: approx % total workforce: Nationality 3 : 0%</p>	
D: Worker remuneration (management information)	<p>D: _____% workers on piece rate D1: _____% hourly paid workers D2: 100% salaried workers</p> <p>Payment cycle: D3: _____% daily paid D4: _____% weekly paid D5: 100% monthly paid D6: _____% other D7: If other, please give details</p>	



Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	05 groups with 04 workers	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 03	D2: Female: 03
E: 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. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	The main complaint regards wage improvement and company is already taking actions and is verifying the possibility to provide profit sharing	
I: What did the workers like the most about working at this site?	They most like the internal relation and the fact that the owners are very supportive	
J: Any additional comment(s) regarding interviews:	The sample chosen has considered the following criteria: hiring age, birth age, gender, position, type of employment contract, nationality. It is important to say that all workers are directly hired by the company and are Brazilian and permanent.	
K: Attitude of workers to hours worked:	Workers agree with working hours and as a matter of fact, some of them would like to	

	<p>conduct more overtime. Also, as per working hours records, the practice of overtime was not evidenced.</p>
<p>L. Is there any worker survey information available?</p>	
<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:</p>	
<p>M: Attitude of workers: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i></p>	
<p>Overall, positive and most of them were interviewed for the first time and they have praised the initiative of Master Client to conduct such activity.</p>	
<p>N: Attitude of worker's committee/union reps: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i></p>	
<p>Regarding Union representatives, they were not available, but as per workers interview, Union is not effective, and they see no reason for a commission considering that company is one of the best in town. Regarding safety commission, as per interview with members and workers, they are representative and are always taking into consideration workers need, not only related to safety, but general needs with great response of the owner who through the years is providing better conditions.</p>	
<p>O: Attitude of managers: <i>(Include attitude to audit, and audit process. Both positive and negative information should be included)</i></p>	
<p>Positive and very participative. It is clear that company, even with nonconformities raised is committed with general improvement and faces all nonconformities as opportunities of growth.</p>	

Audit Results by Clause

0A: Universal Rights covering UNGP

[\(Click here to return to summary of findings\)](#)

0.A. Guidance for Observations

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:

0.A.1 Facility has a Policy covering Human Rights Principles signed by the owner Mr. Daniel Braga, and it is disclosed to workers during induction and during refreshment training last carried out on the last November 14th 2022 after the release of the Policy. The policy is also disclosed through the website to suppliers available on <https://www.visualpromo.com.br/politicas-da-empresa/>

0.A.2 The designated person responsible for implementing standards concerning Human rights is the ESG coordinator Mr. Flavio Miranda with support of the Human Resources team.

0.A.3 Evidenced that company has identified its stakeholders and salient issues regarding Human Rights. The stakeholders are suppliers, workers, local community and customers. As main issue it was noted a demand for workers in wage improvement and regarding this issue, facility is evaluating a profit sharing to the next year. No other potential issue was observed

0.A.4 Facility has measured its impacts covering human rights on right holders and no negative issue was observed.

0.A.5 Facility even without negative impact is aware that in case of adverse impact on human rights within any of their stakeholders, that they must address these issues and enable effective remediation.

0.A.6 Evidenced that company has a grievance in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter through comment box and digital grievance and the last one is available to all stakeholders.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Human rights policy and procedures.
Grievance mechanism.
Workers and management interview

Any other comments: nothing to report

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility has a Policy covering Human Rights Principles signed by the owner, Mr. Daniel Braga</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The designated person responsible for implementing standards concerning Human rights is the governance and ESG coordinator, Mr. Flavio Miranda with support of the Human Resources team Name: Flavio Miranda Job title: governance and ESG coordinator</p>
<p>C: 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?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Evidenced that company has a grievance in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter through comment box and digital grievance and the last one is available to all stakeholders.</p>
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible,</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	D1: If no, please give details
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility has a specific Policy regarding workers' information and basically, all information must remain confidential and only Human Resources has access to it as evidenced after some internal checking. Also, facility has already implemented the local law data protection called LGPD and basically, any workers information to be disclosed must be formally authorized by signed paper upon request. During audit, it was noted that only Human Resources and the doctors providing services to the company have access to workers information.

Findings: NA	
<p> Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/> </p> <p> Description of observation: </p> <p> Local law or ETI/Additional elements / customer specific requirement: </p> <p> Comments: </p>	<p> Objective evidence observed: </p>

Good examples observed: NA	
Description of Good Example (GE):	Objective Evidence Observed:

Measuring Workplace Impact

Workplace Impact		
A: 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)	A1: Last year: 1.1%	A2: This year 2%
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	1.75%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 0.75 %	C2: This year 0.95 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	0.8%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Accidents are recorded through labour accidents communication as required by the local law.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: Number: 0	F2: This year: Number:0
G: 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	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year:0	H2: This year: 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0% workers	I2: 12 months 0% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 0% workers	J2: 12 months 0% workers
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<p>0B: Management system and Code Implementation (Click here to return to summary of findings)</p>
<p>0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code. 0.B.2 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.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code. 0.B.4 Suppliers are expected to communicate this Code to all employees. 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.</p>

<p>Current Systems and Evidence Examined</p> <p><i>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.</i></p>
<p>Current systems:</p> <p>0.B.1 Suppliers through its quality system called Facilito has implement and maintain systems for delivering compliance to this Code through internal risk assessment last carried out on the beginning of November, by evaluating the effectiveness if the Policies and grievance verification</p> <p>0.B.2 Suppliers is operating legally in premises with the correct business licenses and permissions and through the system Facilito controls validity of permits and local law. The following permits were checked related to the operational activities: Business permit without validity number 08.547.001/0001-62. Fire permit nº 555629 valid until 23-12-2022 Municipal permit 23/2022 without validity These are the applicable permits considering that the last permit is environmental and a NC was raised.</p> <p>0.B.3 Suppliers has appointed the governance and EHS coordinator Mr. Flavio Miranda as senior member of management who is responsible for compliance with the Code with support of the human resources department</p> <p>0.B.4 Supplier has communicated this Code to all employees through induction training and during the last refreshment training carried out in November 14th 2022 after the release of the last version of the Code of Ethics based in ETI CODE and training was also conducted with mangers at the same date.</p> <p>0.B.5 Supplier has communicate this code to its own suppliers through the website of the company as following: https://www.visualpromo.com.br/politicas-da-empresa/</p> <p>ADDITIONAL INFORMATION:</p> <p>The site has knowledge of local labour laws concerning labour standards, health and safety, environment and related clauses that are part of the SMETA scope. The knowledge is assured by the local cosuntancy called Facilito responsible to update company with local law. Also, facility receives mailing directly to the</p>

Brazilian government with all updates, so, through both ways, facility is aware and is informed of any change

The site after any change of local law or procedures, verifies compliance and applies risk assessment and the last risk assessment was carried out in the beginning of the month and all the issues raised by company are the same of the nonconformities, confirming that the system is effective.

Workers are informed about their rights and also have awareness of the relevant law and code as conformed after interviews.

There is no land right issues, considering that company is located at the industrial sector of the city and the building is rent.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Social compliance policy and procedures.
- Workers' information about their rights.
- Relevant permits and business licenses.
- Risk assessment.
- Training records.
- Legal control of permits and local law

Any other comments: It is important to say that environmental inspection is not in place, so, one nonconformity was raised against ETI CODE 10B.

Management Systems:	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: through online research to the local city hall, state and federal government website it was noted the absence of fines
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Evidenced Policy inserted in Code of Ethics covering the topics. Also, all procedures of the company were developed to avoid this kind of issues, including recruitment, promotion procedures.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Evidenced training records, awareness of workers related to the policy and grievance in place to report issues. Policies are also known by Human resources and quality team, at least

	<p>once per year applies risk assessment to verify effectiveness. Last risk assessment carried out in November 2022 and refreshment training against the Policies carried on the last November 14th 2022 after release of the Coe of Ethics</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: All workers are trained as following: Training to workers on the last November 14th 2022 after release of the Coe of Ethics. 100% of workers of the unit have been trained.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: D1: Please give details: All workers are trained as following: Training to workers on the last November 14th 2022 after release of the Code of Ethics. 100% of workers of the unit have been trained. Above all, workers are aware of the Policy and procedures in case of any issue. Also, as per verification of grievance it was noted absence of issues and as per last risk assessment, controls are fully implemented and no mitigation or improvement action was requested.</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: facility is not certified</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Evidenced human resources department composed by the local Governance and EHS coordinator supported by one consultant full time and one analyst.</p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Evidenced that he governance and ESG coordinator is the responsible for code implementation Name: Mr. Flavio Miranda – governance and ESG coordinator</p>

<p>I: Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Evidenced policy and LGPD procedures (data protection) to ensure that workers data will remain confidential and basically only human resources has access to workers files and any disclosure of workers information is done only after formal authorization signed by worker</p>
<p>J: Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: IT blocks and all workers data remains at the human resources sector and managers with specific authorization may access workers information, but only those related to their professional development. Sensitive information remains confidential and only Human Resources and the Doctors of the company are allowed to access it.</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: facility through risk assessment verifies the risk of any potential issue covering the Policies and in case of any negative finding, improvement action are taken such as refreshment training covering the Code of Ethics, etc. Facility applies continuous risk assessment to evaluated Policy effectiveness and measure impacts covering stakeholders and as a result of the assessment, no major or minor risks were observed. Also, regarding confidential information, facility checks through random verifications if workers without permission can access workers files, and in fact the verification and risk assessment revealed that only Human resources and health team may verify workers information. Last risk assessment carried out o the last November 14th 2022. It is important to say that risks identified are the same of the nonconformities raised and as company is already taking actions, no new action was necessary.</p>
<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1 Please give details: In case of any issue, facility has set that corrective actions must be taken and registered to treat the issue and eliminate the negative finding aligned with all the ISO9001 standard.</p>

<p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The Ethical Code of the company is applicable to all stakeholders with clear mention on it. Also, purchase sector disclosed the code of Ethics through contracts and Code is available through the website of company already mentioned during current systems.</p>
<p>Land rights</p>	
<p>N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: It is a rent building and the proper property register was observed since 2012 and the company has the operation permit to be installed at the industrial sector in the name of company as following: Municipal permit 23/2022 without validity. Also, there is no land rights issues considering that company is located at the industrial sector of the city.</p>
<p>O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: through its juridical sector and local consultancy called Facilito facility keeps its awareness updated related to all applicable local law including land rights issues. After verification of the system it was noted that there is no land rights law applicable to the unit.</p>
<p>P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: Facility has as main principles and policies is land rights respects covering the FPIC and basically before any land acquisition facility will verify all land rights title and also local communities demands and will only perform the purchase if any negative issue is observed or local demand of the local community is met.</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: Please give details: No evidence of expansion in the last 05 months beginning of the operation at the worksite that need to be compensated. Facility is under its maximum capacity and all proper permits have been requested.</p>

<p>R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: facility has set that all acquisitions must be done in sectors where there is permission to industries and commerce. Also, facility takes into consideration environmental improvements such as green technologies to minimize its impacts</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: No evidence of illegal appropriation. Also, facility is located at an industrial neighbourhood and no expansion is being done to enlarge production.</p>

Non-compliance: NA	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p> <p>2. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>

Observation: NA	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

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Good Examples observed: NA	
Description of Good Example (GE):	Objective evidence observed:

1: Freely Chosen Employment

[\(Click here to return to summary of findings\)](#)

ETI

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:

1.1 There is no forced, bonded or involuntary prison labour as per facility tour and workers interview

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 as checked after leaving records and through workers interview. Workers are not coerced as per interviews and, confirmed that company has no forced labour which includes absence of mandatory overtime and absence of restriction to leave the company at the end of the day.

Additional information: the site has a system to ensure the freely employment chosen with a Formal Policy, verification of the risk of forced labour in the business activities and type of industry without any previous known backlog. Recruitment practice to ensure that no forced labour will be observed and how to identify such cases and clear verification of origin of workers to verify possibility of forced labour specially for migrant workers, but it is important to say that there is no migrant workers in place

No cases of harassment and intimidation were observed through grievance and interview with workers that have also praised the internal work environment.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Contracts

Personnel files

Service level agreement with labour or recruitment agents

Security guard checklist

Wage and hours records as per section ETI CODE 05 and 06.

Resignation / termination records

Disciplinary records without any type of measures that can be classified as forced labour.

Risk Assessment carried out on the last November 2022.

Any other comments: nothing to report

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:</p>
<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: workers confirmed that they are free to terminate the employment contract by any time. Also, one of the workers interviewed was verifying the possibility to terminate the contract during the day of the audit and as confirmed by him, he does not fear any retaliation or sees any restriction to do that. No issue was observed</p>
<p>E: 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'?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding:</p>
<p>F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please describe finding: Through biometric register and workers interview it was noted that they are free to leave the facility by any moment of the day. During audit it was noted open gates without any guard security control or restrictions.</p>
<p>G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: Facility has checked the possibility of forced/ trafficked and or bonded labour and no issue was observed. There is no previous backlog of the sector that may result in additional controls</p>
<p>H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: facility provides induction training and grievance in place to monitor compliance and any possibility of</p>

	forced labour. Also, through grievance and risk assessment, no issue was observed. Above all, workers across the months receive several communications through refreshment conversations regarding the topic to ensure that they are able to identify and report any issue.
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Non-compliance: NA	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement</p> <p>Recommended corrective action:</p> <p>2. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>

Observation: NA	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

Good Examples observed: NA	
<p>Description of Good Example (GE):</p>	<p>Objective evidence observed:</p>

2: Freedom of Association and Right to Collective Bargaining are Respected

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ETI

- 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:

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. At the company there is no onsite Union Commission considering that workers are represented by Union President and CBA. Also, workers see no reason for a Union considering that the same is not representative and company provides proper conditions and good benefits. Additionally, facility has a safety commission (CIPA) that is used to discuss not only safety issued but general improvements. The commission was freely elected last November 2022 and one member of CIPA was interviewed, Mr, Jonathan Melo and monthly meetings are conducted and the last relevant meetings was released in the beginning of November as following:

Lat relevant meeting: November with several improvement such as new hirings, creation of a rest room and improvement in toilet rooms
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities even without any internal commission. As per interview with local Human Resources Department and workers, Union in the last 12 months has not come to the company. This is a common issue in Brazil considering that most of Unions are not very effective. Regarding CIPA commission, facility provides possibility to develop monthly meetings as checked during the audit with the proper evidence as mentioned above.
- 2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace as confirmed by the Human resources department and members of CIPA and no wage deduction was observed. Please refer to section ETI 05 and 07 for more information.
- 2.4 As per management interview, facility is open to parallel commissions and all workers informed that if needed they can contact company to develop a new commission, but once again, as per workers interview, they see no reason for that considering that the company is a great place to work with good internal communication and relation and they can raise their personal demands at any time with proper response and support.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Sindicato dos Trabalhadores nas Industrias Quimicas, Farmaceuticas e de Material Plastico de Suzano represented by Claudi de Carvalho valid until November 2023 with the following conditions:

Wage of the sector: 2,072.13 reais/month

Overtime premium during regular days (Monday to Saturday): 150%.

Overtime premium during rest day or national holidays: 200%

As mentioned previously, there is no on site union commission, and workers see no reason for that.

No minutes with Union considering that is not mandatory and company full follows the local CBA.

Sample covering wages and working hours as per ETI CODE 05 and 06 confirming absence of discrimination to members of the safety commission and members affiliated to the Union.

Policy on Freedom of Association and Collective Bargaining inserted in Code of Ethics of company Personnel files confirming that no disciplinary and unfair action against members of CIPA was raised in the last 24 months.

Interview with human resources department. Workers interview and interview with CIPA (safety commission).

Any other comments: nothing to report

<p>A: What form of worker representation/union is there on site?</p>	<p><input checked="" type="checkbox"/> Union (Sindicato dos Trabalhadores nas Industrias Quimicas, Farmaceuticas e de Material Plastico de Suzano) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (safety commission) <input type="checkbox"/> None</p>
<p>B: Is it a legal requirement to have a union?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>C: Is it a legal requirement to have a worker's committee?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Safety commission called CIPA freely elected on the beginning of November 2022 D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: meeting room with proper equipment and supply such as computer, desk, among others as checked during facility tour</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>Sindicato dos Trabalhadores nas Industrias Quimicas, Farmaceuticas e de Material Plastico de Suzano represented by Claudio de Carvalho with elections valid until October 2024</p>	<p>F1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p>	<p>Safety commission called CIPA used to discuss general improvement freely elected on the last November 2022 valid for one year</p>	<p>G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>H: Are all workers aware of who their representatives are?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Evidenced proper awareness and names disclosed through the communication board</p>
<p>I: Were worker representatives freely elected?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>I1: Date of last election: November 2022 valid for one year</p>
<p>J: Do workers know what topics can be raised with their representatives?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>K: Were worker representatives/union representatives interviewed?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please state how many: 02 workers</p>	
<p>L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.</p>	<p>Lat relevant meeting: November with several improvement such as new hirings, creation of a rest room and improvement in toilet rooms – safety commission minutes As informed previously, company follows the CBA, so, no minutes in place and it is not mandatory as per national law</p>	
<p>M: Are any workers covered by Collective Bargaining Agreement (CBA)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>If Yes, what percentage by trade Union/worker representation</p>	<p>M1: 100% workers covered by Union CBA</p>	<p>M2: 0% workers covered by worker rep CBA</p>

<p>M3: If Yes, does the Collective Bargaining Agreement (CBA) include rates of pay?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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Non-compliance: NA	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p> <p>2. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>

Observation: NA	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

Good Examples observed: NA	
<p>Description of Good Example (GE):</p>	<p>Objective evidence observed:</p>

3: Working Conditions are Safe and Hygienic

[\(Click here to return to summary of findings\)](#)

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ETI

- 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:

3.1 Overall a safe and hygienic work environment is provided considering best market practices and international standards and local law with preventive actions to eliminate or minimize main risks. Even with the great management, no risk assessment covering chemicals was provided and measurement of the grounding protection system was provided, so, two nonconformities were raised

Currently the safety technician is responsible for local research represented by Mr, Jonathan Tadeu and through Facilito system manages legal permits, documents,

3.2 Workers are provided with regular training controlled through excel spreadsheet table covering local law and all training are in date. See further information for training records.
Applicable training: risk assessment, PPE, forklift operation, Safety operation covering machine, chemicals and ergonomic conditons. Work at height, confined space, electrical training is not requested.

3.3 Access to clean toilet facilities and to potable water is provided to all workers without restriction and in place there is a meal room for lunch or dinner.

3.4 Accommodation: not provided.

3.5 The company observing the code shall assign responsibility for Health & Safety is the safety technician, Jonathan Tadeu da Silva Souza – safety technician responsible for legal requirements, recently hired 2 months ago and with experience of 15 years and specific course against safety technician.

MANAGEMENT SYSTEMS:

Adequate knowledge of relevant H&S legislation was observed, and the control is done through excel table and facility is informed about legal needs by the juridical sector and local safety consultancy called Facilito, resulting in proper awareness of local law and maintenance of the Fire Permit as following:

Fire permit nº 555629 valid until 23-12-2022

An effective risk assessment adapted to the site ensuring the safe working conditions for all types of workers, especially the most vulnerable ones, e.g. pregnant and lactating women, young workers, migrant workers was verified. As main risk, it was raised noise and company has projects for collective protection and continuous training. Risk assessment issued by Fabio de Sousa Lucena under CREA 5063146465 last carried out in September 2022 valid for one year. As informed previously, no risk assessment was conducted, so, one nonconformity was raised. Even without the complete risk assessment, facility has already provided masks and ear plug protection aiming the reduction of the exposition. Also, facility has set as mandatory, annual training to workers regarding main risks and the last training was conducted in September and October 2022 covering all workers.

Facility has a General Safety Policy also included in Code of Ethics and in workers manual fit for purpose and with training conducted in the last November 14th 2022 valid for one year. Also, facility has Job Order procedure which is a complete procedure covering main risks, use of PPE, among others, disclosed to all workers in September until November 2022 and valid for one year

As informed previously, the company observing the code shall assign responsibility for Health & Safety is the safety technician, Jonathan Tadeu da Silva Souza – safety technician responsible for legal requirements, recently hired 2 months ago and with experience of 15 years and specific course against safety technician.

A well-functioning grievance system whereby workers can raise H&S problems is provided through comment box and overall, the system is enough to raise any issue that is monthly discussed by the Safety Commission and the Safety Technician.

Personal Protective Equipment (PPE):

Adequate to the risks, adapted to the conditions of work (as per risk assessment previously mentioned). As main PPE it is possible to mention safety shoes, safety gloves and ear plug protection, all available free of charge or on deposit, to all workers and visitors. As informed previously, risk assessment covering chemicals was not conducted, but company, even without the risk assessment has already provided safety masks

Workers receive relevant and effective training about importance of use during a new delivery of PPE and during biannual refreshment training last carried out in October 2022 covering all workers as per attendance list

Workers were properly using the PPE as verified during facility tour and have answered properly about the importance and how to use and maintain the PPE.

EMERGENCY RESPONSE / FIRST AID / ACCIDENTS

Emergency responses are adequate to the risks identified, and well documented through the document Called PAE released on the last November 2022. All workers understand and follow the procedures (e.g. drills) and drills are provided annually to all workers as evidenced during the last November 2022 with all shifts (production and administrative shift), also it confirmed through interviews and management favours safety over production as per workers interview.

Emergency exits and evacuation routes are not blocked, sufficient in numbers and well signaled.

Workers can safely and quickly exit the premises as confirmed after facility tour. It was evidenced that company has provided refreshment training to first aider and fire marshals on the last November 09th 2022 valid for one year

ELECTRICAL SAFETY

Adequate records of regular and effective electrical inspections, done by an official company and supported by correct installations: i.e. no visible wiring, deteriorated plugs, blocked electrical equipment, etc was verified after verification of the safety report last carried out by Fabiano Mendes on the last November 10th 2022 under register 5063255798 valid for one year. Even with the proper measurement, one NC was raised considering that the report did not measured the effectiveness of the system. Please refer to NC for more information.

Electrical training is not applicable considering that electrical maintenance is outsourced and company requires the training to the qualified companies

FIRE SAFETY

Adequate and effective firefighting equipment to fight fire, including fire alarms, fire extinguishers, fire hydrants are in place with monthly verification and annual maintenance by a specialized company last carried out in October and November 2022 and under current renovation.

Accommodation is not provided.

MACHINERY, incl. vehicles.

Machines are regularly maintained and are operated in a safe manner. Monthly inspections are conducted considering that the equipment is brand new. No permit is required, and proper risk assessment was provided by Mr. Fabio de Sousa Lucena under CREA 5063146465 last carried out in September 2022.

Company has one truck and the proper maintenance was also observed with monthly inspection. The driver license is controlled by the Human Resources Department and the same for medical exams and toxicological exam. No issue was observed.

Transport is not provided to workers.

Load is done through forklift and every two years facility has set that training must be conducted. Last training released on the last October 2022.

Training covering safety during equipment operation was also released on the last October 2022 and valid for two years

BUILDING SAFETY:

Relevant licenses for building n was evidenced to the expansion as following:

Municipal permit 23/2022 without validity

No visible structural defects and company has provided engineer evaluation as following:

engineer evaluation was performed aligned with the fire inspection n° 555629 valid until 23-12-2022

HYGIENE

Facility is hygienic including meal room, toilets, shower and changing rooms. No special permit is required.

CHEMICALS

Chemicals are properly stored with secondary containment and the relevant material safety data sheets (MSDS) is available and adequate eye wash / shower station.

Workers are trained on how to handle chemicals safely. As informed previously, no risk assessment covering chemicals is conducted, but even without the risk assessment, the company already conducts exams related to chemicals to monitor workers health. The last training was carried out in October 2022 and is valid for two years

Legally required licenses are valid as following:

Permits do not apply

No banned chemical is used.

WORKER HEALTH

Drinking water is available to workers and facility complies with local law and provides monthly inspection of the water supplied and the complete report of October was observed that water is compliant for human consumption.

Ventilation, light, temperature, noise, dust and sound levels are appropriate as per ergonomic report issued by Mr. Fabio de Sousa Lucena under CREA 5063146465 in the last September 2022 valid for two years. Ergonomic training was also provided on the last October 2022 covering all workers
Medical exams are provided to workers in date as per Medical Program issued by Vicente Marques de Oliveira Jr. under CRM 85.708/SP October 2022 valid for one year.

ACCOMMODATION (not applicable)

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

H&S policy & procedures

Risk assessment

H&S committee minutes

Visual inspection of installations

Fire drill records

PPE issuance list

Training records

Machine maintenance records

Official inspection and permits

Permits/certificates for special operations

Chemical list

MSDS

Accident records

Any other comments: nothing to report

<p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Evidenced Safety Policy included on Ethical Code and on Workers Manual disclosed during induction and across the months through additional communication as evidenced: disclosure of Policy on the last November 2022 combined with the Code of Ethics to all workers and during safety campaigns aligned with the Policy, monthly held. All workers have properly answered about the Policy and procedures</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The policy is also included in workers' manuals and to be more precise the policy in workers manual is way far more detailed considering and covering all safety aspects of the company.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: No addition is being done. No addition in the last 03 years.</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Safety instruction performed during the beginning of the audit done by the Safety Representative which has guided the auditor about the assembly point and actions to be taken in case of emergency. Also, induction training held at the reception of the company with auditor.</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: At the company there is a small emergency room with first aid kit. It is important to say that company is not obligated by law to have an medical room.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: First aiders in place with training (last training held on November 09th 2022 valid for one year.</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: Transport is not provided.</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Locker room for workers to leave their personal belongs</p>

<p>I: 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?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>I1: Please give details: An effective risk assessment adapted to the site ensuring the safe working conditions for all types of workers, especially the most vulnerable ones, e.g. pregnant and lactating women, young workers, migrant workers was verified. As main risk, it was raised noise and company has projects for collective protection and continuous training. Risk assessment issued by Fabio de Sousa Lucena under CREA 5063146465 last carried out in September 2022 valid for one year. As informed previously, no risk assessment was conducted, so, one nonconformity was raised. Even without the complete risk assessment, facility has already provided masks and ear plug protection aiming the reduction of the exposition. Also, facility has set as mandatory, annual training to workers regarding mains risks and the last training was conducted in September and October 2022 covering all workers.</p>
<p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>J1: Please give details: Facility is following all environmental obligation such as waste disposal. For more information see section 10B4 environment 4 pillar</p>
<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>K1: Please give details: Customers requirements are pretty much the same than ETI Code and basically company is aware that banned chemicals are not allowed to be used. Above all, the chemicals used are related to maintenance and most of them are organic based without need for special permit. None of them are banned chemicals.</p>

Non-compliance:

1. Description of non-compliance:

NC against ETI NC against Local Law NC against customer code: **Evidenced that company has not measured the effectiveness of the grounding protection system as requested by NBR 5419 and 'Norma Regulamentadora' number 10. It is important to say that company has provided a report, but the measurement of the system was not done considering that the owner of the building has concretized the system, so the measurement was not done.**

Objective evidence observed:

Safety report

<p>Local law and/or ETI requirement : In accordance with Local Law called Norma Regulamentadora number 10 on item 0.2.3 Companies are required to keep up-to-date single-line diagrams of installations electrical outlets of their establishments with the specifications of the grounding system and other protective equipment and devices.</p> <p>Also as per local law called NBR 5419 on PART III item 7, facility must measure every year effectiveness of the grounding system protection</p> <p>Recommended corrective action: Facility must provide the measurement of the system and the proper report as requested by the local law</p> <p>2. Description of non-compliance: <input type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement: In accordance with Local Law called Instrução Normativa number 77 of the welfare Ministry, facilities must measure chemicals levels to workers exposed to such substances</p> <p>Recommended corrective action: Facility must measure the chemical concentration and if applicable must provide improvement action to eliminate the exposition or to mitigate risks. Facility must perform extension analysis to other missing requirements and if applicable must provide improvement actions.</p>	<p>Management interview</p>
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Observation: NA	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed:</p>

Good Examples observed: NA	
<p>Description of Good Example (GE):</p>	<p>Objective Evidence Observed:</p>

4: Child Labour Shall Not Be Used

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[\(Click here to return to Key Information\)](#)

ETI

- 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:

- 4.1 There is no recruitment of child labour and the minimum wage as per national law for hiring is 16 years old but company has set that the hiring date is 18 years old considering that as there are risks at the company, no underage is allowed as checked after verification of opening positions of the company. The youngest worker is 19 years old.
- 4.2 Company developed a policy forbidden child labour with remediation actions as per provision of ILO if any issue is observed. As mentioned above, there is no underage workers at company, due to the life risk is not allowed to have young apprentice at the company.
- 4.3 As informed previously, facility does not hire under age workers but is aware that if needed, young workers may not be submitted to night or dangerous work as requested by ETI CODE and Brazilian Labour Law. Facility is compliant with local law.
- 4.4 As informed previously, the policies and procedures are in compliance with ILO standards and if any child labour is observed, facility will provide conditions and basic needs which will allow the child to become adult with a good life.

Additional information:

Facility has measured the risk covering child labour and as there is no evidence of child labour in this type of activity, the control remains the same. Risk assessment is the same informed in ETI COEE 0B.

Facility during hiring requires the ID and Brazilian register called CPF and through cross checking with the Brazilian government, facility ensures the legal hiring age. This procedure is aligned with hiring procedure as checked during the audit

Evidence Examined - to support the description of the system (Documents examined and relevant comments. Include renewal/expiration date where appropriate):

Details:

- Personnel files including ID copies for all types of workers.
- Recruitment procedures.
- Child labour policy and procedure, including remediation (when applicable).
- Contracts and Service Level Agreement workers confirming absence of child labour.
- Risk assessment program as informed in ETI COE 0B

Workers interview: 26 out of 26 confirming policies and procedures

Any other comments: Nothing to report

A: Legal age of employment:	18 years old
B: Age of youngest worker found:	19 years old
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	00 %
E: Are workers under 18 subject to hazardous work assignments? <u>(Go to clause 3 – Health and Safety)</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details

Non-compliance: NA

1. Description of non-compliance:

NC against ETI NC against Local Law NC against customer code:

Local law and/or ETI requirement:

Recommended corrective action:

2. Description of non-compliance:

NC against ETI NC against Local Law NC against customer code:

Local law and/or ETI requirement:

Recommended corrective action:

Objective evidence observed:
(where relevant please add photo numbers)

Observation: NA

Description of observation:

Local law or ETI requirement:

Objective evidence observed:

Comments:	
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Good Examples observed: NA	
Description of Good Example (GE):	Objective Evidence Observed:

5: Living Wages are Paid

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key information\)](#)

ETI

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:

5.1 Wages and benefits are paid as per local Union CBA and is above the minimum wage of the country which is 1,212.00 reais/month. Through the CBA, facility also provides overtime premium, the same than legal minimum which is 150% for daily overtime and 200% for overtime during national holidays or rest days. As per local research of company and as per workers interview, the wage could be improved, but is enough to cover basic needs considering that company provides additional benefits such as medical care and food voucher.

5.2 All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid which is every 05th business day of the month.

5.3 Deductions from wages as a disciplinary measure are not allowed and the only deductions done are the allowed by Brazilian Labour Law, such as Income Tax (IRRF) and social security (INSS) All disciplinary measures are recorded as checked and no wage deduction as disciplinary purpose was observed and confirmed by workers.

ADDITIONAL INFORMATION:

Site review the local law, and specially the Union CBA once per year to ensure that the wage paid is the mandatory by Industry standards. Also, workers receive a wage at least as per CBA which is 2,072.13 reais/month. Payment is properly done and is accurate.

Facility right after payment of the wages, review the records covering overtime, wages, deductions, among others to ensure that the payment was properly done. No issue was observed after documents check and as per workers' interview.

As per workers interview, they are fully aware of their employment contract specially about particularities of the wages, incomes and working hours system

Overtime is also paid at a premium as checked after interview and is important to say that overtime was not identified on sample. Please refer to ETI CODE 06 for more information.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Sindicato dos Trabalhadores nas Industrias Quimicas, Farmaceuticas e de Material Plastico de Suzano represented by Claudi de Carvalho valid until November 2023 with the following conditions:

Wage of the sector: 2,072.13 reais/month

Overtime premium during regular days (Monday to Saturday): 150%.

Overtime premium during rest day or national holidays: 200%

Pay and working hours records and interviews with 26 workers confirming the current system as follows: Proven payment records for 26 out of 26 of the following months: October 2022 (Current), July 2022 as non peak and November 2021 as peak, confirming the CBA requirement is being met.

Interview with workers (26)

Employment contract.

The current working day is 5x2 (05 working days and 02 rest days) with 44 hours/week with one shift from Monday to Thursday from 07 am to 05 pm and on Friday from 07 am to 04 pm all with one hours of lunch time and days off on Saturday and Sundays resulting in 44 hours/week.

Policies and procedures on wages

Social insurance / statutory benefits records

Leave records

Resignation records

Any other comments: nothing to report

Non-compliance: NA

1. Description of non-compliance:

NC against ETI NC against Local Law NC against customer code:

Local law and/or ETI requirement:

Recommended corrective action:

2. Description of non-compliance:

NC against ETI NC against Local Law NC against customer code:

Local law and/or ETI requirement:

Recommended corrective action:

Objective evidence observed:
(where relevant please add photo numbers)

Observation:NA	
Description of observation: Local law or ETI requirement: Comments:	Objective evidence observed:

Good Examples observed: NA	
Description of Good Example (GE):	Objective Evidence Observed:

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 44 hours/week	A1: 44 hours/week	A2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 02 hours/day, 10 hours/week and 40 hours/month	B1: no overtime was evidenced	B2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 1,212.00 reais/hour	C1: 2,072.13 reais/month	C2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 150% for overtime during regular days and 200% for overtime during day off or national holidays	D1: 150% for overtime during regular days and 200% for overtime during day off or national holidays	D2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Wages analysis: (Click here to return to Key Information)			
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
A1: If No , why not?	NA		
B: Sample Size Checked <i>(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)</i>	Proven payment records for 26 out of 26 of the following months: October 2022 (Current), July 2022 as non peak and November 2021 as peak		
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	C1: If Yes , please give details: NA	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	D1: If No , please give details: NA	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> 2,072.13 reais/month	
F: Please indicate the breakdown of workforce per earnings:	F1: ____% of workforce earning under minimum wage F2: ____% of workforce earning minimum wage F3: 100% of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i> Nothing to report		
H: What deductions are required by law e.g. social insurance? Please state all types:	Income tax and social security		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made.	1. IRRF 2. INSS Please describe: Evidenced the last 12 monthly wage deduction and negative certificate of debt

		I2: Please list all deductions that have not been made.	1. 2. Please describe: nothing to report
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: All-time records is registered through digital control as confirmed through workers interview and documents check of the sample checked and mentioned previously, including in case of overtime.		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time:		
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details:		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The facility annually checks the cost of living in the region to ensure that the salary paid is sufficient to meet basic needs and as per workers interview the wages and benefits are enough to have basic needs covered		
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Through the sample checked it was noted that all workers with same positions receive same wages. Pay and		

	<p>working hours records and interviews with 30 workers confirming the current system as follows: Proven payment records for 26 out of 26 of the following months: October 2022 (Current), July 2022 as non peak and November 2021 as peak</p>
<p>Q: How are workers paid:</p>	<p> <input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain: </p>

6: Working Hours are not Excessive

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

ETI

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:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

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:

6.1 Working hours regarding contracted hours comply with national law, and as per contract verification the contracted hours is 08 hours/day or 44 hours/week. Overtime was not observed in sample, but as per workers interview, when performed is during national holidays, but once again, no overtime was observed. Workers are aware of the daily limit and possibility of overtime denial.

6.2 Working hours, excluding overtime, are defined by contract, and do not exceed 48 hours per week, considering that as per local law, contracted hours are 44 hours/week as confirmed after employment contract verification.

6.3 All overtime is voluntary as per workers interview and forced labour Policy. Overtime is used responsibly to meet emergencies as per interviews, but as informed previously, no overtime was

observed. As per workers interview, overtime is compensated at a premium when performed and is voluntary. Please refer to CBA information to confirm overtime premium. The same is above of the ETI CODE premium..

6.4 The total hours worked in any 7-day period does not exceed 60 hours (including overtime) considering that local law does not allow it.

6.5 As mentioned previously company is not allowed by local law to exceed 60hours/week

6.6 Workers are provided with at least one day off per week as requested by the national labour law.

ADDITIONAL INFORMATION:

The site through live monitoring checks the working hours and all hours that are not compliant must be justified by local supervisors. Facility through weekly meetings provide to supervisors the status of working hours aiming improvement action and as result of the control, no overtime was observed in sample

Facility has legal advisory under responsibility of the juridic sector of the company related to working hours to be aware of the legal requirements.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Sindicato dos Trabalhadores nas Industrias Quimicas, Farmaceuticas e de Material Plastico de Suzano represented by Claudi de Carvalho valid until November 2023 with the following conditions:

Wage of the sector: 2,072.13 reais/month

Overtime premium during regular days (Monday to Saturday): 150%.

Overtime premium during rest day or national holidays: 200%

Pay and working hours records and interviews with 26 workers confirming the current system as follows: Proven payment records for 26 out of 26 of the following months: October 2022 (Current), July 2022 as non peak and November 2021 as peak, confirming the CBA requirement is being met.

Interview with workers (26)

Employment contract.

The current working day is 5x2 (05 working days and 02 rest days) with 44 hours/week with one shift from Monday to Thursday from 07 am to 05 pm and on Friday from 07 am to 04 pm all with one hours of lunch time and days off on Saturday and Sundays resulting in 44 hours/week.

Policies and procedures on working hours

Collective Agreements and other pieces of legislation

Leave records

Production records confirming the shift time

Any other comments: nothing to report

Non-compliance: NA	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p> <p>2. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>

Observation: NA	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

Good Examples observed: NA	
<p>Description of Good Example (GE):</p>	<p>Objective Evidence Observed:</p>

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe: biometric system				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: NA			
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:			
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:			
		NA			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: NA			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
		Maximum number of days worked without a day off (in sample):			
		05 days			

Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency: NA
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details: NA
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: no overtime in sample in all months checked	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	0%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Employment contract, Code of Ethics and workers interview
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of standard wages: The company practices as per local CBA 150% for daily overtime and 200% times on Sundays and holidays.
N: Is overtime paid at a premium?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: NA. No overtime in sample

<p>O: 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.</p>	<p> <input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other </p>
	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>
	<p>NA</p>
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<p> <input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify) </p>
	<p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details: </p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </p>

7: No Discrimination is Practiced

[\(Click here to return to summary of findings\)](#)

ETI

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:

7.1 After interview, documents check it was noted that 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.

ADDITIONAL INFORMATION:

Facility in the past has never used discriminatory practices such as gender criteria. As per workers interview, all needs are on professional basis.

Facility through the general risk assessment informed under section ETI CODE 0B has checked possibility of discriminatory practice and a great result was evidenced considering that all procedures, including recruitment, job career evaluation among others are based in professional qualification.

Also, facility has grievance in place known by worker to report any issue, but nothing was observed and once again, workers do not see any type of discrimination.

All workers are trained against the Policy during induction and during refreshment training last conducted in November 2022 and valid for one year. Also, after interview with the human resources team it was noted that company has provide to managers and supervisors, last November 2022 specific training covering discrimination and how to avoid it

Overall, in the present days, the company is free from discrimination.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details: Equal opportunity and anti-discrimination policy

Disciplinary cases and list of terminated workers

Payroll & workers attendance list confirming absence of difference between male and female wages

Contracts

Job postings / advertisements and job application form as following:

<https://www.linkedin.com/company/visualpromoofficial/jobs/>

Any other comments:

It is important to say that in this kind of activity is common to have more men than women and through the years, the number of women applying to open positions is close to zero. Also, facility is committed with ONU objectives and has specific goals to include women in management and lead positions

<p>A: Gender breakdown of Management + Supervisors (Include as one combined group)</p>	<p>A1: Male: 75% A2: Female 25 %</p>
<p>B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:</p>	<p>01 sustainability analyst</p>
<p>C: 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?:</p>	<p> <input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found </p> <p>C1: Please give details: It is important to say that in this kind of activity is common to have more men than women and through the years, the number of women applying to open positions is close to zero. Also, facility is committed with ONU objectives and has specific goals to include women in management and lead positions</p>

Professional Development

<p>A: What type of training and development are available for workers?</p>	<p>Annual training plan covering all workers aiming career plan and payment of scholarships</p>
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<p>B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?</p>	<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </p> <p>If no, please give details:</p>
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Non-compliance: NA

<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p> <p>2. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>
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Observation: NA	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

Good Examples observed: NA	
<p>Description of Good Example (GE):</p>	<p>Objective Evidence Observed:</p>

8: Regular Employment Is Provided

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

ETI

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:

8.1 Every extent possible work performed is based on recognised employment relationship established through national law and practice with proper employment contract as checked to the entire sample. However, function deviation was observed, considering that some employees performs activities not agreed through employment contract

8.2 Facility has only direct workers with proper control and monitoring. Facility has no contractors.

Additional Elements: Responsible Recruitment

8.3 Suppliers has full understanding of the entire recruitment process considering that the same is internally conducted without recruiters and hiring criteria is based on company's recruitment Policy. Also, internal recruiters are trained annually to avoid discrimination (last training issued on the last November 2022)

8.4 There is effective management systems in place to identify and monitor the hiring and management of all workers, but it is important to say that all workers are Brazilian and permanent workers. Facility monthly monitors all workers as checked during of the Human Resources Department.

8.5 Employment agencies are not used. At the company there is only direct workers.

8.6 Workers as per interview pay no recruitment fee at any stage of the recruitment process.

8.7 All workers' contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers as confirmed after documents check and workers interview, considering that human resources and facility team checks all contracts before any new workers or contractor if needed. All contracts are in Portuguese and easy to understand.

Evidence Examined - to support the description of the system (Documents examined and relevant comments. Include renewal/expiration date where appropriate):

Details:

Contracts

Service Level Agreements with contractor workers and a sample was done to contractors workers (same months informed in ETI CODE 05 and 06) confirming the proper payment

Personnel files

Hiring and termination records

Employees interview: 26 out of 26

Any other comments: Nothing to report

Non-compliance:

1. Description of non-compliance:

NC against ETI NC against Local Law NC against customer code: **Evidenced after documents check and workers interview that 03 out of 26 workers are conducting activities that are different from their employment contracts. In fact, 02 workers are operators and as per contract they are production assistant and 01 worker is a leader and as per contract the worker is a welder.**

Local law and/or ETI requirement: 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice./ In accordance with National Labour Law called CLT on its article Art. 468 - In individual employment contracts, it is only lawful to change the respective conditions by mutual consent, and even so provided that they do not result, directly or indirectly, in damages to the employee, under penalty of nullity of the infringing clause of this guarantee.

Recommended corrective action: Facility must review the employment contract and must provide a new one signed by both parts. Facility must provide the wage improvement. Facility must provide training to local leaders to ensure awareness regarding importance of communication in contract's change

Objective evidence observed:

Workers interview and documents check

Observation: NA

<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>
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<p>Good Examples observed:NA</p>	
<p>Description of Good Example (GE):</p>	<p>Objective Evidence Observed:</p>

Responsible Recruitment

All Workers	
<p>A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?</p>	<p> <input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions </p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: NA</p>
<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </p> <p>B1: If yes, please describe details and specific category(ies) of workers affected: NA</p>

<p>C: If yes, check all that apply:</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – <p>C1: If other, please give details: NA</p>
<p>D: If any checked, give details:</p>	<p>NA</p>

<p>Migrant Workers: NA</p> <p><i>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</i></p>			
<p>A: Type of work undertaken by migrant workers:</p>			
<p>B: Please give details about recruitment agencies for migrant workers:</p>	<p>B1: Total number of (in country recruitment agencies) used:</p> <p>B2: Total number of (outside of local country) recruitment agencies used:</p>		
<p>C: 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?</p>	<table border="1" style="width: 100%;"> <tr> <td style="width: 50%;"> <ul style="list-style-type: none"> <input type="checkbox"/> Yes <input type="checkbox"/> No <p>C1: Please describe finding:</p> </td> <td style="width: 50%; vertical-align: top;"> <p>C2: Observations:</p> </td> </tr> </table>	<ul style="list-style-type: none"> <input type="checkbox"/> Yes <input type="checkbox"/> No <p>C1: Please describe finding:</p>	<p>C2: Observations:</p>
<ul style="list-style-type: none"> <input type="checkbox"/> Yes <input type="checkbox"/> No <p>C1: Please describe finding:</p>	<p>C2: Observations:</p>		
<p>D: Are Any migrant workers in skilled, technical, or management roles</p> <p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	<ul style="list-style-type: none"> <input type="checkbox"/> Yes <input type="checkbox"/> No <p>D1: If yes, number and example of roles:</p>		

NON-EMPLOYEE WORKERS: NOT APPLICABLE

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other B1 – If other, please give details:
C: If any checked, give details:	

Agency Workers (not applicable)	
<i>(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.)</i>	
A: Number of agencies used (average):	A1: Names if available:
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No

	D1: Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details:

Contractors: NA <i>Note: 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,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details:
B: If Yes , how many workers supplied by contractors?	
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:
D: If Yes , please give evidence for contractor workers being paid per law:	

8A: Sub-Contracting and Homeworking

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

8A.1 There should be no sub-contracting unless previously agreed with the main client.

8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.

Note to auditor on homeworking:

Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.

Note to auditor on subcontracting: auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers

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:

8A.1 8A.2 There is not sub-contracting in place and through cross checking with other companies, no missing production step was noted. Above all, the customer is aware that in case of any sub-contracting and home, that Master Client must allow.

Evidence Examined - to support the description of the system (Documents examined and relevant comments. Include renewal/expiration date where appropriate):

Details:

Invoice checked at the billing sector. Facility tour and cross check with other companies confirming that all production steps are internally conducted. Production records to check the site capacity confirming that the company is under its maximum capacity and interview with site manager confirming the information provided. Due to data law protection, it is not possible to disclose the number of invoices.

Non-compliance: NA

<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI /Additional Elements requirement:</p> <p>Recommended corrective action:</p> <p>2. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>
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Observation: NA	
<p>Description of observation:</p> <p>Local law or ETI/Additional elements requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

Good Examples observed: NA	
<p>Description of Good Example (GE):</p>	<p>Objective Evidence Observed:</p>

Summary of sub-contracting – if applicable	
<input checked="" type="checkbox"/> Not Applicable please x	
<p>A: 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</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe:</p>

B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: If Yes , summarise details:
C: Number of sub-contractors/agents used:	
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If Yes , summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	

Summary of homeworking – if applicable <input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If Yes , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?			
F: What processes are carried out by homeworkers?			
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

9: No Harsh or Inhumane Treatment is Allowed
[\(Click here to return to summary of findings\)](#)

ETI

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.

Additional elements:

9.2 companies should provide access to a confidential grievance mechanism for all workers

<p>A: 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?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: digital reporting through the website available to all stakeholders and through email. Facility has also a digital reporting which was being fixed considering some improvement actions. Grievance was checked and is fit for purpose</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>All workers properly answered about grievance procedures and some did practical demonstration during the audit.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Digital reporting through the website available to all stakeholders and email</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Other D1: Please give details: digital reporting through the website available to all stakeholders</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details</p>
<p>F: 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)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain</p>

<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>H1: If no, please give details</p>
<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>I1: If yes, please give details</p>

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:

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited.

Additional elements:

9.2 Company has provided to workers access to a confidential grievance mechanism for all workers and stakeholders through digital grievance available the website of the company. The mechanism allows anonymous reporting and grievance is properly known and managed with investigation procedures and remediation actions if needed.

ADDITIONAL INFORMATION:

Company has grievance in place and internal procedures covering investigation for harassment or inhumane treatment including disciplinary procedure as per national law. Disciplinary actions are recorded as checked during the audit and nothing wrong was observed.

Workers do not feel harassed. Workers are aware of the disciplinary procedures and as per interview, all reports and issued raised by them are properly treated.

Facility every provide training to managers covering harassment aligned with the Code of Ethics last carried out in November 2022 and valid for one year.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Disciplinary policy

Personnel files and disciplinary notes

Training records

Minutes from grievance hearing confirming that grievance procedure is effective.

Any other comments: nothing to report

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Non-compliance: NA	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p> <p>2. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>

Observation: NA	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

Good Examples observed: NA	
<p>Description of Good Example (GE):</p>	<p>Objective Evidence Observed:</p>

10. Other Issue areas: 10A: Entitlement to Work and Immigration

[\(Click here to return to NC-table\)](#)

Additional Elements

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.

10A.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:

10A.1 Only workers with a legal right to work are employed or used by the supplier and company requires all proper documents such as Job Card, ID and or VISA with permit for work with cross checking verification through live conditions with the government labour Ministry website. It is important to say that all workers are Brazilian and permanent.

10A.2 All d workers, are validated by the supplier for their legal right to work by reviewing original documentation as informed previously.

ADDITIONAL INFORMATION

As all workers info are linked directly with the Brazilian government site, in case of any issue, facility will be aware and will provide all actions to solve the issue, specially in case of migrant workers.

The company has online documents linked with the Brazilian Government through live conditions for proof of right to work and after documents check it was noted that all workers have legal right to work. Also, the information is liked with online application called e-Social, so at any time facility is communicated about any change.

No migrant worker in place, all are Brazilian and permanent workers.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details: Right to work
Personnel files
Contracts

Any other comments: nothing to report

Non-compliance: NA	
<p>1. Description of non-compliance:</p> <p><input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law</p> <p><input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI /Additional Elements requirement:</p> <p>Recommended corrective action:</p> <p>2. Description of non-compliance:</p> <p><input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local</p> <p><input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI/Additional Elements requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>

Observation: NA	
<p>Description of observation:</p> <p>Local law or ETI/Additional Elements requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

Good examples observed: NA	
<p>Description of Good Example (GE):</p>	<p>Objective Evidence Observed:</p>

10. Other issue areas 10B4: Environment 4–Pillar

[\(Click here to return to summary of findings\)](#)

To be completed for a 4–Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar

B.4. Compliance Requirements

10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.

10B4.2 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.

10B4.3 Businesses shall be aware of their end client’s environmental standards/code requirements

10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.

10B4.6 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).

10B4.7 Businesses shall make continuous improvements in their environmental performance.

10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation

10B4.9 Businesses should have a nominated individual responsible for co–ordinating the site's efforts to improve environmental performance.

B4. Guidance for Observations

10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.

10B4.11 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:

10B4.1 Businesses as a minimum meets the requirements of local and national laws related to environmental standards such as waste disposal and noise emission. However, facility has not provided the environmental permit, so, one nonconformity was raised

10B4.2 Facility through Facilito system verifies local law by local online research to ensure compliance with it. The same system will be used to control validity of the permits and future special requirements of the permit. Even without the permit, facility has already raised applicable local law and has provided evidences of compliance.

10B4.3 Businesses is aware of their end client's environmental standards/code requirements which are pretty much the same than ETI CODE requirements with prohibitions of use of banned chemicals.

10B4.4 Supplier has an environmental policy, and is communicated to workers during annual refreshment training last carried out in November 2022 and valid for one year and for suppliers the policy is publicly available on the website of the company as following: <https://www.visualpromo.com.br/politicas-da-empresa/>

10.4.5. Evidenced survey covering aspects and impacts and the proper risk assessment and basically the main issue is related to energy consumptions, considering that all other aspects are not significative. Risk assessment conduct at the beginning of November 2022 and valid for one year.

10B4.6 Measurement of key consumptions and use of natural resources is being done. It is important to say that the records started 05 months ago.

10B4.7 Businesses makes continuous improvements in their environmental performance, and has goals as following:

10% of reduction for waste.

1% of reduction for energy usage.

Reduce waster consumption in 01%

10B4.8 There is no third part certification, but company has a management system based on ISO14001 which is used to support the management system

10B4.9 Businesses has pointed Mr. Flavio Miranda ESG coordinator with support of one analyst as responsible for co-ordinating the site's efforts to improve environmental performance.

B4. Guidance for Observations

10B4. Suppliers has completed the appropriate section of the SAQ and made it available to the auditor and as result the same information evidenced in SAQ was checked during the audit

10B4.11 Site has not recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations as checked in the municipal agency protection site.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Policies

Environmental procedures

Certifications / permits / licenses

Official inspections

Chemical list

Any other comments: nothing to report

Non-compliance:

<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input checked="" type="checkbox"/> NC against Local <input type="checkbox"/> NC against customer code: Evidenced that company has not provided the environmental permit. It is important to say that the project has already been approved but the local environmental agency employee is on annual leaves, so, the inspection was not done and the permit was not released.</p> <p>Local law and/or ETI/Additional Elements requirement: In accordance with local law called Decreto 8468/76 on article62 — The following will depend on the operating license: I — the use of a building of new or modified construction, intended for the installation of a source of pollution; II — the functioning or operation of a source of pollution in a building already constructed; III — the functioning or operation of an installed, expanded or altered source of pollution; IV — the functioning or operation of a system for the treatment or final disposal of waste or solid, liquid or gaseous materials.</p> <p>ETI CODE: 10B4.2 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.</p> <p>Recommended corrective action: Facility must provide the official environmental permit and controls in place that will be requested by the environmental permit.</p>	<p>Objective evidence observed: Management interview</p>
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Observation: NA	
<p>Description of observation:</p> <p>Local law or ETI/Additional elements requirements:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

Good examples observed: NA	
<p>Description of Good Example (GE):</p>	<p>Objective Evidence Observed:</p>

Environmental Analysis <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Flavio Miranda ESG coordiantor
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Evidenced survey covering aspects and impacts and the proper risk assessment and basically the main issue is related to energy consumptions, considering that all other aspects are not significative. Risk assessment conduct at the beginning of November 2022 and valid for one year. Methodology based on ISO14001 STD
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: nothing to report
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? Available at the entrance of the company and on the website: https://www.visualpromo.com.br/politicas-da-empresa/
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Policy aligned with ISO14001 standardwith commitment with continuous improvement.
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please gives details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: nothing to report
H: Have all legally required permits been shown? Please gives details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: environmental permit not observed. NC raised
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: company has proper MSDS and training for handling last carried out in October 2022. No special permit is needed

J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: the quality team sector is responsible to verify with customers any additional requirement and then disclose with the company for later implement.
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility has set as goal for main key consumptions as following: 10% of reduction for water usage. 1% of reduction for energy usage. Reduce in 1% the waste
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: facility recycles when applicable and the quantity is monitored monthly
M: 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: facility has system to measure the use of all key consumption confirmed during the audit with monthly monitoring
N: 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: Please give details: there is no sub-contracting agencies or business partners that needs to have environmental permits.

Usage/Discharge analysis

Criteria	Previous year: Please state period: 2021	Current Year: Please state period: _____
Electricity Usage: Kw/hrs	NA. Facility has started the measurement this year	100,000 kw/h/month
Renewable Energy Usage: Kw/hrs	None	None
Gas Usage: Kw/hrs	None	None
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes , please state result	NA	NA
Water Sources:	<ul style="list-style-type: none"> Public city hall water 	<ul style="list-style-type: none"> Public city hall water

Please list all sources e.g. lake, river, and local water authority.	<ul style="list-style-type: none"> • • 	<ul style="list-style-type: none"> • • •
Water Volume Used: (m ³)	NA. Facility has started the measurement this year	75m ³ /month
Water Discharged: Please list all receiving waters/recipients.	City hall treatment	<ul style="list-style-type: none"> • City hall treatment • •
Water Volume Discharged: (m ³)	NA. Facility has started the measurement this year	75m ³ /month
Water Volume Recycled: (m ³)	NA. Facility has started the measurement this year	None
Total waste Produced (please state units)	NA. Facility has started the measurement this year	6,000.00 kg/month
Total hazardous waste Produced: (please state units)	NA. Facility has started the measurement this year	None
Waste to Recycling: (please state units)	NA. Facility has started the measurement this year	6,000.00 kg/month
Waste to Landfill: (please state units)	NA. Facility has started the measurement this year	Not significant.
Waste to other: (please give details and state units)	NA. Facility has started the measurement this year	None
Total Product Produced (please state units)	NA. Facility has started the measurement this year	Not informed due to confidentiality

10C: Business Ethics – 4-Pillar Audit

[\(Click here to return to summary of findings\)](#)

To be completed for a 4-Pillar SMETA Audit

10C. Compliance Requirements

10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.

10C.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.

10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.

10C.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.

10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,

10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics

10C.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

10C.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.

10C.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:

10C.1 Facility conducts its business ethically without bribery, corruption, or any type of fraudulent Business Practice.

10C.2 Company meets the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices, considering that no deviation was observed during the audit and there is no fines or prosecution to the company as checked after online research

10C.3 Facility has provided the annual financial report (Last fiscal verification done in May 2022) which is signed by an accountability firm confirming that all financial issues are compliant and are communicated to the Brazilian government.

10C.4 Facility has a grievance available on the website that allows the reporter to raise anonymous complaint and one of the premisses of grievance is non retaliation Policy. Grievance was checked and nothing was observed

10C.5 and 10C.8 Facility has a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice, available on the website to all stakeholders including suppliers. Policy was communicated to worker on the last November 2022 valid for one year and suppliers through the website as mentioned. Policy available on <https://www.visualpromo.com.br/politicas-da-empresa/>

10C.7 Facility has provided training to high risk positions on the last November 2022 covering all workers as confirmed after documents check valid for one year

10C.6 Facility has set that Flavio Miranda – governance and ESG coordinator is the designated person responsible for implementing standards concerning Business Ethics with support of the human resources team.

10C.9 No evidence of fines or prosecutions after online research;

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details: Negative certificate of debts issued at the day of the audit and valid for 06 months.
Financial reports and GRI reports as mentioned.
Policies.
Grievance in place
Workers interview.
Training records as mentioned previously.

Any other comments: nothing to report

Non-compliance: NA

<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI/Additional Elements requirement:</p> <p>Recommended corrective action:</p> <p>2. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI/Additional elements requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>
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Observation: NA	
<p>Description of observation:</p> <p>Local law or ETI/Additional elements requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

Good examples observed: NA	
<p>Description of Good Example (GE):</p>	<p>Objective Evidence Observed:</p>

<p>A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy <input checked="" type="checkbox"/> Policy for third parties including suppliers A1: Please give details: Internal Policy and third-party policy disclosed internally and to all suppliers of the facility</p>
<p>B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Evidence integration training against the Policies and refreshment training performed on the Last November 2022 valid for one year with all workers, including high risk positions</p>
<p>C: Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Policy is reviewed periodic and in case of any additional requirement of customers the policy is also reviewed</p>
<p>D: Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Evidenced in the Policy of the topic that the facility requires that the suppliers complete their own business ethics training with at least conformity to Company's Policy, but training is not mandatory. Also, facility has started to check if suppliers are audited against ETI CODE.</p>

Other findings

Other Findings Outside the Scope of the Code

Nothing to report

Community Benefits

(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)

Nothing to report

Appendix 1

<p>Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."</p> <p><input type="checkbox"/> Not Applicable please x</p>	
<p>NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p>Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.,</p>
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
<p>0.A. Guidance for Observations</p> <p>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.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>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.</p> <p>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.</p>	
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p>	

<p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	
<p>ETI 1. Forced Labour</p>	<p>ETI 1. Forced Labour</p>
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>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.</p>	<p>Forced labour</p> <p>The Supplier must under no circumstances use, or in any other way benefit, from forced labour in line with ILO Convention No. 29 on Forced Labour and ILO Convention No. 105 on Abolition of Forced Labour. Forced labour refers to any form of indentured servitude such as the use of physical punishment, confinement, threats of violence as a method of discipline or control such as retaining employees' identification, passports, work permits or deposits as a condition of employment. Where the Supplier is using migrant or prison labourers under a legal framework, the Customer must be made aware to review appropriate documentation maintained by the Supplier. All work shall be voluntary, and workers shall be free to leave work or terminate their employment upon reasonable notice.</p>
<p>ETI 2. Freedom of association and the right to collective bargaining are respected</p>	<p>ETI 2. Freedom of association and the right to collective bargaining are respected</p>
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>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.</p>	<p>Freedom of Association and Collective Bargaining</p> <p>The Supplier should grant its employees the right to Freedom of Association and Collective Bargaining in accordance with all applicable laws and regulations.</p>
<p>ETI 3. Working conditions are safe and hygienic</p>	<p>ETI 3. Working conditions are safe and hygienic</p>
<p>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</p>	<p>The Customer expects the Supplier's operating and management systems, as well as employees, to work in preventing work-related injuries and illnesses.</p>

<p>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.</p> <p>3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p> <p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.</p>	<p>Workplace Environment</p> <p>The Supplier shall provide its employees with a safe and healthy working environment. As a minimum, potable drinking water, adequate lighting, temperature, ventilation, sanitation, and personal protective equipment must be provided together with equipped work stations. In addition, facilities must be constructed and maintained in accordance with the standards set by applicable laws and regulations.</p> <p>Housing Conditions & Respect of Privacy</p> <p>When provided by the Supplier, dormitory facilities shall be constructed and maintained in accordance with all applicable laws and regulations, and they shall be clearly segregated from the factory and production area. All dormitory buildings shall be clean and safe and workers shall be able to enter and leave the dormitory buildings freely at any hour. There shall be clean toilet facilities, access to potable water, and sanitary food preparation and storage facilities. All dormitory facilities shall also provide workers with reasonable personal space, adequate heat and ventilation and clean shower and bathrooms.</p> <p>Emergency preparedness</p> <p>The Supplier shall be prepared for emergency situations. This includes worker notification and evacuation procedures, emergency training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment, and adequate exit facilities. The Supplier shall regularly train employees on emergency planning, responsiveness as well as medical care.</p>
<p>ETI 4. Child labour shall not be used</p>	<p>ETI 4. Child labour shall not be used</p>
<p>4.1 There shall be no new recruitment of child labour.</p> <p>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.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	<p>Minimum age for employment</p> <p>The use of child labour by the Supplier is strictly prohibited, in line with ILO Convention 138 on the Minimum Age, and Convention 182 on the Elimination of the Worst Forms of Child Labour. The ILO Convention 138 on the Minimum Age indicates that no child below 15 years (or 14 in certain developing countries) is allowed to work, subject to exceptions allowed by the ILO or national law. If the Supplier employs young workers, it must demonstrate that the employment of young people does not expose them to undue physical risks that can harm physical, mental or emotional development.</p>
<p>ETI 5. Living wages are paid</p>	<p>ETI 5. Living wages are paid</p>

<p>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.</p> <p>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.</p> <p>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.</p>	<p>Wages and benefits</p> <p>The Supplier's employees must be provided with wages and benefits that, at a minimum, comply with national laws or industry standards whichever is higher, as well as binding collective agreements, including those pertaining to overtime work and other premium pay arrangements. In any event, wages should always be enough to meet basic needs for employees, and their entitled official dependents, and to provide some discretionary income. The Supplier must not apply disciplinary or any other forms of deductions from pay neither apply any forms of discrimination in employment and remuneration practices.</p>
<p>ETI 6. Working Hours are not excessive</p>	<p>ETI 6. Working Hours are not excessive</p>
<p>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.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p> <p>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.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:</p> <ul style="list-style-type: none"> – this is allowed by national law; – this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; – appropriate safeguards are taken to protect the workers' health and safety; and 	<p>Working time and rest days</p> <p>The Supplier must ensure that its employees work in compliance with all applicable laws and mandatory industry standards pertaining to regular working hours, and overtime hours, including for breaks, rest periods, holidays, and maternity and paternity leaves. In absence of law, the Supplier shall not require a regular work week over 60 hours, employees shall be allowed at least one day off after six consecutive days of work, and any overtime worked shall be voluntary and compensated at premium rate.</p>

<p>– The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.</p> <p>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.</p>	
<p>ETI 7. No discrimination is practised</p>	<p>ETI 7. No discrimination is practised</p>
<p>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.</p>	<p>Fair and equal treatment The Supplier must operate with dignity, respect and integrity in regards the treatment of its employees:</p> <ul style="list-style-type: none"> • The Supplier shall not discriminate in hiring and employment practices on the grounds of criteria such as of race, colour, religion, gender, age, physical ability, national origin, sexual orientation, political affiliation, union membership, medical tests, or marital status, in line with ILO Convention No. 111 on Discrimination.
<p>ETI 8. Regular employment is provided</p>	<p>ETI 8. Regular employment is provided</p>
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>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.</p> <p>Additional Elements: Responsible Recruitment</p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p> <p>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.</p> <p>8.5 Employment agencies must only supply workers registered with them.</p> <p>8.6 Workers pay no recruitment fee at any stage of the recruitment process.</p>	<p>Employment practices The supplier shall only employ workers who are legally authorized to work in their facilities and are responsible for validating employees' eligibility to work through appropriate documentation.</p> <p>To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice. 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, subcontracting, 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.</p> <p>In the case of employment through third party labour agencies the Supplier shall comply with Convention No. 181 of the International Labour Organization on Private Employment Agencies.</p>

<p>8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
<p>8A: Sub-Contracting and Homeworking</p>	<p>8A: Sub-Contracting and Homeworking</p>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client. 8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<p>ETI 9. No harsh or inhumane treatment is allowed</p>	<p>ETI 9. No harsh or inhumane treatment is allowed</p>
<p>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. Additional elements: 9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	<p>Fair and equal treatment The Supplier must operate with dignity, respect and integrity in regards the treatment of its employees: <ul style="list-style-type: none"> Any form of psychological, physical, sexual or verbal abuse, intimidation, threat or harassment must not be tolerated. The Supplier shall respect the privacy right of its employees whenever it gathers private information or implements employee monitoring practices. When the Supplier retains direct or contracted workers to provide security to safeguard its personnel and property, the Supplier will make sure that security personnel apply the same standards on fair and equal treatment. </p>
<p>10. Other Issue areas: 10A: Entitlement to Work and Immigration</p>	
<p>Additional Elements 10A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	

<p>SMETA Extra Sections for 4 Pillar Audit:</p>	<p>SMETA Extra Sections for 4 Pillar Audit:</p>
<p>Environment Section</p>	<p>Environment Section</p>
<p>B.4. Compliance Requirements 10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards. 10B4.2 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.</p>	<p>The Customer requires its Supplier to comply with all applicable legal environmental requirements and demonstrate continual improvement of its environmental performance. Environmental Permits and Reporting The Supplier shall make sure that it obtains, keeps current, and follows the reporting guidelines of all the required environmental permits and registrations to be at any time legally compliant.</p>

<p>10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements</p> <p>10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.</p> <p>10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.</p> <p>10B4.6 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).</p> <p>10B4.7 Businesses shall make continuous improvements in their environmental performance.</p> <p>10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation</p> <p>10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.</p> <p>B4. Guidance for Observations</p> <p>10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.</p> <p>10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p>	<p>Environmental Management System The Supplier shall document and implement a relevant environmental management system (based on international standards such as ISO 14001:2004), designed to identify, control and mitigate significant environmental impacts.</p> <p>Hazardous Materials and Product Safety The Supplier shall identify hazardous materials, chemicals and substances, and ensure their safe handling, movement, storage, recycling, reuse and disposal. All the applicable laws and regulations related to hazardous materials, chemicals and substances shall be strictly followed. Supplier shall comply with material restrictions and product safety requirements set by applicable laws and regulations. Suppliers shall ensure that key employees are aware of and trained in product safety practices.</p> <p>Resource Consumption, Pollution Prevention and Waste minimisation The Supplier shall optimise its consumption of natural resources, including energy and water. Supplier shall implement and demonstrate sound measures to prevent pollution and minimize generation of solid waste, wastewater and air emissions. Prior to discharge or disposal, supplier shall characterize and treat wastewater and solid waste appropriately and according to applicable laws and regulations.</p>
<p>Business Practices Section</p>	
<p>10C. Compliance Requirements</p> <p>10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.</p> <p>10C.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.</p> <p>10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.</p> <p>10C.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.</p> <p>10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,</p>	<p>The Customer requires the Supplier to comply with all applicable ethical trade laws and regulations in the countries where materials are sourced, produced and incorporated into the Customer product ("country of use"). In case of services, the location of service delivery should prevail.</p> <p>Anti bribery The Supplier must never, directly or through intermediaries, offer or promise any personal or improper advantage in order to obtain or retain a business or other advantage from a third Party, whether public or private. The Supplier will not pay or accept bribes, arrange or accept kickbacks and shall not take any actions to violate, or cause its business partners to violate, any applicable anti-bribery laws and regulations including the U.S. Foreign Corrupt Practices and the UK Bribery Acts.</p> <p>Grievance mechanisms</p>

10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics

10C.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

10C.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.

10C.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.

The Supplier shall have systems in place enabling anonymous grievances, reporting and management. A designated officer shall continuously monitor the grievance mechanism, keep records on the issues raised and take appropriate actions on a confidential manner.

Records

The Supplier shall maintain transparent and up to date books and records to demonstrate compliance with applicable materials, services, governmental and industry regulations.

Origin

The supplier shall be capable to disclose all the potential sources of primary origins (country of origin) associated with deliveries made. The Customer reserves the right to ask the supplier to create, at a point of time, full supply chain mapping back to origin to facilitate assessment of upstream supply chain compliance

Intellectual property




The Supplier shall take appropriate steps to safeguard and maintain confidential and proprietary information of its business partners and use such information only for the purposes authorized for use by the contractual agreement. In case of sub-contracting, sharing of confidential information should be made with the consent of the Customer.

Conflict of Interest

The Supplier is expected to report to the Customer any situation that may appear as a conflict of interest, and disclose to the Customer if any Customer employee or professional under contract with the Customer may have an interest of any kind in the supplier's business or any kind of economic ties with the supplier.

Photo Form

		
<p>Front View</p>	<p>Biometric system and name of fire marshals and first aiders</p>	<p>Hydrant and fire alarm</p>
		
<p>Meal room with proper supply and evacuation route</p>	<p>Meal room decorated to the world cup</p>	<p>Alarm system</p>

		
<p>Water station</p>	<p>Electrical room identified and locked</p>	<p>Waste disposal</p>



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Your feedback on your experience of the SMETA audit you have observed is extremely valuable. It will help to make improvements to future versions.

You can leave feedback by following the appropriate link to our questionnaire:

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