



SEDEX SMETA
AUDIT REPORTS
2021-2022

Grendene



AUDIT REPORT
SEDEX SMETA
GRENDENE
CRATO FACTORY





Sedex Virtual Assessment Report

Version 1.0.



Sedex Virtual Assessment Declaration

I declare that the assessment underpinning the following report was conducted in accordance with the Sedex Virtual Assessment Technical Requirements, 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): Nil

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

Lead auditor: Cintia Tunger RA21702954

Team auditor: Camila Casanova RA21704448

Interviewers: Cintia Tunger RA21702954

Report writer: Cintia Tunger RA21702954

Report reviewer: Patrick Sister

Date of declaration: August 13, 2021


Note: The focus of this ethical assessment 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.

A Sedex Virtual Assessment is a set of activities to assess a facility's performance against the Sedex Virtual Assessment Technical Requirements (which are based on the SMETA Best Practice Guidance and Measurement Criteria). The activities undertaken include remote engagement with the facility management and their employees via review of documentation, interviews and remote facility tour. The Sedex Virtual Assessment can only be undertaken by approved auditing firms using approved technologies. Due to the nature of this type of assessment and methodologies deployed, the level of verification and triangulation to assess performance against the Sedex Virtual Assessment requirements may vary on a case by case basis depending on the unique set of circumstances at the site during the period of assessment.

This report provides a summary of the findings and other applicable information found/gathered during the social assessment conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social assessment process requires that information be gathered and considered from records review, direct worker engagement, management interviews and visual observation. More information is gathered during the social assessment process than is provided here. The assessment process is a sampling exercise only and does not guarantee that the assessed site prior, during or post-assessment, are in full compliance with the Code being assessed 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 assessment. Release permission must be provided by the owner prior to release to any third parties.

1. Assessment Overview

Site Assessed	
1.1 Sedex Company Reference: (only available on Sedex System)	ZC: 410972263
1.2 Sedex Site Reference: (only available on Sedex System)	ZS: 411841951
1.3 Business name (Company name):	Grendene S. A
1.4 Site name:	Grendene S.A-Crato
1.5 Site address: (Please include full address)	Avenida Rio Grande do Sul, 136 - Franca Alencar - CEP 63.114-000 - Crato-CE
1.6 Country:	Brazil
1.7 Site contact and job title:	Allan Bruno Cruz - Sustainable Development Specialist
1.8 Site phone:	+55 88 3312 4999
1.9 Site email:	allan.souza@grendene.com.br
1.10 Name and Title of person who signed CAPR (if different from above)	Nil
1.11. Sedex Virtual Assessment Pillars: (Please delete as necessary)	4 Pillar
1.12 Sedex Virtual Assessment type: (Please delete as necessary)	Periodic

<p>Audit Company Name, Logo & Reference Number:</p>  <p>SVAZC1060431</p>	<p>Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i></p> <p>Grendene SA</p>
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Assessment details	
Date(s) of Assessment:	August 11 to 13, 2021
Lead Auditor Name	Cintia Tunger RA21702954
Team Auditor Name(s):	Camila Casanova RA21704448
Interviewer Name(s):	Cintia Tunger RA 1702954
Report Writer:	Cintia Tunger RA21702954
Report Reviewer:	Patrick Sister

Auditor-days: 2 auditors x 2,5 days = 5 MD

2.METHODOLOGY

Essential Parameters Review

2.1. Was Site Technology checked as a part of Site Suitability checks?	<p>Yes</p> <p>Please describe how these checks were completed and any deviation from the Sedex Virtual Assessment Technical Requirements: On July 30,2021 during the preparatory call, a connection test was performed without interferences and team's software was tested.</p>
2.2. Was Site Commitment checked as a part of Site Suitability checks?	<p>Yes</p> <p>Please describe how these checks were completed and any deviation from the Sedex Virtual Assessment Technical Requirements: Floor plan sent by facility containing all areas emergency exits, escape, firefighting equipment's and meeting points marked on this plant. During the preparatory call, facility confirmed signed of SVA contract agreeing with commercial terms and proposal. Facility sent documents by e-mails and one drive as requested and floor plan was sent containing all areas regarding emergency exits, escape and firefighting equipment installed on the plant.</p>
2.3. Was Site History checked as a part of Site Suitability checks?	<p>Yes</p> <p>Please describe how these checks were completed and any deviation from the Sedex Virtual Assessment Technical Requirements: There was no evidence of any previous problem with facility transparency, coaching or bribery related to any part of business.</p>
2.4. Were Operational Aspects checked as a part of Site Suitability checks?	<p>Yes</p> <p>Please describe how these checks were completed and any deviation from the Sedex Virtual Assessment Technical Requirements: During the preparatory call, all internal and external areas of the company were visited. There is Wi-Fi / mobile network in all areas of the site and Teams was used on the day. The productive capacity of the factory was normal with employees working normally.</p>

Conditional Considerations Review

2.5. Please describe any additional considerations which affected how the methodology was completed:	Nil
2.6. Scope of Assessment (please mark any deviation/omission from the Sedex Virtual Assessment Technical Requirements):	Nil

Methodology	
2.7. Was the SAQ accessed and reviewed as a part of the assessment preparation?	Yes
2.8. Please provide a list of documents reviewed as part of the assessment preparation	<ol style="list-style-type: none"> 1. Floor with emergency exits, escape, firefighting and equipment installed 2. Policies and Procedures 3. Facility permissions and certificates 4. Risks Assessment of Health & safety and Environment 5. Employee list 6. Facility certification and documents 7. Training records 8. Boiler Assessment 9. Maintenance machines records 10. Chemical products list 11. Fire brigade team records and certification 12. Collective Agreement 13. Ergonomic Assessment 14. Waste Management Plan 15. Potable Drink Analyses 16. Personnel files 17. Employee Handbook 18. Labor contracts 19. Payment receipts employees
2.9. Level of digitization at the site (low, medium high)	High: mostly all digital
2.10. Sample Size Checked (State number of worker records checked and from which weeks/months - should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	52 Peak: 11/2020 Random: 07/2021 Low: 02/2021
2.11. % time spent in preparation including pre-assessment document reviews (offline)	20%
2.12. % time spent in assessment (online)	70%
2.13. Please advise of any technology failures (either partial or whole) encountered during the assessment	No failures
2.14. Please advise of any operational failures (either partial or whole) encountered during the assessment.	Nil
2.15. Detailed site map provided (please attach in appendix)	Yes
2.16. Please list all software used during the assessment	Microsoft Teams

Direct Worker Engagement	
2.17. Please select methods of worker engagement used (Delete as applicable)	Group Interviews
2.18. Total number of workers interviewed: (Only complete if group worker interviews were conducted as a part of the assessment)	52
<i>Women / Men</i>	17 / 35
<i>Contract / Direct</i>	3 / 49
<i>Local / Domestic Migrant / Foreign Migrant</i>	52 / 0 / 0
<i>Service providers</i>	3
<i>Union / Worker reps</i>	2
2.19. Total response rate for Direct Worker Reporting/ Worker Voice (Only complete if Direct Worker Reporting or Worker Voice was used to support the assessment)	%
<i>Women / Men</i>	% / %
<i>Contract / Direct</i>	% / %
<i>Local / Migrant</i>	% / %
2.20. Please provide a summary of the methodology used to collected Direct Worker Reporting/ Worker Voice	
2.21. Please advise how Direct Worker Reporting/ Worker Voice results were used to inform the assessment.	
2.22. Summary of workers key priorities at the site: (To be completed for all methods used)	<p>Auditor conduct group’s interviews with workers at first and second shifts.</p> <p>The meeting room was prepared with chair and laptop for interviews. Auditor ask for employees' that answer if the meeting room was without the supervisor and closed door. Auditor inform that interviews were confidential and that they were pick up by auditor.</p> <p>During interviews, auditor focus on policies and process driven questions which can help to triangulate worker experiences. Auditor used indirect questioning to understand the working experiences for workers, especially workers who fall into vulnerable workers i.e. female workers. Audit asked open questions as working time, forced to work, overtime perform, wages/payments, forced labor, leader behavior, apprentices and service providers, etc. Auditor no asking for clarification of sensitive or personal information during the interviews.</p> <p>Interviewed were calm and friendly during the process.</p>

3. Site Details

Site Details	
3.1. GPS location (live stream):	Latitude: -7.2352366 Longitude: -39.4331388
3.2. Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business license: No 190 valid 31/12/2021 by Prefeitura de Crato. Environmental operating permit: No 45/2020 dated 30/12/2021 by Secretaria do Meio Ambiente. Fire permit: No 4368 dated 17/03/2020 to 17/03/2023. Ibama registration nº 339795 dated 22/07/2021 to 22/10/2021. Federal policy controlled chemical certificate: No 2020-00559925 dated 26/08/20 to 25/08/21. Canteen sanitary permit: No 1181/233 dated 15/07/21 by Prefeitura de Crato. Well Permit: 529/2021 due in 16/04/2031 and No 484/2021 dated 16/04/2021 to 16/04/2031 by Secretaria de Recursos Hídricos.
3.3. Site function: (please delete as necessary)	Factory processing / manufacturer Finished product supplier
3.4. Process overview: <i>(Include products being produced, main operations, number of production lines, main equipment used)</i>	Product: shoes Main operations: receiving, dyeing, injection, assembly, packing and expedition Main equipment: injector, running machine, oven and stove, sewing machine, press, balance beam, serigraphy, hot stamping, reviter, guillotine, painting cabin and milling machine.
3.5. Months of Peak Season:	September to November
3.6. Brief description of site:	Site size: 287.792 m ² of land and 25.016 m ² of construction Site location: Crato / Ceará - Brazil Site age of site: since 1996 Site structure: Concrete Number of buildings: 14
3.7 Number of production buildings	Production 13.824m ² 2. Main entrance 324 m ² 3. Water well 72 m ²

	<p>4. Office 1047 m²</p> <p>5. Boiler 216 m²</p> <p>6. Maintenance 206,85 m²</p> <p>7. Flammable Warehouse 292 m²</p> <p>8. Warehosue 508 m²</p> <p>9. Office n°2 435 m²</p> <p>10. Canteen 972 m²</p> <p>11. Locker rooms 432 m²</p> <p>12. Production n°2 2594 m²</p> <p>13. Pump Warehouse 51,9 m²</p> <p>14. Pump Warehouse n°2 34 m²</p>
3.8. Is accommodation provided?	No
3.9 If yes, please confirm if these are onsite, offsite, or both, and the number of buildings	N/A
3.10. Worker Representation/ Union at site: (Please delete as necessary)	Yes
3.11. Night production: (Please delete as necessary)	Yes
3.12. Further information available: (Please delete as necessary)	No
3.13. General observations and summary of the site:	<p>Grendene, founded in 1971, is one of the world's largest producers of footwear. It has exclusive proprietary technologies in the production of footwear for the women's, men's and children's markets. It owns successful, widely-known brands, including <i>Melissa, Grendha, Zaxy, Rider, Cartago, Ipanema, Pega Forte, Grendene Kids</i> and <i>Zizou</i>.</p> <p>Grendene sells its products through commercial representatives, distributors, direct exports, and exports through its subsidiary Grendene USA, Inc. (USA). These reach approximately 45,000 sales points outside Brazil and 65,000 in the Brazilian market.</p> <p>(i) - In the State of Ceará, it has facilities in three cities. Sobral (where it has been present since 1993), hosts and head office, and its largest industrial unit - six footwear factories, one plant producing PVC and 1 CD (Distribution Center). In the city of Fortaleza (since 1990), it has two plants, producing footwear and PVC components; and in the city of Crato (since 1997) it has one plant, producing footwear and components in EVA (ethyl vinyl acetate).</p> <p>Excellent building and hygienic work conditions and high technology.</p>

Assessment attendance	
Senior Management (Please delete as necessary)	Yes
Union / Worker representative (Please delete as necessary)	No
HR management (Please delete as necessary)	Yes
EHS management (Please delete as necessary)	Yes
If union/worker representatives were not present, please explain why:	Not required

4. Worker Analysis

Worker Profiles											
	Local Workers			Domestic Migrant Workers			Foreign Migrant Workers			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers - Male	1088	0	17	0	0	0	0	0	0	0	1105
Worker numbers - Female	744	0	8	0	0	0	0	0	0	0	752
Total	1832	0	25	0	0	0	0	0	0	0	1857

Assessment attendance

- 4.1. Nationality of management: Brazilian
- 4.2. Number of nationalities on site: Brazilian
- 4.3. Please list the 3 most common nationalities amongst the workforce:
- | | |
|---|--------------------|
| <i>Nationality 1 / % of total workforce</i> | [Brazilian / 100%] |
| <i>Nationality 2 / % of total workforce</i> | |
| <i>Nationality 3 / % of total workforce</i> | |

5. Workplace Impact

Workplace Impact	
5.1. Annual Worker Turnover	22,10%
5.2. Annual Absenteeism	4,40%
5.3. Accidents log available	Yes
5.4. Annual lost days to sickness/accidents per 100 workers	2020: 4 accidents, 27 lost days 2021 YTD: 2 accidents, 12,5 lost days
5.5. % workers who work > 48 hours per week n the last 6 / 12 months:	0
5.6. % workers who work > 60 hours per week n the last 6 / 12 months:	0

6. Details by Clause

0A: Universal Rights covering UNGP

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Facility has Sustainable Policy implemented and available at facility, including expresses commitment to respect Human Rights in pg 01 approved by Board and Code of Conduct implemented in 12/2008 and reviewed in April 29,2021 which topics: Security Information, Interest of Conflicts, Violations, Stakeholders, Ethics Committee, etc. This policy and Code are available in facility intranet and website.

Evidenced Hiring Procedure-PSRH2-02 dated 08/2020 approved by Ana Livia Rangel.

Any other comments: Nil

		Observation	Good Example	
1	[insert description of NC: what, why, when, who and how]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer codes (Requirement Reference)	

OB: Management Systems

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Facility has Sustainable Policy implemented and available at facility, including expresses commitment to respect Human Rights in pg 01 approved by Board and Code of Conduct implemented in 12/2008 and reviewed in April 29,2021 which topics: Security Information, Interest of Conflicts, Violations, Stakeholders, Ethics Committee, etc. This policy and Code are available in facility intranet and website.

Evidenced Facility ETI Code posted at facility entrance.

Facility has Social Responsibility Internal Assessment annually performed by Vanessa da Costa (corporate).

Evidenced Code of Conduct training for managers and supervisors and photos with training of facility employees'.

Facility delivery the Code of conduct in onboarding program and annually provide the refresh training.

Evidenced Hiring Procedure-PSRH2-02 dated 08/2020 approved by Ana Livia Rangel.

Any other comments: Nil

Noncompliance		Observation	Good Example	
1	[insert description of finding (what, why, when, where, who and how)]		ETI Code (Requirement Reference)	

		Local Law (Requirement Reference)	
		Customer code (Requirement Reference)	

1: Freely Chosen Employment

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 system

Current systems: Documents review, management and employees' interview.

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

Details: No evidenced forced, bonded or involuntary prison labor and evidenced through an interviews with staff that everyone has the freedom to work and the freedom to return to their homes daily after the conclusion of work days and there are no lodged deposits or their identic paper with their employer.

Any other comments: Nil

Noncompliance	Observation	Good Example						
1	[insert description of finding (what, why, when, where, who and how)]	<table border="1" style="width: 100%;"> <tr> <td style="width: 50%;">ETI Code (Requirement Reference)</td> <td style="width: 50%;"></td> </tr> <tr> <td>Local Law (Requirement Reference)</td> <td></td> </tr> <tr> <td>Customer code (Requirement Reference)</td> <td></td> </tr> </table>	ETI Code (Requirement Reference)		Local Law (Requirement Reference)		Customer code (Requirement Reference)	
ETI Code (Requirement Reference)								
Local Law (Requirement Reference)								
Customer code (Requirement Reference)								

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

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Workers are free to join a trade union for their category of industry and company must abide to Union CBA (Sindicato dos Trabalhadores nas Indústrias de Calçados e 2 Grupos de Vestuário de Crato, Juazeiro e Barbalha, current 01/03/21 to 28/02/2022).

Facility has a Worker Committee composed by 2 production’s employees.

During the interviews, workers confirmed there are no discriminated against and have access to carry out their representative functions in the workplace.

Any other comments: Nil

Noncompliance		Observation	Good Example	
1	[insert description of NC: what, why, when, who and how]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	

3: Working Conditions are Safe and Hygienic

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 system

Current systems: Documents review, management and employees' interview.

There is a health and safety management system in place.

General Health and Safety management:

- Health and safety good conditions at facility
- Potable water was freely available in all areas
- Sufficient clean toilets segregated by gender were available at all the time to workers
- Ventilation, temperature and lighting were adequate for the production processes according to risk assessment

Fire Safety:

- Fire safety equipment in good condition

Electrical safety:

- Electrical equipment was in good condition

Chemical safety:

- Chemical management in place

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

Details:

- Health and safety committee
- Training records and certificates
- Fire equipment maintenance records
- Accident reports
- Chemical list and MSDS
- PPE records
- Health and Safety risk assessment and medical report
- Electrical reports
- Pressure vessel reports
- Machine guard records

Any other comments: Nil

Non-Compliance	Observation	Good Example
1		ETI Code (Requirement Reference) Local Law (Requirement Reference) Customer code (Requirement Reference)

4: Child Labour Shall Not Be Used

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Facility does not use of child labor and through interview with employees was confirmed information. Facility has PSRH2-02 Hiring and Admission Procedure approved by Ana Livia Rangel. Evidenced Ethics Code of Conduct and Social Responsibility implemented. Employees records and contract labors.

Any other comments: Nil

A: Legal age of employment:	16 years old
B: Age of youngest worker found:	20 years old
C: Are there children present on the work floor but not working at the time of assessment (Please delete as necessary)	Yes No
D: % of under 18's at this site (of total workers)	%
E: Are workers under 18 subject to hazardous work assignments? (Please delete as necessary)	Yes No E1: If yes, give details

Noncompliance	Observation	Good Example						
1	[insert description of finding (what, why, when, where, who and how)]	<table border="1"> <tr> <td>ETI Code (Requirement Reference)</td> <td></td> </tr> <tr> <td>Local Law (Requirement Reference)</td> <td></td> </tr> <tr> <td>Customer code (Requirement Reference)</td> <td></td> </tr> </table>	ETI Code (Requirement Reference)		Local Law (Requirement Reference)		Customer code (Requirement Reference)	
ETI Code (Requirement Reference)								
Local Law (Requirement Reference)								
Customer code (Requirement Reference)								

5: Living Wages are Paid

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Evidence through the employees' documentation, including working timecards and pay receipts. Employees can take payment receipts by internal terminal consulting available in rest areas. The payment method is made by Bradesco bank transfer. The payments are doing on 5 workdays and advance in 20. Facility has an ecteronic car point for employees'.

The company has three work shifts as following:

NORMAL	07:30	12:00	13:00	17:18	
TURNO A	05:25	10:00	11:00	15:13	

TURNO A	05:40	10:00	11:00	15:28	
TURNO A	06:00	10:00	11:28	14:48	Seg à Sab
TURNO B	15:18	19:00	20:00	00:43	
TURNO B	15:33	19:00	20:00	00:56	
TURNO B	14:48	19:00	20:28	23:24	Seg à Sab
ESPECIAL	09:00	13:24	17:00	21:24	
3° TURNO	23:24	06:00			

Sampling was done in the documentation related to the payments of 52 employees.

Any other comments: Nil

Noncompliance	Observation	Good Example	X
1	<p>The company maintains Grendene University whose program aims at the technical and human development of managers and employees.</p> <p>A empresa mantém a “Universidade Grendene” que promove programas de melhoria técnica e comportamental aos gestores e funcionários.</p>	<p>ETI Code (Requirement Reference)</p> <p>Local Law (Requirement Reference)</p> <p>Customer code (Requirement Reference)</p>	

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? <i>(Please delete as necessary)</i>
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>	A1: Legal maximum: 220 hours/month	A2: Legal maximum: 220 hours/month	A3: Yes
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	B1: Legal maximum: 2 hours/day	B2: Legal maximum: 2 hours/day	B3: Yes
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>	C1: Legal minimum: BRL 1.110,00/month	C2: Legal minimum: BRL 1.140,00/month	C3: Yes
D: Overtime wage:	D1: Legal minimum: 150% above salary/hour	D2: Legal minimum: 150% above	D3: Yes

<p>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</p>	<p>200% above salary/hour in Wednesdays Holidays or rest days</p>	<p>salary/hour and Hour Bank 200% above salary/hour in Wednesdays Holidays or rest days and Hour Bank</p>
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Wages analysis:

<p>A: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum? (Please delete as necessary)</p>	<p>Meet E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> BRL 1.140,00/month</p>
<p>B: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: ___% of workforce earning under minimum wage F2: ___% of workforce earning minimum wage F3: _100_% of workforce earning above minimum wage</p>
<p>C: Were appropriate records available to verify hours of work and wages?</p>	<p>Yes</p>
<p>D: Were any inconsistencies found? (if yes describe nature)</p>	<p>No D1: Type Poor record keeping Isolated incident Repeated occurrence:</p>
<p>E: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)</p>	<p>Yes E1: Please give details: Employees' do not confirm to attend meetings before or after work hour.</p>
<p>F: Are workers paid in a timely manner in line with local law?</p>	<p>Yes</p>
<p>G: Is there evidence that equal rates are being paid for equal work:</p>	<p>Yes P1: Please give details: Confirmed by documents review and employees interviewed.</p>
<p>H: How are workers paid:</p>	<p>Bank Transfer Other H1: If other, please explain:</p>

6: Working Hours are not Excessive

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 system

Current systems: Documents review, management and employees' interview

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

Details: Evidenced that employees worked 44 hours a week and that they have the right to at least a seminal break, being verified the records of Working Day and pay stubs of employees.

Evidence specific records of overtime work.

Employees' records: timecards and contract labour.

During interviews, it was verified that overtime work occurs on a voluntary basis and payments for overtime are recorded on monthly payment receipts.

Any other comments: Nil

Noncompliance		Observation	Good Example	
1	[insert description of finding (what, why, when, where, who and how)]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	

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: Eletronic point

B: Are standard/contracted working hours defined in all contracts/employment agreements?

No

B1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:

C1: If YES, please delete as appropriate:

C: Are there any other types of contracts/employment agreements used?	No	0 hours Part time Variable hours Other If "Other", Please define:
D. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	No	<i>D1: If yes, please detail hours, %, types of workers affected and frequency</i> Please give details:
E: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	E2: Please select all applicable: 1 in 7 days No If 'No', please explain:	E3: Is this allowed by local law? Yes
	<i>Maximum number of days worked without a day off (in sample):</i>	
	6 days	
Standard/Contracted Hours worked		
F: Were standard working hours over 48 hours per week found?	No	F1: If yes, % of workers & frequency:
G: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	No	G1: If yes, please give details:
Overtime Hours worked		
H: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 15 min/day	
I: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	No	
J: Approximate percentage of total workers on highest overtime hours:	__3__%	

K: Is overtime voluntary?	Yes Conflicting Information	<i>K1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: CBA</i>
Overtime Premiums		
L: Are the correct legal overtime premiums paid?	Yes N/A - there is no legal requirement to OT premium	<i>L1: Please give details of normal day overtime premium as a % of standard wages: Bank Hour and 150% business days and 200% non-business days</i>
M: Is overtime paid at a premium?	Yes	<i>M1: If yes, please describe % of workers & frequency: 100% of workers in OT receive premium</i>
N: 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.	X-No Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) Collective Bargaining agreements Other	<i>N1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</i>
O: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	Overtime is voluntary Onsite Collective bargaining allows 60+ hours/week Safeguards are in place to protect worker's health and safety Site can demonstrate exceptional circumstances Other reasons (please specify)	<i>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</i>
P: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	No P1: If yes, please give details:	

7: No Discrimination is Practiced

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 system

Current systems: Documents review, management and employees' interview.

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

Details: No confirmation about 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.

Facility has a Code of Conduct and Sustainable Policy implemented.

Any other comments: Nil

A: Gender breakdown of Management + Supervisors (Include as one combined group)

A1: Male: _98,8_ %
A2: Female_1,2__ %

B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:

Technical leader, process leader and supervisor

Noncompliance	Observation	Good Example						
1	[insert description of finding (what, why, when, where, who and how)]	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">ETI Code (Requirement Reference)</td> <td style="width: 30%;"></td> </tr> <tr> <td>Local Law (Requirement Reference)</td> <td></td> </tr> <tr> <td>Customer code (Requirement Reference)</td> <td></td> </tr> </table>	ETI Code (Requirement Reference)		Local Law (Requirement Reference)		Customer code (Requirement Reference)	
ETI Code (Requirement Reference)								
Local Law (Requirement Reference)								
Customer code (Requirement Reference)								

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

8: Regular Employment Is Provided

Current systems: Documents review, management and employees' interview.

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

Details: Sample of employees' labor contract and time records and Employee's Book, which clearly demonstrates the rules established and agreed upon by Employee, Company and Union.

Employees Contract Labor, Collective Agreement, Employee's Payroll, timekeeping records, employee's interview.

Any other comments: Nil

Noncompliance	Observation	Good Example						
1	[insert description of finding (what, why, when, where, who and how)]	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">ETI Code (Requirement Reference)</td> <td style="width: 30%;"></td> </tr> <tr> <td>Local Law (Requirement Reference)</td> <td></td> </tr> <tr> <td>Customer code (Requirement Reference)</td> <td></td> </tr> </table>	ETI Code (Requirement Reference)		Local Law (Requirement Reference)		Customer code (Requirement Reference)	
ETI Code (Requirement Reference)								
Local Law (Requirement Reference)								
Customer code (Requirement Reference)								

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><i>X-Terms & Conditions presented</i> <i>X-Understood by workers</i> <i>X-Same as actual conditions</i></p> <p><i>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:</i></p>
<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><i>No</i></p> <p><i>B1: If yes, please describe details and specific category(ies) of workers affected:</i></p>
<p>C: If yes, list all that apply: (please delete as necessary)</p>	<p><i>Recruitment / hiring fees</i> <i>Service fees</i> <i>Application costs</i> <i>Recommendation fees</i> <i>Placement fees</i> <i>Administrative, overhead or processing fees</i> <i>Skills tests</i> <i>Certifications</i> <i>Medical screenings</i></p>

	Passports/ID's Work / resident permits Birth certificates Police clearance fees Any transportation and lodging costs after employment offer Any transport costs between work place and home Any relocation costs after commencement of employment New hire training / orientation fees Medical exam fees Deposit bonds or other deposits Any other non-monetary assets <i>Other -</i> <i>C1: If other, please give details:</i>
D: If any checked, give details:	

Migrant Workers:
 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

A: Type of work undertaken by migrant workers:	Facility does not have migrant workers.
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: B2: Total number of (outside of local country) recruitment agencies used:
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?	Yes No C1: Please describe finding: C2: Observations:
D: Are Any migrant workers in skilled, technical, or management roles <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	Yes No D1: If yes, number and example of roles:

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	Yes No

B: If yes, check all that apply:	<p><i>Recruitment / hiring fees</i></p> <p><i>Service fees</i></p> <p>Application costs</p> <p>Recommendation fees</p> <p>Placement fees</p> <p>Administrative, overhead or processing fees</p> <p>Skills tests</p> <p>Certifications</p> <p>Medical screenings</p> <p>Passports/ID's</p> <p>Work / resident permits</p> <p>Birth certificates</p> <p>Police clearance fees</p> <p>Any transportation and lodging costs after employment offer</p> <p>Any transport costs between work place and home</p> <p>Any relocation costs after commencement of employment</p> <p>New hire training / orientation fees</p> <p>Medical exam fees</p> <p>Deposit bonds or other deposits</p> <p>Any other non-monetary assets</p> <p>Other</p> <p>B1 - If other, please give details:</p>
C: If any checked, give details:	

Agency Workers (if 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: Facility does not use Agency workers.
B: Were agency workers' age / pay / hours included within the scope of this assessment?	Yes No
C: Were sufficient documents for agency workers available for review?	Yes No
D: Is there a legal contract / agreement with all agencies?	Yes No D1: Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	Yes No E1: Please give details:

Contractors:

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,

A: Any contractors on site?	Yes A1: If yes, how many contractors are present, please give details: 02 (security-Grupo Serval) and catering-Nutrinor Serviços de Alimentação).
B: If Yes, how many workers supplied by contractors?	25
C: Do all contractor workers understand their terms of employment?	Yes C1: Please describe finding: Confirmed by 3 contractors interviewed.
D: If Yes, please give evidence for contractor workers being paid per law:	Confirmed during documents check contract labour, payment receipts and CBA.

9: No Harsh or Inhumane Treatment is Allowed

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
 Facility has whistle blowing mechanism implemented and available in website.
 Facility access complains channel by internal terminal localized at rest areas too.

Any other comments: Nil

Noncompliance	Observation	Good Example						
1	[insert description of finding (what, why, when, where, who and how)]	<table border="1"> <tr> <td>ETI Code (Requirement Reference)</td> <td></td> </tr> <tr> <td>Local Law (Requirement Reference)</td> <td></td> </tr> <tr> <td>Customer code (Requirement Reference)</td> <td></td> </tr> </table>	ETI Code (Requirement Reference)		Local Law (Requirement Reference)		Customer code (Requirement Reference)	
ETI Code (Requirement Reference)								
Local Law (Requirement Reference)								
Customer code (Requirement Reference)								

10A: Entitlement to Work and Immigration

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Facility does not have Immigration work.

Any other comments: Nil

Noncompliance		Observation	Good Example	
1	[insert description of finding (what, why, when, where, who and how)]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	

10B4: Environment 4-Pillar

(Delete as necessary)

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 system

Current systems: Documents review, management and employees' interview.

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

Details:

Facility has an Environment Management System implemented in place.
 Evidenced Environment Operating permit; Water well permit; IBAMA License, Waste and Electricity records, Environmental Policy, Aspects and impacts road map and other documents.
 Facility maintained legally required environmental documents in place.

Any other comments: Nil

Noncompliance	Observation	X	Good Example	
1	<p>During document review and management interview, it was noted that the facility does not have biodiversity policy.</p> <p>Durante análise de documentos e entrevista com a gerência, foi evidenciado que a empresa não possui Política de Biodiversidade.</p>		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	X
			Customer code (Requirement Reference)	
			Good Example	X
1	<p>Facility promote Social Action food drive for seedling native plants.</p> <p>A fábrica promove Ações Sociais de coleta de alimentos em troca de mudas.</p>		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	
			Good Example	X
2	<p>Facility reuse water from treatment station in toilets and to water the garden. The draft is used to composting and co-processing.</p> <p>A fábrica reutiliza a água da estação de tratamento em vasos sanitários e para rega de jardim. A borra da ETE é usada para compostagem e co-processamento.</p>		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	

4 Pillar Environmental Analysis

Only to be completed for a 4-Pillar Sedex Virtual Assessment remove this table if 2 pillar assessment has been conducted. (Site declaration only - this has not been verified by auditor. Please state units in all cases below.)

A: Is there a manager responsible for Environmental issues (Name and Position):	Corporate: Carlos André Carvalho Site: Allan Bruno Cruz de Souza/ Sustainable Development Analyst.
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes B1: Please give details: Risk assessment on environmental impacts and its impacts and controls is done by facility and last revision is from March 2021.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	No C1: Please give details: Facility do not have ISO 14001 or equivalent

<p>D: Does the site have an Environmental policy? (For guidance, please see Measurement criteria)</p>	<p>Yes D1: If yes, is it publicly available? Facility has a public sustainable development policy and employees are trained.</p>
<p>E: If yes, does it address the key impacts from their operations and their commitment to improvement?</p>	<p>Yes E1: Please give details: Sustainable development policy address facility's impacts</p>
<p>F: Does the site have a Biodiversity policy? (For guidance, please see Measurement criteria)</p>	<p>No</p>
<p>G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. (For guidance, please see Measurement criteria)</p>	<p>Yes G1: Please give details: Forest Stewardship Council n° N003114 due in 25/03/2022 The Vegan Society n° 025533 due in 18/02/2022.</p>
<p>H: Have all legally required permits been shown? Please give details.</p>	<p>Yes H1: Please give details: All environmental related permits are in place.</p> <p>Environmental operating permit: 045/2020 due in 30/12/2021</p> <p>Ibama registration n° 339795, certificate # RVPGURHEMEQT56QD due in 22/10/2021.</p> <p>Federal policy controlled chemical certificate: 2020-00559925 due in 22/08/2021.</p> <p>Well Permit: 484/2021 due in 16/04/2031 by Sec. Recursos Hidricos.</p>
<p>I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?</p>	<p>Yes I1: Please give details: Facility utilizes chemicals controlled by Federal Policy and license n° 2020-00559925 is due in 25/08/2021.</p>
<p>J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?</p>	<p>Yes J1: Please give details: There is a system in place to manage environmental and chemical legislation.</p>
<p>K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:</p>	<p>Yes K1: Please give details: Facility has environmental targets related to waste, energy and water linked to production and hours of work.</p>

Usage/Discharge analysis		
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	Yes L1: Please give details: Facility has documents related to waste management to demonstrate reuse of waste, recycling and correct disposal. Regarding 30% of production waste is used in new production.	
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?	Yes M1: Please give details: Facility measure and monitor consumption of water and energy.	
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?	Yes N1: Please give details: Sub-contracting at facility is kitchen for food preparation and their related permits are in place.	
Criteria	Previous year: Please state period: <u>2020 (Jan-Dec)</u>	Current Year: Please state period: <u>2021 (jan-July)</u>
Electricity Usage: <i>Kw/hrs</i>	Previous year: Please state period: <u>2020 (Jan-Dec)</u>	Current Year: Please state period: <u>2021 YTD July</u>
Renewable Energy Usage: <i>Kw/hrs</i>	9.171.379 kwh	5.644.636 kwh
Gas Usage: <i>Kw/hrs</i>	9.475.726 kwh	4.794.661 kwh
Has site completed any carbon Footprint Analysis?	0	0
If Yes, please state result	No	No
Water Sources: <i>Please list all sources e.g. lake, river, and local water authority.</i>	<ul style="list-style-type: none"> Water well 	<ul style="list-style-type: none"> Water well
Water Volume Used: <i>(m³)</i>	18.552 m ³	9.047 m ³
Water Discharged: <i>Please list all receiving waters/recipients.</i>	<ul style="list-style-type: none"> Water Treatment Station 	<ul style="list-style-type: none"> Water Treatment Station
Water Volume Discharged: <i>(m³)</i>	0	0
Water Volume Recycled: <i>(m³)</i>	14.032 m ³	9.047 m ³

Total waste Produced <i>(please state units)</i>	1.532,5 T	693,1 T
Total hazardous waste Produced: <i>(please state units)</i>	24,39 T	10,62 T
Waste to Recycling: <i>(please state units)</i>	1.239,7 T	525,19 T
Waste to Landfill: <i>(please state units)</i>	0	39,11 T
Waste to other: <i>(please give details and state units)</i>	0	0
Total Product Produced <i>(please state units)</i>	7.395,472 Pairs	3.296.317 Pairs

10C: Business Ethics - 4-Pillar Assessment

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Facility delivery the Code of Conduct in onboarding program for new employees' and annually provide refresh training. Facility has a whistle blowing mechanism implemented and available at website. Evidenced Code of Conduct training for managers and supervisors records and photos.

Any other comments: Nil













Noncompliance		Observation	Good Example	
1	[insert description of finding (what, why, when, where, who and how)]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	




<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"/> <i>Internal Policy</i> <input checked="" type="checkbox"/> <i>Policy for third parties including suppliers</i></p> <p>A1: Please give details: Evidenced Code of Conduct available in website and whistle blowing mechanism implemented.</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"/> <i>Yes</i> <input type="checkbox"/> <i>No</i></p> <p>B1: Please give details: training for managers and supervisors and photos evidenced.</p>
<p>C: Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> <i>Yes</i> <input type="checkbox"/> <i>No</i></p> <p>C1: Please give details:</p>
<p>D: Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> <i>Yes</i> <input type="checkbox"/> <i>No</i></p> <p>D1: Please give details: Facility has a Supplier Manual and require signed in Confirmation Term.</p>

Other Findings Outside the Scope of the Code

Nil

Photo Form

		
<p>Main entrance</p>	<p>Production</p>	<p>Production</p>
		
<p>Production</p>	<p>Production</p>	<p>Production</p>
		
<p>Production</p>	<p>Production</p>	<p>Production</p>
		

Effluent Treatment Station	Employees' Time record	Machine Guard
		
Electrical Panel	Fire equipment's	Fire brigade equipments



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AUDIT REPORT
SEDEX SMETA
GRENDENE
FORTALEZA FACTORY





Sedex Virtual Assessment Report

Version 1.0.



Sedex Virtual Assessment Declaration

I declare that the assessment underpinning the following report was conducted in accordance with the Sedex Virtual Assessment Technical Requirements, 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): Nil

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

Lead auditor: Cintia Tunger RA21702954

Team auditor: Camila Casanova RA21704448

Interviewers: Cintia Tunger and Camila Casanova

Report writer: Cintia Tunger

Report reviewer: Patrick Sister

Date of declaration: August 11, 2021


Note: The focus of this ethical assessment 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.

A Sedex Virtual Assessment is a set of activities to assess a facility's performance against the Sedex Virtual Assessment Technical Requirements (which are based on the SMETA Best Practice Guidance and Measurement Criteria). The activities undertaken include remote engagement with the facility management and their employees via review of documentation, interviews and remote facility tour. The Sedex Virtual Assessment can only be undertaken by approved auditing firms using approved technologies. Due to the nature of this type of assessment and methodologies deployed, the level of verification and triangulation to assess performance against the Sedex Virtual Assessment requirements may vary on a case by case basis depending on the unique set of circumstances at the site during the period of assessment.

This report provides a summary of the findings and other applicable information found/gathered during the social assessment conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social assessment process requires that information be gathered and considered from records review, direct worker engagement, management interviews and visual observation. More information is gathered during the social assessment process than is provided here. The assessment process is a sampling exercise only and does not guarantee that the assessed site prior, during or post-assessment, are in full compliance with the Code being assessed 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 assessment. Release permission must be provided by the owner prior to release to any third parties.

1. Assessment Overview

Site Assessed	
1.1 Sedex Company Reference: (only available on Sedex System)	ZC: 410972263
1.2 Sedex Site Reference: (only available on Sedex System)	ZS: 411854036
1.3 Business name (Company name):	Grendene S. A
1.4 Site name:	Grendene S.A-Fortaleza
1.5 Site address: (Please include full address)	Rua: Cândido Castelo Branco, n 865, Barra do Ceará, cep: 60332-170, Fortaleza-CE
1.6 Country:	Brazil
1.7 Site contact and job title:	Talyta Angelo Cruz- Sustainable Development Specialist
1..8 Site phone:	+ 55 85 3533-3600 ramal 3361 or 85 99115-4899
1.9 Site email:	talyta.cruz@grendene.com.br
1.10 Name and Title of person who signed CAPR (if different from above)	Nil
1.11. Sedex Virtual Assessment Pillars: (Please delete as necessary)	4 Pillar
1.12 Sedex Virtual Assessment type: (Please delete as necessary)	Periodic

<p>Audit Company Name, Logo & Reference Number:</p> <div style="text-align: center;">  <p>SVAZC1060431</p> </div>	<p>Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i></p> <p style="text-align: center;">Grendene SA</p>
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Assessment details	
Date(s) of Assessment:	August 09 to 11, 2021
Lead Auditor Name	Cintia Tunger / RA 21702954
Team Auditor Name(s):	Camila Casanova / RA 21704448
Interviewer Name(s):	Cintia Tunger; Camila Casanova
Report Writer:	Cintia Tunger
Report Reviewer:	Patrick Sister



Auditor-days: 2 auditors x 2,5 days = 5 MD

2.METHODOLOGY

Essential Parameters Review

2.1. Was Site Technology checked as a part of Site Suitability checks?	<p>Yes</p> <p>Please describe how these checks were completed and any deviation from the Sedex Virtual Assessment Technical Requirements: On July 30,2021 during the preparatory call, a connection test was performed without interferences and team’s software was tested.</p>
2.2. Was Site Commitment checked as a part of Site Suitability checks?	<p>Yes</p> <p>Please describe how these checks were completed and any deviation from the Sedex Virtual Assessment Technical Requirements: Floor plan sent by facility containing all areas emergency exits, escape, firefighting equipment’s and meeting points marked on this plant. During the preparatory call, facility confirmed signed of SVA contract agreeing with commercial terms and proposal. Facility sent documents by e-mails and one drive as requested and floor plan was sent containing all areas regarding emergency exits, escape and firefighting equipment installed on the plant.</p>
2.3. Was Site History checked as a part of Site Suitability checks?	<p>Yes</p> <p>Please describe how these checks were completed and any deviation from the Sedex Virtual Assessment Technical Requirements: There was no evidence of any previous problem with facility transparency, coaching or bribery related to any part of business.</p>
2.4. Were Operational Aspects checked as a part of Site Suitability checks?	<p>Yes</p> <p>Please describe how these checks were completed and any deviation from the Sedex Virtual Assessment Technical Requirements: During the preparatory call, all internal and external areas of the company were visited. There is Wi-Fi / mobile network in all areas of the site and Teams was used on the day. The productive capacity of the factory was normal with employees working normally.</p>

Conditional Considerations Review

2.5. Please describe any additional considerations which affected how the methodology was completed:	<p>Nil</p>
2.6. Scope of Assessment (please mark any deviation/omission from the Sedex Virtual Assessment Technical Requirements):	<p>Nil</p>

Methodology

2.7. Was the SAQ accessed and reviewed as a part of the assessment preparation?	Yes
2.8. Please provide a list of documents reviewed as part of the assessment preparation	<ol style="list-style-type: none"> 1. Floor with emergency exits, escape, firefighting and equipment installed 2. Policies and Procedures 3. Facility permissions and certificates 4. Risks Assessment of Health & safety and Environment 5. Employee list 6. Facility certification and documents 7. Training records 8. Boiler Assessment 9. Maintenance machines records 10. Chemical products list 11. Fire brigade team records and certification 12. Collective Agreement 13. Ergonomic Assessment 14. Waste Management Plan 15. Potable Drink Analyses 16. Personnel files 17. Employee Handbook 18. Labor contracts 19. Payment receipts employees
2.9. Level of digitization at the site (low, medium high)	High: mostly all digital
2.10. Sample Size Checked (State number of worker records checked and from which weeks/months - should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	<p>52</p> <p>Peak: 11/2020</p> <p>Random: 07/2021</p> <p>Low: 02/2021</p>
2.11. % time spent in preparation including pre-assessment document reviews (offline)	20%
2.12. % time spent in assessment (online)	70%
2.13. Please advise of any technology failures (either partial or whole) encountered during the assessment	No failures
2.14. Please advise of any operational failures (either partial or whole) encountered during the assessment.	Nil
2.15. Detailed site map provided (please attach in appendix)	Yes
2.16. Please list all software used during the assessment	Microsoft Teams

Direct Worker Engagement

2.17. Please select methods of worker engagement used (Delete as applicable)	Group Interviews	
2.18. Total number of workers interviewed: (Only complete if group worker interviews were conducted as a part of the assessment)	52	
<i>Women / Men</i>	20 / 32	
<i>Contract / Direct</i>	3 / 49	
<i>Local / Domestic Migrant / Foreign Migrant</i>	52 / 0 / 0	
<i>Service providers</i>	3	
<i>Union / Worker reps</i>	2	
2.19. Total response rate for Direct Worker Reporting/ Worker Voice (Only complete if Direct Worker Reporting or Worker Voice was used to support the assessment)	%	
<i>Women / Men</i>	% /	%
<i>Contract / Direct</i>	% /	%
<i>Local / Migrant</i>	% /	%
2.20. Please provide a summary of the methodology used to collected Direct Worker Reporting/ Worker Voice		
2.21. Please advise how Direct Worker Reporting/ Worker Voice results were used to inform the assessment.		
2.22. Summary of workers key priorities at the site: (To be completed for all methods used)	<p>Auditor conduct group’s interviews with workers at first and second shifts.</p> <p>The meeting room was prepared with chair and laptop for interviews. Auditor ask for employees' that answer if the meeting room was without the supervisor and closed door. Auditor inform that interviews were confidential and that they were pick up by auditor.</p> <p>During interviews, auditor focus on policies and process driven questions which can help to triangulate worker experiences. Auditor used indirect questioning to understand the working experiences for workers, especially workers who fall into vulnerable workers i.e. female workers. Audit asked open questions as working time, forced to work, overtime perform, wages/payments, forced labor, leader behavior, apprentices and service providers, etc. Auditor no asking for clarification of sensitive or personal information during the interviews.</p> <p>Interviewed were calm and friendly during the process.</p>	

3. Site Details

Site Details	
3.1. GPS location (live stream):	Latitude: -3.7076931 Longitude: -38.5822952
3.2. Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business license: 89.850.341/0014-84 Building permit: AF00053898/2021 due 23/07/2022 Environmental operating permit: 183/2018 due in 19/04/2022 Fire permit: 171605 due in 28/03/2021 Ibama registration nº 339782, certificate # EN12N9928QVWBXJF due in 22/10/2021 Federal policy controlled chemical certificate: 2020-00559923 due in 25/08/2021 Canteen sanitary permit: ILS002008912020 Well Permit: 946/2021 due in 18/05/2021
3.3. Site function: (please delete as necessary)	Factory processing / manufacturer Finished product supplier
3.4. Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Product: shoes Main operations: receiving, dyeing, injection, assembly, packing and expedition Production lines: 22 Main equipment: injector, running machine, oven and stove, sewing machine, press, balance beam, serigraphy, hot stamping, reviter, guillotine, painting cabin and milling machine.
3.5. Months of Peak Season:	September to November
3.6. Brief description of site:	Site size: 43.758 square meters of land and 22.968 square meters of construction Site location: Fortaleza / Ceará - Brazil Site age of site: since 1977 Site structure: Concrete Number of buildings: 15
3.7 Number of production buildings	1. Production 1: 6.530 m ² 2. Production 2: 9.458 m ² 3. Production: 1.338 m ²

	4. Office: 680 m ²
	5. Warehouse: 195 m ²
	6. Canteen: 1.207 m ²
	7. Locker room: 516 m ²
	8. Flammable chemicals: 195 m ²
	9. LPG: 11 m ²
	10. Waste warehouse: 138 m ²
	11. Main entrance: 418 m ²
	12. Pump: 95 m ²
	13. Parking 1: 76 m ²
	14. Parking 2: 2.472 m ²
	15. Bike parking: 306 m ²
3.8. Is accommodation provided?	No
3.9 If yes, please confirm if these are onsite, offsite, or both, and the number of buildings	N/A
3.10. Worker Representation/ Union at site: (Please delete as necessary)	Yes
3.11. Night production: (Please delete as necessary)	Yes
3.12. Further information available: (Please delete as necessary)	No
3.13. General observations and summary of the site:	<p>Grendene, founded in 1971, is one of the world's largest producers of footwear. It has exclusive proprietary technologies in the production of footwear for the women's, men's and children's markets. It owns successful, widely-known brands, including <i>Melissa, Grendha, Zaxy, Rider, Cartago, Ipanema, Pega Forte, Grendene Kids</i> and Zizou.</p> <p>Grendene is a totally integrated operation: As well as five industrial locations - with a total of 11 footwear factories - with aggregate capacity to produce 250 million pairs of shoes per year (Center). In the city of Fortaleza (since 1990), it has two plants,</p> <p>Grendene sells its products through commercial representatives, distributors, direct exports, and exports through its subsidiary Grendene USA, Inc. (USA). These reach approximately 45,000 sales points outside Brazil and 65,000 in the Brazilian market.</p> <p>Excellent building and hygienic work conditions and high technology.</p>

Assessment attendance

Senior Management (Please delete as necessary)	Yes
Union / Worker representative (Please delete as necessary)	No
HR management (Please delete as necessary)	Yes
EHS management (Please delete as necessary)	Yes
If union/worker representatives were not present, please explain why:	Not required

4. Worker Analysis

Worker Profiles											
	Local Workers			Domestic Migrant Workers			Foreign Migrant Workers			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers - Male	938	0	18	0	0	0	0	0	0	0	956
Worker numbers - Female	1010	0	3	0	0	0	0	0	0	0	1013
Total	1948	0	21	0	0	0	0	0	0	0	1969

Assessment attendance

4.1. Nationality of management: Brazilian

4.2. Number of nationalities on site: Brazilian

4.3. Please list the 3 most common nationalities amongst the workforce:

Nationality 1 / % of total workforce [Brazilian / 100%]

Nationality 2 / % of total workforce

Nationality 3 / % of total workforce

5. Workplace Impact

Workplace Impact	
5.1. Annual Worker Turnover	8,3%
5.2. Annual Absenteeism	6,2%
5.3. Accidents log available	Yes
5.4. Annual lost days to sickness/accidents per 100 workers	2021 YTD: 8 accidents, 66 lost days
5.5. % workers who work > 48 hours per week n the last 6 / 12 months:	0
5.6. % workers who work > 60 hours per week n the last 6 / 12 months:	0

6. Details by Clause

0A: Universal Rights covering UNGP

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Facility has Sustainable Policy implemented and available at facility, including expresses commitment to respect Human Rights in pg 01 approved by Board and Code of Conduct implemented in 12/2008 and reviewed in April 29,2021 which topics: Security Information, Interest of Conflicts, Violations, Stakeholders, Ethics Committee, etc. This policy and Code are available in facility intranet and website.

Evidenced Hiring Procedure-PSRH2-02 dated 08/2020 approved by Luciana Paula/Human Resource Supervisor.

Any other comments: Nil

		Observation	Good Example	
1	[insert description of NC: what, why, when, who and how]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer codes (Requirement Reference)	

OB: Management Systems

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Facility has Sustainable Policy implemented and available at facility, including expresses commitment to respect Human Rights in pg 01 approved by Board and Code of Conduct implemented in 12/2008 and reviewed in April 29,2021 which topics: Security Information, Interest of Conflicts, Violations, Stakeholders, Ethics Committee, etc. This policy and Code are available in facility intranet and website.

Evidenced Facility ETI Code posted at facility entrance (photo).

Facility has Social Responsibility Internal Assessment annually, last occurred in 25/03/2021 by Vanessa da Costa (corporate).

Evidenced Code of Conduct training for managers and supervisors dated 21/06/2021 and photos with training of facility employees' in 13/07/2021. Facility delivery the Code of conduct in onboarding program and annually provide the refresh training.

Evidenced Hiring Procedure-PSRH2-02 dated 08/2020 approved by Luciana Paula/Human Resource Supervisor.

Any other comments: Nil

Noncompliance		Observation	Good Example	
1	[insert description of finding (what, why, when, where, who and how)]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	

		Customer code (Requirement Reference)	
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1: Freely Chosen Employment

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 system

Current systems: Documents review, management and employees' interview.

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

Details: No evidenced forced, bonded or involuntary prison labor and evidenced through an interviews with staff that everyone has the freedom to work and the freedom to return to their homes daily after the conclusion of work days and there are no lodged deposits or their identic paper with their employer.

Any other comments: Nil

Noncompliance	Observation	Good Example	
1	[insert description of finding (what, why, when, where, who and how)]	ETI Code (Requirement Reference)	
		Local Law (Requirement Reference)	
		Customer code (Requirement Reference)	

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

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Workers are free to join a trade union for their category of industry and company must abide to Union CBA. Facility has a Worker Committee composed by 2 production's employees.

During the interviews, workers confirmed there are no discriminated against and have access to carry out their representative functions in the workplace.

Any other comments: Nil

Noncompliance		Observation	Good Example	
1	[insert description of NC: what, why, when, who and how]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	

3: Working Conditions are Safe and Hygienic

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 system

Current systems: Documents review, management and employees' interview.

There is a health and safety management system in place.

General Health and Safety management:

- Health and safety good conditions at facility
- Potable water was freely available in all areas
- Sufficient clean toilets segregated by gender were available at all the time to workers
- Ventilation, temperature and lighting were adequate for the production processes according to risk assessment

Fire Safety:

- Fire safety equipment in good condition

Electrical safety:

- Electrical equipment was in good condition

Chemical safety:

- Chemical management in place

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

Details:

- Health and safety committee
- Training records and certificates
- Fire equipment maintenance records
- Accident reports

- Chemical list and MSDS
- PPE records
- Health and Safety risk assessment and medical report
- Electrical reports
- Pressure vessel reports
- Machine guard records

Any other comments: Nil

Noncompliance	X	Observation	Good Example	
1		<p>NC: During document review, it was noted that the facility has Fire Permit (AVCB) n° 171605 expired since 03/28/2021. During document review, it was noted that the facility has Fire Permit (AVCB) n° 171605 is expired since 03/28/2021. The facility had the project approved by certificate n° 295074 on 07/08/2021 and is awaiting inspection to issue the AVCB.</p> <p>Local Law: According to Ceará State Law n° 13556/2004, which provides for fire safety and other measures. Article 2The issuance of licenses for construction, operation of any establishments or use of construction, new or old, will depend on prior issuance, by the Fire Department, of a Certificate of Compliance of the Fire and Panic Protection System. § 1. The safety requirements provided for by the Fire and Panic Protection System will be applied to buildings and risk areas, and must be observed during: I - construction and/or renovation; II - change of occupation and/or use; III - expansion of the built area; IV - adequacy of buildings and risk areas that existed prior to the publication of this Law; and V - expiration of the validity of the respective Inspection Certificates.</p> <p>Obtain Fire Permit (AVCB) renewal.</p>	ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	X
			Customer code (Requirement Reference)	
2		<p>NC: During facility tour, it was noted that manual loading carts do not have the identified load capacity.</p> <p>Local Law: According to the Federal Law Regulatory Standard NR-11 Annex I 1.2.1 All equipment must indicate, in a visible place, its identification, maximum workload allowed, name and CNPJ of the manufacturer and technical responsible.</p> <p>During the audit, the non-compliance was resolved and the facility identified the carrying capacity of the manual carts.</p>	ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	X
			Customer code (Requirement Reference)	
3		<p>NC: During facility tour, it was noted that 1 of 5 fire extinguishers in the warehouse area is with the fire extinguisher support damaged and touching the floor.</p> <p>Local Law: According to the Federal Law Regulatory Standard NR-11 Annex I 1.2.1 All equipment must indicate, in a visible place, its identification, maximum workload allowed, name and CNPJ of the manufacturer and technical responsible.</p>	ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	X
			Customer code (Requirement Reference)	

	During the audit, the non-compliance was resolved and the facility placed the extinguisher in a new support.		
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Non-Compliance	Observation	X	Good Example	
1	<p>During facility tour, it was noted that the chemicals “Hypochlorite” at injection area do not have the MSDS at the place of use.</p> <p>Local Law: According to the Federal Law Regulatory Standard NR-26 item 26.2.3.4 The employer must ensure the workers' access to the safety data sheets of the chemical products they use in the workplace.</p> <p>During the audit, the non-compliance was closed and the facility made available at place of use the MSDS.</p>		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	X
			Customer code (Requirement Reference)	

Non-Compliance	Observation		Good Example	X
1	Due to COVID restrictions, facility developed a card scanner to register training participation instead of using paper registration form and uncontrolled use of pen.		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	

4: Child Labour Shall Not Be Used

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Facility does not use of child labor and through interview with employees was confirmed information. Facility has IT-RH-001- Hiring and Admission Procedure. Evidenced Ethics Code of Conduct and Social Responsibility implemented. Employees records and contract labors.

Any other comments: Nil

A: Legal age of employment:	16 years old
B: Age of youngest worker found:	20 years old

C: Are there children present on the work floor but not working at the time of assessment (Please delete as necessary)	Yes No
D: % of under 18's at this site (of total workers)	%
E: Are workers under 18 subject to hazardous work assignments? (Please delete as necessary)	Yes No E1: If yes, give details

Noncompliance		Observation	Good Example	
1	[insert description of finding (what, why, when, where, who and how)]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	

5: Living Wages are Paid

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Evidence through the employees' documentation, including working timecards and pay receipts. Employees can take payment receipts by internal terminal consulting available in rest areas. The payment method is made by Bradesco bank transfer. The payments are doing on 5 workdays and advance in 20. Facility has an ecteronic car point for employees'.

The company has three work shifts as following:

1o: 5:20am until 02:40pm with 1:00h lunch time break.

7:00 am to 03:40pm 1:00h lunch time break.

2o: 02:40 pm to 10:00pm with 1:00h lunch time break.

3o: 10:00 pm to 05:00am with 1:00h lunch time break.

Administrative: 07:30am to 05:18pm-Sunday do Friday- with 1:00h lunch time break.

Sampling was done in the documentation related to the payments of 52 employees.

Any other comments: Nil

Noncompliance		Observation	Good Example	
1	[insert description of finding (what, why, when, where, who and how)]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	

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? <i>(Please delete as necessary)</i>
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>	A1: Legal maximum: 220 hours/month	A2: Legal maximum: 220 hours/month	A3: Yes
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	B1: Legal maximum: 2 hours/day	B2: Legal maximum: 2 hours/day	B3: Yes
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>	C1: Legal minimum: BRL 1.100,00/month	C2: Legal minimum: BRL 1.130,00/month	C3: Yes
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	D1: Legal minimum: 150% above salary/hour 200% above salary/hour in Wednesdays Holidays or rest days	D2: Legal minimum: 170% above salary/hour and Hour Bank 200% above salary/hour in Wednesdays Holidays or rest days and Hour Bank	D3: Yes

Wages analysis:

<p>A: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum? (Please delete as necessary)</p>	<p>Meet</p>	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> BRL 1.130,00/month</p>
<p>B: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: ___% of workforce earning under minimum wage F2: ___% of workforce earning minimum wage F3: _100_% of workforce earning above minimum wage</p>	
<p>C: Were appropriate records available to verify hours of work and wages?</p>	<p>Yes</p>	
<p>D: Were any inconsistencies found? (if yes describe nature)</p>	<p>No</p>	<p>D1: Type Poor record keeping Isolated incident Repeated occurrence:</p>
<p>E: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)</p>	<p>Yes E1: Please give details: Employees' do not confirm to attend meetings before or after work hour.</p>	
<p>F: Are workers paid in a timely manner in line with local law?</p>	<p>Yes</p>	
<p>G: Is there evidence that equal rates are being paid for equal work?</p>	<p>Yes P1: Please give details: Confirmed by documents review and employees interviewed.</p>	
<p>H: How are workers paid:</p>	<p>Bank Transfer Other H1: If other, please explain:</p>	

6: Working Hours are not Excessive

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 system

Current systems: Documents review, management and employees' interview

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

Details: Evidenced that employees worked 44 hours a week and that they have the right to at least a seminal break, being verified the records of Working Day and pay stubs of employees.

Evidence specific records of overtime work.

Employees' records: timecards and contract labour.

During interviews, it was verified that overtime work occurs on a voluntary basis and payments for overtime are recorded on monthly payment receipts.

Any other comments: Nil

Noncompliance		Observation	Good Example	
1	[insert description of finding (what, why, when, where, who and how)]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	

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.	<i>Describe: Eletronic point</i>	
B: Are standard/contracted working hours defined in all contracts/employment agreements?	No	<i>B1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:</i>
C: Are there any other types of contracts/employment agreements used?	No	<i>C1: If YES, please delete as appropriate:</i> 0 hours Part time Variable hours Other If "Other", Please define:
D. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	No	<i>D1: If yes, please detail hours, %, types of workers affected and frequency Please give details:</i>
E: Are workers provided with at least 1 day off in	E2: Please select all applicable: 1 in 7 days No	E3: Is this allowed by local law? Yes

every 7-day-period, or 2 in 14-day-period?	If 'No', please explain:	
	Maximum number of days worked without a day off (in sample):	
	6 days	

Standard/Contracted Hours worked

F: Were standard working hours over 48 hours per week found?	No	F1: If yes, % of workers & frequency:
G: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	No	G1: If yes, please give details:

Overtime Hours worked

H: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 30 min/day	
I: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	No	
J: Approximate percentage of total workers on highest overtime hours:	__1__%	
K: Is overtime voluntary?	Yes Conflicting Information	K1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: CBA

Overtime Premiums

L: Are the correct legal overtime premiums paid?	Yes N/A - there is no legal requirement to OT premium	L1: Please give details of normal day overtime premium as a % of standard wages: Bank Hour and 170% business days and 200% non-business days
M: Is overtime paid at a premium?	Yes	M1: If yes, please describe % of workers & frequency: 100% of workers receive premium when in OT

<p>N: 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>X-No Consolidated pay (<i>May be standard wages above minimum legal wage, with no/low overtime premium</i>) Collective Bargaining agreements Other</p> <p>N1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>
<p>O: 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>Overtime is voluntary Onsite Collective bargaining allows 60+ hours/week Safeguards are in place to protect worker's health and safety Site can demonstrate exceptional circumstances Other reasons (please specify)</p> <p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p>
<p>P: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p>No P1: If yes, please give details:</p>

7: No Discrimination is Practiced

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 system

Current systems: Documents review, management and employees' interview.

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

Details: No confirmation about 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.

Any other comments: Nil

A: Gender breakdown of Management + Supervisors *(Include as one combined group)*

A1: Male: 90 %
A2: Female: 10 %

B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:

1-Laboratory leader

Noncompliance		Observation	Good Example	
1	[insert description of finding (what, why, when, where, who and how)]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	

8: Regular Employment Is Provided

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Sample of employees' labor contract and time records and Employee's Book, which clearly demonstrates the rules established and agreed upon by Employee, Company and Union.

Employees Contract Labor, Collective Agreement, Employee's Payroll, timekeeping records, employee's interview.

Any other comments: Nil

Noncompliance		Observation	Good Example	
1	[insert description of finding (what, why, when, where, who and how)]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	

		Customer code (Requirement Reference)	
--	--	--	--

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><i>X-Terms & Conditions presented</i> <i>X-Understood by workers</i> <i>X-Same as actual conditions</i></p> <p><i>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:</i></p>
<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><i>No</i></p> <p><i>B1: If yes, please describe details and specific category(ies) of workers affected:</i></p>
<p>C: If yes, list all that apply: (please delete as necessary)</p>	<p><i>Recruitment / hiring fees</i> <i>Service fees</i> <i>Application costs</i> <i>Recommendation fees</i> <i>Placement fees</i> <i>Administrative, overhead or processing fees</i> <i>Skills tests</i> <i>Certifications</i> <i>Medical screenings</i> <i>Passports/ID's</i> <i>Work / resident permits</i> <i>Birth certificates</i> <i>Police clearance fees</i> <i>Any transportation and lodging costs after employment offer</i> <i>Any transport costs between work place and home</i> <i>Any relocation costs after commencement of employment</i> <i>New hire training / orientation fees</i> <i>Medical exam fees</i> <i>Deposit bonds or other deposits</i> <i>Any other non-monetary assets</i> <i>Other -</i> <i>C1: If other, please give details:</i></p>
<p>D: If any checked, give details:</p>	

Migrant Workers:

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

<p>A: Type of work undertaken by migrant workers:</p>	<p>Facility does not have 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><i>B2: Total number of (outside of local country) recruitment agencies used:</i></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>	<p>Yes C2: Observations:</p> <p>No</p> <p><i>C1: Please describe finding:</i></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>	<p>Yes</p> <p>No</p> <p>D1: If yes, number and example of roles:</p>

NON-EMPLOYEE WORKERS

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

Agency Workers (if applicable)

(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)

A: Number of agencies used (average):	A1: Names if available: Facility does not use Agency workers.
B: Were agency workers' age / pay / hours included within the scope of this assessment?	Yes No
C: Were sufficient documents for agency workers available for review?	Yes No
D: Is there a legal contract / agreement with all agencies?	Yes No D1: Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	Yes No E1: Please give details:

Contractors:

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,

A: Any contractors on site?	Yes A1: If yes, how many contractors are present, please give details: 02 (security and catering).
B: If Yes , how many workers supplied by contractors?	21
C: Do all contractor workers understand their terms of employment?	Yes C1: Please describe finding: Confirmed by 3 contractors interviewed.
D: If Yes , please give evidence for contractor workers being paid per law:	Confirmed during documents check contract labour, payment receipts and CBA.

9: No Harsh or Inhumane Treatment is Allowed

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Facility has whistle blowing mechanism implemented and available in website.

Facility access complains channel by internal terminal localized at rest areas too.

Any other comments: Nil

Noncompliance		Observation		Good Example	
1		[insert description of finding (what, why, when, where, who and how)]		ETI Code (Requirement Reference)	
				Local Law (Requirement Reference)	
				Customer code (Requirement Reference)	

10A: Entitlement to Work and Immigration

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Facility does not have Immigration work.

Any other comments: Nil

Noncompliance		Observation		Good Example	

1	[insert description of finding (what, why, when, where, who and how)]	ETI Code (Requirement Reference)	
		Local Law (Requirement Reference)	
		Customer code (Requirement Reference)	

10B4: Environment 4-Pillar
(Delete as necessary)

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 system

Current systems: Documents review, management and employees' interview.

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

Details:

Operating permit; Water well permit; Water, Waste and Electricity records; Ibama records; Environmental Policy; Aspects and impacts There is an environmental management system in place.
Facility maintained legally required environmental documents in place.

Any other comments: Nil

	Observation	X	
1	During document review and management interview, it was noted that the facility does not have biodiversity policy. Implement Biodiversity Policy.	ETI Code (Requirement Reference)	x
		Local Law (Requirement Reference)	
		Customer code (Requirement Reference)	
2	During document review, it was noted that the company made the environmental noise report in November 2020, but it was only carried out in the effluent treatment station area, lacking the other site boundaries. Local law: According to the CONAMA Federal Resolution 1/1990 I - The emission of noise, as a result of any industrial, commercial, social or recreational activities, including political advertising, shall comply, in the interests of health, public peace, with established standards, criteria and guidelines in this Resolution.	ETI Code (Requirement Reference)	
		Local Law (Requirement Reference)	x
		Customer code (Requirement Reference)	

	Carry out the measurement in all other factory boundaries.		
3	<p>During the factory tour it was noted that the company has 1 underground water well and it has a water meter. During the documents review, it was noted that the company has water well permit nº 946/2021 valid until 05/18/2031 and it is authorized to use 1.11L/s for 10 hours/day, but the factory does not have control of this flow.</p> <p>Local law: According to Ceará State Decree nº 33.559/2020 Article 6- The following are subject to the granting of the right to use water resources: I - derivation or abstraction of a portion of water existing in a water body for final consumption, including public supply or input of production process; II - extraction of water from the aquifer for final consumption or input to the production process; III - discharge into a water body of sewage and other liquid or gaseous waste, treated, for the purpose of final disposal, within the treatment standards established in the relevant legislation; IV - reuse of water for purposes other than its original use; V - other uses that alter the regime, quantity or quality of water in a water body.</p> <p>Install a control device to guarantee the flow and operating hours of the well as granted.</p>	ETI Code (Requirement Reference)	
		Local Law (Requirement Reference)	x
		Customer code (Requirement Reference)	

				Good Example	X
1	Facility reuse water from treatment station in toilets and to water the garden. The draft is used to fertilize the soil.				

4 Pillar Environmental Analysis

Only to be completed for a 4-Pillar Sedex Virtual Assessment remove this table if 2 pillar assessment has been conducted. (Site declaration only - this has not been verified by auditor. Please state units in all cases below.)

A: Is there a manager responsible for Environmental issues (Name and Position):

Corporate: Carlos André Carvalho
Site: Talyta Angelo Cruz/Sustainable specialist

B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?

Yes
B1: Please give details:
Risk assessment on environmental impacts and its impacts and controls is done by facility and last revision is from December 2020.

<p>C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.</p>	<p>No C1: Please give details: Facility do not have ISO 14001 or equivalent.</p>
<p>D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i></p>	<p>Yes D1: If yes, is it publicly available? Facility has a public sustainable development policy and employees are trained.</p>
<p>E: If yes, does it address the key impacts from their operations and their commitment to improvement?</p>	<p>Yes E1: Please give details: Sustainable development policy address facility's impacts.</p>
<p>F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i></p>	<p>No</p>
<p>G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. <i>(For guidance, please see Measurement criteria)</i></p>	<p>Yes G1: Please give details: Forest Stewardship Council n° N003114 due in 24/03/2022 The Vegan Society n° 025533 due in 18/02/2022.</p>
<p>H: Have all legally required permits been shown? Please give details.</p>	<p>Yes H1: Please give details: All environmental related permits are in place.</p>
<p>I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?</p>	<p>Yes I1: Please give details: Facility utilizes chemicals controlled by Federal Policy and license n° 2020-00559923 is due in 25/08/2021.</p>
<p>J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?</p>	<p>Yes J1: Please give details: There is a system in place to manage environmental and chemical legislation.</p>
<p>K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:</p>	<p>Yes K1: Please give details: Facility has environmental targets related to waste, energy and water linked to production and hours of work.</p>

Usage/Discharge analysis		
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	Yes L1: Please give details: Facility has documents related to waste management to demonstrate reuse of waste, recycling and correct disposal.	
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?	Yes M1: Please give details: Facility measure and monitor consumption of water and energy.	
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?	Yes N1: Please give details: Sub-contracting at facility is kitchen for food preparation and their related permits are in place.	
Criteria	Previous year: Please state period: <u>2020 (Jan-Dec)</u>	Current Year: Please state period: <u>2021 YTD July</u>
Electricity Usage: <i>Kw/hrs</i>	5.512.865 kWh	3.035.000 kWh
Renewable Energy Usage: <i>Kw/hrs</i>	0 kWh	0 kWh
Gas Usage: <i>Kw/hrs</i>	0 kWh	0 kWh
Has site completed any carbon Footprint Analysis?	No	No
If Yes , please state result		
Water Sources: <i>Please list all sources e.g. lake, river, and local water authority.</i>	<ul style="list-style-type: none"> CAGECE - public water supply 	<ul style="list-style-type: none"> CAGECE - public water supply
Water Volume Used: <i>(m³)</i>	4480 m ³	3562m ³
Water Discharged: <i>Please list all receiving waters/recipients.</i>	<ul style="list-style-type: none"> CAGECE - public water supply 	<ul style="list-style-type: none"> CAGECE - public water supply
Water Volume Discharged: <i>(m³)</i>	0 m ³ All effluent is treated internally and reused in irrigation and toilet flushing	0 m ³ All effluent is treated internally and reused in irrigation and toilet flushing
Water Volume Recycled:	28629 m ³	14615 m ³

(m ³)		
Total waste Produced <i>(please state units)</i>	218.231 kg	320.060 kg
Total hazardous waste Produced: <i>(please state units)</i>	52.581 Kg	42.460 kg
Waste to Recycling: <i>(please state units)</i>	115.301 kg	223.347 kg
Waste to Landfill: <i>(please state units)</i>	66.949 Kg	71.453 kg
Waste to other: <i>(please give details and state units)</i>	35.981 kg co-processing	25.260 kg co-processing
Total Product Produced <i>(please state units)</i>	6.744.932 pairs	3.408.620 pairs

10C: Business Ethics - 4-Pillar Assessment

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Facility delivery the Code of Conduct in onboarding program for new employees' and annually provide refresh training. Facility has a whistle blowing mechanism implemented and available at website. Evidenced Code of Conduct training for managers and supervisors dated 21/06/2021 and photos with training of facility employees' in 13/07/2021.

Any other comments: Nil

Noncompliance		Observation	Good Example	
1	[insert description of finding (what, why, when, where, who and how)]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	

A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?

B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?

C: Is the policy updated on a regular (as needed) basis?

D: Does the site require third parties including suppliers to complete their own business ethics training

- Internal Policy*
- Policy for third parties including suppliers*

A1: Please give details: Evidenced Code of Conduct available in website and whistle blowing mechanism implemented.

- Yes*
- No*

B1: Please give details: training for managers and supervisors dated 21/06/2021 and photos with training of facility employees' in 13/07/2021.

- Yes*
- No*

C1: Please give details:

- Yes*
- No*













D1: Please give details: Facility has a Supplier Manual and require signed in Confirmation Term.




Other Findings Outside the Scope of the Code

Nil

Photo Form



Production	Production	Production
		
Production	Warehouse	Warehouse
		
Chemical Warehouse	Waste Warehouse	Electrical Panel
		
Emergency Exit	Fire Extinguisher	Hydrant
		

Employee lockers	Machine Guard	MSDS posted
		
Employee using PPE	Potable Water	Shower and Eye Wash
		
NC Fixed: FISPQ at local of use	NC Fixed: Manual cart with load capacity	NC Fixed: fire extinguisher at the support



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AUDIT REPORT
SEDEX SMETA
GRENDENE
SOBRAL FACTORY





Sedex Virtual Assessment Report

Version 1.0.



Sedex Virtual Assessment Declaration

I declare that the assessment underpinning the following report was conducted in accordance with the Sedex Virtual Assessment Technical Requirements, 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):

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

Lead auditor: Camila Casanova RA21704448

Team auditor: Cíntia Tunger RA21702954

Interviewers: Camila Casanova RA21704448

Report writer: Camila Casanova RA21704448

Report reviewer: Patrick Sister

Date of declaration: August 19 2021


Note: The focus of this ethical assessment 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.

A Sedex Virtual Assessment is a set of activities to assess a facility's performance against the Sedex Virtual Assessment Technical Requirements (which are based on the SMETA Best Practice Guidance and Measurement Criteria). The activities undertaken include remote engagement with the facility management and their employees via review of documentation, interviews and remote facility tour. The Sedex Virtual Assessment can only be undertaken by approved auditing firms using approved technologies. Due to the nature of this type of assessment and methodologies deployed, the level of verification and triangulation to assess performance against the Sedex Virtual Assessment requirements may vary on a case by case basis depending on the unique set of circumstances at the site during the period of assessment.

This report provides a summary of the findings and other applicable information found/gathered during the social assessment conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social assessment process requires that information be gathered and considered from records review, direct worker engagement, management interviews and visual observation. More information is gathered during the social assessment process than is provided here. The assessment process is a sampling exercise only and does not guarantee that the assessed site prior, during or post-assessment, are in full compliance with the Code being assessed 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 assessment. Release permission must be provided by the owner prior to release to any third parties.

1. Assessment Overview

Site Assessed	
1.1 Sedex Company Reference: (only available on Sedex System)	ZC: 410972263
1.2 Sedex Site Reference: (only available on Sedex System)	ZS: 411841985
1.3 Business name (Company name):	Grendene S. A
1.4 Site name:	Grendene S.A-Sobral
1.5 Site address: (Please include full address)	Avenida Pimentel Gomes, 214, Bairro Alto da Expectativa, Sobral/Ceará-Brazil
1.6 Country:	Brazil
1.7 Site contact and job title:	Táisa Sandolli Rossetto/ Environmental Specialist
1..8 Site phone:	+ 55 55 3112-2960
1.9 Site email:	Taisa.rosseto@grendene.com.br
1.10 Name and Title of person who signed CAPR (if different from above)	Nil
1.11. Sedex Virtual Assessment Pillars: (Please delete as necessary)	4 Pillar
1.12 Sedex Virtual Assessment type: (Please delete as necessary)	Periodic

<p>Audit Company Name, Logo & Reference Number:</p>  <p>SVAZC1060431</p>	<p>Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i></p> <p>GRENDENE S.A</p>
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Assessment details	
Date(s) of Assessment:	August 17, 18 and 19 2021
Lead Auditor Name	Camila Casanova RA21704448
Team Auditor Name(s):	Cíntia Tunger RA21702954
Interviewer Name(s):	Camila Casanova RA21704448
Report Writer:	Camila Casanova RA21704448
Report Reviewer:	Patrick Sister
Auditor-days:	2 auditors x 2,5 days = 5 MD

2.METHODOLOGY

Essential Parameters Review

2.1. Was Site Technology checked as a part of Site Suitability checks?	Yes Please describe how these checks were completed and any deviation from the Sedex Virtual Assessment Technical Requirements: On July 30,2021 during the preparatory call, a connection test was performed without interferences and team's software was tested.
2.2. Was Site Commitment checked as a part of Site Suitability checks?	Yes Please describe how these checks were completed and any deviation from the Sedex Virtual Assessment Technical Requirements: Floor plan sent by facility containing all areas emergency exits, escape, firefighting equipment's and meeting points marked on this plant. During the preparatory call, facility confirmed signed of SVA contract agreeing with commercial terms and proposal. Facility sent documents by e-mails and one drive as requested.
2.3. Was Site History checked as a part of Site Suitability checks?	Yes Please describe how these checks were completed and any deviation from the Sedex Virtual Assessment Technical Requirements: There was no evidence of any previous problem with facility transparency, coaching or bribery related to any part of business.
2.4. Were Operational Aspects checked as a part of Site Suitability checks?	Yes Please describe how these checks were completed and any deviation from the Sedex Virtual Assessment Technical Requirements: During the preparatory call, all internal and external areas of the company were visited. There is Wi-Fi / mobile network in all areas of the site and Teams was used on the day. The productive capacity of the factory was normal with employees working normally.

Conditional Considerations Review

2.5. Please describe any additional considerations which affected how the methodology was completed:	Nil
2.6..Scope of Assessment (please mark any deviation/omission from the Sedex Virtual Assessment Technical Requirements):	Nil

Methodology

2.7. Was the SAQ accessed and reviewed as a part of the assessment preparation?	Yes
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<p>2.8. Please provide a list of documents reviewed as part of the assessment preparation</p>	<ol style="list-style-type: none"> 1. Floor with emergency exits, escape, firefighting and equipment installed 2. Policies and Procedures 3. Facility permissions and certificates 4. Risks Assessment of Health & safety and Environment 5. Employee list 6. Facility certification and documents 7. Training records 8. Boiler Assessment 9. Maintenance machines records 10. Chemical products list 11. Fire brigade team records and certification 12. Collective Agreement 13. Ergonomic Assessment 14. Waste Management Plan 15. Potable Drink Analyses 16. Personnel files 17. Employee Handbook 18. Labor contracts 19. Payment receipts employees
<p>2.9. Level of digitization at the site (low, medium high)</p>	<p>High: mostly all digital</p>
<p>2.10. Sample Size Checked (State number of worker records checked and from which weeks/months - should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</p>	<p>62 Current and Peak: July 2021 Random: June 2021 Low: March 2021</p>
<p>2.11. % time spent in preparation including pre-assessment document reviews (offline)</p>	<p>20%</p>
<p>2.12. % time spent in assessment (online)</p>	<p>80%</p>
<p>2.13. Please advise of any technology failures (either partial or whole) encountered during the assessment</p>	<p>No failures</p>
<p>2.14. Please advise of any operational failures (either partial or whole) encountered during the assessment.</p>	<p>Nil</p>

2.15.. Detailed site map provided (please attach in appendix)	Yes
2.16. Please list all software used during the assessment	Microsoft Teams

Direct Worker Engagement	
2.17. Please select methods of worker engagement used (Delete as applicable)	Group Interviews
2.18. Total number of workers interviewed: (Only complete if group worker interviews were conducted as a part of the assessment)	62
<i>Women / Men</i>	28 / 34
<i>Contract / Direct</i>	5 / 57
<i>Local / Domestic Migrant / Foreign Migrant</i>	62 / 0 / 0
<i>Service providers</i>	5
<i>Union / Worker reps</i>	1
2.19. Total response rate for Direct Worker Reporting/ Worker Voice (Only complete if Direct Worker Reporting or Worker Voice was used to support the assessment)	%
<i>Women / Men</i>	% / %
<i>Contract / Direct</i>	% / %
<i>Local / Migrant</i>	% / %
2.20. Please provide a summary of the methodology used to collected Direct Worker Reporting/ Worker Voice	
2.21. Please advise how Direct Worker Reporting/ Worker Voice results were used to inform the assessment.	
2.22.. Summary of workers key priorities at the site: (To be completed for all methods used)	<p>Auditor conduct group’s interviews with workers from first and second shifts.</p> <p>The meeting room was prepared with chair and laptop for interviews. Auditor ask for employees' that answer if the meeting room was without the supervisor or any other person besides the interviewees and closed door. Auditor inform that interviews were confidential and that they were pick up randomly by auditor.</p> <p>During interviews, auditor focus on policies and process driven questions which can help to triangulate worker experiences. Auditor used indirect questioning to understand the working experiences for workers, especially workers who fall into vulnerable workers i.e. female workers. Auditor asked open</p>

questions as working time, forced to work, overtime perform, wages/payments, forced labor, leader behaviour, apprentices and service providers, etc. Auditor no asking for clarification of sensitive or personal information during the interviews.

Interviewed were calm and friendly during the process.

3. Site Details

Site Details	
3.1. GPS location (live stream):	Latitude: -3.671230554327633 Longitude: -40.345153659594494
3.2. Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Business Recod ID 89.850.341/0001-60 issued by RFB</p> <p>Surveillance License for facility No 0867 valid 02/06/2022 issued by Prefeitura de Sobral-Secretaria Municipal de Saúde</p> <p>City Hall License no38/2020 dated 01/16/2020 to 01/16/2022 issued by Prefeitura de Sobral</p> <p>Surveillance License for Restaurant No 3548 valid 07/06/2022 issued by Prefeitura de Sobral- Secretaria Municipal de Saúde</p> <p>Sanitary License for ambulatory No 0867 valid 06/02/2022 issued issued by Prefeitura de Sobral- Secretaria Municipal de Saúde</p> <p>Army Record no 361360 dated 06/05/2017 to 01/24/2022 issued by Exercito Brasileiro</p> <p>Environmental operating permit No 450/2019 dated 09/10/2019 to 08/14/2027 issued by SEMACE-Superintendência Estadual do Meio Ambiente</p> <p>Fire License No 256534 dated 09/11/2020 and valid until 09/11/2023 issued by Corpo de Bombeiros Militar</p> <p>Regularity Certification Record nº 69684 dated 06/08/2021 to 09/08/2021 issued by IBAMA</p> <p>Federal policy License for controlled chemical products No 2020-00559924 dated 07/22/2021 to 08/25/2022 issued by Polícia Federal</p> <p>Estate inscription: 06.916113-5</p> <p>Municipal inscription: 4530</p>
3.3. Site function: (please delete as necessary)	Factory processing / manufacturer
3.4. Process overview: <i>(Include products being produced, main operations, number of production lines, main equipment used)</i>	<p>Product: shoes (sandals, flip flops, boots)</p> <p>Main operations: innovation and development, polymer mix, matrices, dyeing, sewing, extrusion, screen print, plastic</p>

	<p>injection, assembly, packing, warehouse and expedition, recycling</p> <p>Main equipment: plastic injector, robots, running machine, oven and stove, sewing machine, press, balance beam, mill, cutting, embroiderer, stove, hot stamping, belts, guillotine, painting cabin and milling machine</p>
3.5.. Months of Peak Season:	Second semester
3.6. Brief description of site:	<p>Facility started operations in March 26, 1971 and located in Sobral-CE Brazil</p> <p>Site size: 485.126,24 square meters of land and 218.862,87 square meters of construction</p> <p>Site location: Sobral / Ceará - Brazil</p> <p>Site structure: Concrete</p> <p>Production lines: 204</p> <p>Number of buildings: 8</p>
3.7 Number of production buildings	<p>Facility 1: 14.480 square meters (plastisol, assembly, warehouse, maintenance, drugstore, waste management area)</p> <p>Facility 2: 15.264 square meters (PCP, warehouse, maintenance, ecommerce)</p> <p>Facility 3: 16.795 square meters (Injection, maintenance, dyeing, quality)</p> <p>Facility 4: 3.848 square meters (extrusion, laboratory)</p> <p>Facility 5: 18.023 square meters (screen print, warehouse, maintenance, cutting, ink area, pieces cleaning)</p> <p>Facility 6: 26.338 square meters (components injection, PVC recycling, graphic, laboratories, packing, support offices)</p> <p>Facility 7: 37.498 square meters (dyeing, components injection, warehouse)</p> <p>Facility 8: 28.110 square meters (packing, warehouse and controller offices)</p> <p>Flammable products warehouse: 1.428 square meters</p> <p>Waste Management Area: 1.101 square meters</p>
3.8. Is accommodation provided?	No
3.9 If yes, please confirm if these are onsite, offsite, or both, and the number of buildings	N/A
3.10. Worker Representation/ Union at site: (Please delete as necessary)	Yes
3.11. Night production: (Please delete as necessary)	Yes

3.12.. Further information available: (Please delete as necessary)	No
3.13. General observations and summary of the site:	<p>Grendene, founded in 1971, is one of the world’s largest producers of footwear. It has exclusive proprietary technologies in the production of footwear for the women’s, men’s and children’s markets. It owns successful, widely-known brands, including Melissa, Grendha, Zaxy, Rider, Cartago, Ipanema, Pega Forte, Grendene Kids and Zizou. It also licenses the use of celebrity personalities, and characters in the world of children’s media.</p> <p>Grendene is a totally integrated operation: As well as five industrial locations - with a total of 11 footwear factories - with aggregate capacity to produce 250 million pairs of shoes per year - it has its own mold-producing plant, a factory producing PVC for its footwear production, and distribution logistics serving both traditional and non-traditional distributors and retailers in the whole of Brazil, and in the export market.</p> <p>Grendene’s industrial plants are in three States of Brazil.</p> <p>(i) - In the State of Ceará, it has facilities in three cities. Sobral (where it has been present since 1993), hosts and head office, and its largest industrial unit - six footwear factories, one plant producing PVC and 1 CD (Distribution Center).</p> <p>Grendene sells its products through commercial representatives, distributors, direct exports, and exports through its subsidiary Grendene USA, Inc. (USA). These reach approximately 45,000 sales points outside Brazil and 65,000 in the Brazilian market. Further to this structure, Grendene has a separate sales department, and selective distribution, for the Melissa brand, one Showroom Melissa in Milan and four concept stores: three "Galeria Melissa" (São Paulo, New York and London), and a "Casa Ipanema" (Rio de Janeiro).</p> <p>Excellent maintenance buildings and hygienic conditions.</p>

Assessment attendance	
Senior Management (Please delete as necessary)	Yes
Union / Worker representative (Please delete as necessary)	No
HR management (Please delete as necessary)	Yes
EHS management (Please delete as necessary)	Yes
If union/worker representatives were not present, please explain why:	Not required

4. Worker Analysis

Worker Profiles											
	Local Workers			Domestic Migrant Workers			Foreign Migrant Workers			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers - Male	6.807	0	118	0	0	0	0	0	0	0	6.925
Worker numbers - Female	4.222	0	14	0	0	0	0	0	0	0	4.236
Total	11.029	0	132	0	0	0	0	0	0	0	11.161

Assessment attendance

4.1. Nationality of management: Brazilian

4.2. Number of nationalities on site: 1

4.3. Please list the 3 most common nationalities amongst the workforce:

Nationality 1 / % of total workforce Brazilian / 100%

Nationality 2 / % of total workforce

Nationality 3 / % of total workforce

5. Workplace Impact

Workplace Impact	
5.1. Annual Worker Turnover	2020: 1,79% / 2021 YTD: 3%
5.2. Annual Absenteeism	2020: 2,64% / 2021 YTD: 4,33%
5.3. Accidents log available	Yes
5.4. Annual lost days to sickness/accidents per 100 workers	2021 YTD: 30 accidents, 119 lost days
5.5. % workers who work > 48 hours per week n the last 6 / 12 months:	65%
5.6. % workers who work > 60 hours per week n the last 6 / 12 months:	0 / 0

6. Details by Clause

0A: Universal Rights covering UNGP

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Facility has Sustainable Policy implemented and available at facility, including expresses commitment to respect Human Rights in page 01 approved by Board and Code of Conduct implemented in 12/2008 and reviewed in April 29,2021 which topics: Security Information, Interest of Conflicts, Violations, Stakeholders, Ethics Committee, etc. This policy and Code are available in facility intranet and website.

Evidenced Hiring Procedure-PSRH2-02 dated 08/2020 approved by Luciana Paula/Human Resource Supervisor.

Any other comments: Nil

		Observation	Good Example	
1	[insert description of NC: what, why, when, who and how		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer codes (Requirement Reference)	

OB: Management Systems

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Facility has Sustainable Policy implemented and available at facility, including expresses commitment to respect Human Rights in pg 01 approved by Board and Code of Conduct implemented in 12/2008 and reviewed in April 29,2021 which topics: Security Information, Interest of Conflicts, Violations, Stakeholders, Ethics Committee, etc. This policy and Code are available in facility intranet and website.

Evidenced Facility ETI Code posted at facility.

Facility has Social Responsibility Internal Assessment annually.

Evidenced Code of Conduct training for managers and supervisors and photos with training of facility employees'. Facility delivery the Code of conduct in onboarding program and annually provide the refresh training.

Evidenced Hiring Procedure-PSRH2-02 dated 08/2020 approved by Luciana Paula/Human Resource Supervisor.

Any other comments: Nil

Noncompliance	Observation	Good Example						
1	[insert description of finding (what, why, when, where, who and how)]	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">ETI Code (Requirement Reference)</td> <td style="width: 20%;"></td> </tr> <tr> <td>Local Law (Requirement Reference)</td> <td></td> </tr> <tr> <td>Customer code (Requirement Reference)</td> <td></td> </tr> </table>	ETI Code (Requirement Reference)		Local Law (Requirement Reference)		Customer code (Requirement Reference)	
ETI Code (Requirement Reference)								
Local Law (Requirement Reference)								
Customer code (Requirement Reference)								

1: Freely Chosen Employment

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 system

Current systems: Documents review, management and employees' interview.

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

Details: No evidenced of forced, bonded or involuntary prison labor and evidenced through interviews with staff and employees that everyone has the freedom to work and the freedom to return to their homes daily after the conclusion of work days and there are no lodged deposits or their ID with their employer.

Any other comments: Nil

	Noncompliance	Observation	Good Example	
1	[insert description of finding (what, why, when, where, who and how)]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	

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

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Workers are free to join a trade union for their category of industry and company must abide to Union CBA.

During the interviews, workers confirmed there are no discriminated against and have access to carry out their representative functions in the workplace.

Any other comments: Nil

Noncompliance		Observation	Good Example	
1	[insert description of NC: what, why, when, who and how]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	

3: Working Conditions are Safe and Hygienic

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 system

Current systems: Documents review, management and employees' interview.

There is a health and safety management system in place.

General Health and Safety management:

- Health and safety good conditions at facility
- Potable water was freely available in all areas
- Sufficient clean toilets segregated by gender were available at all the time to workers
- Ventilation, temperature and lighting were adequate for the production processes according to risk assessment

Fire Safety:

- Fire safety equipment in good condition

Electrical safety:

- Electrical equipment was in good condition

Chemical safety:

- Chemical management in place

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

Details:

- Health and safety committee
- Training records and certificates
- Fire equipment maintenance records
- Accident reports
- Chemical list and MSDS
- PPE records
- Health and Safety risk assessment and medical report
- Electrical reports
- Pressure vessel reports
- Machine guard records

Any other comments: Nil

Noncompliance	X	Observation	Good Example	
1		<p>During facility tour it was noted lack of inspection tag in extinguishers F8, F6 in Waste Centre and F7 of warehouse (facility 7).</p> <p>Local Law: In accordance with Technical Instruction No. 004/2008 of the Firefight Authority of the state of Ceará item 4.2.1.2.1. The firefighting devices shall be unblocked, duly signed and with good visibility, inspected to ensure that possible operators be familiarize with its location.</p> <p>Provide inspection records in extinguishers F8 and F6 in Waste Centre.</p>	ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	X
			Customer code (Requirement Reference)	

Noncompliance		Observation	Good Example	X
1		<p>Facility has a drugstore and ergonomic, physiotherapy and dental surgeon support available for all employees' inside at the facility.</p>	ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	

4: Child Labour Shall Not Be Used

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Facility does not use of child labor and through interview with employees was confirmed information. Facility has IT-RH-001- Hiring and Admission Procedure. Evidenced Ethics Code of Conduct and Social Responsibility implemented. Employees records and contract labors.

Any other comments: Nil

A: Legal age of employment: 18 years

B: Age of youngest worker found:	18 years
C: Are there children present on the work floor but not working at the time of assessment (Please delete as necessary)	No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? (Please delete as necessary)	No E1: If yes, give details

Noncompliance		Observation	Good Example	
1	[insert description of finding (what, why, when, where, who and how)]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	

5: Living Wages are Paid

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Evidence through the employees' documentation, including working timecards and pay receipts. Employees can take payment receipts by internal terminal available in rest areas. The payment method is made by Bradesco bank transfer. The payments are done on 5th and advance in 20th. Facility has an electronic card punch time for working hours.

The company has three main work shifts for factory employees as follow:
 1st: 5:25 am until 03:13 pm - Monday to Friday with 1:00h lunch time break.
 2nd: 03:23 pm to 12:47 am - Monday to Friday with 1:00h lunch time break.
 3rd: 11:24 pm to 06:00 am - Monday to Friday with 1:00h lunch time break.
 Administrative: 07:30 am to 05:28 pm-Monday to Friday- with 1:00h lunch time break.

Sampling was done in the documentation related to the payments of 62 employees.

Any other comments: Nil

Noncompliance	Observation	Good Example	X
1	<p>The company maintains Grendene University whose program aims at the technical and human development of managers and employees.</p> <p>A empresa mantém a “Universidade Grendene” que promove programas de melhoria técnica e comportamental aos gestores e funcionários.</p>	<p>ETI Code (Requirement Reference)</p> <p>Local Law (Requirement Reference)</p> <p>Customer code (Requirement Reference)</p>	

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? <i>(Please delete as necessary)</i>
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>	A1: Legal maximum: 220 hours/month	A2: 220 hours/month	A3: Yes
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	B1: Legal maximum: 2 hours/day	B2: 2 hours/day	B3: Yes
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>	C1: Legal minimum: BRL 1.100,00/month	C2: BRL 1.144.430/month	C3: Yes
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	D1: Legal minimum: 50% above salary/hour 100% above salary/hour in Wednesdays Holidays or rest days	D2: 50% above salary/hour and Hour Bank 100% above salary/hour in Wednesdays Holidays or rest days and Hour Bank	D3: Yes

Wages analysis:		
A: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> BRL 1.144,43 for monthly employees

(Please delete as necessary)	
B: Please indicate the breakdown of workforce per earnings:	F1: 0% of workforce earning under minimum wage F2: 0% of workforce earning minimum wage F3: 100% of workforce earning above minimum wage
C: Were appropriate records available to verify hours of work and wages?	Yes
D: Were any inconsistencies found? (if yes describe nature)	No D1: Type
E: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	Yes E1: Please give details: Employees stated during interview they only work registering working hours; no work is done off clock.
F: Are workers paid in a timely manner in line with local law?	Yes
G: Is there evidence that equal rates are being paid for equal work?	Yes P1: Please give details: Confirmed by document review and employee interview.
H: How are workers paid:	Bank Transfer H1: If other, please explain:

6: Working Hours are not Excessive

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 system

Current systems: Documents review, management and employees' interview

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

Details: Evidenced that employees worked 44 hours a week and that they have the right to at least a meal break, being verified the records of Working Day and pay stubs of employees.
 Evidence specific records of overtime work.
 Employees' records: timecards and contract labour.
 During interviews, it was verified that overtime work occurs on a voluntary basis and payments for overtime are recorded on monthly payment receipts.

Any other comments: Nil

Noncompliance		Observation		Good Example	
---------------	--	-------------	--	--------------	--

1	[insert description of finding (what, why, when, where, who and how)]	ETI Code (Requirement Reference)	
		Local Law (Requirement Reference)	
		Customer code (Requirement Reference)	

Working hours' analysis <i>Please include time e.g. hour/week/month</i> <i>(Go back to Key information)</i>		
Systems & Processes		
A. What timekeeping systems are used: time card etc.	<i>Describe:</i> Electronic card	
B: Are standard/contracted working hours defined in all contracts/employment agreements?	Yes	<i>B1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:</i>
C: Are there any other types of contracts/employment agreements used?	No	<i>C1: If YES, please delete as appropriate:</i>
D. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	No	<i>D1: If yes, please detail hours, %, types of workers affected and frequency. Please give details:</i>
E: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	E2: Please select all applicable: 1 in 7 days If 'No', please explain:	E3: Is this allowed by local law? Yes
	<i>Maximum number of days worked without a day off (in sample): 6 days</i>	
Standard/Contracted Hours worked		

F: Were standard working hours over 48 hours per week found?	Yes	F1: If yes, % of workers & frequency: Employees work 4 hours on Saturday. <i>65% of sample</i>
G: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	No	G1: If yes, please give details:
Overtime Hours worked		
H: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 1 hour per day	
I: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	No	
J: Approximate percentage of total workers on highest overtime hours:	1%	
K: Is overtime voluntary?	Yes Conflicting Information	<i>K1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: CBA</i>
Overtime Premiums		
L: Are the correct legal overtime premiums paid?	Yes	<i>L1: Please give details of normal day overtime premium as a % of standard wages: Bank Hour and 50% business days and 100% non-business days</i>
M: Is overtime paid at a premium?	Yes	<i>M1: If yes, please describe % of workers & frequency: 100% of workers on OT receive a premium</i>
N: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please	No	

complete the boxes where relevant.	<p>N1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p> <p>CBA</p>
O: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<p>NA</p> <p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p>
P: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<p>No</p> <p>P1: If yes, please give details:</p>

7: No Discrimination is Practiced

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 system

Current systems: Documents review, management and employees' interview.

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

Details: No confirmation about 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.

Any other comments: Nil

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 95% A2: Female 5%
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	50

Noncompliance		Observation	Good Example	
1	[insert description of finding (what, why, when, where, who and how)]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	

8: Regular Employment Is Provided

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Sample of employees' labor contract and time records and Employee's Book, which clearly demonstrates the rules established and agreed upon by Employee, Company and Union.

Employees Contract Labor, Collective Agreement, Employee's Payroll, timekeeping records, employee's interview.

Any other comments: Nil

Noncompliance		Observation	Good Example	
1	[insert description of finding (what, why, when, where, who and how)]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	

Responsible Recruitment

All Workers

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?	<i>X Terms & Conditions presented</i> <i>X Understood by workers</i> <i>X Same as actual conditions</i> <i>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:</i>
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<i>No</i> <i>B1: If yes, please describe details and specific category(ies) of workers affected:</i>
C: If yes, list all that apply: (please delete as necessary)	<i>C1: If other, please give details:</i>
D: If any checked, give details:	

Migrant Workers:	
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	
A: Type of work undertaken by migrant workers:	Facility does not have migrant workers.
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: B2: Total number of (outside of local country) recruitment agencies used:
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?	Yes No C2: Observations: <i>C1: Please describe finding:</i>
D: Are Any migrant workers in skilled, technical, or management roles <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	Yes No D1: If yes, number and example of roles:

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	Yes

B: If yes, check all that apply:	B1 - If other, please give details:
C: If any checked, give details:	

Agency Workers (if applicable)
(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)

A: Number of agencies used (average):	A1: Names if available: Facility does not use Agency workers.
B: Were agency workers' age / pay / hours included within the scope of this assessment?	Yes No
C: Were sufficient documents for agency workers available for review?	Yes No
D: Is there a legal contract / agreement with all agencies?	Yes No D1: Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	Yes No E1: Please give details:

Contractors:
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,

A: Any contractors on site?	Yes A1: If yes, how many contractors are present, please give details: 2companies: Meal preparation Name: Nutrinor Restaurantes de Coletividade Ltda Business license: 02.139.237/0001-83 Surveillance Name: Serval Serviços de Segurança Ltda Business license: 09.212.665/0001-33
B: If Yes, how many workers supplied by contractors?	Meal preparation: 124 employees Surveillance: 8 employees
C: Do all contractor workers understand their terms of employment?	Yes C1: Please describe finding:
D: If Yes, please give evidence for contractor workers being paid per law:	Confirmed by 5 contractors interviewed. Confirmed during documents check: contract labour, payment receipts and CBA.

9: No Harsh or Inhumane Treatment is Allowed

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Facility has internal channels as e-mail and suggestion box at the facility.

Noncompliance		Observation	Good Example	
1	[insert description of finding (what, why, when, where, who and how)]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	
			Customer code (Requirement Reference)	

10A: Entitlement to Work and Immigration

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Facility does not have Immigration work.

Any other comments: Nil

Noncompliance		Observation	Good Example	
1	[insert description of finding (what, why, when, where, who and how)]		ETI Code (Requirement Reference)	
			Local Law (Requirement Reference)	

		Customer code (Requirement Reference)	
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10B4: Environment 4-Pillar

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 system

Current systems: Documents review, management and employees' interview.

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

Details:

Operating permit; Water well permit; Water, Waste and Electricity records; Ibama records; Environmental Policy; Aspects and impacts. There is an environmental management system in place. Facility maintained legally required environmental documents in place.

Any other comments: Nil

Noncompliance	Observation	X	Good Example
1	During document review and management interview, it was noted that the facility do not have biodiversity policy.		ETI Code (Requirement Reference) X
			Local Law (Requirement Reference)
			Customer code (Requirement Reference)
2	During interview with Sustainable Development management, it was noted that Environment Service Suppliers procedure is not finished.		ETI Code (Requirement Reference) X
			Local Law (Requirement Reference)
			Customer code (Requirement Reference)

Noncompliance	Observation	Good Example	X
1	Facility has a photovoltaic plant installed since 2019 that produce around 2,5% of total energy consumed in the plant.	ETI Code (Requirement Reference)	

		Local Law (Requirement Reference)	
2	Facility reuse water from treatment station in toilets and to water the garden. The draft is used to fertilize the soil.	ETI Code (Requirement Reference)	
		Local Law (Requirement Reference)	
3	Facility publish Sustainability Report (last version 2020) based on GRI-Global Reporting Initiative and get in on CDP (Carbon Disclosure Project) for Climate Change.	ETI Code (Requirement Reference)	
		Local Law (Requirement Reference)	
		Customer code (Requirement Reference)	

4 Pillar Environmental Analysis

Only to be completed for a 4-Pillar Sedex Virtual Assessment remove this table if 2 pillar assessment has been conducted. (Site declaration only - this has not been verified by auditor. Please state units in all cases below.)

A: Is there a manager responsible for Environmental issues (Name and Position):	Corporate: Carlos André Carvalho Site: Taisa Rossetto
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes B1: Please give details: Risk assessment on environmental impacts and its impacts and controls is done by facility
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	No C1: Please give details: Facility do not have ISO 14001 or equivalent
D: Does the site have an Environmental policy? (For guidance, please see Measurement criteria)	Yes D1: If yes, is it publicly available? Facility has a public sustainable development policy and employees are trained
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	Yes E1: Please give details: Sustainable development policy address facility's impacts
F: Does the site have a Biodiversity policy? (For guidance, please see Measurement criteria)	No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details.	Yes G1: Please give details: Forest Stewardship Council n° N003114 due in 24/03/2022 The Vegan Society n° 025533 due in 18/02/2022

Usage/Discharge analysis	
<i>(For guidance, please see Measurement criteria)</i>	
H: Have all legally required permits been shown? Please gives details.	Yes H1: Please give details: All environmental related permits are in place
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	Yes I1: Please give details: Facility utilizes chemicals controlled by Federal Policy and license n° 2020-00559924 is due in 08/25/2022
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes J1: Please give details: There is a system in place to manage environmental and chemical legislation
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	Yes K1: Please give details: Facility has environmental targets related to waste, energy and water liked to production and hours of work
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	Yes L1: Please give details: Facility has documents related to waste management to demonstrate reuse of waste, recycling and correct disposal
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?	Yes M1: Please give details: Facility measure and monitor consumption of water and energy

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?	Yes N1: Please give details: Sub-contracting at facility is kitchen for food preparation and main entrance and their related permits are in place	
Criteria	Previous year: Please state period: <u>2020 (Jan-Dec)</u>	Current Year: Please state period: <u>2021 YTD July</u>
Electricity Usage: <i>Kw/hrs</i>	67.887.092	41.917.785
Renewable Energy Usage: <i>Kw/hrs</i>	1.235.820,37	686.255
Gas Usage: <i>Kw/hrs</i>	0	0
Has site completed any carbon Footprint Analysis?	Yes	Yes
If Yes, please state result	0,036 kg/par	0,035 kg/par
Water Sources: <i>Please list all sources e.g. lake, river, and local water authority.</i>	<ul style="list-style-type: none"> • Water authority • 	<ul style="list-style-type: none"> • Water authority • •
Water Volume Used: <i>(m³)</i>	186.058	83.069
Water Discharged: <i>Please list all receiving waters/recipients.</i>	<ul style="list-style-type: none"> • 37% reuse bathroom • 63% reuse garden 	<ul style="list-style-type: none"> • 37% reuse bathroom • 63% reuse garden •
Water Volume Discharged: <i>(m³)</i>	67.861	57.314
Water Volume Recycled: <i>(m³)</i>	67.861	57.314
Total waste Produced <i>(please state units)</i>	23.135.036,50	20.498.071,86
Total hazardous waste Produced: <i>(please state units)</i>	270.207,56	388.083,82
Waste to Recycling: <i>(please state units)</i>	22.620.407,50	19.756.114,43
Waste to Landfill: <i>(please state units)</i>	512.461,00	432.754,01
Waste to other: <i>(please give details and state units)</i>	1.024,00	741,00
Total Product Produced <i>(please state units)</i>	128.035.065	80.974.266

10C: Business Ethics - 4-Pillar Assessment

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 system

Current systems: Documents review, management and employees' interview.

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

Details: Evidenced Code of Conduct training for managers and supervisors and employees. Facility delivery the Code of conduct in onboarding program and annually provide the refresh training.

Noncompliance	Observation	Good Example		
1	[insert description of finding (what, why, when, where, who and how)]	ETI Code (Requirement Reference)		
		Local Law (Requirement Reference)		
		Customer code (Requirement Reference)		


- A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?
- B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?
- C: Is the policy updated on a regular (as needed) basis?
- D: Does the site require third parties including suppliers to complete their own business ethics training

- Internal Policy
- Policy for third parties including suppliers
- A1: Please give details:
- Yes
- No
- B1: Please give details:
- Yes
- No
- C1: Please give details:
- Yes
- No
- D1: Please give details:

Other Findings Outside the Scope of the Code

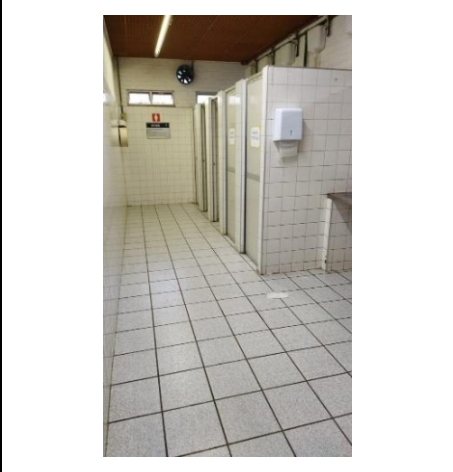
Nil

Photo Form

		
View of main	Production building	Chemicals warehouse

		
Production	Production	Production

		
Production	Production	Production



Bathroom



Electrical panel



Machine guarding



NC: fire extinguisher



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