




# Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC1077137	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS1085960
Business name (Company name):	UVAS DOCE, S.L.		
Site name:	UVAS DOCE, S.		
Site address: <i>(Please include full address)</i>	Ctra. Monforte- Agost, km. 6,9 – 03670 Monforte del Cid – Alicante	Country:	SPAIN
Site contact and job title:	Araceli Moreno – RRHH Manager		
Site phone:	+34 965620125	Site e-mail:	araceli@uvasdoce.com
SMETA Audit Type:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety	<input type="checkbox"/> Environment <input type="checkbox"/> Business Ethics
Date of Audit:	14/06/2022		

<b>Audit Company Name &amp; Logo:</b> 	<b>Report Owner (payer):</b> <b>UVASDOCE, S.L.</b>
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact [grievance@sedex.com](mailto:grievance@sedex.com).

To confirm the validity of this report, please visit <https://www.sedex.com/audit-verifier/>

## Audit Content:

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

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

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

- (1) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (2) Any Non-Compliance against customer code alone shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Any exceptions to this must be recorded here (e.g. different sample size):

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

Lead auditor: Pilar Orden APSCA number: CSCA21702370

Lead auditor ASPSCA status: CSCA

Team auditor: Martina Cedillo - APSCA number: RA32200181

Interviewers: Martina Cedillo - APSCA number: RA32200181

Report writer: Pilar Orden APSCA number: CSCA21702370

Report reviewer: SILVIA GONZALEZ

Date of declaration: 14/06/2022

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

*This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.*

## Summary of Findings

<b>Issue</b> (please click on the issue title to go direct to the appropriate audit results by clause) <i>Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>		<b>Area of Non-Conformity</b> (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				<b>Record the number of issues by line*:</b>			<b>Findings</b> (note to auditor, summarise in as few words as possible NCs, Obs and GE)
		ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	<a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
0B	<a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			1	GE: The company has implemented some donations to different organizations.
1.	<a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
2	<a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
3	<a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		1		Obs.: Company has not performed fire drill during this year as they are doing improving works at facility until this works has not finished, they could not perform fire drill
4	<a href="#">Child Labour</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
5	<a href="#">Living Wages and Benefits</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
6	<a href="#">Working Hours</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
7	<a href="#">Discrimination</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
8	<a href="#">Regular Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
8A	<a href="#">Sub-Contracting and</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>

	<u>Homeworking</u>								
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>

#### General observations and summary of the site:

The audit process was to crosscheck various sources of information to evaluate conformance with the ETI Base Code and local legislations. An opening meeting was held on day 1st which was attended by:

- ✓ Araceli Moreno – RRHH Manager

The Scope of audit was the activity at packhouse site at Monforte del Cid - Alicante

The auditor introduced himself and explained the purpose and scope of the audit, including potential benefits to the site. After the opening meeting, a site tour was done.

The company agreed that SGS auditor conducted confidential interviews with workers who were chosen freely without influence from managers. Employees were interviewed about their working conditions. The interviewees showed a cooperative attitude and effective evidence was collected during the workers interview. Most employees were satisfied with working conditions and benefits.

During closing meeting, the auditor explained the SMETA CAPR

Any non-conformity was raised during audit.

One observation was raised :

Company has not performed fire drill during this year as they are doing improving works at facility until this works has not finished, they could not perform fire drill



Positive:

Good examples:

The company has implemented some donations to different organizations.

The facility management systems are certified under the international standards:

- BRC granted by Kiwa valid until August 2022
- IFS granted by Kiwa valid until September 2022
- GLOBAL GAP granted by SAI Global valid until October 2022
- GOLBAL GRASS granted by SAI Global valid until October 2022

A copy of the SMETA Corrective Action Plan was provided to Company

The auditor thanked management for their time and contribution and reconfirmed the purpose and scope of the assessment.

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

## Site Details

Site Details														
A: Company Name:	UVAS DOCE, SL.													
B: Site name:	UVAS DOCE, S.L.													
C: GPS location: (If available)	Ctra. Monforte- Agost, km. 6,9 – 03670 Monforte del Cid – Alicante	Latitude: 38°23'25.9"N Longitude: 0°42'59.2"W												
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	CIF (fiscal identification number): B-53510566 Sanitary Register granted by local authorities nº 21.09587/A Rea 03/10203 Activity license of Monforte del Cid, file 9/2009 dated June 25, 2009													
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Packaging of Grapes													
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Family company founded in 2002, Uvasdoce is placed in Monforte del Cid (Alicante) one of the regions with the greatest tradition in grape growing worldwide. Their plantations are in the heart of Valle del Vinalopó, also known as the Valley of Grapes, because its mild year-round microclimate makes their lands born a fruit of high quality.</p> <p>They have a production of 15.000.000 kgs of grapes</p> <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground Floor</td> <td>Production area</td> <td></td> </tr> <tr> <td>First floor</td> <td>Office</td> <td></td> </tr> <tr> <td>New building</td> <td>Lunchroom - office</td> <td>NONE</td> </tr> </tbody> </table> <p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F2: Please give details:</p> <p>F3: Does the site have a structural engineer evaluation?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F4: Please give details:            Details: N/A</p>		Production Building no	Description	Remark, if any	Ground Floor	Production area		First floor	Office		New building	Lunchroom - office	NONE
Production Building no	Description	Remark, if any												
Ground Floor	Production area													
First floor	Office													
New building	Lunchroom - office	NONE												



G: Site function:	<input type="checkbox"/> Agent <input type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input checked="" type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
H: Month(s) of peak season: (if applicable)	From July to December
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Reception of raw material → Selection and grading → packing → labelling → palletizing → loading → dispatch
J: What form of worker representation / union is there on site?	<input checked="" type="checkbox"/> Union (CCOO, UGT) <input checked="" type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Open door policy and suggestion box). <input type="checkbox"/> None
K: Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No If No, please give details N/A

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:00 Day 1 Time out: 17:00	Day 2 Time in: Day 2 Time out:	Day 3 Time in: Day 3 Time out:
B: Number of Auditor Days Used:	2 auditor x 1 Manday		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other – Define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not:		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Araceli Moreno – RRHH Manager		
H: Is further information available (if Y please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	25/05/21		
J: Previous audit type:	Periodical SMETA PILLAR II		
K: Was any previous audit reviewed during this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	-		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	-		

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	30	46	0	26	114	0	0	216
Worker numbers – female	67	18	0	33	46	0	0	164
Total	97	64	0	59	160	0	0	380
Number of Workers interviewed – male	2	3	0	2	8	0	0	15
Number of Workers interviewed – female	4	2	0	2	3	0	0	11
Total – interviewed sample size	6	5	0	4	11	0	0	26

A: Nationality of Management	Spanish	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i>	Nationalities: B1: Nationality 1: spanish Nationality 2 : french Nationality 3 : polish Nationality 4: ukrainian Nationality 5: romaian Natioality 6: italian Nationality 7: Morrocco Nationality 8: Ecuatorian Nationality 9 : Senegal	Was the list completed during peak season? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please describe how this may vary during peak periods:
C: Please provide more information for the three most common nationalities.	Country 1: spanish Country 2: french Conutry 3 : polish Country 4 : ukrainian Nationality 5: Romanian Natioality 6: Italian	approx. 75 % total workforce approx. 1 % total workforce approx. 1 % total workforce approx. 2 % total workforce approx. 5 % total workforce approx. 1 % total workforce

	Nationality 7: Morocc0 approx. 5 % total workforce Nationality 8: Ecuatorian approx. 3 % total workforce Nationality 7: Senegal approx. 6 % total workforce
D: Worker remuneration (management information)	D: ____ % workers on piece rate D1: 91 % hourly paid workers D2: 9 % salaried workers Payment cycle: D3: ____ % daily paid D4: ____ % weekly paid D5: 100 % monthly paid D6: % other (*) D7: If other, please give details: (*)

Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	5 groups of 4 people	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	Male: 3	Male: 3
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If N, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	During the interviews, the general attitude was positive, the only aspect that was recurrent during the interviews, was about the management of overtime and schedules.	

I: What did the workers like the most about working at this site?	Payment on time, good environment of work, working hours
J: Any additional comment(s) regarding interviews:	None to report.
K: Attitude of workers to hours worked:	In general, positive, workers indicated that there is very work atmosphere.
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, please give details:	
M: Attitude of workers: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>	
During the audit, a sample of employees were interviewed to represent the workforce in terms of age, gender, and various departments. Interviews were conducted on site in a private room without management presence. Interviewed workers were comfortable to answer questions and provided an unanimously positive view of the company culture, management and facilities, describing the company as a good place to work. The most general comment among those workers with the longest tenure was that the work environment was that of a family between the workers.	
N: Attitude of worker's committee/union reps: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>	
The workers representative can talk with managers when is required. Managers have a good attitude to listen to workers to improve the conditions and facilities. According to the interviews, there is any issue in this moment. CBA is being negotiated now.	
O: Attitude of managers: <i>(Include attitude to audit, and audit process. Both positive and negative information should be included)</i>	
Management were co-operative throughout the audit and provided all requested information. A site tour was facilitated with access granted to all areas internal and external. Workers interviews were arranged and in a confidential room provided. Overall management gave a positive approach to the audit.	

## Audit Results by Clause

### 0A: Universal Rights covering UNGP

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

#### 0.A. Guidance for Observations

0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.

0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights

0.A.3 Businesses shall identify their stakeholders and salient issues.

0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.

0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.

0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.

Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

### Current Systems and Evidence Examined

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

#### Current systems:

The company has a well detailed social compliance and human rights procedure covering all ILO fundamental Conventions.

The company has implemented a grievance system in place to allow workers to raise their complaints regarding human rights issues and even inform workers to the option to go to the official Spanish organisms responsible for these rights.

The company has also a specific procedure to monitor their supply chain and a worker is in charge of these issues.

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

Details: Documentary review, management interview.



A: Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The company follows Ethical code, CBA and Worker Statutes.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Araceli Moreno Job title: HR manager.
C: Does the businesses have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Spanish legislation has a transparent system to report human rights impacts confidentially by Labour inspection.
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Personal records were kept at each employee's personal files. Administration department was responsible data privacy.

Findings	
<b>Finding: Observation</b> <input type="checkbox"/> <b>Company NC</b> <input type="checkbox"/> <b>Description of observation:</b> None observed <b>Local law or ETI/Additional elements / customer specific requirement:</b> <b>Comments:</b>	<b>Objective evidence observed:</b>

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

## Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2020 23%	A2: This year: 2021 10%
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	1Q: 5% 2Q: 2% 3Q: 2% 4Q: 1%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year / 2] * number available workdays in the year	C1: Last year: 2019 8,2%	C2: This year: 2020 4,6%
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month	1Q: 7,6% 2Q: 6,5% 3Q: 4,9% 4Q: 4,6%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: The company has a process to record and investigate.	
F: Annual Number of work related accidents and injuries per 100 workers: [Number of work related accidents and injuries * 100] / Number of total workers]	F1: Last year: 2019 Number: 1,77%	F2: This year: 2020 Number: 1,07 %
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [Number of work related accidents and injuries * 100] / Number of total workers]	1Q: 2,98% 2Q: 0,73% 3Q: 0,93% 4Q: 0,37%	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2019 Days 1,12%	H2: This year: 2020 Days 0,20%
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0 % workers	I2: 12 months 0 % workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 0 % workers	J2: 12 months 0 % workers

## 0B: Management system and Code Implementation

[\(click here to return to NC Table\)](#)

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

### Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### Current systems:

The company has its own Ethical code implanted. Moreover, the company has appointed a member of management who is the responsible for compliance with these issues.

The company has a Welcome book for new workers.

Opening License available.

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

Details: Confirmed by management interview and facility tour, record review.

Any other comments: None

### Management Systems:

A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?

☐ Yes

☒ No

A1: Please give details: Confirmed by management.

B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?

☒ Yes

☐ No

B1: Please give details: Recruitment procedures include the requirement for employees to provide a document proving their identity and age.

C: If Yes, is there evidence (an indication) of effective implementation? Please give details.

From employee's interviews, it was clear that their employment is freely chosen.  
Employees written contracts of employment state their notice period.  
There is no retention of original identification documents, and no deposits are left with management.

	<p>From employee interviews, management interviews, and site tour, there is no evidence of forced or prison labour.</p> <p>Observed workers were clearly over 18.</p> <p>Dates of birth are recorded for employees.</p> <p>Prior to commencing work employees supply a document proving their identity and age.</p> <p>A copy of this document was on file for all interviewed employees.</p> <p>Clear statements from interviewed employees that they had not seen or experienced any discrimination.</p> <p>There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement.</p> <p>Disciplinary and grievance procedures are fully documented.</p>
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: The company has own HR Department with a responsible in charge of other workers.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Training records.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details:
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Manager together with 2 workers mores.
H: Is there a senior person /manager responsible for implementation of the Code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Araceli Moreno oversees implementation of the Ethical Code.
I: Is there a policy to ensure all worker information is confidential	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The company complies with the Organic Law 15/1999, of December 13, on the Protection of Personal Data.
J: Is there an effective procedure to ensure confidential information is kept confidential	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Spanish legislation in Data protection.

K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details:
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1 Please give details: Only feedback by open door policy.
M: Does the facility have policy/code which requires labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The Ethical code.

Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Activity license of Monforte del Cid, file 9/2009 dated June 25, 2009
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: National laws were followed by the company management.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: N/A
Q: Is there evidence that facility site compensated the owner/lessor for the land prior to the facility being built or expanded. Please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: N/A
R: Does the Facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts Please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: N/A
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input type="checkbox"/> No S1: Please give details: N/A

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law None observed <b>Local law and/or ETI requirement:</b> <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b>

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

Good Examples observed:	
<b>Description of Good Example (GE):</b>  The company has implemented some donations to different organizations.	<b>Objective evidence observed:</b>  Document review Worker interview



## 1: Freely Chosen Employment

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

### ETI

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

### Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### Current systems:

Employment contracts and worker interviews confirm that work is undertaken voluntarily. The company does not withhold deposits or the original identity documents of workers. Workers have not been required to pay for services to obtain employment. The workers confirmed that they were in possession of their own identity documents and controlled their own bank accounts. None of the workers reported having been charged any fees for obtaining or retaining employment at the facility. Employees can leave the buildings and site at the end of their shift without restriction.

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

Details:  
Documents and worker interviews  
Human Resources files  
Contracts to establish notice periods.  
Site tour.

A: Is there any evidence of retention of original documents, e.g. passports/ID's	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:
C: Is there Any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes please give details and category of worker affected.
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding:

E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding:
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding:
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected:
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: Spanish Laws.

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code: None Observed  <b>Local law and/or ETI requirement</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>

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

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

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

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

### ETI

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

### Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### Current systems:

Collective Bargaining Agreement is called "CONVENIO COLECTIVO AGROPECUARIO DE ALICANTE"

The company gives freedom of association to all workers. The company respects the right of employees to elect their representatives, and to be unionized.

There is established a Worker Committee integrated by 2 workers from CC.OO + 4 UGT., last election was done in 2019. Last minute in May 2022

Workers have been informed about these issues. According to workers interviews and documentary review there is not any conflict and there is a good relationship between workers and management.

Open-door policy and suggestion and grievance box, also a phone number, system effectively works.

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

Details: To support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate): Management interview and worker interviews.

A: What form of worker representation/union is there on site?	<input checked="" type="checkbox"/> Union (CCOO, UGT) <input checked="" type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Open door policy and suggestion box) <input type="checkbox"/> None
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee) e.g. H&S, sexual harassment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Open door policy and suggestion box.  D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The employees state this in the interviews.	
F: Name of union and union representative, if applicable:	CCOO (2 members) + UGT ( 4 members)	F1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
G: If no union what is parallel means of consultation with workers e.g. worker committees?	Open-door policy and suggestion box.	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	According to workers interviews.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Date of last election: in June 2019
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: 1 person	
L: State any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The committee members were interviewed, they stated that there is a good work atmosphere, and the management and HR department follows an open doors attitude for all employees. No negative information was raised through workers' representative committee members interviews. Meetings, minutes.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If <b>Yes</b> what percentage by trade Union/worker representation	M1: 100 % workers covered by Union CBA	M2: 100 % workers covered by worker rep CBA
M3: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer Code:  None Observed  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>

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

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

### 3: Working Conditions are Safe and Hygienic

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#### ETI

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

#### Current Systems and Evidence Examined

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

#### Current systems:

The company implements their Health and Safety system with MAZ (before they had Prevenpine as external company). Umivale is the external company regarding medical care. There is a H&S Committee established.

The company has a prevention plan (included policy) and an annual plan prevention to improve aspects.

Risk assessment has been updated on May 11st, 2021,  
There is a H&S committee with meetings periodically.

The company perform investigation of accidents, it has been recorded in 2021, 16 accidents with leave and 3 accidents without leave, and in 2021 there are 6 accidents recorded without leave and 8 with leave.

First aid kits are located in different places of production areas. There is a person in charge of the control of these first aids.

Emergency measures plan is updated in May 2021 Workers have received training in this emergency plan. Last fire drill was performed on May 11st, 2021 as they are working in new building the fire drill for this year has not been done.

The following training has been done to workers

- Training in the risk assessment performed in April 22 and in September has schedule new training
- Good manufacture practices training performed on April 21
- Emergency plan on April 21.
- Forklift training performed March 2020 and June 22

Records of PPE's are updated, and it was checked during visit that worker are using them.

Firefighting (extinguishers, fire alarm, etc.) are controlled by authorized company Conejero, S.L, every 2 months, last inspection performed in April 2022

Pest control performed with Higivec last visit in April 2022

Washrooms are clean and well ventilated and lighted.

Chemical store seen cleaned and in order, technical data sheet available to workers. They have a list of all chemicals used, at warehouse only cleaning products are used. MSDS available.

Company has performed the following assessments:

- Noise assessment performed in September 2020 and will be done when new line will be working.
- Ergonomic assessment performed in March 2021

Annual medical exams were performed during October and July 2022

Wastes are segregated by authorized company, Reciclados Elda, S.L.. Documentation available.

Machinery inspected by "OCA" and periodically maintenance:

- Low voltage inspected by authorized company, Atisae in December 2017
- High voltage inspection performed by Atisae in December 20
- Yearly Maintenance of high voltage performed by Electromotril
- Company is placement a new cold system in the company with FRIMAVE, the maintenance will be done by themselves.

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

Details:

The H&S appointed person in charge of the H&S management system interview

Committee meetings

H&S management system documents and registers

The risk evaluations per work post

The PPEs hand in registers

Hygienic and working conditions assessments registers

The compulsory annual medical checks for all employees' registers

Accident/injuries registers, investigations and corrective actions (when applicable)

H&S annual plan

Procedures and registers about the coordination activities (including H&S issues) with the outsourced firms

The emergency preparedness plans

The emergency response teams training and the emergency preparedness plan training for all employee's registers

Firefighting equipment maintenance registers

Facility tour, Facility's Local labor office registers book (for inspections performed by the Local Government), MSDS, machinery security measures. Maintenance annual plan available and followed.

<p>A: Does the facility have general Health &amp; Safety and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>A1: Please give details: Elaborated by external company and implanted by the own company.</p>
<p>B: Are the policies included in worker's manual?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>



	B1: Please give details: Records available.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: No evidence.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: As per health and safety policy, health and safety rules should be followed by visitors at the company premises.
E: Is a medical room or medical facility provided for workers?  If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Available first aid kits.
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: Available first aid kits.
G: Where facility provides worker transport - it is fit for purpose, safe and maintained and operated by competent persons e.g. buses and other vehicles	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: The employees use their own transport.
H: Secure personal storage space is provided for workers in their living space and is fit for purpose	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Lockers.
I: H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and there are controls to reduce identified risk	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Risk assessment is conducted and controlled periodically by external expert. Risks were identified.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Environmental permit was reviewed. Also wastes were disposed via authorized companies.
K: Is the site meeting its customer requirements on environmental	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

standards, including the use of banned chemicals

K1: Please give details:

### Non-compliance:

#### 1. Description of non-compliance:

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

None Observed

**Local law and/or ETI requirement:**
**Recommended corrective action:**
**Objective evidence observed:**

### Observation:

#### 1. Description of observation:

Company has not performed fire drill during this year as they are doing improving works at facility until this works has not finished, they could not perform fire drill

**Local law or ETI requirement:**  
ETI CODE 3.1

**Recommended corrective action:**  
Fire drill must be done yearly

**Objective evidence observed:**

H&amp;S Documentation

### Good Examples observed:

**Description of Good Example (GE):**
**Objective Evidence Observed:**

#### 4: Child Labour Shall Not Be Used

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##### ETI

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

#### Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

##### Current systems:

Employees are verified as of legal age at the time of recruitment, using identity documentation. The company management is aware of legislation regarding both child labour and young workers.

Child labour is not used by the company.

There is no evidence of any historical child labour which required remediation.  
According to Spanish legislation, children work is forbidden, and young employees are not engaging in hazardous or night work.

Workers are noted to be 18 years or older. They youngest worker is 18 years old.

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

Details: ID copies, child labour policy and recruitment procedure were reviewed.  
Confirmed with employee, management interviews and document review (ID copy checks).

A: Legal age of employment	16 YEARS OLD (with some restrictions and parent's authorization).
B: Age of youngest worker found:	18 YEARS OLD
C: Children present on workfloor but not working at time of audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %
E: Workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  None Observed  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>

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

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

## 5: Living Wages are Paid

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### ETI

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

### Current Systems and Evidence Examined

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

#### Current systems:

Wage and Salary is based on Collective bargaining agreement "Convenio colectivo Agropecuario."

Wages are paid according worked hours and employment conditions. During recruitment process, employee is informed about work and social conditions. A copy of signed contract is retained by the employee. Payment is done at the beginning each month by bank transfer and manager gives payroll to employees. During interviews, employees have confirmed this process.

Applied deductions are adequate with local labour law. Workers are provided with legal social insurance and others complements.

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

##### Details:

Confirmed with employee, management interviews and document review (i.e: payment records, social insurance fund, annual leave records, pay slips etc.) in accordance with SMETA Best Practice Guidance and Local Law.

26 attendance records and payroll records from January 2021 were reviewed in this audit. Moreover, management has available for audit process payrolls from the total workforce, 26 workers were interviewed.

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  None Observed  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>

Observation:	
<b>Description of observation:</b>  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>  Documentary review

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

## Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 40 hours/week	40 hours/week	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 80 hours/year	No overtime	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D: wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 7,77 €/hora	7,77 €/hora	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
E: overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: Never below CBA.	According to CBA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



Wages analysis: <a href="#">(Click here to return to Key Information)</a>			
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
A1: If <b>No</b> , why not?			
B: 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)	26 employees' payment records were reviewed for the last 12 months as per SMETA Guidance.		
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If <b>Yes</b> , please give details: Depending on category detailed in CBA.	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	D1: If <b>No</b> , please give details:	
D: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above	E1: Lowest actual wages found: Note: full time employees and please state hour / week / month etc.  950€/hour	
F: Please indicate the breakdown of workforce per earnings:	F1: ____% of workforce earning under minimum wage F2: 80 % of workforce earning minimum wage F3: 20 % of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: Note: full time employees and please state hour / week / month etc. Night bonus Work job bonus Help bonus ...		
H: What deductions are required by law e.g. social insurance? Please state all types:	Social insurance, seizure (in case of the legal authority requested) and tax.		
I: Have these deductions been made? Please list all deductions that have/have not been made.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that <b>have</b> been made.	1. Contingencia comunes. 2. Desempleo. 3. Formación Profesional. 4. IRPF. 5. Seizure request by public authority (if apply) Please describe:

		I2: Please list all deductions that <b>have not</b> been made.	1. 2. Please describe:
J: Were appropriate records available to verify hours of work and wages?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type  <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Records of working hours		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered Yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please specify amount/time: N/A		
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details:		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The CBA of the sector is periodically reviewed by workers union and patronal.		
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details:		
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:		

## 6: Working Hours are not Excessive

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

### ETI

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where **all** of the following are met:

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

6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

## Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

### Current systems:

Hours are recorded manually by quality person and informed to RRHH every day.

Normally they have a working hour from Monday to Friday, 08:00 to 13:00 and from 15:00 to 19:00 but depending on production.

Workers are provided with 1 ½ day off in campaign and rest of time Saturday and Sunday.

Overtime is voluntary as comment by workers during interview and it is compensated according to agreement.

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

Documentary review. 26 attendance records from January 2021

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed <b>Local law and/or ETI requirement:</b> <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b>

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

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

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

Standard/Contracted Hours worked		
G: Standard working hours over 48 per week found	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:  
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:  
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours:	No overtime
J: Combined hours (standard/contracted plus= total) 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours		
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Working interview
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Please give details of normal day overtime premium as a % of <b>standard</b> wages: 150% standard hour and 180% public holiday and Sunday.
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, please describe % of workers & frequency: 150% standard hour and 180% public holiday and Sunday.
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input checked="" type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	

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

## 7: No Discrimination is Practiced

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

### ETI

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

### Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### Current systems:

The company follows ethical code. Workers interviewed reflected the gender, age and nationality mix within the company and confirmed that treatment is equal to groups and workers are given the same opportunity for training and vacancies arising.

Staff and managers are aware of their responsibilities regarding dealing with discrimination. There were no reports of discrimination suffered or witnessed from employees.

The salary is the same for males or females with the same labour category even with the employees of temporary company. The company does not practice discrimination as a basis of factory management. During hiring process, candidates are treated equally. On training or compensation, the company does not apply discrimination.

Company has implemented an equal plan and is working in the new one.

#### Evidence examined – to support system description (Documents examined & relevant comments.

##### Include renewal/expiry date where appropriate):

It was confirmed through interviews that there is no discrimination in hiring, access to training, termination or retirement based of race, cast, national origin, religion, age, disability, sexual orientation, union membership, political affiliation, gender or marital status.

Document review.

A: Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 60 % Female: 40 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst	- production manager - Marketing - RRHH Manager - Packhouse manager
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found  C1: Please give details:



## Professional Development

A: What type of training and development are available for workers?

Please give details: Safety training, quality, programmes, maintenance, languages, Labour aspects, Digital program, Environment, Management aspects, etc.

B: Are HR decisions on e.g. promotion, training, compensation based on objective, transparent criteria?

☒ Yes

☐ No

If no, please give details:

## Non-compliance:

### 1. Description of non-compliance:

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

None Observed

Local law and/or ETI requirement:

Recommended corrective action:

### Objective evidence observed:

(where relevant please add photo numbers)

## Observation:

Description of observation:

Local law or ETI requirement:

Comments:

### Objective evidence observed:

Documentation

## Good Examples observed:

Description of Good Example (GE):

Objective Evidence Observed:

## 8: Regular Employment Is Provided

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

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### ETI

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

### Additional Elements: Responsible Recruitment

8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.

8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.

8.5 Employment agencies must only supply workers registered with them.

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

8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

## Current Systems and Evidence Examined

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

### Current systems:

Regular employment is provided by the company. Workers have signed a labour contract with the company before they have started the relationship. Contracts are done according to Spanish labour law and CBA applied. All the internal workers have permanent contracts.

Contracts contain working conditions (work time, labour days, remuneration...). Each worker keeps a copy of their signed contract. The company pays the social insurance and other legal requirements.

The factory does not use home-workers workers.

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

Details: Document review (personnel files and labour contracts) and worker declarations.

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  None observed  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b>

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

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

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

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 and where they do not intend to remain permanently 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:	Production	
B: Migrant worker recruitment		
C: Migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and evidence of transaction is supplied by the facility to the worker.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please describe finding:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please describe finding:
D: Are Any migrant workers in skilled, technical, or management roles  <b>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  D1: If yes, number and example of roles: Field managers, Team Managers, packhouse manager	

## NON-EMPLOYEE WORKERS

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

C: If any checked, give details:	
----------------------------------	--

Agency Workers (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):	
B: Were agency workers' age/pay/hours included within scope of this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The Company request to the agencies the social payment insurance and other tax and other documents relatives to these aspects.

Contractors:	
<i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes how many contractors are present, please give details:
B: If <b>Yes</b> , how many workers supplied by contractors	
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:
D: If <b>Yes</b> , please give evidence for contractor workers being paid per law:	

## 8A: Sub-Contracting and Homeworking

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

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

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

*Note to auditor on homeworking:*

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

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

## Current Systems and Evidence Examined

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

### Current systems:

No evidence of subcontractors nor homeworking at place.

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

Certificate on Social Security and Treasury Department.

### If any processes are sub-contracted – please populate below boxes

Process Subcontracted	Process 1
Name of factory	
Address	

Details: Documentary review.

## Non-compliance:

### 1. Description of non-compliance:

☐ NC against ETI/Additional Elements ☐ NC against Local Law

☐ NC against customer code:

None observed

Local law and/or ETI /Additional Elements requirement:

Recommended corrective action:

### Objective evidence observed:

*(where relevant please add photo numbers)*

Observation:	
<b>Description of observation:</b>  <b>Local law or ETI/Additional elements requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

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

Summary of sub-contracting – if applicable <input checked="" type="checkbox"/> Not Applicable please x	
<b>A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work hours or undeclared sub-contracting</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <b>A1: Please describe:</b>
<b>B: If sub-contractors are used, is there evidence this has been agreed with the main client?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <b>B1: If Yes, summarise details: N/A</b>
<b>C: Number of sub-contractors/agents used</b>	
<b>D: Is there a site policy on sub-contracting?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <b>D1: If Yes, summarise details:</b>
<b>E: What checks are in place to ensure no child labour is being used and work is safe?</b>	



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

## 9: No Harsh or Inhumane Treatment is Allowed

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

### ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 <sup>rd</sup> party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Spanish legislation and courts has processes to these issues.
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	All the workers know about it according to the interviews, the existence of the suggestion box.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Grievance box and Ethical Committee and Worker Committee.
D: Is there a grievance mechanism in place for:	<input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Other D1: Please give details: Open door policy and suggestion box.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: If yes, please give details According to CBA

### Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### Current systems:

The facility has a copy of CBA which includes disciplinary action for breaches. It is noted that the facility operates with a friendly and open approach and there are no reported cases of inappropriate behaviour by management or workers.

Interviewed workers confirmed that the company was a good place to work, and they were confident any inappropriate behaviour by Managers or Supervisors would be addressed.

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

Details: Document Review, Factory Tour, Management and workers interviews.

### Non-compliance:

#### 1. Description of non-compliance:

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

None observed

**Local law and/or ETI requirement:**

**Recommended corrective action:**

#### Objective evidence observed:

(where relevant please add photo numbers)

### Observation:

**Description of observation:**

**Local law or ETI requirement:**

**Comments:**

**Objective evidence observed:**

### Good Examples observed:

**Description of Good Example (GE):**

**Objective Evidence Observed:**

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

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

### Additional Elements

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

10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

### Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### Current systems:

Through the interview with the management, it was noted that they are fully aware of the requirements to verify eligibility to work in Spain including the responsibilities of checking passports, visas and immigration documentation.

A system is implemented for right to work documentation to be verified and copies kept on file, passport copies, birth certificates and other acceptable documents as per government guidelines.

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

Details:

Prior to commencing work employees are meant to supply a document demonstrating their right to work in Spain.

A copy of this document was on file of workers.

### Non-compliance:

#### 1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

None observed

#### Local law and/or ETI /Additional Elements requirement:

#### Recommended corrective action:

#### Objective evidence observed:

(where relevant please add photo numbers)

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

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

## 10. Other issue areas 10B2: Environment 2-Pillar

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

To be completed for a 2-Pillar SMETA Audit, and remove the following page which is 10B4 environment 4 pillar

10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.

10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. Note for auditors and readers, This is not a full environmental assessment but a check on basic systems and management approach.

### Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### Current systems:

The company meets the requirements of local and national laws related to environmental and industrial standards. Relevant valid permits are demonstrated. Business license approved in 2016.

Company meets the requirements of local and national laws related to environmental and industrial standards. Relevant valid permits are demonstrated. The site has a management system, but it is not certified according to environmental regulations (ISO 14001). There is a nominated management representative for environmental issues.

Wastes are segregated by authorized company, Reciclajes Elda, Granulla it is for bodegas Vipin

Legionella inspection performed periodically by external company Ox-Tac, S.L.

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

Details: Interviews with assistant manager, visit around the factory.

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law None observed <b>Local law and/or ETI/Additional Elements requirement:</b> <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>










Observation:	
<b>Description of observation:</b> <b>Local law or ETI/additional elements requirement:</b> <b>Comments:</b>	<b>Objective evidence observed:</b>

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






Other Findings Outside the Scope of the Code
N/A

Community Benefits
<i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
Collaboration with Cancer Association

## Photo Form

		
WAREHOUSE	Washing area	Entrance
		
MACHINERY	INSTRUCTIONS	EXTINGUISHER
		
QUALITY CONTROL AREA	TOILET	SUGGESTION BOX



		
EXIT DOOR	FIRST AIDS	VENDING MACHINE
		
LUNCH ROOM	ELECTRIC PANEL	



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

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

**[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)**

[https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw\\_3d\\_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

**Click here for Supplier (B) members:**

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY\\_2brg\\_3d\\_3d](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)

**Click here for Auditors:**

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