




# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details			
Sedex Company Reference: (only available on Sedex System)	ZC: 103574042	Sedex Site Reference: (only available on Sedex System)	ZS: 403574042
Business name (Company name):	VERTICAL AGRO (EPZ) LIMITED.		
Site name:	VERTICAL AGRO (EPZ) LIMITED.		
Site address: (Please include full address)	P.O. Box 41852 – 00100 NAIROBI.  Buffallo Mall Naivasha Off Nairobi – Nakuru Highway	Country:	Kenya
Site contact and job title:	RICHARD WAFULA - Technical Manager		
Site phone:	+254724451968	Site e-mail:	farmscompliance@verticalagro.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:	04 <sup>th</sup> – 05 <sup>th</sup> March, 2021		

<b>Audit Company Name &amp; Logo:</b>  	<b>Report Owner (payer):</b>  VERTICAL AGRO (EPZ) LIMITED.
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Audit Conducted By					
Affiliate Audit Company	<input type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input checked="" 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:	Morris Adino	APSCA number:	RA21704457
Lead auditor APSCA status:		In good Standing.	
Team auditor:	N/A	APSCA number:	
Interviewers:	Morris Adino	APSCA number:	RA21704457

Report writer: Morris Adino

Report reviewer: Kathy O'Grady

Date of declaration: 5th March, 2021.

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

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

## Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.		Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (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"/>		0	0	None noted.
0B	<a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None noted.
1.	<a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None noted.
2	<a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None noted.
3	<a href="#">Safety and Hygienic Conditions</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	2	0	Observations: 1. Fire alarms had not been marked/labelled. 2. Fire extinguisher not been mounted (it was placed on the floor). [all corrected during audit]
4	<a href="#">Child Labour</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None noted.
5	<a href="#">Living Wages and Benefits</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None noted.
6	<a href="#">Working Hours</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None noted.

7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None noted.
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None noted.
8A	<u>Sub-Contracting and Homeworking</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None noted.
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None noted.
10A	<u>Entitlement to Work</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None noted.
10B2	<u>Environment 2-Pillar</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None noted.
10B4	<u>Environment 4-Pillar</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Not in scope.
10C	<u>Business Ethics</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Not in Scope.

General observations and summary of the site:

#### Site overview.

Vertical Agro EPZ is a vegetable and fruits packing and exporting company. The company is located behind Buffalo Mall in Naivasha, off Nairobi Nakuru Highway. The processing areas, stores and offices are all in one structure of about 450,000 sq. meters. The facilities include, offices on 2 floors, packing area, cold rooms, blast chillers, packaging material stores, changing rooms and washrooms. The site also has a rest area, waste collection area and rejects area. The facility has a total of 205 employees (154 women and 51men). On the day of the audit there were 123 workers present.

#### Audit process.

This audit was carried out in two days by one auditor and included; an opening meeting that was attended by the Technical Manager, production manager, Welfare committee representatives, Pack house Assistant, Hygiene officer, Quality Assurance Manager, factory manager, Commercial Manager, Health and Safety representative, Agency Human resource manager and facility's human resource manager. A facility walk, individual and group

interviews with sampled workers and a pre-closing meeting prior to the closing meeting that was done on the second day. The audit findings were based on observations during the health and safety tour, interviews and document review.

*\*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:	VERTICAL AGRO (EPZ) LIMITED.	
B: Site name:	VERTICAL AGRO (EPZ) LIMITED.	
C: GPS location: (If available)	GPS Address:	Latitude: -0.704821, Longitude: 36.430496
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Certificate of incorporation: CPR/2015/191680            Trade license: 2021/A21A0267401;21/01/2021-31/01/2021            Tax PIN:PU51592220V            Export License : LA11/1001150            Export license: LA11/1001150            EPZ enterprise license: 002695            LR No. 23399 Goodison two eighteen Naivasha            VAT exemption letter from Export Processing zone authority dated 26/06/2020.            Tax Compliance certificate KRAMT 1200110920            Certificate of a workplace 0006409-12-12-R; 08/12/2020-05/12/2021</p>	
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Processing and exporting of fresh, frozen vegetables and fruits	
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Vertical Agro EPZ limited company processes and exports fresh, frozen vegetables and fruits. The company is located behind Buffalo Mall In Naivasha, on Nairobi Nakuru highway. The facility is 450,000 square metres in size. The company has been in operation since the year 2015.</p> <p>The facilities at the site are housed in one Godown that hosts all the departments. i.e. offices on 2 floors, packing area, cold rooms, blast chillers, packaging material stores, changing rooms and washrooms. The site also has a rest area, waste collection area and rejects area not within the building.</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: All structures at the site were observed to be in good condition at the time of the audit.</p> <p>F3: Does the site have a structural engineer evaluation?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>F4: Please give details: The site has been evaluated by the local authorities.</p>	
G: Site function:	<input type="checkbox"/> Agent	

	<input type="checkbox"/> Factory Processing/Manufacturer <input checked="" type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input 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)	Aug, Sept, Oct, Nov, Dec, Jan, Feb, Mar, Apr
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Vegetables and fruits processing, freezing, packing and exporting. Main equipment includes blast chiller, spin dryer, weighing scales and knives.
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Health & Safety, Hygiene and Welfare) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" 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 L1: 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 M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No N1: If no, please give details; Not Applicable.

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 0840hrs A2: Day 1 Time out: 1700hrs	A3: Day 2 Time in: A4: Day 2 Time out:	A5: Day 3 Time in: A6: Day 3 Time out:
B: Number of auditor days used:	2 (1 auditor x 2 days).		
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  If other, please define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail:    weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: 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)	Chris Kaluku - Human Resource Manager		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	16-18, December, 2019		
J: Previous audit type:	SMETA Pillar 4 – Periodic.		
K: Were any previous audits reviewed for 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Not applicable.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	Workers at the site are not affiliated to any union.		

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	14	0	40	0	0	0	0	54
Worker numbers – female	16	0	135	0	0	0	0	151
Total	30	0	175	0	0	0	0	205
Number of Workers interviewed – male	6	0	5	0	0	0	0	11
Number of Workers interviewed – female	4	0	11	0	0	0	0	15
Total – interviewed sample size	10	0	16	0	0	0	0	26



A: Nationality of Management	KENYAN	
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: Kenyan.	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.	C: approx. 100% total workforce: Nationality 1 Kenyan.	
D: Worker remuneration (management information)	D: 0% workers on piece rate D1: 0% hourly paid workers D2: 100% salaried workers  Payment cycle: D3: 0% daily paid D4: 86% weekly paid D5: 14% monthly paid D6: 0% 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)	4 groups of 5 workers each.	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 4	D2: Female: 2
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. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	None noted.	
I: What did the workers like the most about working at this site?	They are provided tea during tea break.	
J: Any additional comment(s) regarding interviews:	None.	
K: Attitude of workers to hours worked:	Favourable.	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:		
M: Attitude of workers: (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		

The workers had a favourable attitude towards the workplace, management and the interview process. They were responsive during the interview process.

N: Attitude of worker's committee/union reps:

*(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*

The worker representatives had a positive attitude towards management, workplace and the audit process and openly responded to queries at the time of the audit indicating it's an opportunity for improvement at the site in case one is observed.

O: Attitude of managers:

*(Include attitude to audit, and audit process. Both positive and negative information should be included)*

The managers had a favourable attitude towards the audit process, provided documentation on request, guidance during the facility walk and ambient environment for the worker interviews.



## Audit Results by Clause

### 0A: Universal Rights covering UNGP

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

#### 0.A. Guidance for Observations

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

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

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

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

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

The facility has a Human Right policy that covers human rights impacts and issues and has been communicated to the employees through trainings and suppliers through contract agreements. The policy is also posted on notice boards at the facility. The Human Resource manager is responsible for the implementation of this code. Any violation of this code can be reported through the committee representatives and by use of the suggestion box, workers are aware of the reporting modes. No issue was noted under this code at the time of the audit.

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

##### Details:

1. Policies posted on notice boards
2. Worker and management interviews
3. Human Rights policy
4. Training records.

Any other comments: None.

A: Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility has human rights policy expressing its commitment to respecting human rights.
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: Chris Kaluka Job title: Human Resource manager
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: There is a grievance procedure in the Human Resource policies and procedures manual through which human rights impacts can be reported and dealt with without fear of reprisal towards the reporter.
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 E1: Please give details: All confidential information under the custody of the Human Resource manager.

Findings		
<b>Finding: Observation</b> <input type="checkbox"/> <b>Company NC</b> <input type="checkbox"/> <b>Description of observation:</b> None noted. <b>Local law or ETI/Additional elements / customer specific requirement:</b> Not applicable. <b>Comments:</b> None.	<b>Objective evidence observed:</b> Not applicable.	

Good examples observed:	
<b>Description of Good Example (GE):</b> None noted.	<b>Objective Evidence Observed:</b>

	Not Applicable.
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## 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: March 2019 -Feb 2020  7_%	A2: This year: March 2020 - Feb 2021  _16_%
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	4%	
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: March 2019 -Feb 2020  0 %	C2: This year: March 2020 - Feb 2021  0 %
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	0%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: The site has an accident book for documenting all injuries.	
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: March 2019 -Feb 2020  Number: 3	F2: This year: March 2020 - Feb 2021  Number: 1
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 0	H2: This year: 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0% workers	I2: 12 months 0% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months % workers	J2: 12 months 0% workers
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### 0B: Management system and Code Implementation

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

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 facility has policies and procedures in the Human resource policies and procedures manual for ensuring compliance to the code. Workers have been trained on the policies and procedures and some policies and procedures have been displayed on the notice boards at the facility. The site has all the required valid business operational permits, certificates and licenses. The HR Manager is responsible for ensuring compliance to this code.

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

Details:

1. Facility walk
2. Company's policies and procedures
3. Workers and management interviews
4. Training records,
5. Permits and license.

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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: The facility has acquired the necessary business operational licenses and were noted to be valid.
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The policies that reduce the above risks are available in the Human

	Resource policies and procedures manual has these policies .
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	The workers at the site are aware of the contents and applicable use of the policies and procedures.
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: All workers at the site have been trained on forced labour, child labour, discrimination, harassment and abuse standards.
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 were available for review. The interviewed workers showed awareness of the policies.
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: None is available.
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: There is a human Resource department headed by a human resource manager.
H: Is there a senior person / manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: The Compliance manager is responsible for the implementation of this 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 facility has a confidential policy that ensures all workers information is held in confidence.
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: Yes all information is kept under the custody of the Human Resource Department under lock and key.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Risk assessments are carried out annually.

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: Risk reduction measures and controls are developed for the identified risks with set timelines and persons responsible.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: All the suppliers at the facility have a contract agreement which has a clause on labour standards.
<b>Land rights</b>	
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: The site is under lease with Buffalo Mall .Lease agreements were available for review at the time of the audit.
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: The site engages the services of lawyers.
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: The site is on Export Processing Zone – Government gazetted zone. All due diligence was done by the facility contracted lawyer as per the land policy of the company.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: Lease agreement and payment documents were available for review.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No R1: Please give details: There were no adverse impacts reported or observed with the land occupied.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: The facility was acquired legally with no illegal noted/reported.

**Non-compliance:**

<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against customer code:  None noted.  <b>Local law and/or ETI requirement:</b>  None Applicable.  <b>Recommended corrective action:</b> None Applicable.	<b>Objective evidence observed:</b>  None Applicable.
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Observation:	
<b>Description of observation:</b> None noted.  <b>Local law or ETI requirement:</b> None Applicable.  <b>Comments:</b> None.	<b>Objective evidence observed:</b>  None Applicable.

Good Examples observed:	
<b>Description of Good Example (GE):</b>  None noted.	<b>Objective evidence observed:</b>  None Applicable.



## 1: Freely Chosen Employment

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

### ETI

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

The facility has a policy on forced labour that prohibits any form of forced labour, bonded or involuntary labour. Workers are voluntarily employed at the site and each has a signed employment agreement copies are available in their personal files. Workers are not required to pay any deposits of any kind in order to secure or retain employment at the site.

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

Details:

1. Workers and management interviews.
2. Forced labour policy.
3. Recruitment policy
4. Personnel files.

Any other comments: None.

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: Workers are allowed to terminate their employment as per the employment agreement.
E: If any part of the business is UK based or registered there & has a	<input type="checkbox"/> Yes <input type="checkbox"/> No

turnover over £36m, is there a published a 'modern day slavery statement?	<input checked="" type="checkbox"/> Not applicable E1: Please describe finding: The company has no business in UK.
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: Workers are free to leave the facility at the end of the work day.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: The facility has a forced labour policy which is included in the suppliers' agreement and workers inducted on the same.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: The forced labour policy and the recruitment procedure are available and are implemented.

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 noted.  <b>Local law and/or ETI requirement</b> Not Applicable.  <b>Recommended corrective action:</b> Not Applicable.	<b>Objective evidence observed:</b>  Not Applicable.

Observation:	
<b>Description of observation:</b> None noted.  <b>Local law or ETI requirement:</b>  <b>Comments:</b> None.	<b>Objective evidence observed:</b>  Not Applicable.

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

None noted.

Not Applicable.

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

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

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

### 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:

The workers at the facility are not affiliated to any workers union. There are worker representatives at the site through which workers can channel their issues. The worker representatives are able to carry out their duties during working hours without fear of discrimination. A grievance handling procedure is available for handling any worker issues. Workers are aware of their representatives and have been trained on the freedom of association policy.

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

##### Details:

1. Worker committee representative interviews.
2. Grievance handling procedure, Freedom of Association policy.
3. Worker and management interviews.
4. Trainings records.
5. Minutes of workers committee.

Any other comments: None.

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Health and Safety , Hygiene) <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: The facility has a Safety & Health committee and a Hygiene committee.  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: Committee representatives are able to carry out their activities during working hours and are provided for any requirement by the management.	
F: Name of union and union representative, if applicable:	N/A	F1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Yes, worker committee, Health and Safety, Hygiene committees.	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	
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 2 <sup>nd</sup> Dec 2020
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:	
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The Health and Safety committee meets quarterly. Last meeting was on 11 <sup>th</sup> February 2021. Agendas included enforcing Covid -19 measures, Reducing workplace hazards.  The Welfare committee meets quarterly and have scheduled meetings with the management and workers. The recent meeting with the management was on 22 <sup>nd</sup> February 2021. Agendas included Salary increment, consideration of hiring long serving workers from the Agency on permanent basis.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If <b>Yes</b> , what percentage by trade Union/worker representation	M1: 0% workers covered by Union CBA  Not Applicable.	M2: 0% workers covered by worker rep CBA  Not Applicable.

M3: If **Yes**, does the Collective Bargaining Agreement (CBA) include rates of pay?

☐ Yes  
☐ No  
 Not Applicable.

#### Non-compliance:

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

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:  
 None noted.

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

Not Applicable.

##### Recommended corrective action:

Not Applicable.

##### Objective evidence observed:

Not applicable.

#### Observation:

##### Description of observation:

None noted.

##### Local law or ETI requirement:

Not Applicable.

**Comments:** None.

##### Objective evidence observed:

Not applicable.

#### Good Examples observed:

Description of Good Example (GE):

None noted.

##### Objective evidence observed:

Not applicable.

### 3: Working Conditions are Safe and Hygienic

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

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

#### 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 facility has provided recommendable levels of safety and Health for its workers. Safety policies and safety work procedures are in place and communicated to the workers through trainings and some have been mounted on notice boards or areas of work. There is a trained team of safety and Health committee representative who together the safety and health manager and technical manager are in charge of implementing this code. The team was trained on 4th June 2019. Annual risk assessments are carried out at the site, the recent was done on 18/08/2020. The safety committee meets quarterly. The recent meeting was on 11<sup>th</sup> February 2021.

The facility has undertaken measures on fire safety including constituting a team of fire marshals that were trained on 7<sup>th</sup> December 2019. A number of firefighting and detection equipment is available on site and has been serviced as expected by law. A fire drill was conducted on 19<sup>th</sup> November 2020. First aiders are available on site for any emergency, they undertook a statutory training on 29<sup>th</sup> June 2020 and are the custodians of the first Aid boxes at the site. Accidents and incidents are recorded at the facility, common incidents at the facility are cuts. The facility has an arrangement with the nearest hospital in case of any major incidences.

The facility has undertaken measures to reduce risk of COVID-19 infections at the site through screening temperatures for all entrants at the gate, information charts posted at various locations, providing for social distancing at workplaces and provision of hand washing & sanitation facilities at various locations. Personal Protective Equipment for the workers is provided for as per the tasks. Relevant statutory medical examinations have been conducted for the workers.

Welfare facilities including washrooms from different genders, changing rooms and wholesome drinking water have been adequately provided.

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

##### Details:

1. Safety and Health Policy
2. Safety and Health Committee interviews
3. Safety and Health Committee meeting minutes
4. Facility walk

5. Worker and Management interviews
6. Risk Assessment report
7. Fire equipment servicing report
8. Training Certificates
9. Fire drill report
10. Medical test reports.
11. Internal inspection reports.

Any other comments: None.

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility has safety & Health policy and complementary procedures that have been communicated to the workers through trainings and some have been posted on the notice boards and in work areas.
B: Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: All policies and procedures have been included in the Human Resource policies and procedures manual.
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: all structures at the site have been legally constructed.
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: Visitors are given a brief safety talk at the gate and provided with the relevant PPEs depending on the areas they are visiting.
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: There is a first aid room with a resting bed and first aid boxes and supplies.
F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: Trained first Aiders are available at the site.
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: The site does not provide transport for its workers.
H: Is secure personal storage space 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: Personal storage space in the changing rooms is provided and fit for purpose.



I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Risk assessments are conducted annually, mitigation and control measures are put in place with timelines and persons responsible for ensuring they are addressed.
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: The facility has met all environmental regulations and have the relevant permits.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: There are no banned chemicals at the facility, there is a list of chemicals maintained at the site.

### 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 noted.  <b>Local law and/or ETI requirement</b> Not Applicable.  <b>Recommended corrective action:</b> Not Applicable.	<b>Objective evidence observed:</b>  Not Applicable.
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### Observation:

<b>Description of observation:</b> One fire extinguisher near the receiving area had not been mounted (it was placed on the floor)  <b>Local law or ETI requirement:</b> Fire Risk Reduction Rules 2007 Section 29(3) states - Every occupier shall ensure that any portable fire extinguisher is mounted at an easily accessible height of not less than 60 cm from the floor.  ETI Code 3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.  <b>Recommended corrective action:</b> It was recommended that the extinguisher is mounted at an appropriate height (at least 60cm from the floor).	<b>Objective evidence observed:</b>  Facility tour.
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<p>This was done before end of day 1 of the audit.</p> <p><b>Description of observation:</b> 3 Fire alarms (one in the high care section, one at the reception one at the stairs leading to the top admin area/boardroom) had not been marked/labelled.</p> <p><b>Local law or ETI requirement:</b> ETI Code 3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Occupational Safety and Health Act 2007 Section 6(2c) Without prejudice to the generality of an occupier's duty under subsection (1), the duty of the occupier includes— (c) the provision of such information, instruction, training and supervision as is necessary to ensure the safety and health at work of every person employed</p> <p><b>Recommended corrective action:</b> It was recommended that the Fire alarms switch are marked.</p>	<p>Facility tour.</p>
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Good Examples observed:	
<p>Description of Good Example (GE):</p> <p>None noted.</p>	<p><b>Objective Evidence Observed:</b></p> <p>Not Applicable.</p>

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

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

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

##### ETI

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

#### Current Systems and Evidence Examined

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

##### Current systems:

There is no recruitment of children/person with no age verification document/ persons below the age of 18 years at the facility. There is a child labour policy and complementary employment procedures at the facility that prohibit the same. Workers at the facility have been trained and are aware of the policies. Before recruitment applicant/job seekers are required to provide age verification document.

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

##### Details:

1. Child labour policy
2. Recruitment procedure
3. Training records.
4. Worker and management interviews.

Any other comments: None.

A: Legal age of employment:	18 years
B: Age of youngest worker found:	23 years
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: If yes, give details: Not Applicable.

#### 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 noted.  <b>Local law and/or ETI requirement:</b> None applicable.  <b>Recommended corrective action:</b> None applicable.	<b>Objective evidence observed:</b>  None applicable.
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Observation:	
<b>Description of observation:</b>  None noted.  <b>Local law or ETI requirement:</b>  None Applicable.  <b>Comments:</b> None.	<b>Objective evidence observed:</b>  None applicable.

Good Examples observed:	
<b>Description of Good Example (GE):</b>  None noted.	<b>Objective Evidence Observed:</b>  None applicable.

## 5: Living Wages are Paid

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

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

### ETI

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

All wages and benefits at the site meet minimum wage regulations. Workers are paid above the stipulated minimum wage. Some workers are paid on daily rate while others are on monthly pay. The contracts are signed by the employees and a site representative and each employee has a copy. Statutory deductions are made and remitted to the relevant agencies. No deductions are made as a form of disciplinary measure.

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

##### Details:

1. Wages and Benefits policy
2. Worker and management interviews
3. Pay records

Any other comments: None.

### Non-compliance:

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

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:  
None.

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

Not Applicable.

#### Recommended corrective action:

Not Applicable.

#### Objective evidence observed:

Not Applicable.

<b>Observation:</b>	
<b>Description of observation:</b> None noted.  <b>Local law or ETI requirement:</b> Not Applicable.  <b>Comments:</b> None.	<b>Objective evidence observed:</b> Not Applicable.

<b>Good Examples observed:</b>	
<b>Description of Good Example (GE):</b> None noted.	<b>Objective Evidence Observed:</b> Not Applicable.

### 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: 48 hours per week	A1: 48 hours per week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: Not specified in law	B1: 12hours a week	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: 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: Kshs. 7240.90 per month	C1: Kshs. 10752 per month.	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 1.5 For normal working days & 2 during holiday and rest days.	D1: 1.5 For normal working days & 2 during holiday and rest days.	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<b>Wages analysis:</b> <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?	Not Applicable.		
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 personnel files, 26 pay and time records for the Months of March 2020, July 2020 and February 2021		
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: By worker category as stipulated in the minimum wage order of 21st December 2018	
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:	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i>  Kshs 10752 per month	
F: Please indicate the breakdown of workforce per earnings:	F1: 0% of workforce earning under minimum wage F2: 0% of workforce earning minimum wage F3: 100% of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i>  No bonus scheme found.		
H: What deductions are required by law e.g. social insurance? Please state all types:	1. NSSF (National Social Security Fund) 2. NHIF (National Hospital Insurance Fund) 3. PAYE (Pay as You Earn)		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that <b>have</b> been made.	1. PAYE 2. NHIF 3. NSSF  Please describe: The above are deducted and remitted to the relevant government agency.
		I2: Please list all deductions that <b>have not</b> been made.	1. None.  Please describe: Not Applicable.

J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: All worked hours are captured by a biometric data system	
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time:	
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: Not Applicable.	
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 site reviews wages as per the reviews done by the government/directed by law.	
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: Workers with equal work are paid equally.	
Q: How are workers paid:	<input checked="" 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

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

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

### ETI

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

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

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

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

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

The standard working hours at the site are 8 hours a day and 48 hours per week as defined in the employees' contracts and are in line with the national legislation and ETI base code. Overtime at the site is voluntary and not excessive. It is compensated as per the national regulations. Total weekly worked hours at the site do not exceed 60 hours. Workers are provided with 1 day rest in seven days. No issue was noted under this clause.

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

Details:

1. Time attendance records.
2. Payment records.
3. Worker and management interviews.
4. Employee contracts

Any other comments: None.

### Non-compliance:

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

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:  
None noted.

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

Not applicable.

#### Recommended corrective action:

Not applicable.

#### Objective evidence observed:

Not applicable.

### Observation:

#### Description of observation:

Not applicable.

#### Local law or ETI requirement:

Not applicable.

Comments: None

#### Objective evidence observed:

Not applicable.

### Good Examples observed:

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

None noted

#### Objective Evidence Observed:

Not Applicable.

### Working hours' analysis

Please include time e.g. hour/week/month  
(Go back to Key information)

#### Systems & Processes

A. What timekeeping systems are used: time card etc.

Describe:  
Biometric reader

B: Is sample size same as in wages section?

☒ Yes  
☐ 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. Please give details:			
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:			
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:			
		Not Applicable.			
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 <b>yes</b> , 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?	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):				
	6 days.				
<b>Standard/Contracted Hours worked</b>					
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:			
		Not Applicable.			
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:			
		Not Applicable.			
<b>Overtime Hours worked</b>					
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 2 hours/week, 26 hours a month.				

J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	4.8%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	<i>L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:</i>  Overtime shall be requested and only upon authorization by the worker will it be worked.
<b>Overtime Premiums</b>		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	<i>M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages: 150%</i>
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<i>N1: If yes, please describe % of workers &amp; frequency: 100% of the workers whenever it is worked.</i>
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other Not Applicable.	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	
	Not Applicable.	
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<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:	
	Not Applicable.	

<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  Q1: If yes, please give details:</p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>

## 7: No Discrimination is Practiced

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

### ETI

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

### Current Systems and Evidence Examined

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

#### Current systems:

The facility has a discrimination policy that prohibits discrimination of any kind at the site. Hiring and promotion at the site is fair and based on merit. All recruitment and promotions at the facility are guided by the recruitment policy. The workers have been trained and are aware of the policies. No issue was noted under this clause.

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

Details:

1. Discrimination Policy
2. Worker and management interviews
3. Recruitment Procedure
4. Training records.

Any other comments: None.

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 45.7 % A2: Female: 54.3 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	6 quality checkers.
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: There was no evidence or report of discrimination at the facility at the time of the audit.

## Professional Development

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

Firefighting training, first aid training, hygiene and health ,safety trainings and Covid -19 .

B: Are HR decisions 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 noted

### Local law and/or ETI requirement:

Not Applicable.

### Recommended corrective action:

Not Applicable.

### Objective evidence observed:

Not Applicable.

## Observation:

### Description of observation:

None noted

### Local law or ETI requirement:

Not Applicable.

Comments: None.

### Objective evidence observed:

Not Applicable.

## Good Examples observed:

### Description of Good Example (GE):

None noted.

### Objective Evidence Observed:

Not Applicable.

## 8: Regular Employment Is Provided

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

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

### ETI

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

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

### Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

## Current Systems and Evidence Examined

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

### Current systems:

There are contracts of employment between the facility and the workers that stipulate the terms and conditions of employment. The terms and conditions from the reviewed contracts and workers interviewed are in line with national law. The contracts are signed by the employees and each has a copy. All workers at the site are Kenyan nationals. The site has contracted an agency for the supply of labour on a needs basis and has an upgrading plan for converting the agency workers to their direct permanent employees. All workers are expected to provide national identity cards before being engaged at the site. There is no subcontracting or homeworking at the site. No issue was noted under this clause.

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

Details:

1. Recruitment procedures.
2. Personnel files
3. Worker and management interviews.

Any other comments: None.



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 noted.  <b>Local law and/or ETI requirement:</b> Not Applicable  <b>Recommended corrective action:</b> Not Applicable.	<b>Objective evidence observed:</b>  Not Applicable.

Observation:	
<b>Description of observation:</b> None noted.  <b>Local law or ETI requirement:</b> Not Applicable.  <b>Comments:</b> None.	<b>Objective evidence observed:</b>  Not Applicable.

Good Examples observed:	
<b>Description of Good Example (GE):</b>  None noted.	<b>Objective Evidence Observed:</b>  Not Applicable.

## 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 the 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: Not Applicable.
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:
D: If any checked, give details:	Not Applicable.

<p align="center"><b>Migrant Workers: NOT APPLICABLE</b></p> <p align="center"><i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i></p>		
A: Type of work undertaken by migrant workers:	Not Applicable.	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used:  B2: Total number of (outside of local country) recruitment agencies used:	
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:	C2: Observations:
D: Are Any migrant workers in skilled, technical, or management roles  Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: If yes, number and example of roles:	

## NON-EMPLOYEE WORKERS:

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" 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:	Not Applicable.

Agency Workers (if applicable) (workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
A: Number of agencies used (average):	A1: Names if available: Palmac Agriculture Services.
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	D1: Please give details: The facility has an agreement with the agency for provision of labour when there are high orders (peak months of February - April).
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  E1: Please give details: The facility has a contract with the agency, the contract includes a check of the agencies labour standards as outlined by the company policies and procedures manual.

<b>Contractors: NOT APPLICABLE.</b> <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?	Not Applicable.
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:	Not Applicable.

### 8A: Sub-Contracting and Homeworking

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

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

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

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

*Note to auditor on homeworking:*

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

There is no sub-contracting nor homeworking at the facility. All processes are done by workers at the facility although some workers are provided by the agency.

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

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

Not Applicable.

Details:

1. Management and worker interviews
2. Personnel files.

### Non-compliance:

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

- ☐ NC against ETI/Additional Elements  
☐ NC against customer code:

None noted.

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

Not Applicable.

#### Recommended corrective action:

Not applicable.

#### Objective evidence observed:

Not Applicable.

### Observation:

<b>Description of observation:</b> None noted.  <b>Local law or ETI/Additional elements requirement:</b> Not Applicable.  <b>Comments:</b> None.	<b>Objective evidence observed:</b>  Not Applicable.
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Good Examples observed:	
<b>Description of Good Example (GE):</b>  None noted.	<b>Objective Evidence Observed:</b>  Not Applicable.

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

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

### 9: No Harsh or Inhumane Treatment is Allowed

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

#### ETI

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

Additional elements:

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

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: The facility has documented, published and communicated confidential reporting channels. They include Welfare committee representatives and suggestion box for reporting violations of labour or any other grievances.
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	Yes, workers are aware of their representatives and the use and location 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.	There is a suggestion box at the facility which can be accessed by the workers.
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: The facility has a grievance mechanism for the workers and the suppliers.
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No  I1: If yes, please give details
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Current Systems and Evidence Examined
<p><i>To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.</i></p> <p><b>Current systems:</b>  The facility has policies on Discipline , Harassment &amp; Abuse and Non- discrimination that prohibit physical abuse, sexual harassment and verbal abuse or other forms of intimidation at the site. The facility has a welfare committee through which the workers can raise any harassment issues. There is a Grievance handling procedure that guides the facility in handling disputes from workers. No issue was noted under this clause. All workers have been trained and are aware of the policies and procedures and how to report any violation of the same.</p> <p><b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b></p> <p>Details:</p> <ol style="list-style-type: none"> <li>1. Training records.</li> <li>2. Grievance procedure</li> <li>3. Anti-Harassment policy.</li> <li>4. Worker and Management interviews.</li> <li>5. Facility walk.</li> <li>6. Personnel files.</li> </ol> <p>Any other comments: None.</p>

Non-compliance:	
<p><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 noted.</p> <p><b>Local law and/or ETI requirement:</b>  Not Applicable.</p> <p><b>Recommended corrective action:</b>  Not Applicable.</p>	<p><b>Objective evidence observed:</b>   Not Applicable.</p>

Observation:	
<p><b>Description of observation:</b>   None noted.</p>	<p><b>Objective evidence observed:</b>  Not Applicable.</p>

<b>Local law or ETI requirement:</b> Not Applicable.  <b>Comments:</b> None.	
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Good Examples observed:	
<b>Description of Good Example (GE):</b>  None noted.	<b>Objective Evidence Observed:</b>  Not Applicable.

## 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:

All workers at the facility are Kenyan nationals with all required documents for employment as per the Kenyan law, copies are maintained at the facility. Agency workers are also validated by the site and copies for their documents maintained at the facility HR office.

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

Details:

1. Recruitment Procedures.
2. Workers personnel files
3. Worker and management interviews.

Any other comments: None.

### Non-compliance:

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

- ☐ NC against ETI/Additional Elements  
☐ NC against customer code:

None noted.

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

Not applicable

#### Recommended corrective action:

Not applicable

#### Objective evidence observed:

Not applicable

### Observation:

<b>Description of observation:</b> None noted.	<b>Objective evidence observed:</b>
<b>Local law or ETI/Additional Elements requirement:</b> Not applicable.	Not applicable
<b>Comments:</b> Not applicable	

Good examples observed:	
<b>Description of Good Example (GE):</b> None noted.	<b>Objective Evidence Observed:</b> Not applicable

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

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

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 facility has complied with all the applicable national and international environmental regulations. An environmental policy is in place and provides a guide on the environmental systems and practices at the site. The site has been audited by the National Environmental Authority and found compliant to the regulations. The facility maintains a record on clients' requirements including environmental requirements.

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

Details:

1. Management and worker interviews.
2. Environmental permits and licenses.
3. Environmental policy
4. Environmental audit report.

Any other comments: None.

### Non-compliance:

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

☐ NC against ETI/Additional Elements

☐ NC against Local Law

None noted.

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

Not Applicable.

#### Recommended corrective action:

Not Applicable.

#### Objective evidence observed:

Not Applicable.

### Observation:

<b>Description of observation:</b> None noted.  <b>Local law or ETI/additional elements requirement:</b> Not Applicable.  <b>Comments:</b> None.	<b>Objective evidence observed:</b>  Not Applicable.
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Good examples observed:	
<b>Description of Good Example (GE):</b> None noted.	<b>Objective Evidence Observed:</b>  Not Applicable.

## Other findings

Other Findings Outside the Scope of the Code
None noted.

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>
None noted.

## Appendix 1

<p><b>Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."</b></p> <p><input checked="" type="checkbox"/> Not Applicable please x</p>	
<p><b>NOTE:</b> The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p><b>Instruction to Audit Company:</b> fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
<p><b>0.A. Guidance for Observations</b></p> <p>0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.</p> <p>0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.</p>	
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p>	

<p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	
<b>ETI 1. Forced Labour</b>	<b>ETI 1. Forced Labour</b>
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.</p>	
<b>ETI 2. Freedom of association and the right to collective bargaining are respected</b>	<b>ETI 2. Freedom of association and the right to collective bargaining are respected</b>
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.</p>	
<b>ETI 3. Working conditions are safe and hygienic</b>	<b>ETI 3. Working conditions are safe and hygienic</b>
<p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>3.2 Workers shall receive regular and recorded Health &amp; Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p> <p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p>	



3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.	
<b>ETI 4. Child labour shall not be used</b>	<b>ETI 4. Child labour shall not be used</b>
<p>4.1 There shall be no new recruitment of child labour.</p> <p>4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	
<b>ETI 5. Living wages are paid</b>	<b>ETI 5. Living wages are paid</b>
<p>5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</p> <p>5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.</p> <p>5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.</p>	
<b>ETI 6. Working Hours are not excessive</b>	<b>ETI 6. Working Hours are not excessive</b>
<p>6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p> <p>6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular</p>	

<p>employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where <b>all</b> of the following are met:</p> <ul style="list-style-type: none"> <li>– this is allowed by national law;</li> <li>– this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;</li> <li>– appropriate safeguards are taken to protect the workers' health and safety; and</li> <li>– The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.</li> </ul> <p>6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.</p>	
<b>ETI 7. No discrimination is practised</b>	<b>ETI 7. No discrimination is practised</b>
<p>7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p>	
<b>ETI 8. Regular employment is provided</b>	<b>ETI 8. Regular employment is provided</b>
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p><b>Additional Elements: Responsible Recruitment</b></p>	

<p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p> <p>8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.</p> <p>8.5 Employment agencies must only supply workers registered with them.</p> <p>8.6 Workers pay no recruitment fee at any stage of the recruitment process.</p> <p>8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
<b>8A: Sub-Contracting and Homeworking</b>	<b>8A: Sub-Contracting and Homeworking</b>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.</p> <p>8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<b>ETI 9. No harsh or inhumane treatment is allowed</b>	<b>ETI 9. No harsh or inhumane treatment is allowed</b>
<p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.</p> <p>Additional elements:</p> <p>9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<b>10. Other Issue areas: 10A: Entitlement to Work and Immigration</b>	
<p><b>Additional Elements</b></p> <p>10A.1 Only workers with a legal right to work shall be employed or used by the supplier.</p> <p>10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
<b>10. Other issue areas 10B2: Environment 2-Pillar</b>	
<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p>10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.</p>	

Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
Environment Section	Environment Section
<p><b>B.4. Compliance Requirements</b></p> <p>10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.</p> <p>10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.</p> <p>10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements</p> <p>10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.</p> <p>10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.</p> <p>10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).</p> <p>10B4.7 Businesses shall make continuous improvements in their environmental performance.</p> <p>10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation</p> <p>10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.</p> <p><b>B4. Guidance for Observations</b></p> <p>10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.</p> <p>10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p>	
Business Practices Section	
<p><b>10C. Compliance Requirements</b></p> <p>10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.</p>	

10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.

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

10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.

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

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

10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

#### 10C. Guidance for Observations







10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.

10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented.



## Photo Form

 <p>4 Mar 2021 10:22:31 Unnamed Road Nakuru County</p>	 <p>4 Mar 2021 10:24:18 Unnamed Road Nakuru County</p>	 <p>4 Mar 2021 10:29:09 Unnamed Road Nakuru County</p>
<p><b>General :Notice board</b></p>	<p><b>General : Loading area</b></p>	<p><b>General : Detergent storage</b></p>
 <p>4 Mar 2021 10:23:55 Unnamed Road Nakuru County</p>	 <p>4 Mar 2021 10:23:55 Unnamed Road Nakuru County</p>	 <p>4 Mar 2021 10:23:55 Unnamed Road Nakuru County</p>
<p><b>General : Rejects area</b></p>	<p><b>General : Gents and Ladies Toilets</b></p>	<p><b>General : Fire Assembly point.</b></p>
 <p>4 Mar 2021 10:28:27 Unnamed Road Nakuru County</p>	 <p>4 Mar 2021 10:28:48 Unnamed Road Nakuru County</p>	 <p>4 Mar 2021 10:28:48 Unnamed Road Nakuru County</p>

<b>General: First Aid Box.</b>  <p>4 Mar 2021 10:28:37 Unnamed Road Nakuru County</p>	<b>General: Rest area/ Canteen area.</b>  <p>4 Mar 2021 10:29:40 Unnamed Road Nakuru County</p>	<b>General :First Aid room</b>  <p>4 Mar 2021 10:30:43 Unnamed Road Nakuru County</p>
<b>General: First Aid Box.</b>  <p>5 Mar 2021 10:09:31 Unnamed Road Nakuru County</p>	<b>General :Emergency shower</b>  <p>4 Mar 2021 10:32:12</p>	<b>Obs: Unmounted fire extinguisher</b>  <p>4 Mar 2021 10:02:53</p>
<b>Obs :Mounted fire extinguisher</b>	<b>General :cold room</b>	<b>General : Packhouse</b>





General : Detergent store



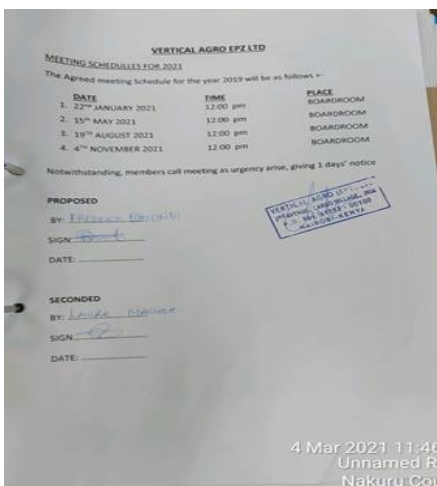
General : Entrance



General: Emergency exit.



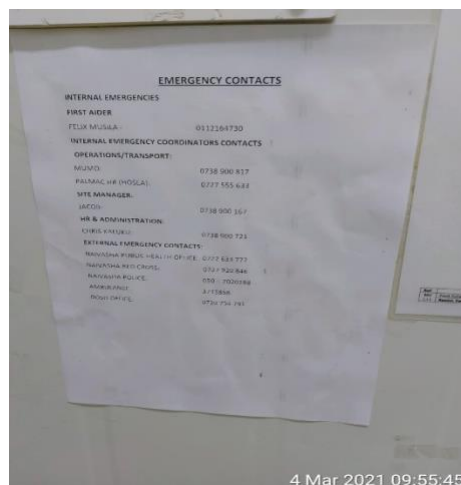
General : Pack house.




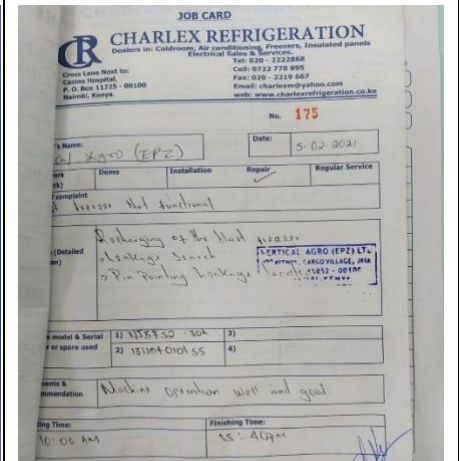
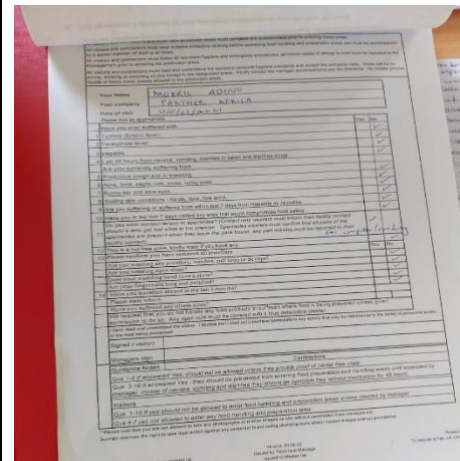
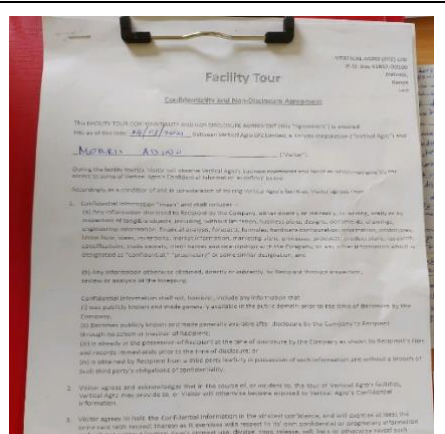

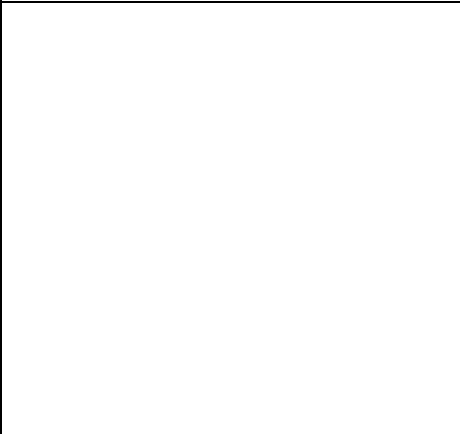
General: Meeting schedules.



Observation : Fire alarm signage





<p><b>General: Receiving bay.</b></p>  <p>5 Mar 2021 11:58:27 Unnamed Road Nakuru County</p>	<p><b>General: Fire Assembly.</b></p>  <p>5 Mar 2021 12:00:14</p>	<p><b>General :Emergency contacts</b></p>  <p>4 Mar 2021 09:46:07 Unnamed Road Nakuru County</p>
<p><b>General :Boiler Inspection report</b></p>  <p>4 Mar 2021 09:46:02</p>	<p><b>General :Machine inspection</b></p>  <p>4 Mar 2021 09:54:43</p>	<p><b>General: Safety entrance sheet.</b></p>  <p>4 Mar 2021 09:54:43</p>
<p><b>General: Safety entrance sheet.</b></p>	<p><b>General : Covid 19 awareness</b></p>	



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

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

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[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw\\_3d\\_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw_3d_3d)

**[Click here for Supplier \(B\) members:](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)**

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\\_2brg\\_3d\\_3d](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

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