



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC5000001931		Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS1000002030
Business name (Company name):	UNIBAG			
Site name:	UNIBAG			
Site address:	Bernardo O'higgins Bernardo O'Higgins 143, Parque Industrial Los Libertadores, Colina Santiago, Chile Santiago de Chile 9361274 CL		Country:	CL
Site contact and job title:	Patricia Antipan / Responsible for managing all Human Resources processes			
Site phone:	225714898		Site e-mail:	gustavo.navarrete@unibag.cl
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	2024-07-01			

Audit Company Name:	
SGS Chile	

Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Mauricio Saldana	APSCA Number:	21702767
Additional Auditors:			
Date of declaration:	2024-07-01		

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

Site Representation	
Full Name:	Patricia Antipan
Title:	Responsible for managing all Human Resources processes
Date of declaration:	2024-07-01
Comments: <i>Any exceptions to this must be recorded here (e.g. different sample size): Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020). The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i>	
No comment	

Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause)	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>0A - Universal rights covering UNGP</u>			0	0	0	
<u>0B - Management systems and code implementation</u>			0	0	0	
<u>1 - Freely chosen employment</u>			0	0	0	
<u>2 - Freedom of association and right to collective bargaining are respected</u>			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1		3	0	0	NC - ZAF600575168 NC - ZAF600575169 NC - ZAF600575170
<u>4 - Child labour shall not be used</u>			0	0	0	
<u>5 - Living wages are paid</u>			0	0	0	
<u>6 - Working hours are not excessive</u>			0	0	0	
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>	8.1		1	0	0	NC - ZAF600575171
<u>8A - Subcontracting and homeworking</u>			0	0	0	
<u>9 - No harsh or inhumane treatment is allowed</u>			0	0	0	
<u>10A - Entitlement to work and immigration</u>			0	0	0	
<u>10B2 - Environment 2-pillar</u>			0	0	0	
<u>10B4 - Environment 4-pillar</u>			0	0	0	
<u>10C - Business ethics 4-pillar</u>			0	0	0	

Site Details

Site Details			
Company Name	UNIBAG		
Site Name	UNIBAG		
GPS location (if available)	GPS Address:	0000	
	Coordinates:	-33.300320773649425, -70.71809231649758	
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Resolución Sanitaria: 2313459682 - RUT: 76.283.675-0		
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturing of reusable bags		
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The company UNIBAG SpA is located at Bernardo OHiggins 143, Colina Región Metropolitana, Santiago, Chile. It began its activities in May 2013 in other facilities, and has been in the current premises since July 2021. The company manufactures reusable vegetable bags. It has a wide range of reusable bags in different materials and other reusable products for ecommerce, logistics and other uses. The facilities are located on a 5000m ² site of which 3201 are built, currently 55 workers work, all direct employees of the company.		
Structure and number of buildings	Building Name: Unibag Plant		
	Floor	Description	Remark
	Factory	bag manufacturing	None
	Offices	Administrative offices	None
	Building Name: Warehousing		
	Floor	Description	Remark
	Warehousing	Cellar materials	None
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No structural damage is observed.		
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Final reception of the facilities		
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input checked="" type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homewoker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor		

Months of peak season	Select a month to Select a month
Process overview	The company produces bags, envelopes and pallet covers, for which it has flexographic printers, screen printers, rewinders, palletizers, electric stackers, and bag sealers. The raw material is received in coils that are sized, printed, cut, assembled, packed, stored and shipped.
What form of worker representation is there on site?	<input type="checkbox"/> Union <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input checked="" type="checkbox"/> None
Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not have

Audit Parameters				
Time in and time out	Day 1			
	In	10:30		
	Out	18:30		
Audit type:	FULL_INITIAL			
Was the audit announced?	ANNOUNCED			
Was the Sedex SAQ available for review?	Yes			
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No			
Who signed and agreed CAPR	Patricia Antipan / Responsible for managing all Human Resources processes			
Is further information available	No			

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	No	No
B: Present at the audit?	Yes	No	No
C: Present at the closing meeting?	Yes	No	No
<i>Reason for absence at the opening meeting</i>	There is no union or worker representative.		
<i>Reason for absence during the audit</i>	There is no union or worker representative.		
<i>Reason for absence at the closing meeting</i>	There is no union or worker representative.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers - male	23	0	0	13	0	0	0	36
Worker numbers - female	14	0	0	4	0	0	0	18
Total	37	0	0	17	0	0	0	54
Number of Workers interviewed - male	3	0	0	3	0	0	0	6
Number of Workers interviewed - female	2	0	0	2	0	0	0	4
Total - interviewed sample size	5	0	0	5	0	0	0	10

Nationalities Structure				
Nationality of Management	Chilean			
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Chilean approx %: 69% Nationality 2: Venezuelan approx %: 20% Nationality 3: Peruvian approx %: 2%			
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not ave peak season			
Worker remuneration	Workers on piece rate:		0%	
	Paid hourly:		0%	
	Salaried:		100%	
Payment cycle	Paid daily:		0%	
	Paid weekly:		0%	
	Paid monthly:		100%	
	Other:		0%	
	Details for other:		N/A	

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	1 group of 4 workers
Number of individual interviews:	Male: 2 Female: 4
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
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
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	No complaints were detected in interviews.
What did the workers like the most about working at this site?	Good work environment, payments on time and good treatment.
Any additional comment(s) regarding interviews:	No additional comments.
Attitude of workers to hours worked:	The workers are satisfied with the number of working hours and declare that, if necessary, overtime is completely voluntary.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:

The interviews with the workers selected by the audit were carried out in an independent area. The interviewees demonstrated a cooperative attitude and effective evidence was collected during the interview with the workers. In general, the appreciation is good with no claims or suggestions raised.

Attitude of worker's committee/union reps:

Not have

Attitude of managers:

Heads of different areas had a good attitude in relation with the audit and process developed, giving all his support to perform an adequate audit and access to all necessary documents and visited areas. Besides, they were receptive with the findings founded which were accepted after made an explanation about the reason why were issued and the support of them. At the end of the closing meeting the site responsible gives her commitment to attend them and make the corrective actions necessary in an adequate way and time.

**0A - Universal Rights covering UNGP
[Summary of Findings]****0A: Compliance Requirements**

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

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

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

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

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

0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined

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

Current Systems:

The company maintains a system based on the Human Rights policy and the Code of Ethical Conduct. There is evidence of a person in charge and review carried out to the system, through internal audits.

Evidence examined:

Human Rights Policy.

Recruitment Policy.

Rules of Procedure

ETI CODE

<https://unibag.cl/codigo-de-etica-2/>

Any other comments:

None

Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Internal Rules and Code of Etics
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The policies are not included in the internal regulations, however they are delivered to all workers at the beginning of the season. It is also published in different parts of the site.
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: RRHH Responsible

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 Please give details: Complaints channel on your website, https://unibag.cl/denuncia/
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
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There is an ethics committee on the site and corporately, which ensures that the different issues are treated confidentially.
Measuring Workplace Impact	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 25.0% This year 23.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	8.0%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 0.0% This year 0.0%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month))	0.0%
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Accidents are reported every time they occur. A copy of the accident statistics and investigation is sent to the mutual insurance company that is registered.
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year 2.41% This year 3.91%

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)	1.8%	
Lost day work cases per 100 workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year This year	53.23% 13.8%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month 12 month	0.0% 0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month 12 month	0.0% 0.0%

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

Current Systems and Evidence Examined
<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>
Current Systems:
The company maintains a management system based on its corporate principles, holding annual audits of the management system and reviews by senior management.
Evidence examined:
Human Rights Policy. Recruitment Policy. Rules of Procedure Eti Code
Any other comments:
None

Management Systems	
In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: During the review of the direction of the work, no observations have been received.
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 Please give details: Code of conduct and internal rules
If Yes, is there evidence (an indication) of effective implementation? Please give details.	During the interviews with the workers, they explain that the policies are delivered before the start of the season and it is explained to them that minors cannot be hired, they in turn explain that they have not seen minors on the site.
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 Please give details: All the personnel are trained by the company in the code of conduct and internal rules, at the end of each training they carry out a test to verify that the knowledge is acquired by the participants.

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 Please give details: Electronic records are kept in a shared folder on the progress and status of worker training.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not have
Is there a Human Resources manager/department?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No People Manager
Is there a senior person /manager responsible for implementation of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Patricia Antipan /People Manager
Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Recruitment Procedure, and intenal rules
Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The code of conduct ensures the privacy of the information and data of the workers.
Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: During the annual internal audits the effectiveness is evaluated.
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 Please give details: Recruitment Procedure, and intenal rules
Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Personnel Recruitment Procedure.
Land Rights	
Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The company is located in a consolidated industrial area.
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The company is located in a consolidated industrial area.

Does the site have a written policy and procedures specific to land rights?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The company is located in a consolidated industrial area.
Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The company is located in a consolidated industrial area.
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 Please give details: The company is located in a consolidated industrial area.
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 Please give details: The company is located in a consolidated industrial area.

**1 - Freely chosen Employment
[Summary of Findings]****1: Compliance Requirements**

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

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

Current Systems and Evidence Examined

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

Current Systems:

All the employees can present their voluntary renounce to their job without adverse effect, matter evidenced through employee's interview. Additionally, the company has a responsible person who reviews this matter. At the time of audit, no evidence of bonded or involuntary prison labour was found in the facility. Workers confirmed that no original documents were requested to be deposited with the facility by the workers at the time of the recruitment.

Evidence examined:

Were observed contracts for employees and other documents related with the working relation between the facility and the employees that do not show any items related with forced employment (Internal Rules, Human Resources policy and Company Ethical Code).

Any other comments:

None

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Workers may resign when deemed appropriate.
If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details: N/A
Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Workers can leave the facilities at the end of their shift; if they need to do so sooner, they must inform the supervisor for safety reasons.

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 Please give details: Training is received from the human resources department and the Chilean security association
Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The company is against any type of forced labor, this is verified in each of its internal audits.

2 - Freedom of Association and Right to Collective Bargaining are Respected
[Summary of Findings]**2: Compliance Requirements**

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Current Systems and Evidence Examined

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

Current Systems:

The company is open to the formation of unions, to date there no union on site

Evidence examined:

Employees interview.
Document "Internal Rules"
Document Code of conduct
Worker interviews
Worker files.

Any other comments:

None

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input type="checkbox"/> Other	<input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> None
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
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	Please give details: Direct comunicacion with chief
Is there evidence of free elections?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Please give details: Not ununion
Name of union and union representative, if applicable:	Not ununion	
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable	

If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	No worker committees
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No worker representatives
Were worker representatives freely elected?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date of last election:	null
Do workers know what topics can be raised with their representatives?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	No worker representatives or union
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

3 - Working Conditions are Safe and Hygienic
[Summary of Findings]**3: Compliance Requirements**

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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:**1. There is General Health and Safety**

During the audit, non-compliances were found, indicating that the facility partially complies with the requirements regarding health and safety conditions, which are specified below. The health and safety manager has documented and implemented a facility maintenance program, training such as the use of PPE, use of chemical management, safety talks, occupational risks, hygiene, psychosocial risks, among others, application of ministerial protocols, emergency response plan describing all fire safety equipment, training, equipment certifications, and drill reports.

2. Fire safety

The company has a fire alarm, smoke detectors, a moisture network, fire extinguishers (some of these are not located at the height indicated by law and are on the ground) and have an emergency plan that indicates what to do in case of fire, as well as the telephone numbers of the fire brigade.

3. Electrical safety

The company has an electrical panel system which has restricted access and when it is in operation, the workers in the area have a Loto blocking system.

4. Chemical safety

The company uses some chemicals in its operations and these are properly stored and has trained personnel in charge.

5. Machinery

The facilities, machinery and equipment are kept in good condition and the maintenance area has an annual maintenance plan so that everything meets the standards. However, it is observed that the company's infrastructure is not regularly maintained and there is evidence of deterioration in the infrastructure.

Staff receive an induction on admission where all health and safety regulations are explained. They are given all the PPE and the accident law is explained to them; First aid kits are located in work areas.

Accident statistics are kept and investigated in accordance with the requirements of the law.

Workers exposed to risk in the area of operation undergo annual examinations to verify their state of health. It was noticed that all the areas are clean and there is a cleaning team that is in charge of keeping the facilities clean.

There is a dining room in good infrastructure and hygiene conditions.

Evidence examined:

- H&S committee members panel
- Procedure in case of fire and earthquake
- Company policy including H&S matter
- Panel with accident information
- Risk advertising signalling
- Evacuation way signalling
- Point to point lesson download truck posted
- Risk matrix by area posted
- Fire extinguisher duly located and signalled
- Dining room view
- Bathroom view
- Employee lockers view
- Information about UV radiation effect
- Cellar for chemicals duly identified and closed
- MSDS and technical document for chemical
- Emergency stop button
- Machinery protection view
- PPE use signalling
- Emergency lights
- Emergency phone numbers posted
- First aid kit
- PPE provision to employee record
- Evacuation drawing posted
- Internal rules provision to employee record
- Light, noise, plagicide exposition, wheat flour exposition measurement reports.
- H&S committee meeting
- Accident investigation reports

Any other comments:

Evidence 3 NC

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 Please give details: The policy and procedure cover the following topics among others: fire safety, use of personal protective equipment, machinery and tools, hazardous materials, storage, handling, use and disposal) and work at heights.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Document "Internal rules" and Safe behaviour procedure.
Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: None
Are visitors to the site informed on H&S and provided with personal protective equipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: At entrance all visitors receive a training about the H&S rules that apply in the company and how shall act in case of emergency.

Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: It is not a legal requirement; the law requires that you must be a member of an administrative body that provides the service in case of accidents.
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 Please give details: It is not required by law, the personnel authorized to attend is the administrative body of law and also for a first attention we have trained personnel.
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All buses are in good condition and up to date.
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 Please give details: If lockers are provided where they can store their belongings.
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 Please give details: Risk matrix by area was evidenced during document review.
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 Please give details: The company work in agreeing with the local regulation. During the facility visit, responsible interview and document review was confirmed. Company does not use banned chemical products.
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 Please give details: The company complies with customer and legal requirements and does not use prohibited chemicals.

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600575168	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	274 - Proper safeguards not used to prohibit unauthorised access/use of dangerous machinery (e.g. panels left open / keys left in forklift etc.)	
Subcategory	Machinery	
New or carried over?	<input checked="" type="checkbox"/> New	<input type="checkbox"/> Carried Over
Root cause	<input checked="" type="checkbox"/> Training	<input type="checkbox"/> System
	<input type="checkbox"/> Costs	<input type="checkbox"/> Lack of workers
<input type="checkbox"/> Other		
Root cause - Other		
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	- During the visit to the site, vertical ladders were evident that do not have adequate fall protection and do not have a mechanism that prevents their use by unsuitable personnel.- Durante la visita al sitio se evidenciaron escaleras verticales que no cuentan con una adecuada protección de caída y no cuentan con un mecanismo que impida el uso de estas por personal no adecuado.	
Follow up method	<input type="checkbox"/> Follow up audit	<input checked="" type="checkbox"/> Desktop audit
Timescale	<input type="checkbox"/> Immediate	<input checked="" type="checkbox"/> 30 days
	<input type="checkbox"/> 90 days	<input type="checkbox"/> 120 days
	<input type="checkbox"/> 365 days	<input type="checkbox"/> 180 days
	<input type="checkbox"/> Other	
Actions	- Be sure to keep protection on vertical ladders operational. - Asegúrese de mantener la protección a las escaleras verticales operativas.	



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Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600575169	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate	
Subcategory	Personal Protective Equipment/Clothing	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	-During the visit to the site, it was evident that a worker was carrying out ink transfer tasks and was not using the appropriate PPE (Mask). - Durante la visita al sitio se evidenció un trabajador que realizaba labores de trasvasaje de tintas y este no esta utilizando el Epp adecuado (Mascarilla)	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	- Make sure workers use PPE whenever necessary. - Asegúrese que los trabajadores utilicen el EPP cada vez que sea necesario.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600575170	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt / hand guards on other machines)	
Subcategory	Machinery	
New or carried over?	<input checked="" type="checkbox"/> New	<input type="checkbox"/> Carried Over
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> Costs <input type="checkbox"/> Other	<input type="checkbox"/> System <input type="checkbox"/> Lack of workers
Root cause - Other		
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	During the visit to the facilities, equipment was evident in which the protection of moving parts was not used. - Durante la visita a las instalaciones se evidenciaron equipos en los cuales no se utilizaban las protecciones de partes móviles.	
Follow up method	<input type="checkbox"/> Follow up audit	<input checked="" type="checkbox"/> Desktop audit
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 90 days <input type="checkbox"/> 365 days	<input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 120 days <input type="checkbox"/> Other
Actions	- Make sure that personnel always use guards on moving parts. - Asegúrese que el personal siempre utilice las protecciones de las partes móviles.	



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4 - Child Labour Shall Not Be Used
[Summary of Findings]**4: Compliance Requirements**

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

Current Systems and Evidence Examined

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

Current Systems:

The human rights department performs a review of identification documents prior to hiring to avoid child labor, a copy of this is left as evidence of verification. The company does not hire minors.

Evidence examined:

Rules of Procedure.
Code of Conduct.
Recruitment policies.

Any other comments:

None

Legal age of employment:	18
Age of youngest worker found:	22
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
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not have employeen minnor 18 years old

5 - Living Wages are Paid
[Summary of Findings]**5: Compliance Requirements**

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

The administrative responsible make a verification of each salary payment to determine the correct amount to pay supported by the assistance records and bonus that applies. The employees confirm that the payment is on time, the payment stub is clear and the discount applied is in agreed with the local law.

Evidence examined:

Employees contract
Pay record
attendance

Any other comments:

None

Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 9.0 Per Week: 44.0 Per Month: 176.0	Actual Per Day: 9.0 Per Week: 44.0 Per Month: 176.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 12.0 Per Month: 48.0	Actual Per Day: 2.0 Per Week: 7.0 Per Month: 18.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 16666 Per Week: 125000 Per Month: 500000	Actual Per Day: 23333 Per Week: 175000 Per Month: 700000	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 11136 Per Week: 38977 Per Month: 100226	NO

Wages Analysis:

Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 records from the months of November 2023, February and May 2024
Are there different legal minimum wage grades? If Yes, please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details:
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	700000 CLP
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage
Bonus Scheme found: Please specify details:	Bonus Scheme found: No evidence bonnus Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.
What deductions are required by law e.g. social insurance? Please state all types:	Health ISAPRE, Retirement AFP, Unemployment Insurance
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Please list all deductions that have been made.	Health ISAPRE, Retirement AFP, Unemployment Insurance
Please list all deductions that have not been made.	None
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Weekly and monthly records are maintained of the total normal hours worked and overtime hours.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

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 <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Adjustments required by law apply. If a worker is promoted, his or her remuneration is reviewed
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There is a salary scale that defines the different salary levels, for example, all operators receive the same salary.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

6 - Working Hours are not Excessive
[Summary of Findings]**6: Compliance Requirements**

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

The human resources is responsible to review and verify of monthly assistance records for each employee to determine the working hours and determine the normal and overtime hours worked. During the document and worker interview was evidenced that the overtime is voluntary, and the employees can refuse made it without posterior consequences.

Evidence examined:

Work contract
Salary settlement
Time record
Employees interviews.

Any other comments:

None

Working hours' analysis**Systems & Processes**

What timekeeping systems are used?	Biometrical finger print
Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input type="checkbox"/> 1 in 7 days <input checked="" type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	5
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	2 per day, 7 per week, 18 per month
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: 52 hours agreed maximum
Approximate percentage of total workers on highest overtime hours:	25.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: Workers confirmed that overtime is completely voluntary
Overtime premium	
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium Please give details: Overtime was canceled as defined by current local legislation.
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 150%
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 <input type="checkbox"/> Collective Bargaining agreements <input checked="" type="checkbox"/> Other
Please give details	150%

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

7 - No Discrimination is Practiced
[Summary of Findings]**7: Compliance Requirements**

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

Current Systems and Evidence Examined

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

Current Systems:

During the audit the employees confirmed there is not discrimination. Besides, the plant is following the Chilean law in this matter that forbidden the discrimination as a fundamental worker right. The employees commented that they receive the payment in agree with the position and production.

Evidence examined:

Internal Rules, Politics, Employees interviews.

Any other comments:

None

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 62.5%	Female: 37.5%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	3, People Manager, Process Manager, Commercial Manager	
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"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> Access to training <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	No evidence	
Professional Development		
What type of training and development are available for workers?	Good practices, health and safety.	
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

**8 - Regular Employment Is Provided
[Summary of Findings]****8: Compliance Requirements**

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current Systems:

The company maintains an HR department which is responsible for verifying legal compliance and its own policies, the human resources management is in charge of verifying an adequate process on the part of each site.

Evidence examined:

Employees contract
Employees interviews

Any other comments:

Evidence 1 NC

Responsible Recruitment**All Workers**

Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?

Terms & Conditions presented Understood by workers
 Same as actual conditions

If any are unchecked, please describe finding and specific category(ies) of workers affected:

During the documentary review, it was evident that workers did not maintain the current function described in their employment contracts, the contractual function is that of Plant Assistant and the worker's function during the site visit is that of printing assistant.

Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)

Yes No

Migrant Workers	
Type of work undertaken by migrant workers:	operative
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Legal discounts are only made
Is there any observation on this finding?	No
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	No agencies
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No agencies
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No agencies
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)	
Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No contractor on site
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No contractor on site

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600575171	
Clause	8 - Regular Employment Is Provided	
Issue Title	534 - Information about internal rules and regulations is not available e.g. by providing handbooks or terms & conditions for workers and it is a legal requirement	
Subcategory	Terms of Employment/Engagement	
New or carried over?	<input checked="" type="checkbox"/> New	<input type="checkbox"/> Carried Over
Root cause	<input checked="" type="checkbox"/> Training	<input type="checkbox"/> System
	<input type="checkbox"/> Costs	<input type="checkbox"/> Lack of workers
	<input type="checkbox"/> Other	
Root cause - Other		
ETI code	8.1 - To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.	
Explanation to the non compliance	-During the documentary review, it was evident that workers did not maintain the current function described in their employment contracts, the contractual function is that of Plant Assistant and the worker's function during the site visit is that of printing assistant. - Durante la revisión documental se evidenciaron trabajadores que no mantenían la función actual descrita en sus contratos de trabajo, la función por contrato es de Ayudante de planta y la función del trabajador durante la visita al sitio es de ayudante de impresión.	
Follow up method	<input type="checkbox"/> Follow up audit	<input checked="" type="checkbox"/> Desktop audit
Timescale	<input type="checkbox"/> Immediate	<input checked="" type="checkbox"/> 30 days
	<input type="checkbox"/> 90 days	<input type="checkbox"/> 60 days
	<input type="checkbox"/> 365 days	<input type="checkbox"/> 120 days
		<input type="checkbox"/> 180 days
		<input type="checkbox"/> Other
Actions	- Be sure to keep worker functions updated even if this is temporary. - Asegúrese de mantener actualizadas las funciones de los trabajadores aún cuando esta sea de manera temporal.	

**8A - Sub-Contracting and Homeworking
[Summary of Findings]****8A: Compliance Requirements**

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

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

Current Systems and Evidence Examined

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

Current Systems:

Not have subcontracting or homeworking

Evidence examined:

Employees interviews

Administrative employees interviews

Facility tours

Any other comments:

None

Summary of sub-contracting – if applicableIs there any sub-contracting at this site? Yes No**Summary of homeworking – if applicable**Is homeworking used at this site? Yes No

9 - No Harsh or Inhumane Treatment is Allowed
[Summary of Findings]**9: Compliance Requirements**

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

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

Current Systems and Evidence Examined

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

Current Systems:

The Company is following the Chilean law in this matter that prohibits inhumane or harsh treatment. No evidence of harsh or inhumane treatment was found at the Company. The records review did not reveal any disciplinary action taken against any worker. Interviews with workers confirmed the same. However, there is no written procedure for the complaints channel.

The employee can directly contact the company's human resources manager and the Plant Manager (open door).

Evidence examined:

Document "Internal Rules"

Employees interview

Site responsible Interview

Company Code of ethics

Disciplinary procedure

Any other comments:

None

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The employee can directly contact the company's human resources manager and the Plant Manager (open door). But they are unaware of the complaints channel that the company has through webpages.
If yes, are workers aware of these channels and have access? Please give details.	
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	
Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Worker <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other
Please provide grievance mechanism details	The company shares a reporting channel on its website, which is available to all interested parties. https://unibag.cl/denuncia/
Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
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 Please give details:

**10A - Entitlement to Work and Immigration
[Summary of Findings]****10A: Compliance Requirements**

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

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

Current Systems and Evidence Examined

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

Current Systems:

Compliance of the law as it specifies that can be hired migrant worker, having open the doors to any non-Chilean person that want work – same opportunity. The site responsible has the responsibility to control this matter. The step is first to verify the legal right to the worker to be employee through the requirement of working authorization issued by the local authorities or well through the identification card.

Evidence examined:

Employee files
Employee contracts
Employee Id Card
Migrant working authorization
Migrant interview

Any other comments:

None

**10B2 - Environment 2-Pillar
[Summary of Findings]****10B2: Compliance Requirements**

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

10.B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.

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

Current Systems and Evidence Examined

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

Current Systems:

The company has the permits required by law that allows it to comply with local and international regulations. However, to date, the hazardous waste warehouse does not have its sanitary resolution. An environmental legal compliance management system has been implemented.

In interviews and documentary review, it is observed that the company does not know the environmental requirements of its clients.

Evidence examined:

Area for storage of non-hazardous residues

Waste disposal records

Certificate of treatment and final disposal of industrial waste

Containers for residues segregation

Any other comments:

None

Attachments

 <u>CAPR_ZAA600075094.pdf</u>	 <u>Untitled_10072024_183402.pdf</u>
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 <u>Canteen.jpg</u>	 <u>Emergency exit sign.jpg</u>

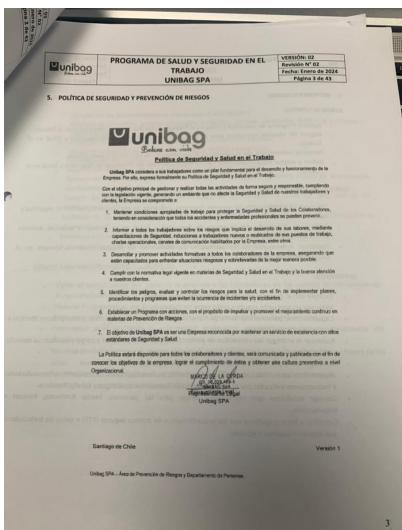
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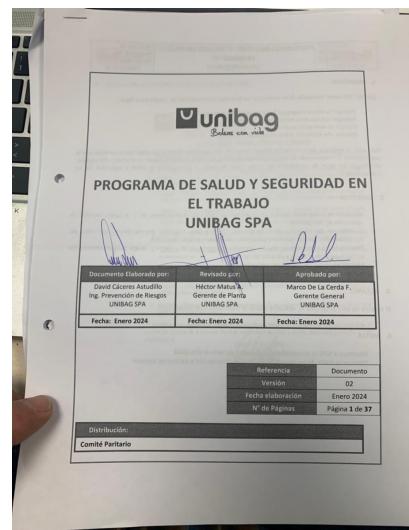
First aids kit.jpg



first aids kit 2.jpg



Health and safety policy.jpg



Health and safety program.jpg



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