




# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 407909490	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 407918794
Business name (Company name):	HONG NGOC SEAFOOD CO., LTD		
Site name:	HONG NGOC SEAFOOD CO., LTD		
Site address: <i>(Please include full address)</i>	Lot B3 Hoa Hiep Industrial Zone, Hoa Hiep Bac Commune, Dong Hoa District, Phu Yen Province, Viet Nam	Country:	Vietnam
Site contact and job title:	Ms. Tran Thi Hong Ngoc – Director Ms. Tran Thi Nho – HR Manager		
Site phone:	+84 2573 548 333	Site e-mail:	ngoc@hongngocseafood.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:	27/02/2023		

<b>Audit Company Name &amp; Logo:</b>  	<b>Report Owner (payer):</b> <i>(If paid for by the customer of the site please remove for Sedex upload)</i> <b>HONG NGOC SEAFOOD CO., LTD</b>
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

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

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

## Audit Content:

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

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

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size): None

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

Lead auditor: Qui Tran - Auditor APSCA number: RA21700472  
Lead auditor APSCA status: RA  
Team auditor: NA APSCA number: RA21700472  
Interviewers: Qui Tran - Auditor APSCA number: RA21700472

Report writer: Qui Tran - Auditor

Report reviewer: Maria Ivory Motus, Report Reviewer

Date of declaration: 27/02/2023

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

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

## Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A <a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>		0	0	• None observed
0B <a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	• None observed
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	• None observed
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	• None observed
3. <a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	1	0	0	<b>NCs:</b> <ul style="list-style-type: none"> <li>The facility was not updated list of machinery, equipment, materials or substances having strict safety and hygiene requirements to Government</li> </ul>
4. <a href="#">Child Labour</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	• None observed
5. <a href="#">Living Wages and Benefits</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	• None observed
6. <a href="#">Working Hours</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	• None observed
7. <a href="#">Discrimination</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	• None observed
8. <a href="#">Regular Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	• None observed
8A. <a href="#">Sub-Contracting and</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	• None observed

	<u>Homeworking</u>								
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	• None observed
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	• None observed
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	• None observed
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	• Not applicable
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	• Not applicable

General observations and summary of the site:

- The products manufactured at this site are Seafood (Frozen tuna).
- This periodic audit was conducted by Intertek Vietnam Limited. One auditor assessed / verified the facility's operations against the ETI Base Code and local legislations on a sampling basis in one day (on February 27, 2023).
- The auditor entered the facility then held an opening meeting according to the ETI Base Code and SMETA guidance. The facility representatives, Mr. Nguyen Manh Cuong/ General Manager, Ms. Tran Thi Nho – HR Manager, Mr. Le Hoai Tan – HCAAP Officer and Mr. Pham Bao Sinh – Chairman of Trade Union attended in the opening meeting. They stated that the facility would be cooperative with this audit.
- At present, the facility has a total of 60 employees (33 female employees and 27 male employees). There are 50 production employees and 10 non-production employees. The management would communicate the outcome of the audit to the workers though discussion at next worker committee meeting.
- The youngest employee on site was 18 years old.
- There was no peak season in the facility.
- 10 employees were randomly selected for interview; they were interviewed as 1 group of 4 employees and the balance of 06 employees were interviewed individually.
- In general, employees are working for 6 days in a week in 1 shift from Monday to Saturday. The daily normal working time is from 07:30 to 17:00 (break time is from 11:30 to 13:00) for all working sections. Fingerprint system have been used to monitor working hours of the employees. Employees' wages are calculated based on monthly rate for all employees. Employees are paid by cash from 05th to 06th of the following month.
- The legal minimum wage was VND 3,640,000 in July 2022 and all employees were paid above the minimum wage.
- Payrolls for the period from February 2022 to January 2023 were selected for review. Randomly sampled 10 employees' payrolls and attendance records from January 2023 (current month), August 2022 (sample month) and April 2022 (sample month) for further checking on status of wages and working hours.
- Based on the provided attendance records, standard working hours in this facility were 8 hours per day, 48 hours per week with at least 1 day off in a week.
- Based on the provided attendance records and payrolls, overtime working was paid correctly. Employees were paid at least 150%, 200% rate of standard wage for overtime hours in normal workdays and overtime hours in rest days respectively, and no overtime hours in public holidays observed.

- Based on the provided attendance records, the status of maximum overtime hours in sample was as below:

- 0 hours/day; 0 hours/week and 0 hours/month in January 2023 (current month)
- 0 hours/day; 0 hours/week and 0 hours/month in August 2022 (sample month)
- 0 hours/day; 0 hours/week and 0 hours/month in April 2022 (sample month)

**NC's summary:**

There were non-compliances noted in the areas of "Safety and Hygienic Conditions No. 3". Details of findings were listed below:

**Safety and Hygienic Conditions No. 3**

1. Based on the document review and management interview, it was noted that the facility was not updated list of machinery, equipment, materials or substances having strict safety and hygiene requirements to Government

**Observation's summary:**

None observed

**GE**

None observed

**Additional Auditor Remark:**

The facility has good practice on protection as well as preventive measure for workers to avoid this pandemic and following local authority's procedure and regulation. All visitors and employees must be worn mask and hand washing with sanitizer before entering the facility as well as they must be worn mask during working in the facility to prevent COVID-19. Besides, the facility posted the 7 steps regarding how to protect the health from COVID-19 and the hand washing guidance throughout the facility for employees and visitors for preventing COVID-19.

*\*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:	HONG NGOC SEAFOOD CO LTD																
B: Site name:	HONG NGOC SEAFOOD CO LTD																
C: GPS location: (If available)	GPS Address: Lot B3 Hoa Hiep Industrial Zone, Hoa Hiep Bac Commune, Dong Hoa District, Phu Yen Province, Viet Nam	Latitude: 13°00'39.2"N Longitude: 109°21'51.3"E															
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business license No. 4400363291 issued by Department of Planning and Investment of Phu Yen Province on 14 April 2005 and last updated on 06 June 2020																
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Seafood (Frozen Tuna)																
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>HONG NGOC SEAFOOD CO LTD is located at Lot B3 Hoa Hiep Industrial Zone, Hoa Hiep Bac Commune, Dong Hoa District, Phu Yen Province, Viet Nam. The main products manufactured by the facility are seafood. There is no dormitory for employees and management.</p> <p>The total land area occupied by the facility is about 8,800 square meters. There is total four buildings in the facility including: One (01) flat building is used for office, canteen and kitchen. One (01) flat building is used for accessories warehouse. One (01) flat building is used for fresh goods workshop and frozen warehouse. One (01) flat building is used for frozen goods and frozen warehouse. All 04 buildings were built from 2005.</p> <table border="1"> <thead> <tr> <th>Building No. 1</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor 1</td> <td>Office, canteen, material warehouse</td> <td>The facility made of concrete and steel</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>NA</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Building No. 2</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor 1</td> <td>Accessories warehouse</td> <td>The facility made of concrete and steel</td> </tr> </tbody> </table>		Building No. 1	Description	Remark, if any	Floor 1	Office, canteen, material warehouse	The facility made of concrete and steel	Is this a shared building?	No	NA	Building No. 2	Description	Remark, if any	Floor 1	Accessories warehouse	The facility made of concrete and steel
Building No. 1	Description	Remark, if any															
Floor 1	Office, canteen, material warehouse	The facility made of concrete and steel															
Is this a shared building?	No	NA															
Building No. 2	Description	Remark, if any															
Floor 1	Accessories warehouse	The facility made of concrete and steel															



	Is this a shared building?	No	NA
	Building No. 3	Description	Remark, if any
	Floor 1	Fresh goods workshop and frozen warehouse	The facility made of concrete and steel
	Is this a shared building?	No	NA
	Building No. 4	Description	Remark, if any
	Floor 1	Frozen goods and frozen warehouse	The facility made of concrete and steel
	Is this a shared building?	No	NA
	<p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                      F2: Please give details: NA</p> <p>F3: Does the site have a structural engineer evaluation?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                      F4: Please give details: NA</p>		
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input 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)	There was no peak season in the facility.		
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	The main products of the facility are Seafood. The main production processes are listed as follows: Washing, Chilling, Pre-processing, CO treating, CO incubating, Vacuumed packing, Freezing, Packing, Preserving, Cutting, Re-freezing, Glazing, Metal detecting, Carton packing.		

	<p>Total machines: 60 units                  There were 2 production lines and main equipment including:</p> <table border="0"> <tr> <td>Air-conditioner</td> <td style="text-align: right;">13 units</td> </tr> <tr> <td>Refrigerator</td> <td style="text-align: right;">10 units</td> </tr> <tr> <td>Chlorine pump</td> <td style="text-align: right;">2 units</td> </tr> <tr> <td>CO pump</td> <td style="text-align: right;">2 units</td> </tr> <tr> <td>Cutting machine</td> <td style="text-align: right;">9 units</td> </tr> <tr> <td>Other</td> <td style="text-align: right;">24 units.</td> </tr> </table>	Air-conditioner	13 units	Refrigerator	10 units	Chlorine pump	2 units	CO pump	2 units	Cutting machine	9 units	Other	24 units.
Air-conditioner	13 units												
Refrigerator	10 units												
Chlorine pump	2 units												
CO pump	2 units												
Cutting machine	9 units												
Other	24 units.												
<p>J: What form of worker representation / union is there on site?</p>	<p><input checked="" type="checkbox"/> Union (name) : Trade Union of HONG NGOC SEAFOOD CO LTD  <input type="checkbox"/> Worker Committee  <input type="checkbox"/> Other (specify)  <input type="checkbox"/> None</p>												
<p>K: Is there any night production work at the site?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>												
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  L1: If yes, approx. % of workers in on site accommodation</p>												
<p>M: Are there any off site provided worker accommodation buildings</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  M1: If yes, approx. % of workers</p>												
<p>N: Were all site-provided accommodation buildings included in this audit</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  N1: If no, please give details The facility did not have accommodation buildings.</p>												

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 09:05 A2: Day 1 Time out: 17:30	A3: Day 2 Time in: NA A4: Day 2 Time out: NA	A5: Day 3 Time in: NA A6: Day 3 Time out: NA
B: Number of auditor days used:	1 auditor in 1 day (1 man-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)	Mr. Nguyen Manh Cuong – General 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:	22/01/2022		
J: Previous audit type:	Periodic		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <input type="checkbox"/> N/A		

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

## 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	19	0	0	0	0	0	0	19
Worker numbers – female	31	0	0	0	0	0	0	31
Total	50	0	0	0	0	0	0	50
Number of Workers interviewed – male	4	0	0	0	0	0	0	4
Number of Workers interviewed – female	6	0	0	0	0	0	0	6
Total – interviewed sample size	10	0	0	0	0	0	0	10



<p>A: Nationality of Management</p>	<p>Vietnamese</p>	
<p>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></p>	<p>Nationalities:            B1: Nationality 1: ___ Vietnamese ___            B2: Nationality 2: _____            B3: Nationality 3: _____</p>	<p>Was the list completed during peak season?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods:</p>
<p>C: Please provide more information for the three most common nationalities.</p>	<p>C: approx % total workforce: Nationality 1 ___100%___            C1: approx % total workforce: Nationality 2 _____            C2: approx % total workforce: Nationality 3 _____</p>	
<p>D: Worker remuneration <i>(management information)</i></p>	<p>D: _____% workers on piece rate            D1: _____% hourly paid workers            D2: ___100___% salaried workers</p> <p>Payment cycle:            D3: _____% daily paid            D4: _____% weekly paid            D5: ___100___% monthly paid            D6: _____% other            D7: If other, please give details</p>	



<b>Worker Interview Summary</b>	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	01 group of 04
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 2      D2: Female: 4
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	None
I: What did the workers like the most about working at this site?	Stable working hours and payment, friendly management.
J: Any additional comment(s) regarding interviews:	None
K: Attitude of workers to hours worked:	Interviewed workers satisfied with the working.
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details: NA	
M: Attitude of workers: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>	

10 employees were randomly selected for interview; they were interviewed as 1 group of 4 employees and the balance of 6 employees were interviewed individually. The employees were assured of confidentiality, and they spoke freely of their views of the facility. All employees said they were satisfied with their employment at the facility and that they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationship with their supervisors and managers who treated them with respect. They were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions adopted. They were able to complain directly to their supervisors and felt free to give their general concerns to their worker representatives who would take it to the management.

**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 Trade Union was cooperative and supportive during the audit. Based on the interview with the Trade Union chairman, association activities were support by the facility management.

**O: Attitude of managers:**

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

The facility management showed a cooperative and supportive attitude during the audit. Auditors were allowed to visit all places in the facility. All document requested were provided on time. At the closing meeting, all findings were accepted by the facility management.



## 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:

- Based on document review, it was noted that the facility did not have a policy, endorsed at the highest level, covering human rights impacts and issues
- Based on document review, it was noted that the facility also did not assign a designated person responsible for implementing standards concerning Human Rights.
- Based on document review, it was noted that the facility did not have a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter.

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

Details:

- Document review
- Training record
- Employee interview

Any other comments: Nil

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  A1: Please give details: It stipulates complying with ETI Code and respect human rights</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please give details:                  Name: Ms. Tran Thi Nho                  Job title: HR Manager</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  C1: Please give details: The facility had a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter.</p>
<p>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)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  D1: If no, please give details</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  E1: Please give details: All employees' private information such as personal identity information managed by HR. Without permission, nobody can review.</p>

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

Good examples observed:	
<p><b>Description of Good Example (GE):</b>  Not applicable</p>	<p><b>Objective Evidence Observed:</b>  Not applicable</p>

## 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: 2022 __18.98__ %	A2: This year: 2023 __1.65__ %
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]	1.65%	
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: 2022 __12__ %	C2: This year 2023 __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: Accident was recorded by the nurse	
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: 2022 Number: 0	F2: This year: 2023 Number: 0
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2022 0%	H2: This year: 2023 0%
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 12 months __0__% workers	I2: 06 months __0__% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 12 months __0__% workers	J2: 06 months __0__% workers

**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 a sound Ethical Trade system.
- ETI Code of Conduct posted in local language. Labor regulation is posted at the bulletin board.
- Based on document review, Ms. Tran Thi Nho - HR Manager responsible for monitoring the implementation of ETI Code in the facility.
- All suppliers are required to sign the commitment to follow the ETI Based Code when signing the business contract with the facility.
- Employees are communicated on the ETI code on the orientation training and on the annual basis.

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

Details:

1. ETI Code of Conduct posted in local language.
2. Labor regulation is posted at the bulletin board.
3. Assignment letter, social compliance policies and procedures, training document and records.

Any other comments: Nil

**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: NA
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 facility has the policy on social responsibility include the policy on forced labor, child labor, discrimination, harassment & abuse.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	There was no child labor in the facility. During document review, worker interview and facility tour, it was noted that youngest workers was 18

	years old. There was no reported case of forced labor, discrimination, harassment & abuse.
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: Terms of forced labor, child labor, discrimination, harassment & abuse were regulated in the internal regulation. The internal regulation was communicated to all employees by posting on the bulletin board on February 17, 2023
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: During interview with employees and management representative, it was noted that the managers and workers understand the terms of forced labor, child labor, discrimination, harassment & abuse which were regulated in the internal regulation.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: BRCS, Certificate No. VN16/818842638 and valid until 15 July 2023
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: The HR Department is in charge of recruitment, monitoring of working hours, termination process, health, safety and environment. Accounting department were in charge of remaining issues.
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: Ms. Tran Thi Nho – HR Manager was assigned to implement the 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: Policy stipulate that ensure all worker information is confidential
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: All employees' private information such as personal identity information managed by HR. Without permission, nobody can review.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	K1: Please give details: The risk assessments were conducted to evaluate policy and procedure effectiveness on January 06, 2020
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: The facility provides PPE, training health safety to reduce identified risks.
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: The facility had a policy/code which require labour standards of its own suppliers
<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 factory had all required land rights licenses and permissions
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 factory had systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC:
Q: 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 Q1: Please give details: Land-use permit was issued by local authority
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: The facility has no alternative to specific land acquisition to avoid or minimize adverse impacts
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 obtains land-use permit and final acceptance of building completion

Non-compliance:	
<p><b>1. Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI/Additional Elements      <input type="checkbox"/> NC against Local Law</p> <p><input type="checkbox"/> NC against customer code:</p> <p>None Observed</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> <i>(where relevant please add photo numbers)</i></p> <p>Not applicable</p>

Observation:	
<p><b>Description of observation:</b> None Observed</p> <p><b>Local law or ETI requirement:</b> Not applicable</p> <p><b>Comments:</b> Not applicable</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>

**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 factory has a policy which prohibits forced labor and this was available for review.
- There was a non-formalized application procedure which states that workers must present their ID's for proof of age during the job interview and only copies must be kept in the personnel files and the original given back to the workers.
- No prison labor or forced labor is noted during the audit.
- The terms and conditions of employment in the handbook state that the workers are free to leave the workplace outside of their working hours.
- All the management staff and security guards are given respective job descriptions which clearly stated their daily duties in compliance with the general concepts of the local laws.
- All selected employees confirmed that they worked at the facility voluntarily and no enforcement to work overtime and the overtime forms are signed by workers before overtime performance.
- Employee's salaries are paid from 5<sup>th</sup> to 6<sup>th</sup> of each month by cash. During the employment, the facility did not deduct or withhold any money from the employee's monthly salary. No deposit is required upon hiring.

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

- Details:
  - - Personnel files
  - - Resignation records
  - - Factory rules
  - - Management and worker interview
  - - Contracts for security guards
  - - Recruitment policy and announcement

Any other comments: Nil

A: Is there any evidence of retention of original documents, e.g. passports/ID's

Yes

No

A1: If yes, please give details and category of workers affected:

B: Is there any evidence of a loan scheme in operation

Yes

No

B1: If yes, please give details and category of worker affected:



C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding:
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding:
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding:
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected:
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: The facility had recruitment procedure to reduce the risk of forced / trafficked labour

<b>Non-compliance:</b>	
<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 Observed  <b>Local law and/or ETI requirement:</b> Not applicable  <b>Recommended corrective action:</b> Not applicable</p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)                      Not applicable</p>

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

Good Examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>

**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 Trade Union of HONG NGOC SEAFOOD CO LTD has been established on 28 December 2022 with 8 members.
- Based on employee interview, all selected employees said they are given the full rights to join any legal and external associations, and all of them are labor union members. And they have all rights in wages and benefits and working conditions as others.
- Interviewed workers confirmed that the members of the workers committee had been elected by fellow workers.

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

Details:

- Minutes of the works committee meeting
- Site policy on freedom of association
- Interview with workers
- Interview with workers committee

Any other comments: Nil

A: What form of worker representation/union is there on site?	<input checked="" type="checkbox"/> Union (name): Trade Union of HONG NGOC SEAFOOD CO LTD <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
B: Is it a legal requirement to have a union?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&amp;S, sexual harassment)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  D1: Please give details:  Suggest box  Verbal  Directly  Hotline</p> <p>D2: Is there evidence of free elections?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  E1: Please give details: The trade union was not conducted related business</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>Trade Union of HONG NGOC SEAFOOD CO LTD / Tran Thi Nho – Chairwoman of Trade Union</p>	<p>F1: Is there evidence of free elections?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p>	<p>NA</p>	<p>G1: Is there evidence of free elections?  <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<p>H: Are all workers aware of who their representatives are?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Mr. Pham Bao Sinh – Chairman of Trade Union</p>
<p>I: Were worker representatives freely elected?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>I1: Date of last election: The Trade Union Chairwoman was freely elected on December 28, 2022 and valid for 5 years</p>
<p>J: Do workers know what topics can be raised with their representatives?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>K: Were worker representatives/union representatives interviewed?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If <b>Yes</b>, please state how many: Mr. Pham Bao Sinh – Chairman of Trade Union</p>	
<p>L: Please describe any evidence that union/worker's committee is effective?  Specify date of last meeting; topics covered; how minutes were communicated etc.</p>	<p>The Union would hold the meeting quarterly within at least 90 minutes per time. The meeting minutes was posted at the bulletin board for all employees to read. The meeting report was provided for review. The union fee will be deducted from monthly employees' salary with their agreement.</p> <p>The facility would also pay a certain amount to the Union activity monthly. The Union representatives are requested to involve and join all meetings related to employees' benefits/ wage and disciplinary action. The last record was on February 10, 2023.</p>	

M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If <b>Yes</b> , what percentage by trade Union/worker representation	M1: <u>100</u> % workers covered by Union CBA	M2: <u>    </u> % workers covered by worker rep CBA
M3: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Non-compliance:	
<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 Observed  <b>Local law and/or ETI requirement:</b> Not applicable   <b>Recommended corrective action:</b> Not applicable</p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)                       Not applicable</p>

Observation:	
<p><b>Description of observation:</b> None Observed  <b>Local law or ETI requirement:</b> Not applicable  <b>Comments:</b> Not applicable</p>	<p><b>Objective evidence observed:</b>                      Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p><b>Objective evidence observed:</b>                      Not applicable</p>

**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:**

1. General Health and Safety management

- Mr. Nguyen Manh Cuong/ General Manager has been assigned to be in charge of health, safety and environment issues in the facility.
- The general housekeeping is clean and tidy. The cleaning team with 04 persons is in charge of cleaning and hygiene of whole workshop building.

2. Fire Safety

- The fire drill and evacuation drill are conducted for all employees quarterly. The last drill was on February 02, 2023.
- A total of 60 fire extinguishers, 15 fire alarm buttons and 5 fire hydrants, 85 smoke detectors and 2 fire water pumps were installed in the facility.
- Warning signs of "No smoking" and "No fire" were posted in the facility.
- Through facility tour, the evacuation maps are posted at all exit doors of each workshop floor.
- Evacuation routes with arrows for direction were painted on the floor in all production sections.

3. Electrical safety

- There were competent electricians at the site and their training certificates were available for review.

4. Medical services

- The facility has 1 nurse for first aid activities and a trained first aid team of 25 employees who was trained on December 10, 2022.
- 3 first aid kits were installed in the facility.
- The facility conducted health check every 06 months. The latest was conducted on December 8, 2022.

5. Machine safety

- All machines were installed with safety guards.
- 15 air compressors were certified by the local authority. The expiry date of the inspection is until December 2024.

6. Chemical safety

All chemical was stored at secondary containment. Eyewash station was equipped where chemical was used. PPE was provided for employees.

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

Details:

- Health and safety procedures, instructions and training records.
- First aid training records, medical logbook and accident records, medical check-up records.
- Firefighting and prevention project, fire drill and fire-fighting training records.
- Drinking water test records on 022 November 2022
- Maintenance plan and records for machines, fire-fighting equipment, electricity.
- Chemical handling, storage procedures
- Machine inspection certificates.
- Health and safety policy
- Health and safety manual
- Health and safety committee minutes
- Training records and certificates
- Fire equipment maintenance records
- Fire drill records on 02 February 2023
- Building structure safety certificate
- Trained first aider register
- Interviews with workers and H&S committee members
- Accident reports on 27 December 2022
- Sanitation permits for kitchen
- Health certificates for kitchen staff on 08 December 2022
- Interviews with H&S manager

Any other comments: Nil

<p>A: Does the facility have general and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  A1: Please give details: All employees receive regular and recorded health &amp; safety training such as fire drill</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  B1: Please give details: During document review and worker's interview, the worker was provided with the employee's manual and the training before working in the facility</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  C1: Please give details: NA</p>
<p>D: Are visitors to the site informed on H&amp;S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  D1: Please give details: All visitors were required to wear provided PPE during facility tour</p>
<p>E: Is a medical room or medical facility provided for workers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>

<p>If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p>E1: Please give details: There had 1 medical room in facility</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  F1: Please give details: The facility has 1 nurse in the facility.</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  G1: Please give details: The facility has a transportation allowance for all employees</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  H1: Please give details: Each worker was provided with the locker to keep the personal item</p>
<p>I: Are H&amp;S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  I1: Please give details: The facility conducts the risk assessment (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and there are controls to reduce identified risk)</p>
<p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  J1: Please give details: Please describe: The facility has obtained the environment impact assessment report, environmental impact approval and environmental protection acceptance check.</p>
<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  K1: Please give details: The meeting was conducted before start process order</p>

<p style="text-align: center;"><b>Non-compliance:</b></p>	
<p><b>1. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input checked="" type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:                      Based on the document review and management interview, it was noted that the facility was not updated list of machinery, equipment, materials or substances having strict safety and hygiene requirements to Government</p> <p><b>Local law and/or ETI requirement</b>                      In accordance with point 2 of Article 16, Decree 44/2016/ND-CP dated 15 May 2016: Responsibility of organizations and individuals using machine, equipment and materials with strict requirements on occupational safety                      2. Notifies the Department of Labor - Invalids and Social Affairs in locality within 30 days before or after using the machine, equipment and materials with strict requirements on occupational safety, unless otherwise specified by the specialized law.</p>	<p><b>1. Objective evidence observed:</b>                      - Document review                      - Management interview</p>



<p>In accordance with 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><b>Recommended corrective action:</b> It is recommended that the facility shall ensure to update list of machinery, equipment, materials or substances having strict safety and hygiene requirements to Government</p> <p><b>Action by:</b> Mr. Nguyen Manh Quan/ General Manager <b>Timescale:</b> 30 days <b>Verification Method:</b> Desktop</p>	
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Observation:	
<p><b>Description of observation:</b> None Observed</p> <p><b>Local law or ETI requirement:</b> Not applicable</p> <p><b>Recommended corrective action:</b> Not applicable</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE): None Observed</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 a formal procedure for checking ages of workers at application stage, and this includes checking original ID's while the workers attended the job interview and their original ID's are copied and given back to them whilst copies only are kept in their personnel file.
- Based on provided copies of national ID cards of employees, none showed child labor. The youngest worker present was age 18 years.

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

Details:

- Personnel files of 10 of 10 selected workers
- Latest list of employees
- Anti-child labor policy
- Recruitment procedure

Any other comments: Nil

A: Legal age of employment:	15 years old
B: Age of youngest worker found:	18
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 checked="" type="checkbox"/> No E1: If yes, give details

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<b>Non-compliance:</b>	
<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 Observed</p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p> <p>Not applicable</p>

<b>Observation:</b>	
<p><b>Description of observation:</b> None Observed</p> <p><b>Local law or ETI requirement:</b> Not applicable</p> <p><b>Comments:</b> Not applicable</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>

<b>Good Examples observed:</b>	
<p>Description of Good Example (GE): None Observed</p>	<p><b>Objective Evidence Observed:</b></p> <p>Not applicable</p>

**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:**

- Minimum wages paid by the facility to employees are VND 3,640,000 per month effective from July 2022 onwards in compliance with the local law.
- Employees receive their salary by cash on the 5<sup>th</sup> to 6<sup>th</sup> of the follow month. The pays lip in local language is distributed together with each payment period to each employee.
- All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Total Eleven (11) holidays are provided and paid to all employees in the year.

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

- Details:
- - The payrolls and attendant records from February 2022 to January 2023(12 months)
- - Annual leave records from February 2022 to January 2023 (12 months)
- - Leave applicant records from February 2022 to January 2023 (12 months)
- - Employee files and labor contracts of selected employees.

Any other comments: Nil

**Non-compliance:**

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

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

None Observed

**Local law and/or ETI requirement:** Not applicable

**Recommended corrective action:** Not applicable

**Objective evidence observed:**

*(where relevant please add photo numbers)*

Not applicable

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

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

**Summary Information**

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 8 hours per day 48 hours per Week	A1: 8 hours per day 48 hours per week	A2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 4 hours per day 40 hours per month.	B1: 0 hours/ day in January 2023 (current month) 0 hours/ day in August 2022 (random month) 0 hours/ day in April 2022 (Random month)  0 hours/week in January 2023 (current month) 0 hours/ week in August 2022 (random month)	B2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

		<p>0 hours/ week in April 2022 (Random month)</p> <p>0 hours/month in January 2023 (current month)</p> <p>0 hours/month in August 2022 (random month)</p> <p>0 hours/month in April 2022 (Random month)</p>	
<p>C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</p>	<p>Legal minimum: VND 3,640,000 per month</p>	<p>C1: VND 3,895,000 per month in 2020</p>	<p>C2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</p>	<p>Legal minimum: 150% of normal wage on regular daytime, 215% on regular night time, 200% of normal wage for rest day, 400% of normal wage for holiday</p>	<p>D1: 150% of normal wage on regular day time.</p>	<p>D2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

<p><b>Wages analysis:</b></p> <p><a href="#">(Click here to return to Key Information)</a></p>	
<p>A: Were accurate records shown at the first request?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>A1: If <b>No</b>, why not?</p>	<p>NA</p>
<p>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)</p>	<p>10 selected samples in January 2023 (current month)</p> <p>10 selected samples in August 2022 (sample month)</p> <p>10 selected samples in April 2022 (sample month)</p>
<p>C: Are there different legal minimum wage grades? If <b>Yes</b>, please specify all.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: If <b>Yes</b>, please give details: From 1 July 2022 Grade 1: VND 4,680,000 for region 1</p>

		Grade 2: VND 4,160,000 for region 2 Grade 3: VND 3,640,000 for region 3 Grade 4: VND 3,250,000 for region 4	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	D1: If <b>No</b> , please give details: Remark: VND 3,640,000 for region 3	
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> VND 3,640,000 per month  Based on the sample selected, it was noted that the facility paid salary from employees from VND 4,275,000 to VND 4,670,000	
F: Please indicate the breakdown of workforce per earnings:	F1: ___% of workforce earning under minimum wage F2: ___% of workforce earning minimum wage F3: _100___% of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i>  - Transportation Allowance: VND 400,000/month - Attendant Allowance: VND 100,000/month		
H: What deductions are required by law e.g. social insurance? Please state all types:	Employees should pay and be deducted from their monthly salary for insurance such as Social insurance: 8%, Health insurance: 1.5% and Unemployment insurance: 1% (total 10.5%)		
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. Social insurance 2. Medical insurance 3. Unemployment insurance  Please describe: Compulsory insurances.
		I2: Please list all deductions that <b>have not</b> been made.	1. Transportation Allowance 2. Attendant Allowance  Please describe: NA
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:	

<p>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)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: Please give details: During worker's interview, they confirmed that they were paid according with the working time in facility</p>
<p>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></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: NA</p>
<p>M2: If yes, what was the calculation method used.</p>	<p><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:</p>
<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: During documents review, workers' interviews and confirmation of facility management, it was noted that the facility annually reviews the wage of the employees</p>
<p>O: Are workers paid in a timely manner in line with local law?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Through factory rules review, payroll records review and employees' interviews, it was confirmed that equal rates are being paid for equal work</p>
<p>Q: How are workers paid:</p>	<p><input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:</p>



**6: Working Hours are not Excessive**

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

**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 regular working time is eight (8) hours per day and six (6) days per week. There was no peak season in the facility

Based on the provided attendance records and payrolls, the working hours were noted as following.

- 0 hours/day; 0 hours/week and 0 hours/month in January 2023 (current month)
- 0 hours/day; 0 hours/week and 0 hours/month in August 2022 (sample month)
- 0 hours/day; 0 hours/week and 0 hours/month in April 2022 (sample month)

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

Details:

- Employee interview
- Management interview
- Local and national laws

- Factory policy on working hours
- Attendance records from February 2022 to January 2023 (12 months).
- Pay slips with recorded hours all workers interviewed
- Workers contracts
- 03-month hours' records to establish highest and lowest hours over all employees
- Quality and production records to cross check hours
- Clinic records
- Daily production records
- Security logbooks
- Broken needle logbooks

Any other comments: Nil

**Non-compliance:**

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

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

None Observed

**Local law and/or ETI requirement:** Not applicable

**Recommended corrective action:** Not applicable

**Objective evidence observed:**

*(where relevant please add photo numbers)*

Not applicable

**Observation:**

**Description of observation:** None observed

**Local law or ETI requirement:** Not applicable

**Comments:** Not applicable

**Objective evidence observed:**

Not applicable

**Good Examples observed:**

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

None Observed

**Objective Evidence Observed:**

Not applicable

<b>Working hours' analysis</b> Please include time e.g. hour/week/month ( <a href="#">Go back to Key information</a> )					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe: Fingerprint system				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details				
C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. 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:			
		NA			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If <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			

Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency: None
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: None
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: - 0 hours/day; 0 hours/week and 0 hours/month in January 2023 (current month) - 0 hours/day; 0 hours/week and 0 hours/month in August 2022 (sample month) - 0 hours/day; 0 hours/week and 0 hours/month in April 2022 (sample 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:	___0___%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:  Labour contract, worker interview
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages: 150% of normal wage on regular day time, 215% on regular night time, 200% of normal wage for rest day, 400% of normal wage for holiday
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: 100% workers are paid at the rate of 150% for overtime working hours every month together with wages payment.

<p>O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p>	<p> <input type="checkbox"/> No  <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium)  <input checked="" type="checkbox"/> Collective Bargaining agreements  <input type="checkbox"/> Other         </p> <p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p> <p>Monthly rate salary must not lower than regional basic wage (= minimum wage x 107% x 105%). The facility paid 150% for OT premium.</p>
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<p> <input type="checkbox"/> <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)         </p> <p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> <p>None</p>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p> <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No            Q1: If yes, please give details:         </p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p> <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No         </p>

**7: No Discrimination is Practiced**

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- Based on interviewed employees and management, there is no evidence of any discriminatory practices based on the race, religion, age, nationality, social association, sexual orientation, gender or disability.
- During the audit, all selected employees confirmed they are treated with respect and dignity.
- No worker was required to do the examination of the hepatitis B virus and HIV.
- Anti-discrimination procedure on hiring, compensation, promotion and access to training are available during the audit.
- Gender divisions did not exist in the factory; both female and male workers were distributed in all types of work.
- There was an internal grievance process, and all interviewed workers were aware of the grievance channels in case they encountered any discrimination cases.
- There was no evidence of sexual harassment.

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

Details:

- The hiring and termination procedure, leave application records and employee handbook.
- Payrolls
- Training records
- Attendance records
- Termination records

Any other comments: Nil

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: <u>46</u> % A2: Female <u>54</u> %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	5
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability,	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training

gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found  C1: Please give details:
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**Professional Development**

A: What type of training and development are available for workers?	Health safety, Fire drill, first aid, Internal/External training to increase skill (if any)
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B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details:
--	---

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  None Observed  <b>Local law and/or ETI requirement:</b> Not applicable  <b>Recommended corrective action:</b> Not applicable	<b>Objective evidence observed:</b> (where relevant please add photo numbers)  Not applicable

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

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

- Based on reviewed documents and interviewed employees, all employees are interviewed and hired directly by the facility. They are given an orientation on the facility rules and regulations including labor issues, wages and benefits, working time, and health and safety. A labor contract is signed by both employee and employer after employee's probation period is passed.
- All workers were not required to sign blank papers, resignation letter etc.

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

- Details:
- - The hiring and termination practices (not formalized)
- - Personal files
- - Payroll records were provided for review.

Any other comments: Nil



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 Observed</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>                      (where relevant please add photo numbers)</p> <p>Not applicable</p>

Observation:	
<p><b>Description of observation:</b> None Observed</p> <p><b>Local law or ETI requirement:</b> Not applicable</p> <p><b>Comments:</b> Not applicable</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p><b>Objective Evidence Observed:</b></p> <p>Not applicable</p>

**Responsible Recruitment**

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

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:	None

<b>Migrant Workers:</b>	
<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>	
A: Type of work undertaken by migrant workers:	There was no migrant worker.
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: NA  B2: Total number of (outside of local country) recruitment agencies used: NA
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: NA  C2: Observations: NA
D: Are Any migrant workers in skilled, technical, or management roles  <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No NA  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:	NA

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

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

<b>Contractors:</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?	
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:
D: If <b>Yes</b> , please give evidence for contractor workers being paid per law:	

**8A: Sub-Contracting and Homeworking**

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

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

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:**

A site tour showed that it was noted that all production processes were presented in the facility.

Details:

- Site tour (Calculation on total production and estimated capacity)
- Materials in/out records
- Management interview
- Worker interview

**Non-compliance:**

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

- NC against ETI/Additional Elements  NC against Local Law
- NC against customer code:

None Observed

**Local law and/or ETI /Additional Elements requirement:** Not applicable

**Recommended corrective action:** Not applicable

**Objective evidence observed:**

*(where relevant please add photo numbers)*

Not applicable

**Observation:**

**Description of observation:** None Observed

**Local law or ETI/Additional elements requirement:** Not applicable

**Comments:** Not applicable

**Objective evidence observed:**

Not applicable

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

<b>Summary of sub-contracting – if applicable</b>	
<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?	Not applicable

<b>Summary of homeworking – if applicable</b>			
<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 Not applicable		C1: If through agents, number of agents:
			Not applicable
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable		

E: How does the site ensure worker hours and pay meet local laws for homeworkers?	Not applicable
F: What processes are carried out by homeworkers?	Not applicable
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable G1: Please give details:
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable

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

**ETI**

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

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&amp;S or any other grievances to a 3<sup>rd</sup> party?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  A1: Please give details: Any violations of Labour standards and H&amp;S violations of Labour standards and H&amp;S or any other grievances can be reported to the Trade Union representative or the local authority on labour. Electronic email was established for reporting any violations of Labour standards and H&amp;S or any other grievances to a 3rd party</p>
<p>B: If <b>Yes</b>, are workers aware of these channels and have access? Please give details.</p>	<p>During interview with employees and Trade Union representative, it was noted that the workers know how to report violations of Labour standards and H&amp;S or any other grievances.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>- Suggestion mailbox.  - Workplace dialogue.  - Directly communication.</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers  <input type="checkbox"/> Communities  <input type="checkbox"/> Suppliers  <input type="checkbox"/> Other    D1: Please give details: There is an internal process for grievance which a grievance box was installed in the workshop, where workers can report any grievances anonymously (harassment, bullying, discrimination etc.), any received complaint will be handled by management, without any reprisal for the worker in question. This system was installed, and most of workers knew about this.</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No    E1: If yes, please give details</p>
<p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No    F1: If no, please give details</p>



<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>G1: If no, please explain</p>
<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>H1: If no, please give details</p>
<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>I1: If yes, please give details</p>

**Current Systems and Evidence Examined**

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

**Current systems:**

- Based on the documentation review, it was noted that the factory management had established a disciplinary procedure for workers' misbehavior which included oral warning, written warning and finally termination and the site, had developed a training program for all employees on the procedure. Worker interview confirmed that workers were aware of the disciplinary procedure
- As per management interview, document review and workers interview, there was a policy on Harsh Treatment.
- There is an internal process for grievance which a grievance box was installed in the workshop, where workers can report any grievances anonymously (harassment, bullying, discrimination etc.), any received complaint will be handled by management, without any reprisal for the worker in question. This system was installed, and most of workers knew about this.
- No deduction from wage and benefits is made because of any reason.
- Through the facility management and employees' interview, it is noted that no case of abuse or discipline was happened in the facility and the disciplinary procedure of the facility was verbally warning and employees signed a slip to confirm they had understood the procedure.

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

- 
- Details:
  - - The policy on non-harassment & abuse and related procedure.
  - - Training records.
  - - Procedure on grievance handling and related records.
- 

Any other comments: Nil

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 Observed</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>                      (where relevant please add photo numbers)</p> <p>Not applicable</p>

Observation:	
<p><b>Description of observation:</b> None Observed</p> <p><b>Local law or ETI requirement:</b> Not applicable</p> <p><b>Comments:</b> Not applicable</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p><b>Objective Evidence Observed:</b></p> <p>Not applicable</p>

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

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

**Additional Elements**

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.  
 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

**Current Systems and Evidence Examined**

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

**Current systems:**

- Per document review, facility management representation and worker interview, all workers in the facility were Vietnamese
- All workers had the proper legal rights to work in this region.
- The youngest age was 18 years old.
- All of them were recruited directly by the facility and no agency was involved in facility's recruitment processes.
- No agency staff or foreign worker was used by the facility.

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

Details:

- Hiring procedure.
- Personnel files.

Any other comments: Nil

**Non-compliance:**

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

- NC against ETI/Additional Elements       NC against Local Law  
 NC against customer code:

None Observed

**Local law and/or ETI /Additional Elements requirement:** Not applicable

**Recommended corrective action:** Not applicable

**Objective evidence observed:**

*(where relevant please add photo numbers)*

Not applicable

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

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

**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:**

- Environment monitoring report was conducted on March 04, 2021. All indexes met the standards.
- Hazardous waste collecting contract was signed with authorized company and valid until December 31, 2026.
- Environmental Protection Commitment was approved on August 9, 2017.
- Environmental policy was established in the facility.
- Electricity, water, gas is monitored and recorded monthly.

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

Details:

- Environmental policy
- Energy bills
- Water bill
- Employees' and management interview.
- Site tour

Any other comments: Nil

**Non-compliance:**

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

NC against ETI/Additional Elements       NC against Local Law

None Observed

**Local law and/or ETI/Additional Elements requirement:** Not applicable

**Recommended corrective action:** Not applicable

**Objective evidence observed:**

(where relevant please add photo numbers)

Not applicable

Observation:	
<p><b>Description of observation:</b> None Observed</p> <p><b>Local law or ETI/additional elements requirement:</b> Not applicable</p> <p><b>Comments:</b> Not applicable</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>

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

Other findings

**Other Findings Outside the Scope of the Code**

None observed

**Community Benefits**

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

None observed

## 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>
<b>ETI Code / Additional Elements</b>	<b>Customer's Supplier Code equivalent</b>
<b>0.A. Universal Rights covering UNGP</b>	<b>0.A. Universal Rights covering UNGP</b>
<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>	
<b>0.B. Management Systems &amp; Code Implementation</b>	<b>0.B. Management Systems &amp; Code Implementation</b>
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p>	



<p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	
<p><b>ETI 1. Forced Labour</b></p>	<p><b>ETI 1. Forced Labour</b></p>
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.</p>	
<p><b>ETI 2. Freedom of association and the right to collective bargaining are respected</b></p>	<p><b>ETI 2. Freedom of association and the right to collective bargaining are respected</b></p>
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.</p>	
<p><b>ETI 3. Working conditions are safe and hygienic</b></p>	<p><b>ETI 3. Working conditions are safe and hygienic</b></p>
<p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent 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> <p>3.5 The company observing the code shall assign responsibility for Health &amp; Safety to a senior management representative.</p>	
<p><b>ETI 4. Child labour shall not be used</b></p>	<p><b>ETI 4. Child labour shall not be used</b></p>
<p>4.1 There shall be no new recruitment of child labour.</p> <p>4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	
<p><b>ETI 5. Living wages are paid</b></p>	<p><b>ETI 5. Living wages are paid</b></p>
<p>5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</p> <p>5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.</p> <p>5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.</p>	
<p><b>ETI 6. Working Hours are not excessive</b></p>	<p><b>ETI 6. Working Hours are not excessive</b></p>
<p>6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p>	

<p>6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where <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>	
<p><b>ETI 7. No discrimination is practised</b></p>	<p><b>ETI 7. No discrimination is practised</b></p>
<p>7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p>	
<p><b>ETI 8. Regular employment is provided</b></p>	<p><b>ETI 8. Regular employment is provided</b></p>
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or</p>	

<p>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>              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.</p>	
<p><b>8A: Sub-Contracting and Homeworking</b></p>	<p><b>8A: Sub-Contracting and Homeworking</b></p>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.              8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<p><b>ETI 9. No harsh or inhumane treatment is allowed</b></p>	<p><b>ETI 9. No harsh or inhumane treatment is allowed</b></p>
<p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.              Additional elements:              9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<p><b>10. Other Issue areas: 10A: Entitlement to Work and Immigration</b></p>	
<p><b>Additional Elements</b>              10A.1 Only workers with a legal right to work shall be employed or used by the supplier.              10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
<p><b>10. Other issue areas 10B2: Environment 2-Pillar</b></p>	

<p>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.  <i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	
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SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
<p><b>Environment Section</b></p>	<p><b>Environment Section</b></p>
<p><b>B.4. Compliance Requirements</b>            10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.            10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.            10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements            10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.            10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.            10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).            10B4.7 Businesses shall make continuous improvements in their environmental performance.            10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation            10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.  <b>B4. Guidance for Observations</b>            10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.            10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p>	
<p><b>Business Practices Section</b></p>	

**10C. Compliance Requirements**

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

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

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

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

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

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

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

**10C. Guidance for Observations**

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

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

## Photo Form

A. Non-compliance photos:













**B. General photos:**

<p>Facility Name</p>	<p>Main Gate</p>	<p>Security Gate</p>
<p>Overview</p>	<p>Employee's Parking</p>	<p>Timekeeping system</p>
<p>Handwash before entering the production</p>	<p>Receiving area</p>	<p>Processing area</p>
<p>PPE Being Used</p>	<p>Processing area</p>	<p>Processing area</p>



<p>2023-02-27 10:49</p>	<p>2023-02-27 10:48</p>	<p>2023-02-27 10:41</p>
<p>CO Treated Area</p>	<p>Packing area</p>	<p>Finished goods warehouse</p>
<p>2023-02-27 10:58</p>	<p>2023-02-27 10:59</p>	<p>2023-02-27 10:35</p>
<p>Clinic room</p>	<p>Sickbed</p>	<p>First aid kit</p>
<p>2023-02-27 10:20</p>	<p>2023-02-27 10:21</p>	<p>2023-02-27 10:45</p>
<p>Assemble point</p>	<p>Fire alarm control</p>	<p>Firewater pump</p>
<p>2023-02-27 10:39</p>	<p>2023-02-27 10:25</p>	<p>2023-02-27 10:25</p>
<p>Fire alarm tested onsite</p>	<p>Fire Hose</p>	<p>Smoke detector</p>

<p>2023-02-27 10:25</p>	<p>2023-02-27 10:54</p>	<p>2023-02-27 10:35</p>																																																																																																																		
<p>Exit sign &amp; Emergency Light</p>	<p>Fire hose tested onsite</p>	<p>Evacuation map</p>																																																																																																																		
<p>2023-02-27 10:21</p>	<table border="1"> <thead> <tr> <th colspan="6">HONG NGOC SEAFOOD CO., LTD CHECKING FIRE EXTINGUISHER SHEET (Phiếu kiểm tra bình chữa cháy)</th> </tr> <tr> <th>Date</th> <th>Result</th> <th>Signature</th> <th>Remark</th> <th colspan="2"></th> </tr> </thead> <tbody> <tr> <td>Ngày KT</td> <td>Đúng/ Sai</td> <td>Tên</td> <td>Sửa lại</td> <td>Ký tên</td> <td>Ghi chú</td> </tr> <tr> <td>03/01/23</td> <td>✓</td> <td>Tai</td> <td></td> <td>Crang</td> <td></td> </tr> <tr> <td>10/01/23</td> <td>✓</td> <td></td> <td></td> <td>Crang</td> <td></td> </tr> <tr> <td>17/01/23</td> <td>✓</td> <td></td> <td></td> <td>Crang</td> <td></td> </tr> <tr> <td>24/01/23</td> <td>✓</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>31/01/23</td> <td>✓</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>07/02/23</td> <td>✓</td> <td></td> <td></td> <td>Crang</td> <td></td> </tr> <tr> <td>14/02/23</td> <td>✓</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>21/02/23</td> <td>✓</td> <td></td> <td></td> <td>Crang</td> <td></td> </tr> <tr> <td>28/02/23</td> <td>✓</td> <td></td> <td></td> <td>Sinh</td> <td></td> </tr> <tr> <td>07/03/23</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>14/03/23</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>21/03/23</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>28/03/23</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>04/04/23</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>11/04/23</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>18/04/23</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>2023-02-27 10:21</p>	HONG NGOC SEAFOOD CO., LTD CHECKING FIRE EXTINGUISHER SHEET (Phiếu kiểm tra bình chữa cháy)						Date	Result	Signature	Remark			Ngày KT	Đúng/ Sai	Tên	Sửa lại	Ký tên	Ghi chú	03/01/23	✓	Tai		Crang		10/01/23	✓			Crang		17/01/23	✓			Crang		24/01/23	✓					31/01/23	✓					07/02/23	✓			Crang		14/02/23	✓					21/02/23	✓			Crang		28/02/23	✓			Sinh		07/03/23						14/03/23						21/03/23						28/03/23						04/04/23						11/04/23						18/04/23						<p>2023-02-27 10:21</p>
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<p>Fire Extinguisher</p>	<p>Monthly checked by Internal</p>	<p>Fire Extinguisher in good condition</p>																																																																																																																		
<p>2023-02-27 10:21</p>	<p>2023-02-27 10:32</p>	<p>2023-02-27 10:34</p>																																																																																																																		
<p>Fire Extinguisher warranty</p>	<p>Warning sign</p>	<p>Exit route</p>																																																																																																																		
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<p>Chemical Area</p>	<p>MSDS</p>	<p>Eyewash</p>																																																																																																																		

		
<p>Electric panel with warning sign</p>	<p>Inner cover for electric panel</p>	<p>No smoking &amp; No fire sign</p>
		
<p>Kitchen Area</p>	<p>Eating area</p>	<p>Drinking water</p>
		
<p>Toilet (Male)</p>	<p>Toilet (Female)</p>	<p>Soap in toilet</p>
		
<p>Toilet paper</p>	<p>Noticed Board</p>	<p>Suggest Box</p>

	<p>No photo</p>	<p>No photo</p>
<p>Hazardous waste area</p>	<p>Nil</p>	<p>Nil</p>

**C. Best practice photos:**

<i>No photo</i>	<i>No photo</i>	<i>No photo</i>
Nil	Nil	Nil



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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.

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