



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 405397201	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 405688877
Business name (Company name):	MING FAI ENTERPRISE (CAMBODIA) CO., LTD		
Site name:	MING FAI ENTERPRISE (CAMBODIA) CO., LTD		
Site address: <i>(Please include full address)</i>	National Road No. 41 (Preah Ang Duong Road), Veal Vong Village, Sen Dei Commune, Samrong Tong District, Kampong Speu Province, Kingdom of Cambodia.	Country:	Cambodia
Site contact and job title:	Ms. Anya Lee – HR-Admin Manager		
Site phone:	070279077	Site e-mail:	Anya.Lee@mingfiagroup.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar
			<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	21-22 December 2021		

Audit Company Name & Logo:	Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i>
Eurofins CPA 	MING FAI ENTERPRISE (CAMBODIA) CO., LTD

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.

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: **Ellen Tomboc** (Lead Auditor) APSCA number: RA 21700449
Lead auditor APSCA status: Registered Auditor
Team auditor: **Monyna Lin** (Auditor) APSCA number: RA 21700447
Interviewers: **Monyna Lin** APSCA number: RA 21700447

Report writer: Ellen Tomboc

Report reviewer: Alexis Shu/Reviewer

Date of declaration: 22 December 2021

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

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

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> <i>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 Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None
0B Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> None
2. Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> None
3. Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	1	1	1	<p>GE:</p> <ul style="list-style-type: none"> facility provides more cooling systems to every building <p>Obs:</p> <ul style="list-style-type: none"> 1 out 5 drying oven machines have only certificates <p>NC:</p> <ul style="list-style-type: none"> 8 Toothbrush moulding machines' certificate was already expired since February 21, 2020
4. Child Labour	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> None

5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				GE: <ul style="list-style-type: none"> Facility provided additional 10USD to attendance bonus and can get total of 20USD per month facility provided 2000 riel for lunch allowance per day to all employees which is not required by law
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> None
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> None
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> N/A
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None

General observations and summary of the site:

MING FAI ENTERPRISE (CAMBODIA) CO., LTD is located at National Road No. 41 (Preah Ang Duong Road), Veal Vong Village, Sen Dei Commune, Samrong Tong District, Kampong Speu Province, Kingdom of Cambodia. Ming Fai was founded in 1980, the facility headquarter was in Hong Kong; and with factories located in Shenzhen China and Cambodia. They also have offices in Singapore, Malaysia, Australia, Hong Kong, Asia-Pacific Region and major cities in China to support global sourcing and operations to their worldwide clients. With over 30 year's professional experience, facility delivered luxury quality products and trust 5-star solutions to their clients, offering OEM bags products, Hotel and Travelling Amenities to support their client's business growth.

In 2017, Ming Fai invested new production site in Cambodia, expanding business on premium bags, non-woven items and sewing products to gain on benefits of aggressive pricing, duty tariff and flexibility on production capacity arrangement.

The company was established on 2017 under Business Registration No.00030579 dated 04 January 2018 without expiration.

The SMETA 4-pillars audit was performed over 4.5 man-days by 2 auditors for 2 days to verify the facility operations against to SMETA 4-pillars program. There were 62 randomly selected employees for interviews and reviewed of records. Employees interviewed were conducted in a confidential room without interfere by the facility representative. Foreign employees were not included in the interviews since all of them worked in management positions.

A total of 2213 employees were currently working in the facility which includes 1888 female employees and 325 male employees. There were 2139 production employees and 74 non-production employees including management, office staffs, mechanics, and security guards. The security guards were contracted from security service company and service obtained from **Taprom Security Co., Ltd.** There were 56 foreign employees (Chinese Nationality) working as management level. All employees were directly hired by the facility except of 18 security guards.

The facility normal working hour was from 7am to 4pm with one-hour break from 11am-12noon from Monday to Saturday.

Employees' wages and benefits are calculated based monthly and paid by facility to employees two times per month by Bank Auto-pay (Wing Transfer). Each month from 25th and 10th released their salaries directly to the employees.

All employees were recruited under Fixed duration contract (FDC) and Unfixed duration contract (UDC).

Facility used finger print system to capture the employee's time in and time out.

**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:	MING FAI ENTERPRISE (CAMBODIA) CO., LTD													
B: Site name:	MING FAI ENTERPRISE (CAMBODIA) CO., LTD													
C: GPS location: (If available)	GPS Address:	Latitude: 11.41398630 Longitude: 104.65094180												
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<ul style="list-style-type: none"> - Business registration number: No.00030579 dated on 04 January 2018 and no expiration date. - Tax Identification Number (TIN): L001-901800484 - National Social Security Fund (NSSF): No.101384315 													
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Cosmetic pouches, Fashion handbags, Travelling bags, Kids backpacks, socks, slippers and non-woven items.													
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>The facility MING FAI ENTERPRISE (CAMBODIA) CO., LTD. is located at National Road No. 41 (Preah Ang Duong Road), Veal Vong Village, Sen Dei Commune, Samrong Tong District, Kampung Speu Province, Kingdom of Cambodia. The operation has begun in this location since January 2018 and it is a private limited company.</p> <p>The factory consists of 16 main buildings which detail as below:</p> <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Building Number 1</td> <td>The mezzanine floor is used as storage for unused sewing machines. This building ground floor is used as production for sewing/stitching process.</td> <td>This building was built by cement with aluminium roof. Floor size is about 49,449 Square meters.</td> </tr> <tr> <td>Building Number 2</td> <td>This building was ground floor which used as production for gluing and cutting process.</td> <td>This building was built by cement with aluminium roof. Floor size is about 49,449 Square meters.</td> </tr> <tr> <td>Building Number 3</td> <td>This building was ground floor which used as</td> <td>This building was built by cement</td> </tr> </tbody> </table>		Production Building no	Description	Remark, if any	Building Number 1	The mezzanine floor is used as storage for unused sewing machines. This building ground floor is used as production for sewing/stitching process.	This building was built by cement with aluminium roof. Floor size is about 49,449 Square meters.	Building Number 2	This building was ground floor which used as production for gluing and cutting process.	This building was built by cement with aluminium roof. Floor size is about 49,449 Square meters.	Building Number 3	This building was ground floor which used as	This building was built by cement
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Building Number 3	This building was ground floor which used as	This building was built by cement												

	production for auto-linking for socks and osmosis process.	with aluminium roof. Floor size is about 49,449 Square meters.
Building Number 4	This building was ground floor which used as production for toothbrush processing and airline packing	This building was built by cement with aluminium roof. Floor size is about 49,449 Square meters.
Building Number 5	This building was ground floor which used for slipper production.	This building was built by cement with aluminium roof. Floor size is about 49,449 Square meters.
Building Number 6	This building was ground floor which used for non-woven process but no production during the audit date	This building was built by cement with aluminium roof. Floor size is about 49,449 Square meters.
Building Number 7	This building was ground floor only which used as raw material warehouse and zipper cutting process.	This building was built by cement with aluminium roof. Floor size is about 49,449 Square meters.
Building Number 8	This building was ground floor only which used as raw material warehouse.	This building was built by cement with aluminium roof. Floor size is about 49,449 Square meters.
Building Number 9	This building was ground floor only and no production yet	This building was built by cement with aluminium roof. Floor size is about 49,449 Square meters.

	Building Number 13	This building was ground floor only and no production yet	This building was built by cement with aluminium roof. Floor size is about 49,449 Square meters.
	Building Number 14	This building was ground floor only and no production yet	This building was built by cement with aluminium roof. Floor size is about 49,449 Square meters.
	Building Number 15	This building was ground floor only and used as finished goods warehouse.	This building was built by cement with aluminium roof. Floor size is about 49,449 Square meters.
	Building Number 16	This building was ground floor only and no production yet	This building was built by cement with aluminium roof. Floor size is about 49,449 Square meters.
	Building Number 10	The mezzanine floor was used as sewing/stitching line. The ground floor was used for edge painting process and at the side of it was located the centralized power generator and air compressor.	This building was built by cement with aluminium roof. Floor size is about 49,449 Square meters.
	Building Number 11	This building was ground floor only and used as management and staff office.	This building was built by cement with aluminium roof. Floor size is about 1,395 Square meters.

	<table border="1"> <tr> <td data-bbox="655 215 933 546"> Building Number 12 </td> <td data-bbox="933 215 1198 546"> This building was used as dormitory building with 3floors. The kitchen and dining area of foreign employees located at ground floor. </td> <td data-bbox="1198 215 1485 546"> This building was built by cement with aluminium roof. Floor size is about 1,014 Square meters. </td> </tr> <tr> <td data-bbox="655 546 933 613"> Is this a shared building? </td> <td data-bbox="933 546 1198 613"> No </td> <td data-bbox="1198 546 1485 613"> No </td> </tr> </table> <p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: During facility tour, there is no crack was found.</p> <p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F4: Please give details: The first building inspection conducted by Panhahaksasela Construction on December 1, 2017 and valid until December 2022. The second building inspection for new building was conducted by SGS on December 14-15, 2021.</p>	Building Number 12	This building was used as dormitory building with 3floors. The kitchen and dining area of foreign employees located at ground floor.	This building was built by cement with aluminium roof. Floor size is about 1,014 Square meters.	Is this a shared building?	No	No
Building Number 12	This building was used as dormitory building with 3floors. The kitchen and dining area of foreign employees located at ground floor.	This building was built by cement with aluminium roof. Floor size is about 1,014 Square meters.					
Is this a shared building?	No	No					
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)	As per factory management advice no peak season in the last 12 months.						
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	The facility primary products were Cosmetic pouches, Fashion handbags, Travelling bags, Kids backpacks, and non-woven items. The facility main production processes were from raw material warehousing, cutting, sewing, and inspection, packing and loading section. The facility approximate production capacity per month was 500,000 – 600,000 pieces.						

	<p>The facility uses major machines such as: DY Stitching Machine, Sewing Machine, High Head Stitching Machine, Touch screen patter machine, automatic hot tamping disc machine, sock knitting machine, Ultrasonic eye mask trimming machine, Blowing machine, computer sewing machine, edging machine, gold/blocking/silk screen machine, plastic machine, Hair toothbrush machine, plastic automatic machine, button pressor machine, Embroidery machine and cutting machine. The total of machines was about 2241 machines.</p>
<p>J: What form of worker representation / union is there on site?</p>	<p><input checked="" type="checkbox"/> Union (name) : There is one (1) union recognized by the facility under name: Union Workers Asean of Ming Fai Enterprise (Cambodia) Co., Ltd. under registration No.1052000206 dated 03 February 2020. <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (specify): Shop steward or representative election records were conducted on December 10, 2021 and valid until December 10, 2023. <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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation The dormitory provided by facility was for all foreign management employee (2.53%) only.</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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: If no, please give details</p>

Audit Parameters			
A: Time in and time out	Day 1 Time in: 8:40 am Day 1 Time out: 5:00 pm	Day 2 Time in: 9:00 am Day 2 Time out: 7:00 pm	Day 3 Time in: NA Day 3 Time out: NA
B: Number of auditor days used:	2 auditors in 2 days		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Ms. Anya Lee – HR-Admin 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:	24-25 December 2020		
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	Worker Representative was not present during opening and closing meeting because they were busy with their job and attend only the interview.		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	Union Representative was not present during opening meeting and closing meeting because they were busy with their job and attend only the interview.		

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	277	0	11	37	0	0	0	325
Worker numbers – female	1862	0	7	19	0	0	0	1888
Total	2139	0	18	56	0	0	0	2213
Number of Workers interviewed – male	13	0	1	0	0	0	0	14
Number of Workers interviewed – female	48	0	0	0	0	0	0	48
Total – interviewed sample size	61	0	1	0	0	0	0	62



A: Nationality of Management	Chinese	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first. Please add more nationalities as applicable to site. Add more rows if required.</p>	<p>Nationalities: B1: Nationality 1: <u>Cambodian</u> B2: Nationality 2: <u>Chinese</u> 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: No peak season for the last 12 months</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 : <u>97.47%</u> C1: approx % total workforce: Nationality 2 : <u>2.53%</u> C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: 0% workers on piece rate D1: 0% hourly paid workers D2: 100% salaried workers</p> <p>Payment cycle: D3: 0% daily paid D4: 0% weekly paid D5: 0% monthly paid D6: 100 % other D7: If other, please give details: The facility wages paid two times per month (Bi-Weekly).</p>	



Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <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>	8 groups of 5 members (Remark: We practice social distancing during the group interview)
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 7 D2: Female: 15
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?	No, any complaint was raised by employees.
I: What did the workers like the most about working at this site?	Employees stated that working condition of this factory is acceptable, workplace well organized and respected human right. In addition, factory provided additional benefit such as lunch allowance and additional 10USD for attendance bonus which better than local law requirement.
J: Any additional comment(s) regarding interviews:	All employees wish to have overtime.
K: Attitude of workers to hours worked:	All employees expressed that they worked 8 hours per day, 6 days per week and get one rest day per week which accepted.
L. Is there any worker survey information available?	

Yes

No

L1: If yes, please give details:

M: Attitude of workers:

(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk

During 62 randomly selected employees interviewed, they stated that they were happy working in this facility. They are freely to speak out to auditor regarding working environment.

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

Based on the shop steward and union representative interview, it was noted that they were satisfied to work in the facility. The facility provided one room for them to have a meeting monthly or as necessary.

O: Attitude of managers:

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

The facility management was cooperated for two days audit. The facility management joined during opening meeting, closing meeting, and allowed auditor to access all building belong to facility.

The facility management's team arranged one room for auditor to conduct the audit process. During employee interviews, the facility fully cooperates invited the selected employees including union and shop steward representatives to meet the auditor as requested.

During document reviewed, they provided all document as requested by the auditor and provided the transparency information to auditor.

At the end of the audit process on the second day, facility management agreed with CAPR Report which present by Lead auditor and both parties were signed for acknowledgment.

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:

1. The facility has developed Code of Conducts Policy which includes the human rights implementation in the facility.
2. The facility has designated person for handling human rights, or any concern related to employee's well-being. **Ms. Anya Lee/HR-Admin Manager and Mr. Em Sarat/Compliance Manager** to be responsible for implementing standards concerning of Human rights.
3. The facility has identified their customer expectation and the client demands on human rights.
4. The facility has established Anti-corruption policy and signed by top management.
5. Facility's internal rule and regulation was approved by ministry of labour and vocational training dated September 20, 2019.

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

Details:

- Internal rules and regulations
- Human Right Policy
- Training records
- Interviews with management, employees, and worker representative.
- Suggestion boxes records

Any other comments: None

<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: The facility developed Code of Ethics which includes Human Right implementation dated January 2, 2021.</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. Anya Lee / Mr. Em Sarat Job title: HR-Admin Manager / Compliance 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 installed suggestion boxes and set up a grievance procedure for employees to express their concerns through suggestion boxes anonymously without fears.</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: NA</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 personal identity information of employees was kept in the lock filing cabinet. Human Resource staffs could access.</p>

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

Good examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p>Objective Evidence Observed: 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: 2020 <u>3</u> %	A2: This year : 2021 <u>4</u> %
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 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	2%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2020 <u>1</u> %	C2: This year : 2021 <u>0.5</u> %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	0.5%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Accident logs has maintained by on-site infirmary nurses. The last report submitted to health department was in December 15, 2021 for the month of November 2021.	
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: 2020 Number: 0%	F2: This year: 2021 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: 2020 0%	H2: This year: 2021 0%
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months <u>0</u> % workers	I2: 12 months <u>0</u> % workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months <u>0</u> % workers	J2: 12 months <u>0</u> % 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:

1. The site had obtained legal documents and permits from relevant ministries to operate their business at the registered location. Those legal documents and permits were well maintained at the site such as:
 - Business licence, VAT certificate, Patent Tax certificate, Environment license, National social security fund certificate, building permit and business operation certificate, the Council for the Development of Cambodia (CDC) were available for reviewed.
2. The facility had assigned **Ms. Anya Lee/Admin-HR Manager and Mr. Em Sarat/Compliance Manager** to be responsible in social compliance tasks and ensure that social standards were implemented and fulfilled. The assigned officer can directly report to top management about any concerns, compliance status and results.
3. **Ms. Anya Lee/Admin-HR Manager and Mr. Em Sarat/Compliance Manager** is also responsible for ensuring the legal and clients' requirements were communicated to all employees and implemented.

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

Details:

- Social compliance policies and procedures endorsed by facility management.
- Policies, procedures, and other notifications posted on employee bulletin boards.
- Induction training provided to employees on December 16 2021.
- Facility tour and employee's interview

Any other comments:

None

Management Systems:

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

- Yes
- No

A1: Please give details: There is no non-compliance raised to facility on the last 12 months.

<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility has developed the policy to reduce the risk of forced labour, child labour, discrimination, harassment, and abuse.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>The facility's code of conduct/refresher training was trained to employees on December 1, 2021 (management staff) and November 23, 2021 (local employees) and was covered all social standard requirement. It was noted that training records was maintained and were available for auditor reviewed.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: The facility's code of conduct/refresher training was trained to employees on December 1, 2021 (management staff) and November 23, 2021 (local employees) and was covered all social standard requirement. It was noted that training records was maintained and were available for auditor reviewed.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The Training recorded were maintained by the facility.</p>
<p>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).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: The site does not have any internal recognised system certificate.</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Human Resource department was developed in the facility and acknowledged by facility top management. Human Resource Team as name below: 1. Ms. Anya Lee / HR-Admin Manager 2. Mr. Phun Sophar / Admin Staff</p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Ms. Anya Lee / HR-Admin Manager</p>
<p>I: Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

	I1: Please give details: The confidential information was mentioned in policy and procedure of human resource.
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 information of employee was kept at confidential area and monitored by Human Resource department.
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 site has been carried out the risk assessment on an annual basis. The last risk assessment was made on 1 May 2021.
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 Risk assessment was conducted by Compliance Manager Mr. Em Sarat/Compliance Manager and outcome were discussed and reviewed to management to do the corrective action plan and signed.
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 has a supplier selection policy. According to the policy the facility checks labour standards of the suppliers before they used it.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The Facility obtained land rental agreement between the landowner, land rights permission from the ministry of land management urban planning and construction and building construction permit to ensure that the facility location was built legally.
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: Facility appointed Mr. Em Sarat / Compliance Manager to communicate with relevant ministries to make sure the land rights was in compliance.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: It was noted that the Land right policy was developed by the facility to implement between facility owner and land owner to aware the

	condition and right for controlling and compliance with the law.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: The facility obtained a building construction permit which copied from building owner and approved building permits from Ministry of Land Management, Urban Planning and Construction.
R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: The factory area where located and assigned as industry usage.
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 land and building were compiled legally.

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

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

Good Examples observed:	
<p>Description of Good Example (GE):</p> <p>None observe</p>	<p>Objective evidence observed:</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:

1. The Facility internal rule and regulation was approved by the Ministry of Labour and Vocational Training dated on September 20, 2019.
2. The Recruitment policy and procedure was developed by the facility dated January 2, 2021 and communicate to all employees.
3. The prohibition of forced labour's policy was established dated January 2, 2021 was available for review.
4. In the recruitment procedure established January 2, 2021 stated that no deposit required.
5. The facility did not keep any original documents of its employees. Based on sampled personnel files and procedures checked, the facility obtained the age proofs in photocopies for reference.
6. All employees were directly recruited by the site and all recruitments must be done by Human Resource staff.

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

Details:

- The Prohibition of forced labour policy and procedure
- Freedom of Association and collective Bargaining
- The Facility internal rule and regulation
- Personnel files and employment contract of all 62 selected.
- Management interview and employee interviews.

Any other comments:

None

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected: All documents across checked through 62 employee profiles and contracts were found in photocopies.</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected: NA</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected: NA</p>

D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: Based on employees' interviews, it was noted that no restriction on employees' freedom to end their employments contract.
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 checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable E1: Please describe finding: Not applicable
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: Based on selected employees interviewed, it was noted that no restriction activities were noted. All employees could leave the factory at the end of working time.
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: NA
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 established Anti-Forced labour policy and effectively implemented in the facility.

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

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

Good Examples observed:

Description of Good Example (GE):

None observe

Objective evidence observed:

Not applicable

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

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

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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:

1. Freedom of Association and collective Bargaining policy and procedure was developed / established by the facility dated January 2, 2021.
2. The shop steward/worker representative was elected by the employees in the facility on 10 December 2021 which observed and approved by the Ministry of Labour and valid until 10 December 2023.
3. From document and interviewed (management, union representative and employees) there is one trade union in the facility named **Union Workers Asean of MING FAI ENTERPRISE (CAMBODIA) CO., LTD.** With registration number 1052000206 dated February 3, 2020.
4. The facility provided one room with meeting table, chairs, and document cabinet to union to hold the meeting. The last meeting conducted on November 9, 2021.

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

Details:

- Internal rule and regulation
- The policy on freedom of association and collective bargaining
- The shop steward/worker representative election
- The minute meeting of union and shop steward/worker representative
- Facility tour and 62 selected employees' interview

Any other comments:

None

A: What form of worker representation/union is there on site?

- Union (name): **Union Workers Asean of MING FAI ENTERPRISE (CAMBODIA) CO., LTD.**
- Worker Committee
- Other (specify): The last shop steward election was on 10 December 2021 and valid until 10 December 2023.
- None

B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: - Suggestion box - Directly report to HR and Admin Staff D2: Is there evidence of free elections? E <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility provided one room for Union and employee's representative's to conduct their meeting. They stated that the facility management gives them time off to conduct a meeting to check any issue from employees each department and passed all the issued to the management to find out the solution for the facility's improvement. The last meeting was conducted on 9 November 2021.	
F: Name of union and union representative, if applicable:	Union Workers Asean of MING FAI ENTERPRISE (CAMBODIA) CO., LTD. Ms. Khat Som Ang	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Worker Representative was in place. Leader: Ms. Khat Som Ang	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Last Worker's representative election on 10 December 2021.
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Leader: Ms. Khat Som Ang
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: December 10, 2021
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: 1 people – union/worker representative	
L: Please describe any evidence that union/worker's committee is effective?	Union and worker's representative conducted monthly meeting to discuss about general issue especially health and safety regarding how to be preventing action to avoid the Infection of covid-19 and	

Specify date of last meeting; topics covered; how minutes were communicated etc.	business impact. The last meeting was conducted on 9 November 2021.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes , what percentage by trade Union/worker representation	M1: <u>0</u> % workers covered by Union CBA	M2: <u>0</u> % workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Not applicable	

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

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

Good Examples observed:	
Description of Good Example (GE):	Objective evidence observed:

3: Working Conditions are Safe and Hygienic

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

ETI

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined

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

Current systems:

- The facility has assigned Mr. Em Sarat /Compliance Manager to monitors all the status of overall health and safety issues in the facility.
- The site has established Health and Safety policy, covid-19, chemical management, and emergency evacuation procedure, for its implement in the facility.
- Drinking water is provided to all employees with free of charge and the water is periodically checked by Institute of Standards of Cambodia and Industrial Laboratory Centre of Cambodia. The last drinking water testing conducted on March 5, 2021.
- There were enough water supply and clean toilets available for employees' uses.
- Health and safety training are provided to employees.
- Firefighting and emergency evacuation drill trainings were provided to all employees every two times a year. The last drill exercise conducted with the participation of fire police was on November 27, 2021 that took 3 minutes for all employees to evacuate.
- There were at least 2-4 exits doors at each buildings and walkways were clearly marked.
- The facility has firefighting equipment which including 350 fire extinguishers, 130 fire alarms, 394 smoke detectors, 116 emergency lights and 177 exit light which were set up to prevent fire risks occur in the facility.
- Firefighting equipment were checked by Fire Police Officer and issued certificate valid until January 4, 2022.
- Electrical equipment was maintained in good condition by facility.
- Air compressor (dated 01-09-2021), Generator (dated 01-01-2021), and forklift (dated 01-09-2021), machines were inspected from ministry of Industry and Handicraft with one year validity.
- Operators of Steam boiler, air compressor and generator were trained have the skill to operate it as well with certificate dated 03 July 2021 and valid for 3 years.
- Chemicals were labelled and posted with Material Safety Data Sheets (MSDS).
- Infirmary staffs (nurses and doctor) were present during working hours and employees or patients can consult and get medical treatment for free.
- First aid kits were supplied adequately first aid items in each production areas. There were available medical items stored in medical cabinets at the infirmary room. There are 43 first aid kit boxes were installed in production building.

- All employees were covered by National Social Security Fund (NSSF) for health assurance and work accident.

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

Details:

- Health and safety policy
- HSE committee structure
- Meeting records of HSE committee
- Training records
- Firefighting and drill training and certificates
- First aid training and certificates
- Fire inspection reports
- Drinking water testing
- Heavy machine inspection certificates
- Medical staff profiles reviews
- Accident record log reviews
- Risk assessment reviews
- Fire alarm testing
- Management and employee interviews
- Facility observations

Any other comments:

None

<p>A: Does the facility have general and occupational Health & 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: The Health and Safety policies and the procedure were written by the facility to implement and posted on the bulletin board for employee's awareness and communicated to its employees through health and safety training. The facility has also setup the health and safety committee, AIDS committee, firefighting committee, and first aid committee in which employees from each department joined this committee. The last health and safety training which included the COVID-19 procedure was conducted on 23 October 2021 to employees.</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: All new employees received company policy and procedure at induction, and a copy was posted on the notice board of the factory. The last induction training was provided for employees on 16 December 2021.</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: During facility tour, no structural additions without required permits/inspection. Building inspection report for new building was conducted on 14-15 December 2021 by third party company SGS.</p>

<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Visitor had informed on H &S while went to visit the facility and provide hair net.</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Onsite clinic room were setup by facility with medical item, sick bed for health purpose which meet legal requirement.</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: There are three (3) Nurses and One (1) doctor were standby onsite clinic room. The facility established First aider to be response if any health and safety issue happen for immediately help and solve the problem. The last training was provided to first aider on 26 November 2021.</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: Transportation was not provided by the facility. Furthermore, it was compensated to 7USD monthly as per local law.</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: This is not applicable due to the facility does not provide a dormitory to its employee. In addition, the facility provided personal lockers for employee to store their personnel items in secure way.</p>
<p>I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The last risk assessment was conducted on 01 May 2021.</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: The site has obtained the approval permit form ministry of Environment such as in detail below: - The solid waste permit No. 018121 on 8 January 2021. - Wastewater permit No.019121 on 18 January 2021 - Indoor Air Quality monitoring dated 8 December 2021 - Sound quality monitoring dated 9 December 2021 - Waste disposal contract with Veng Sreng Green (Garbage collection service).</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: Based on the facility tour and document review, it was noted that the facility did not use any banned or restricted hazardous chemical in the facility.</p>

Non-compliance:

1. Description of non-compliance:

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

Based on documents reviewed it was noted that 8 Toothbrush moulding machines was already expired since February 21, 2020.

Local law and/or

Cambodian industrial law Prakas No 152 article 11. Prior operation, the enterprise must apply for heavy machine inspection and obtain the certificate issued by ministry of industry and handicraft. This certificate issue for machine which comply with technical standard only.

ETI requirement

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.

Recommended corrective action:

We will apply as soon as possible to Ministry to comply with local law.

Objective evidence observed:

(where relevant please add photo numbers)

Documents reviewed and management interviewed.

Observation:

Description of observation:

Based on facility tour it was noted that facility used 5 drying oven machines for Socks process, however only one machine with serial number 190621175 has certificate. The facility missed since in-charged was not familiar that all machine should have certificate each.

Local law:

Cambodian industrial law Prakas No 152 article 11. Prior operation, the enterprise must apply for heavy machine inspection and obtain the certificate issued by ministry of industry and handicraft. This certificate issue for machine which comply with technical standard only.

ETI requirement:

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.

Recommended corrective action:

The facility already applied to the Ministry and received the application dated December 21, 2021.

Objective evidence observed:

Machine certificate and application form to Ministry of Industry.

Good Examples observed:

<p>Description of Good Example (GE):</p> <p>The facility provides more cooling systems to every building to reduce the hot temperature in the production area.</p>	<p>Objective Evidence Observed:</p> <p>Facility Tour</p>
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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:

1. The policy and procedure of Young Worker and child labor was developed by the facility dated 2 January 2021. In addition the facility also established a child remediation policy dated 2 January 2021 to be implemented if necessary.
2. The facility has a program and materials for training relevant employees including all designated staff to be responsible for the recruitment process on the facility's policies and procedures on the child labour practices.
3. All applicants are required to complete the application forms and present their age proofs in originals. The facility does not keep original documents of applicants and the facility just makes copy of those documents for references.
4. The facility also developed Recruitment Policy and implemented to avoid any young worker / child labor to be employed in the facility in compliance with local law.

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

Details:

- Internal rules and regulations
- Recruitment policy
- Young worker and child labour policy
- Selected employees' personal profiles
- Interviews with management, employees, and worker representatives
- Site observations

Any other comments:

None

A: Legal age of employment:	18 years old as full working age.
B: Age of youngest worker found:	19 years old and 10 months during audit day. (Date of birth: 10 October 2002 and joint date: 04 January 2021)

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? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details

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

Observation:	
Description of observation: None observe Local law or ETI requirement: Not applicable Comments: None	Objective evidence observed: Not applicable

Good Examples observed:	
Description of Good Example (GE): None observe	Objective Evidence Observed: Not applicable

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The facility pays USD 187 as basic salary to probationary employees and USD192 as basic salary to regular employees from 1st January 2021 onward.
2. Based on payroll reviewed and facility management, it was noted that all employees' wages were calculated as monthly basis.
3. Employees' wages and benefits are calculated on monthly basis and paid by facility to employees in two time per month. Each month 10th and 25th released their salaries directly to the employees.
4. All Employees confirmed that they were understood all information about their employment condition.
5. The Facility use finger print machine to record their in and out.
6. Each employment contract was signed by employee and the facility representative and it is maintained with the application form and other documents in the personnel files.
7. The facility grants the following benefits to its qualified employees:
8. Health insurance (NSSF)
9. Leave Record (Maternity leave, Sick Leave, Special Leave)
10. Attendance Bonus
11. Transport and Housing Allowance
12. Seniority Bonus
13. Overtime pays: 150% of normal wage rate on regular days, additional 100% of normal wage rate for national holiday work and 200% of normal wage rate for Sunday work.

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

Details:

- All kinds of payments records reviews
- Management and employees' interviews
- Signed employment contract reviews
- Policy and internal rule reviews
- NSSF record reviews

Any other comments:

None

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

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

Good Examples observed:	
<p>Description of Good Example (GE):</p> <ol style="list-style-type: none"> The facility provided additional 10USD to attendance bonus and can get total of 20 USD if they complete the whole month without absent. The facility provided 2000 riel for lunch allowance per day to all employees which is not required by law 	<p>Objective Evidence Observed:</p> <p>Document review and interview</p>

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 and 48 hours per week	A1: 8 hours per day and 48 hours per week	A2: <input type="checkbox"/> Yes <input checked="" 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: 2 hours per day and 12 hours per week	B1: 2 hours per day and 10 hours per week	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours:	Legal minimum:	C1:	C2:

<p>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</p>	<p>1. USD187 per month for probationary employees. 2. USD 192 per month for regular employees from 1st January 2020 onward.</p>	<p>1. USD187 per month for probationary employees. 2. USD 192 per month for regular employees from 1st January 2020 onward.</p>	<p><input type="checkbox"/> Yes <input checked="" 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 basic wage for regular day overtime 130% of basic wage for night work 200% of basic wage for weekly day off overtime Additional 100% of basic wage for public holiday overtime (1+1)</p>	<p>D1: 150% of basic wage for regular day overtime 130% of basic wage for night work 200% of basic wage for weekly day off overtime Additional 100% of basic wage for public holiday overtime (1+1)</p>	<p>D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

<p style="text-align: center;">Wages analysis: (Click here to return to Key Information)</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 No, why not?</p>	<p>Not Applicable</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>62 samples from November 2021 (current month) 62 samples from August 2021 (random month) 62 samples from January 2021 (random month)</p>	
<p>C: Are there different legal minimum wage grades? If Yes, please specify all.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>C1: If Yes, please give details: Not Applicable</p>
<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>	<p>D1: If No, please give details: Not Applicable</p>

<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i></p> <p>USD 187 per month</p>	
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: ___% of workforce earning under minimum wage F2: <u>100</u>% of workforce earning minimum wage F3: ___% of workforce earning above minimum wage</p>		
<p>G: Bonus Scheme found: Please specify details:</p>	<p>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></p> <p>Not Applicable</p>		
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<ul style="list-style-type: none"> Personnel income tax (if salary more than USD 325) 		
<p>I: Have these deductions been made?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Please list all deductions that have been made.</p>	<p>Personnel Income Tax</p> <p>Please describe: 5% of monthly wage earning</p>
		<p>I2: Please list all deductions that have not been made.</p>	<p>National Social Security Fund</p> <p>Please describe: The facility is responsible to pay for all employees.</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type</p> <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence: Not Applicable	
<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>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>L1: Please give details: It was noted that all records of working hours worked, and wages were correctly paid to employees.</p>		
<p>M: Is there a defined living wage:</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>M1: Please specify amount/time:</p>		

<p>This is <i>not normally</i> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</p>	<p>Only minimum wages are defined by the local law. There is no specific local was mentioned of living wage.</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: Not Applicable</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: There was an annual review of wage when local wage rates are update. Facility assigned Human Resource Manager Mr. Em Sarat to update new law update.</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:</p>
<p>Q: How are workers paid:</p>	<p><input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain: Wing Transfer</p>

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The facility was developed Working hours policy and procedure and approved by top management to be implemented in the factory.
2. Overtime working hours on voluntary policy and procedure and approved by top management.
3. The facility uses finger print system to record working hours of all employees.
4. Employees are required to scan their card to record time in and time out information for each employee.
5. It was noted that no inconsistency regarding working hour was observed between employee interview, management interviewed, and the attendance records reviewed.
6. Based on sampled employees interviewed, all the 62 randomly selected employees stated that they worked overtime on voluntary basis and no excessive overtime work was implemented in the site.
7. Production records such as raw material in / out records, daily production reports, payroll records and attendance records were randomly selected for reviews by audit team and no inconsistency was noted.

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

Details:

- Working hours Policy
- 12 months of attendance records were reviewed, and 3 months records were selected as sampling record November 2021 (current month), August 2021 (random month), and January 2021 (random month).
- Sampled wage record of all 62 selected employees
- 62 Employee contracts
- Quality and production records.

Any other comments:

None

Non-compliance:

1. Description of non-compliance:

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

None observe

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 observe

Local law or ETI requirement:

Not applicable

Comments:

None

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE):

None observe

Objective Evidence Observed:

Not applicable

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe: Finger Print 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 all 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: Not applicable			
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:			
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:			
		Not applicable			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: Not applicable			
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):			
		Maximum 6 consecutive 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: Not applicable
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details: Not applicable
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: November 2021 : 2 hours per day / 10 hours per week / 38 hours per month August 2021 : 2 hours per day / 10 hours per week / 40 hours per month January 2021 : 2 hours per day / 10 hours per week / 30 hours per 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:	<u>3</u> %	
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: Based on document reviewed and from selected employee's interviewed, it was noted that the overtime was based on voluntary basis.
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 standard wages: 150% of basic for regular overtime 100% of basic for public holiday 200% of basic for Sunday work
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: Employee (100%) were paid at a premium wage of overtime work. All employees confirmed that overtime work was voluntary, and their maximum of overtime work is 2 hours per day.

<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 type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other Not applicable </p>
	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>
	<p>Not applicable</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"/> Overtime is voluntary <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) Not applicable, Facility had worked less than 60 hours per week. </p>
	<p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p>
	<p>Not applicable</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: Not applicable </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 type="checkbox"/> Yes <input checked="" 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:

1. The facility has established written policy and procedure for non-discrimination and approved by top management and implemented in the facility.
2. No pregnant testing, hepatitis B virus and HIV testing are required prior to employment and no contraception is practiced during the employment as per policy and employee interviews. Pregnant employees are still able to work in the facility and granted benefit such as regular health check without wage deduction, breast feeding time and light job assignment.
3. Policy of freedom of association is also available for practices. Employee's representatives are present in the facility to protect the employee's legal rights.
4. Employees can elect their representative in confidential manner and without any interference.
5. The site had developed the hiring policy and procedure which mentions that the facility does not discriminate on applicant and employees on race, national origin, religion, age, gender, disability, sex, marital status, and political affiliation.
6. All employees have equal opportunity for promotion, compensation, wage increment and attending relevant training.
7. No sexual harassment according to selected employee interviews.

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

Details:

- The hiring and termination procedure
- Freedom of association policy
- Internal rule and regulation which approved by ministry of labour
- Leave application records
- 3 months Payroll records
- Induction training
- Facility's policy on prohibition of discrimination
- Employment contract reviews
- Personnel file of 62 selected employees

Any other comments:

None

<p>A: Gender breakdown of Management + Supervisors (Include as one combined group)</p>	<p>A1: Male: <u>66</u> % A2: Female <u>34</u> %</p>
<p>B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:</p>	<p>0%</p>
<p>C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:</p>	<p> <input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found </p> <p>C1: Please give details: Not applicable</p>

Professional Development

<p>A: What type of training and development are available for workers?</p>	<p>It was noted that the facility provided training to employees on a regular basis for the health and safety issues including safety hygiene practice for covid-19. Furthermore, all employees were trained regarding the working hours and wage and benefits as per local law. In addition, operators of all heavy machines were also send to Ministry to obtained training and get certificate.</p>
--	--

<p>B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?</p>	<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </p> <p>The HR staffs is responsible to provided training based on objective or transparent criteria the last training of wage and benefit which also included in the induction training.</p> <p>If no, please give details:</p>
---	---

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

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

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

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:

1. The facility signed employment contracts with their employees. The first copy was kept in the individual employee's personal file and the second copy was given to employee for own reference as per document review and advice of facility management.
2. New employees must work within 2 months for probationary contract and after passing the probationary period, the employment contracts of all employees are becoming Fixed Duration Contract (FDC) and will convert to undetermined duration contract after 2 years.
3. The facility had set up internal rules and regulation for implementation in the facility. The internal rule and regulation were also posted on the notice board in local language of employees for employees free to read by all employees.
4. It was noted that every employee could resign from work and the facility could also discontinue the employment by following the legal procedures with prior notice and compensation according to the local law requirement.

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

Details:

- Management interviewed and employees interviewed.
- Recruitment policy and procedure
- The facility's internal rule and regulation was reviewed and approved from ministry of labour
- Employee resignation procedures were reviewed.

- Employment contracts of 62 selected employees were also reviewed.
- Security contract, payroll and attendance record were reviewed.

Any other comments:
None

Non-compliance:

1. Description of non-compliance:

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

None observe

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 observe

Local law or ETI requirement:

Not applicable

Comments:

None

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE):

None observe

Objective Evidence Observed:

Not applicable

Responsible Recruitment

All Workers

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

- Terms & Conditions presented
- Understood by workers
- Same as actual conditions

	<p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: During employees interviewed, all the selected employees were clear about all the terms and conditions of their employment.</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 B1: If yes, please describe details and specific category(ies) of workers affected: It was noted that no fee was deduct from employees to get the job.</p>
<p>C: If yes, check all that apply:</p>	<p><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: Not Applicable</p>
<p>D: If any checked, give details:</p>	<p>Not Applicable</p>

<p>Migrant Workers: <i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i></p>	
<p>A: Type of work undertaken by migrant workers:</p>	<p>Supervisor and Management level</p>
<p>B: Please give details about recruitment agencies for migrant workers:</p>	<p>B1: Total number of (in country recruitment agencies) used: B2: Total number of (outside of local country) recruitment agencies used: All migrant employees were directly hired by facility.</p>
<p>C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No C2: Observations: Not applicable</p>

is evidence of the transaction supplied by the facility to the worker?	C1: Please describe finding: Not applicable	
<p>D: Are Any migrant workers in skilled, technical, or management roles</p> <p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: If yes, number and example of roles:</p> <p>There were 56 expatriate employees working as management and staffs.</p>	

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: Not applicable
C: If any checked, give details:	Not applicable

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: One (1) Agency from Security service company.

	Name: Taprom Security Co., Ltd. Address: # 16A, Street 215, Phnom Penh, Cambodia.
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Security's Employment Contract was provided for review.
D: Is there a legal contract / agreement with all agencies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: The Security contract agreement between the security guard and the security company was maintained by the facility.
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Working hours and wages of security guards complied with local law standards.

Contractors:	
<i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details:
B: If Yes , how many workers supplied by contractors?	Not applicable
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not applicable
D: If Yes , please give evidence for contractor workers being paid per law:	Not applicable

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

- 1- The facility does not use sub-contractor any processors.
- 2- Productions were planed based on the available capacity to avoid subcontracting.

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

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

Details:

- During the facility tour,
- It was found subcontractor not used by the facility during the day audit.
- Gate pass recorded; production records were across check during facility tour.

Non-compliance:

1. Description of non-compliance:

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

None observe

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 observe Local law or ETI/Additional elements requirement: Not applicable Comments: None	Objective evidence observed: Not applicable

Good Examples observed:	
Description of Good Example (GE): None observe	Objective Evidence Observed: Not applicable

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

Summary of homeworking – if applicable	
<input checked="" type="checkbox"/> Not Applicable please x	
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If Yes , summarise details:

B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?			
F: What processes are carried out by homeworkers?			
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

9: No Harsh or Inhumane Treatment is Allowed

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

ETI

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

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility has established Grievance Procedure for implementation in the facility which approved by top management and channels such as suggestion box were available for reporting any violations/issues of labor or health and safety standard.</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>Based on employees interviewed, it was noted that employees were aware of the channel through orientation training. Furthermore, instruction and procedure was also posted in the information board and employees can check if they want.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<ul style="list-style-type: none"> - Compliant / Suggestion box - Emergency hotline (Compliance, HR and admin) - Worker representative name and phone number
<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</p> <p>D1: Please give details: All employees can complain through the HR department or employee's representatives and Union representative about any issue happen in the facility</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>E1: If yes, please give details : Not applicable</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</p> <p>F1: If no, please give details : Not applicable</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 : Not applicable</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 : Not applicable</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 : Not applicable</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:

1. The Policy on the prohibition of harassment and abuse was developed in the facility for its internal implementation and approved by management.
2. The policy on the prevention and Human Trafficking was developed in the facility for implementation and approved by management
3. The facility had set up suggestion boxes at workplace for employees to report any complaint, concerns, or abuse case.
4. Grievance procedures was developed by the facility for implementation and approved by management.
5. **Ms. Anya Lee / HR-Admin Manager** and **Mr. Em Sarat / Compliance Manager** were assigned to monitor and maintain the management system in the site to ensure that all policies and procedures are communicated and implemented to all relevant parties.
6. All 62 sampled employees interviewed were aware of the system.

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

Details:

- Reviewed grievance procedure, prohibition of harassment and abuse, human right, prevent on human trafficking of the facility were reviewed.
- Interview and reviewed of 62 profiles randomly selected
- Induction training to all employees

Any other comments:

None

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

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

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

1. Facility's recruitment policy and procedure was developed and endorsed by the top management for facility's guideline.
2. All foreign management and technical staff are directly hired from overseas and they had obtained the legal visa and work permits to stay and work in the country.
3. The legal labour books issued by the local officials are issued for all foreign management staff who has worked in the facility.

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

Details:

- The legal labour books issued by the local officials
- Quota record for foreign employees applied for 2021 by issued No. QTA024939 on 2 December 2021 with target of 125 expats
- Recruitment policy and procedure
- Discrimination policy
- 62 Selected employee's Personnel profiles

Any other comments:

None

Non-compliance:

1. Description of non-compliance:

- NC against ETI/Additional Elements NC against Local Law
 NC against customer code:
 None observe

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 observe Local law or ETI/Additional Elements requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable

Good examples observed:	
Description of Good Example (GE): None observe	Objective Evidence Observed: Not applicable

10. Other issue areas 10B4: Environment 4–Pillar

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

To be completed for a 4–Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar

B.4. Compliance Requirements

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.

B4. Guidance for Observations

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.

Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in place. Following this assessment, the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)

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. The facility obtained and signed environmental protection contract with the ministry of environment dated 05 June 2018 to complied and reduce environmental significant impact from its operation.
2. The facility visited by Ministry of Environment dated 17 December 2020 to verify their environmental compliance. Furthermore, no any issue raise during the visit.
3. The facility has developed the policy on the environment for its operation reference.
4. The facility conducted an environmental risk assessment on 3 June 2021.
5. The facility management contracted to an accredited third party for the disposal of industrial solid waste named Veng Sreng Green and contract valid until 2022.
6. The facility obtained solid waste permit dated 8 January 2021 and waste water discharge permit dated 18 January 2021 both valid for one year.
7. The facility also conducted environmental monitoring which includes indoor air quality (dated 8 December 2021), sound and air quality (dated 9 December 2021)
8. The facility also obtained Sanitation certificate with permit no. 170/21 dated 23 March 2021.

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

Details:

- Environmental permit and contract
- Waste disposal permit
- Waste collection contract
- Environmental risk assessment record
- Environmental policy
- Inspection record from ministry
- Interview management
- Facility tour observation.

Any other comments:
None

Non-compliance:

1. Description of non-compliance:

- NC against ETI/Additional Elements NC against Local
 NC against customer code:
 None observe

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 observe

Local law or ETI/Additional elements requirements:
Not applicable

Comments:
None

Objective evidence observed:

Not applicable

Good examples observed:

Description of Good Example (GE):
None observe

Objective Evidence Observed:

Not applicable

Environmental Analysis <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Ms. Anya Lee / HR-Admin Manager Mr. Em Sarat / Compliance Manager
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The last environmental risk assessment conducted on 3 June 2021.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: The facility don't have standard certification, however they established environmental management strategy and environmental policy which aligned with the international standards.
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? The facility established environmental policy approved by management dated 2 January 2021.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility monitors their electricity and water consumption to reduce the possible significant impact to the environment.
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please gives details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: Not applicable
H: Have all legally required permits been shown? Please gives details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: The facility obtained environmental protection contract signed also by Ministry of Environment dated 5 June 2018 with no expiration.
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: The facility management maintains the inventory of chemical used in the production for their reference.
J: Is there a system for managing client's requirements and legislation in the destination	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

countries regarding environmental and chemical issues?	J1: Please give details: The facility uses its internal management system to manage environmental and chemical requirement.
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: The facility monitors their electricity and water consumption to mitigate significant impact to the environment. Solid waste was properly segregated and collected by third party waste collector.
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: Please give details: The facility don't have recycling system.
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The facility has system to measure it by recording every month and reduce costs.
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Not applicable the facility does not use subcontractor.

Usage/Discharge analysis

Criteria	Previous year: Please state period: 2020 (Jan-Dec)	Current Year: Please state period: __2021 (Jan-Nov)___
Electricity Usage: Kw/hrs	292 390 Kw/hr	448 625 Kw/hr
Renewable Energy Usage: Kw/hrs	N/A	N/A
Gas Usage: Kw/hrs	2304 Kw/hr	2112 Kw/hr
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes , please state result	N/A	N/A
Water Sources: Please list all sources e.g. lake, river, and local water authority.	<ul style="list-style-type: none"> • Ground water supply • local water authority 	<ul style="list-style-type: none"> • Ground water • Supply • local water authority
Water Volume Used: (m ³)	357 151 cubic meter	10998943 cubic meter
Water Discharged:	<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • N/A

<i>Please list all receiving waters/recipients.</i>		
Water Volume Discharged: (m ³)	• N/A	• N/A
Water Volume Recycled: (m ³)	• N/A	• N/A
Total waste Produced (please state units)	340 tons	600 tons
Total hazardous waste Produced: (please state units)	800 kg	1000 kg
Waste to Recycling: (please state units)	• N/A	• N/A
Waste to Landfill: (please state units)	• N/A	• N/A
Waste to other: (please give details and state units)	• N/A	• N/A
Total Product Produced (please state units)	Approximately 500 000 pcs/month	Approximately 600 000 pcs/month

10C: Business Ethics – 4-Pillar Audit

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

To be completed for a 4-Pillar SMETA Audit

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

Note for auditors and readers. This Business Ethics section is intended to take not more than 0.25 auditor days. It is an assessment not an audit.

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. The facility developed policy and procedure of anti-corruption and bribery and signed management dated on 2 January 2021.
2. The facility was assigned Ms. Anya Lee / HR-Admin Manager and Mr. Em Sarat / Compliance Manager to implement and monitor the standards concerning Business Ethic without any corruption and/or bribery.
3. The facility provided business ethical training and anti-bribery to all relevant staff on 4 December 2021.
4. The facility has 4 suggestion boxes for employee reports bribery case without fear of reprisal.

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

Details:

- Internal anti-corruption and bribery review
- Training record review
- Clients code of conduct

- Interview management

Any other comments:
None

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

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

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

<p>A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy <input type="checkbox"/> Policy for third parties including suppliers</p> <p>A1: Please give details: The facility has developed anti-corruption and bribery policy and effectively implemented.</p>
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<p>B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>B1: Please give details: The last training conducted on 4 December 2021 attended by 23 staff / personnel.</p>
<p>C: Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please give details: The policy was reviewed and updated last 2 January 2021.</p>
<p>D: Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: Please give details: All suppliers are required to train on the business ethics training. The last training was conducted on 4 December 2021.</p>

Other findings

Other Findings Outside the Scope of the Code
None










Community Benefits <i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
None

Appendix 1

<p>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."</p> <p style="text-align: center;"><input checked="" type="checkbox"/> Not Applicable please x</p>





Photo Form

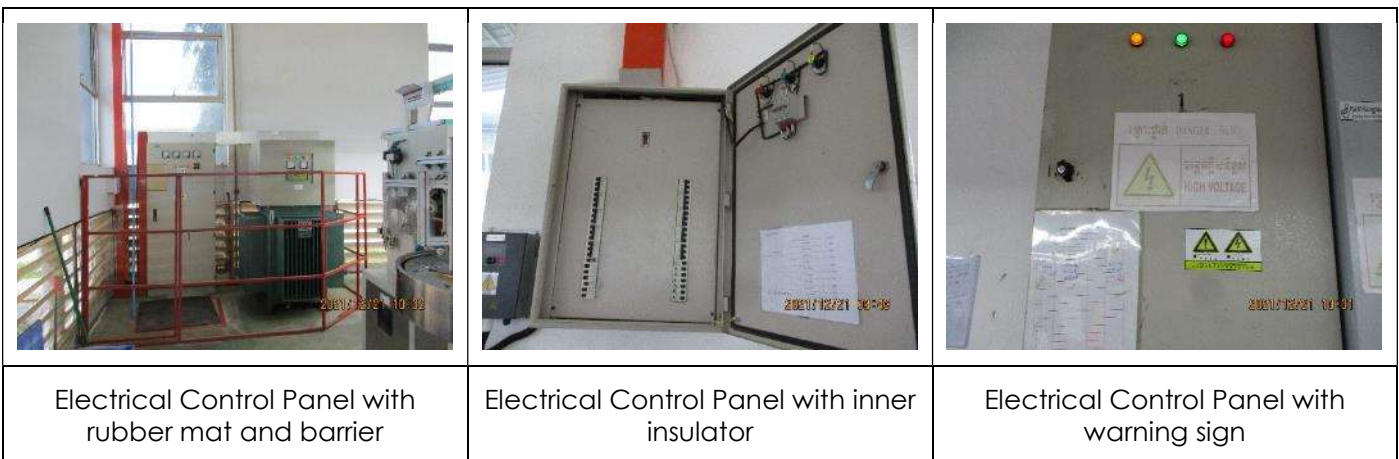
General Photo

		
<p>Facility name board</p>	<p>Facility main gate</p>	<p>Security guard booth</p>
		
<p>Visitor card</p>	<p>Equipment of Temperature checking during Covid-19 pandemic</p>	<p>Staff and visitor parking area</p>
		
<p>Parking area for local employees</p>	<p>Assembly point</p>	<p>Finger Print machine</p>

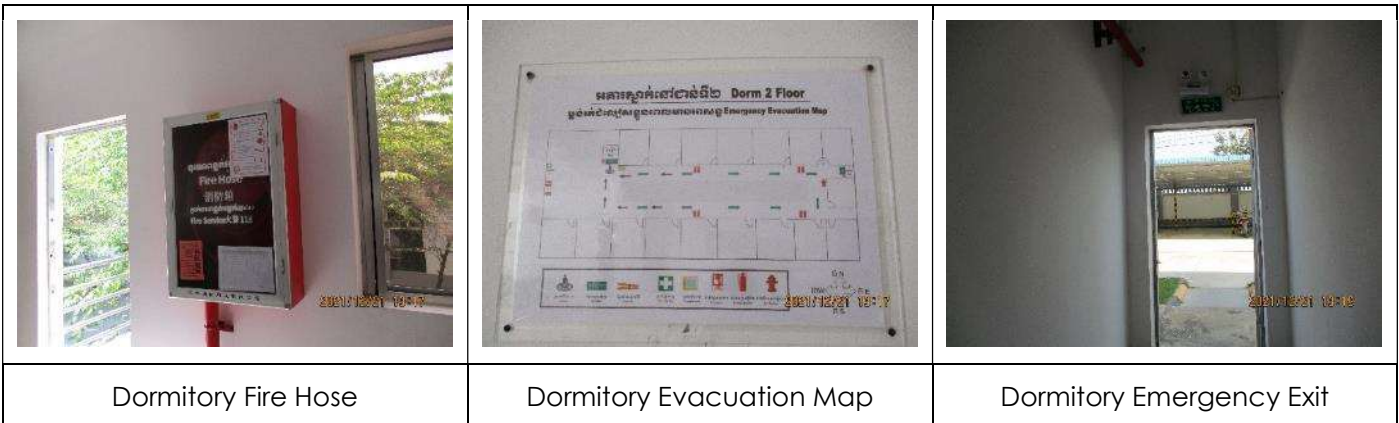
<p>Eating area for local employees</p>	<p>Kitchen</p>	<p>Dining area for Foreign employees</p>
<p>Centralized CCTV control and fire alarm main control panel</p>	<p>Drinking Water for employees</p>	<p>Toilet for Local employees</p>
<p>Raw Material Warehouse</p>	<p>Cutting Section 1</p>	<p>Cutting Section 2</p>

<p>Sewing</p>	<p>Gluing</p>	<p>Edge Painting</p>
<p>Socks Auto-Linking</p>	<p>Osmosis</p>	<p>Toothbrush insertion</p>
<p>Toothbrush Moulding</p>	<p>Airline Kit Packing</p>	<p>Zipper Cutting</p>
<p>Packing 1</p>	<p>Packing 2</p>	<p>Finished Good warehouse</p>

		
<p>Emergency exit door</p>	<p>Fire extinguisher</p>	<p>Fire alarm</p>
		
<p>Fire alarm Flashlight</p>	<p>Smoke Detector</p>	<p>Emergency and Exit Light</p>
		
<p>Fire Hose Reel</p>	<p>Fire Sprinkler</p>	<p>Evacuation Map</p>
		
<p>Fire Alarm Testing</p>	<p>Emergency and Exit Light Testing</p>	<p>Fire Hose reel testing</p>



		
<p>Personal Protection Equipment 4</p>	<p>Reserved PPE at chemical storage</p>	<p>Sewing Machine needle guards</p>
		
<p>Machine safety warning signs</p>		
		
<p>Chemical Storage</p>	<p>MSDS posted at chemical storage</p>	<p>Chemical in-line with secondary containment and label</p>



		
<p>Dormitory secondary emergency exit</p>	<p>Emergency light and Exit light</p>	<p>Evacuation route/aisle</p>
		
<p>Information Board</p>	<p>Suggestion Box</p>	<p>Exhaust Fan</p>
		
<p>Generator</p>	<p>Air Compressor</p>	<p>Forklift</p>
		
<p>Drying Oven Machine</p>	<p>Toothbrush Moulding Machine</p>	<p>Mechanical Lifter</p>



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

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

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http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

[Click here for Supplier \(B\) members:](#)

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d

[Click here for Auditors:](#)

<https://www.surveymonkey.co.uk/r/BRTVCKP>