



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC416333003	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS416337881	
Business name (Company name):	From Wild LLC			
Site name:	From Wild LLC			
Site address:	659377, Россия, Алтайский край, Бийский район, с. Лесное, ул. Совхозная, 24Г с. Лесное 659377 RU	Country:	RU	
Site contact and job title:	Kirill Maltsev / Cheif technologist			
Site phone:	7 923 655 2442	Site e-mail:	malcev@from-wild.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2024-07-02			

Audit Company Name:
SGS CBE Russia

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

Audit Content:

- (1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.
- (2) The audit scope was against the following reference documents
2-Pillar SMETA Audit
 - ETI Base Code
 - SMETA Additions
 - Universal rights covering UNGP
 - Management systems and code implementation,
 - Responsible Recruitment
 - Entitlement to Work & Immigration,
 - Sub-Contracting and Home working,**4-Pillar SMETA**
 - 2-Pillar requirements plus
 - Additional Pillar assessment of Environment
 - Additional Pillar assessment of Business Ethics
 - The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Konstantin Kopotilov	APSCA Number:	21703197
Additional Auditors:			
Date of declaration:	2024-07-03		

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

Site Representation	
Full Name:	Kirill Maltsev
Title:	Cheif technologist
Date of declaration:	2024-07-03
Comments:	<p><i>Any exceptions to this must be recorded here (e.g. different sample size):</i> <i>Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).</i> <i>The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i></p>
n/a	

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	1	0	Obs - ZAF600498051
0B - Management systems and code implementation			0	0	2	GE - ZAF600544444 GE - ZAF600544445
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
3 - Working conditions are safe and hygienic	3.1 3.1 3.1 3.1	§1 §2 §3 §4	4	0	1	NC - ZAF600544439 NC - ZAF600544440 NC - ZAF600544441 NC - ZAF600544442 GE - ZAF600544446
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid			0	0	1	GE - ZAF600544443
6 - Working hours are not excessive			0	0	0	
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is allowed			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2-pillar			0	0	0	
10B4 - Environment 4-pillar			0	0	2	GE - ZAF600544447 GE - ZAF600544448
10C - Business ethics 4-pillar			0	1	0	Obs - ZAF600498052

Local Law Issues

Issue	Description
§1	Labor Code of the Russian Federation Article 214. Responsibilities of the employer in the field of labor protection. The employer is obliged to ensure: systematic identification of hazards and occupational risks, their regular analysis and assessment; Трудовой Кодекс РФ Статья 214. Обязанности работодателя в области охраны труда. Работодатель обязан обеспечить: систематическое выявление опасностей и профессиональных рисков, их регулярный анализ и оценку;

§2	<p>Labor Code of the Russian Federation Article 214. Responsibilities of the employer in the field of labor protection. The employer is obliged to ensure: the development and approval of local regulations on labor protection, taking into account the opinion of the elected body of the primary trade union organization or another representative body authorized by employees (if there is such a representative body) in the manner established by Article 372 of this Code for the adoption of local regulations; maintaining a register (list) of regulatory legal acts (including the use of electronic computers and databases) containing labor protection requirements, in accordance with the specifics of their activities, as well as access for employees to current versions of such regulatory legal acts; / Трудовой Кодекс РФ Статья 214. Обязанности работодателя в области охраны труда. Работодатель обязан обеспечить: разработку и утверждение локальных нормативных актов по охране труда с учетом мнения выборного органа первичной профсоюзной организации или иного уполномоченного работниками представительного органа (при наличии такого представительного органа) в порядке, установленном статьей 372 настоящего Кодекса для принятия локальных нормативных актов; ведение реестра (перечня) нормативных правовых актов (в том числе с использованием электронных вычислительных машин и баз данных), содержащих требования охраны труда, в соответствии со спецификой своей деятельности, а также доступ работников к актуальным редакциям таких нормативных правовых актов;</p>
§3	<p>Rules of the fire regime in the Russian Federation of September 16, 2020 N 1479 Item 60; Set of rules 9.13130.2009 Fire equipment. Fire extinguishers. Operating requirements. Paragraphs 4.3.5 – 4.3.7, 4.3.9 / Правила противопожарного режима в Российской Федерации от 16 сентября 2020 года N 1479 Пункт 60; СП 9.13130.2009 Техника пожарная. Огнетушители. Требования к эксплуатации. Пункты 4.3.5 – 4.3.7, 4.3.9</p>
§4	<p>Order of the Ministry of Health of the Russian Federation dated December 15, 2020 N 1331n "On Approval of Requirements for Completion of First Aid Kit with Medical Devices" / Приказ Министерства здравоохранения Российской Федерации от 15 декабря 2020 года N 1331н «Об утверждении требований к комплектации медицинскими изделиями аптечки для оказания первой помощи работникам»</p>

Site Details

Site Details			
Company Name	From Wild LLC		
Site Name	From Wild LLC		
GPS location (if available)	GPS Address:	659377, Russia, Altai Territory, Biysk district, Lesnoye village, Sovkhoznaya str., 24 G	
	Coordinates:	52.466426 85.248854	
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Registration number of the insurant № 2206011251 Registration number of a pension fund № 032-014-117-063		
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Processing of pine nuts, production of crude vegetable oils, oilcake production		
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	Date of company foundation: 27.10.2015. Number of years of occupied production site: 8 years. Building: Total number of buildings: 2. Total area of the occupied territory: 16117 sq.m.		
Structure and number of buildings	Building Name:		Main building
	Floor	Description	Remark
	1	Office, production, warehouse	Raw materials warehouse (refrigerator), packaging warehouse, industrial premises, administrative and amenity premises
	Building Name:		Warehouse
	Floor	Description	Remark
1	Warehouse, repair site	Raw materials warehouse (refrigerator) - 2 rooms, Repair area	
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not observed during the audit		
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Monitoring the condition of buildings and structures is included in the functionality of the Production manager		

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
Months of peak season	September to December
Process overview	The main stages of production include: 1. Drying pine nuts to a moisture content of 14-16% 2. Fractionation of pine nuts (dividing the nut by size) 3. Hulling the pine nut (removing the shell) 4. Kernel drying 5. Removal of amniotic film 6. Optical nut sorting 7. Inspection for foreign matter and kernel quality (visual) 8. Packaging of individual bags, putting finished products into boxes, labeling. 9. Squeezing cedar oil 10. Bottling cedar oil
What form of worker representation is there on site?	<input type="checkbox"/> Union <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input checked="" type="checkbox"/> None
Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The company does not provide dormitories to employees There is no accommodation buildings on the site

Audit Parameters				
Time in and time out	Day 1		Day 2	
	In	08:00	In	08:00
	Out	17:00	Out	12:00
Audit type:	PERIODIC			
Was the audit announced?	ANNOUNCED			
Was the Sedex SAQ available for review?	Yes			
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No			
Who signed and agreed CAPR	Kirill Maltsev / Cheif technologist			
Is further information available	No			

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

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	36	0	0	0	0	0	0	36
Worker numbers - female	20	0	0	0	0	0	0	20
Total	56	0	0	0	0	0	0	56
Number of Workers interviewed - male	6	0	0	0	0	0	0	6
Number of Workers interviewed - female	4	0	0	0	0	0	0	4
Total - interviewed sample size	10	0	0	0	0	0	0	10

Nationalities Structure	
Nationality of Management	Russian
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Russian approx %: 100%
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No additional personnel are hired for the Peak production period. Confirmed during interviews with employees, management, as well as during the documentation review
Worker remuneration	Workers on piece rate: 0%
	Paid hourly: 0%
	Salaried: 100%
Payment cycle	Paid daily: 0%
	Paid weekly: 0%
	Paid monthly: 0%
	Other: 100%
	Details for other: Twice a month

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	1 group of 4 employees
Number of individual interviews:	Male: 2 Female: 4
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	No negative information has been received
What did the workers like the most about working at this site?	collective; timely paid without a delay; stability; good leadership attitude; good working conditions
Any additional comment(s) regarding interviews:	There was no negative information. Communication between management and workers is well established.
Attitude of workers to hours worked:	Workers have noted, that the schedule of work approaches them.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:

There was no negative information. Communication between management and workers is well established. The management is publicly available for applications from workers. Workplace's safety inspections are carried out monthly. The results are registered, and measures are taken to improve the conditions. Implementation control is by the management.

Attitude of worker's committee/union reps:

N/A There was no worker's committee/union reps.

Attitude of managers:

The management and employees of the company were open and available during the audit process. There were no obstacles to the audit. All information, documents, procedures were publicly available to the auditor.

0A - Universal Rights covering UNGP
[Summary of Findings]

0A: Compliance Requirements

0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.
 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights
 0.A.3 Businesses shall identify their stakeholders and salient issues.
 0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
 0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.
 0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined

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

Current Systems:

The organization observes requirements specified in this section. The organization operates on the territory of Russia, where human rights are taken into account in legislative acts, the main of them is the Labour Code of Russia of 30.12.2001 # 197-FL with last changes. For observance of the Russian legislation and the requirements of the Code, the Organization has developed and implemented procedures, which including take into account human rights. All these procedures are approved by the top management. Responsibility for their implementation identified in the job descriptions of the employees of various management levels.

Evidence examined:

Staffing table 01/01/2024
 Internal labor regulations 02/01/2021
 Regulations on remuneration and bonuses for employees 09/01/2020
 Regulations on wage indexation 09/01/2024
 Regulations on mentoring 03/01/2022
 Regulations on the processing, storage, and distribution of personal data 03/01/2021
 Policy for the protection and processing of personal data 09/01/2022
 Regulation on trade secrets / confidential information 12/05/2022
 Regulations on contract work 01/27/2023
 Personnel policy 07/26/2021
 Policy on the protection of human rights and protection against discrimination 07/26/2021
 Code of Ethics 07/26/2021
 Supplier Code 07/26/2021
 Personal files, time sheets, employee pay slips according to the audit sample

Any other comments:

None

Policy statement that expresses commitment to respect human rights?

Yes No

Please give details:

Policy on the protection of human rights and protection against discrimination 07/26/2021

Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All employees are familiarized by signature.
Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Kirill Maltsev - Chief technologist
Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Policy in the field of protection of human rights and protection from discrimination and harassment
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Regulations on the processing, storage, and distribution of personal data 03/01/2021 Policy for the protection and processing of personal data 09/01/2022
Measuring Workplace Impact	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 10.0% This year 8.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	2.0%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 4.33% This year 3.56%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month)	3.1%

Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Log of registration of accidents and records according to Labor Code RF	
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year	0.0%
	This year	0.0%
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)	0.0%	
Lost day work cases per 100 workers(((Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year	0.0%
	This year	0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

Observation		Evidence
[Back to findings summary]		
Observation		
Status	OPEN	
Reference	ZAF600498051	
Clause	0A - Universal Rights covering UNGP	
Issue Title	683 - No / inadequate policy in place to respect international human rights standards	
Subcategory	Human rights	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA422575095	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	N/A	
Explanation to the observation	There is no evidence of human rights policy being broadcast to all relevant parties, including their own suppliers. / Отсутствуют свидетельства трансляции политики по правам человека всем соответствующим сторонам, включая своих собственных поставщиков.	
Actions	N/A	

0B - Management Systems and code Implementation
[Summary of Findings]

0B: Compliance Requirements

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

Current Systems and Evidence Examined

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 organization observes requirements specified in this section. The supplier implements and maintains system for ensuring compliance with this code. Company operates under the RF laws (Labour code of the RF, Land code of the RF, Tax law, Environmental, etc.). Responsible person for Code implementation is Kirill Maltsev – Chief technologist. Supervisory authorities monitor Code principles implementation.

Evidence examined:

- Staffing table 01/01/2024
- Internal labor regulations 02/01/2021
- Regulations on remuneration and bonuses for employees 09/01/2020
- Regulations on wage indexation 09/01/2024
- Regulations on mentoring 03/01/2022
- Regulations on the processing, storage, and distribution of personal data 03/01/2021
- Policy for the protection and processing of personal data 09/01/2022
- Regulation on trade secrets / confidential information 12/05/2022
- Regulations on contract work 01/27/2023
- Personnel policy 07/26/2021
- Policy on the protection of human rights and protection against discrimination 07/26/2021
- Code of Ethics 07/26/2021
- Supplier Code 07/26/2021
- Personal files, time sheets, employee pay slips according to the audit sample

Any other comments:

None

Management Systems

In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Log of accounting by checking a legal entity. No any fines/prosecutions for non-compliance to any regulations in the last 12 months.
Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Policy in the field of protection of human rights and protection from discrimination and harassment

If Yes, is there evidence (an indication) of effective implementation? Please give details.	As evidenced by document review and worker / managements interviews, implementation of policies is effective.
Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: When hiring, each employee is interviewed with the rules; when making changes to procedures. Evidence: familiarization sheets with the signature of the staff.
If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: As evidenced by document review and worker / managements interviews, implementation of policies are effective, familiarization sheets.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Is there a Human Resources manager/department?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No HR Manager
Is there a senior person /manager responsible for implementation of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Kirill Maltsev – Chief technologist
Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Procedure on personal data
Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Procedure on personal data Regulation on trade secrets / confidential information
Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Interview with management.
Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Interview with management.
Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Supplier Code 07/26/2021
Land Rights	

<p>Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Lease agreement dated 20.09.2018 w/n</p>
<p>Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Periodical control and monitoring by site and regulatory bodies. Compliance.</p>
<p>Does the site have a written policy and procedures specific to land rights?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Not required</p>
<p>Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Land fee. In the case of construction or expansion of production documentation and payments will be carried out in accordance with the legal requirements.</p>
<p>Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: N/A All Land use aspects are under control of regulatory bodies.</p>
<p>Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Not observed during the audit.</p>

Good Example		Evidence																		
[Back to findings summary]																				
<table border="1"> <thead> <tr> <th colspan="2">Good Example</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600544444</td> </tr> <tr> <td>Clause</td> <td>0B - Management Systems and code Implementation</td> </tr> <tr> <td>Issue Title</td> <td>48 - More than 80% of workforce on open ended permanent contracts</td> </tr> <tr> <td>Subcategory</td> <td>Outcome Indicators</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Explanation to the good example</td> <td>100% of workforce on open ended permanent contracts / 100% рабочей силы работают по бессрочным постоянным контрактам</td> </tr> <tr> <td>Evidence</td> <td>Documents review, employees / management interview</td> </tr> </tbody> </table>		Good Example		Status	OPEN	Reference	ZAF600544444	Clause	0B - Management Systems and code Implementation	Issue Title	48 - More than 80% of workforce on open ended permanent contracts	Subcategory	Outcome Indicators	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	100% of workforce on open ended permanent contracts / 100% рабочей силы работают по бессрочным постоянным контрактам	Evidence	Documents review, employees / management interview	
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Subcategory	Outcome Indicators																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
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Evidence	Employee's interview																			

1 - Freely chosen Employment
[Summary of Findings]

1: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

The organization as a whole complies with the requirements specified in this section. The organization does not use forced or indentured labor. The original documents from employees, confirmed by the interviewed employee, are not stored. Employees can leave their employer at any time by giving notice.

Evidence examined:

Staffing table 01/01/2024
Internal labor regulations 02/01/2021
Regulations on remuneration and bonuses for employees 09/01/2020
Regulations on wage indexation 09/01/2024
Personnel policy 07/26/2021
Policy on the protection of human rights and protection against discrimination 07/26/2021
Code of Ethics 07/26/2021
Supplier Code 07/26/2021
Personal files, time sheets, employee pay slips according to the audit sample

Any other comments:

None

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There are no restrictions according to the Internal Labor Regulations and Code of Conduct
If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details: N/A

<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>Document Review, Facility Tour, Management interview, Employee interviews.</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>Policy on the protection of human rights and protection against discrimination 07/26/2021 Code of Ethics 07/26/2021 Supplier Code 07/26/2021. Regulations against forced / illegal labour are set out in local documents and current legislation of the Russian Federation.</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Regulations against forced / illegal labour are set out in local documents and current legislation of the Russian Federation.</p>

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

2: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

The organization observes requirements specified in this section. There is no union at the site. At interview workers of the organization informed, that know about that can organize trade unions, but they do not have such necessity. Also, workers have an opportunity to exercise negotiations with management of the organization about working conditions through supervisor or directly to address to the top management.

Evidence examined:

Internal labor regulations 02/01/2021
 Personnel policy 07/26/2021
 Policy on the protection of human rights and protection against discrimination 07/26/2021
 Code of Ethics 07/26/2021
 Supplier Code 07/26/2021
 Personal files, time sheets, employee pay slips according to the audit sample

Any other comments:

None

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input type="checkbox"/> Other	<input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> None
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Through supervisor /directly to address to the management / compliance letter box	
Is there evidence of free elections?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A as there are no the Union or committee.	

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

3 - Working Conditions are Safe and Hygienic
[Summary of Findings]

3: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

The organization observes requirements specified in this section. Safety instructions have been developed for all positions. All employees are familiar with the First Aid Instructions, Fire Safety Instructions. The production halls provide access to first aid kits. Workers receive regular and registered health and safety training, and such training should be repeated for new or reassigned employees. The workers are provided with food-intake rooms equipped with refrigerators and microwave ovens. Employees have access to drinking water. There are changing rooms, showers, toilets for men and women. The staff is provided with high-quality workwear and PPE, locker rooms.

Evidence examined:

Labour protection policy 01.02.2022
 Regulations on labor protection 01.09.2020
 Regulations on the labor protection management system 09/01/2021
 Regulations on the management of professional risks 09.08.2021
 Summary statement of occupational risk assessment (risk register) 09.08.2021
 List of measures to reduce professional risks 09.08.2021
 Report on the special assessment of working conditions 15.09.2022
 Summary statement of occupational risk assessment (risk register) 09.08.2021
 List of measures to reduce professional risks 09.08.2021
 Report on the special assessment of working conditions 15.09.2022
 The program of production control over compliance with sanitary rules and the implementation of sanitary and anti-epidemic (preventive) measures 15.01.2022
 Order No. 2/OT dated 10.02.2023 on the appointment of persons responsible for conducting labor safety briefings
 List of labour protection instructions 29.12.2022
 Training programs for safe work methods and practices
 Register of microdamage's (microtraumas) of workers

Any other comments:

None

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?

Yes No

Please give details:

Labour protection policy 01.02.2022

<p>Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Included in the program of induction training</p>
<p>Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Not observed during the site tour.</p>
<p>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</p> <p>Please give details: All visitors are trained, and the necessary protective equipment are provided for visitors.</p>
<p>Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Medical room not required. There is a possibility call an ambulance / there is an instruction on rendering the first pre-medical help for workers in divisions / heads of structural divisions are trained to provide first aid in a specialized organization</p>
<p>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</p> <p>Please give details: There is no medical office in the company, heads of departments and staff are trained in first aid. There are first aid kits.</p>
<p>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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The company provides transfer to and after work. All vehicles are in good condition, serviced in a timely manner.</p>
<p>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</p> <p>Please give details: N/a, there are no living quarters on the territory of the facility. In the dressing room, employees have two lockers for storing personal belongings.</p>
<p>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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: The organization has not confirmed a systematic approach to identifying, analyzing and assessing hazards and occupational risks. For example, hazards have not been identified and risks have not been assessed for two new car driver jobs created in January 2024.</p>
<p>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</p> <p>Please give details: The facility is met its legal obligations on environmental requirements.</p>

Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?

Yes No

Please give details:

The facility does not use of banned chemicals.

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600544439	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	152 - Health and safety risk assessment conducted, but not suitable / sufficient and/or documented	
Subcategory	Health & Safety Management	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Labor Code of the Russian Federation Article 214. Responsibilities of the employer in the field of labor protection. The employer is obliged to ensure: systematic identification of hazards and occupational risks, their regular analysis and assessment; Трудовой Кодекс РФ Статья 214. Обязанности работодателя в области охраны труда. Работодатель обязан обеспечить: систематическое выявление опасностей и профессиональных рисков, их регулярный анализ и оценку;	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	The organization has not confirmed a systematic approach to identifying, analyzing and assessing hazards and occupational risks. For example, hazards have not been identified and risks have not been assessed for two new car driver jobs created in January 2024. / Организацией не подтвержден системный подход по выявлению, анализу и оценке опасностей и профессиональных рисков. Например, не идентифицированы опасности и не оценены риски в отношении двух новых рабочих мест водителей автомобиля, образованных в январе 2024.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	

Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	<p>Hazard identification and risk assessment of new workplaces must be carried out. A systematic approach to identifying, analyzing and assessing hazards and occupational risks must be established. / Необходимо провести идентификацию опасностей и оценку рисков новых рабочих мест. Необходимо установить системный подход к выявлению, анализу и оценке опасностей и профессиональных рисков.</p>	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600544440	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	146 - Lack of detailed health and safety policy that is communicated to workers	
Subcategory	Health & Safety Management	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	<p>Labor Code of the Russian Federation Article 214. Responsibilities of the employer in the field of labor protection. The employer is obliged to ensure: the development and approval of local regulations on labor protection, taking into account the opinion of the elected body of the primary trade union organization or another representative body authorized by employees (if there is such a representative body) in the manner established by Article 372 of this Code for the adoption of local regulations; maintaining a register (list) of regulatory legal acts (including the use of electronic computers and databases) containing labor protection requirements, in accordance with the specifics of their activities, as well as access for employees to current versions of such regulatory legal acts; / Трудовой Кодекс РФ Статья 214. Обязанности работодателя в области охраны труда. Работодатель обязан обеспечить: разработку и утверждение локальных нормативных актов по охране труда с учетом мнения выборного органа первичной профсоюзной организации или иного уполномоченного работниками представительного органа (при наличии такого представительного органа) в порядке, установленном статьей 372 настоящего Кодекса для принятия локальных нормативных актов; ведение реестра (перечня) нормативных правовых актов (в том числе с использованием электронных вычислительных машин и баз данных), содержащих требования охраны труда, в соответствии со спецификой своей деятельности, а также доступ работников к актуальным редакциям таких нормативных правовых актов;</p>	
ETI code	3.1 - A safe and hygienic working environment shall	

	be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	When assessing the documentation, it was found that some local regulations on labor protection, for example, the Regulations on the Occupational Safety and Health Management System, and the administrative documents (orders) in the field of labor protection in force in the company, require updating due to changes in legislation. / При проведении оценки документации было установлено, что некоторые локальные акты по охране труда, например Положение о Системе управления охраной труда, Распорядительные документы (приказы) в области охраны труда, действующие в компании, требуют актуализации в связи с изменениями законодательства.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is necessary to establish control over changes in current legislation, as well as ensure timely updating of all relevant local regulations on labor protection. / Необходимо установить контроль за изменениями действующего законодательства, а также обеспечить своевременную актуализацию всех соответствующих локальных нормативных документов по охране труда.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600544441	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	187 - Fire extinguishers not inspected / checked regularly / out of date	
Subcategory	Fire Safety - Fire Fighting Equipment	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Resolved by audit	ZAA600069421	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Rules of the fire regime in the Russian Federation of September 16, 2020 N 1479 Item 60; Set of rules 9.13130.2009 Fire equipment. Fire extinguishers. Operating requirements. Paragraphs 4.3.5 - 4.3.7, 4.3.9 / Правила противопожарного режима в Российской Федерации от 16 сентября 2020 года N 1479 Пункт 60; СП 9.13130.2009 Техника пожарная. Огнетушители. Требования к эксплуатации. Пункты 4.3.5 - 4.3.7, 4.3.9	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	There is no evidence of quarterly inspections of fire extinguishers. The fire protection operation log is not presented. / Не предоставлено свидетельств проведения ежеквартальных осмотров огнетушителей. Не представлен журнал эксплуатации противопожарной защиты.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	

<p>Actions</p>	<p>It is necessary to ensure that periodic inspections of fire extinguishers are carried out in a timely manner. Records must be kept in accordance with applicable law. / Необходимо обеспечить проведение периодических осмотров огнетушителей в установленные сроки. Необходимо обеспечить ведение записей в соответствии с действующим законодательством.</p>	
<p>Additional comments</p>	<p>В ООО "Фром Вайлд" организованы работы по осмотру и обслуживанию огнетушителей. Учет выполненных мероприятий, сроки их проведения и результаты обследования фиксируются в специальных журналах, карточках, как на бумажных носителях так и в электронном виде Corrective actions are accepted and effective</p>	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600544442	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	289 - First aid box available but contents are missing / contents out of date or otherwise inadequate	
Subcategory	First Aid / Accidents	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Order of the Ministry of Health of the Russian Federation dated December 15, 2020 N 1331n "On Approval of Requirements for Completion of First Aid Kit with Medical Devices" / Приказ Министерства здравоохранения Российской Федерации от 15 декабря 2020 года N 1331н «Об утверждении требований к комплектации медицинскими изделиями аптечки для оказания первой помощи работникам»	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	Not all first aid kits for workers located in production workshops are equipped in accordance with current standards. First aid kits partially contain opened packages of sterile medical devices. Confirmation of the establishment of control and appointment of those responsible for the maintenance and timely replenishment of first aid kits was not provided. / Не все аптечки для оказания первой помощи работникам, размещенные в производственных цехах, укомплектованы в соответствии с действующими нормами. Частично в аптечках присутствуют вскрытые упаковки стерильных медицинских изделий. Не представлено подтверждение об установлении контроля и назначении ответственных за содержанием и своевременным пополнением аптечек.	
Follow up	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	

method		
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Equip first aid kits in accordance with the Requirements, appoint responsible persons, and ensure control over the consumption of medical products. / Укомплектовать аптечки в соответствии с Требованиями, назначить ответственных, обеспечить контроль расходования медицинских изделий.	

Good Example	Evidence																		
[Back to findings summary]																			
<table border="1" style="width: 100%;"> <thead> <tr> <th colspan="2" style="text-align: center;">Good Example</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600544446</td> </tr> <tr> <td>Clause</td> <td>3 - Working Conditions are Safe and Hygienic</td> </tr> <tr> <td>Issue Title</td> <td>345 - Excellent worker facilities (e.g. changing rooms, lockers)</td> </tr> <tr> <td>Subcategory</td> <td>Hygiene Facilities & Housekeeping</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Explanation to the good example</td> <td>Excellent worker facilities / Отличные условия для работников</td> </tr> <tr> <td>Evidence</td> <td>Site tour, employees interview</td> </tr> </tbody> </table>		Good Example		Status	OPEN	Reference	ZAF600544446	Clause	3 - Working Conditions are Safe and Hygienic	Issue Title	345 - Excellent worker facilities (e.g. changing rooms, lockers)	Subcategory	Hygiene Facilities & Housekeeping	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	Excellent worker facilities / Отличные условия для работников	Evidence	Site tour, employees interview
Good Example																			
Status	OPEN																		
Reference	ZAF600544446																		
Clause	3 - Working Conditions are Safe and Hygienic																		
Issue Title	345 - Excellent worker facilities (e.g. changing rooms, lockers)																		
Subcategory	Hygiene Facilities & Housekeeping																		
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																		
Explanation to the good example	Excellent worker facilities / Отличные условия для работников																		
Evidence	Site tour, employees interview																		

4 - Child Labour Shall Not Be Used
[Summary of Findings]

4: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

The organization as a whole observes requirements specified in this section. There are no young workers or child worker has been identified during interview to employees and audit of documentation HR, including labour contracts. Organization checks the age before recruitment and maintains age related documents in the workers personnel files. During audit to the youngest worker was 20. The lower age limit is set to the local documents of the company (instructions on labor protection and working instructions) - 18.

The requirements of local legislation are reflected in the Labor Code of the Russian Federation. children, that is, those under the age of 18 are granted the same status in terms of labor law. It is prohibited to employ workers under 18 years of age to work on the night shift, overtime work and on weekends. Employees under the age of 18 may not be hired for hazardous or underground work. It is also forbidden to involve employees under 18 years of age in lifting and moving things that exceed the weight norms permissible for their age. The site did not use child labour. The inspection confirmed the absence of child labor at the Factory. The factory has effective procedures to verify the age of workers at the time of hiring. The site verifies the age of employees with high school diplomas, passports and medical examinations. For a more detailed study, 10 employees' personal files were taken.

Evidence examined:

Staffing table 01/01/2024
 Internal labor regulations 02/01/2021
 Regulations on the processing, storage, and distribution of personal data 03/01/2021
 Policy for the protection and processing of personal data 09/01/2022
 Personnel policy 07/26/2021
 Policy on the protection of human rights and protection against discrimination 07/26/2021
 Code of Ethics 07/26/2021
 Supplier Code 07/26/2021
 Personal files, time sheets, employee pay slips according to the audit sample

Any other comments:

None

Legal age of employment:	16
Age of youngest worker found:	20
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0.0%

Are workers under 18 subject to hazardous work assignments?

Yes No

Please give details:

There are no young workers.

5 - Living Wages are Paid
[Summary of Findings]

5: Compliance Requirements

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

The organization as a whole observes requirements specified in this section. Workers receive wages on bank card, twice a month. The level of salaries set in Regulations on remuneration, bonuses and additional payments for employees, Staffing table as well as employment orders and contracts. Deductions apply only to income tax. Pay slips are provided monthly. Wages and benefits were found paid in accordance with List of staff. Workers interviewed found that they were aware about salary scheme.

Evidence examined:

Staffing table 01/01/2024
Internal labor regulations 02/01/2021
Regulations on remuneration and bonuses for employees 09/01/2020
Regulations on wage indexation 09/01/2024
Personnel policy 07/26/2021
Policy on the protection of human rights and protection against discrimination 07/26/2021
Code of Ethics 07/26/2021
Personal files, time sheets, employee pay slips according to the audit sample

Any other comments:

None

Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: null Per Week: 40.0 Per Month: null	Actual Per Day: 8.0 Per Week: 40.0 Per Month: 184.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 24230	Actual Per Day: 0 Per Week: 0 Per Month: 25480	NO

Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 0 Per Week: 0 Per Month: 0	NO
Wages Analysis:			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	Number of documents to check 10 for the period from June 01, 2023 – May 31, 2024 (November 2023 - high season, February 2024 - low season, May 2024 - last paid).		
Are there different legal minimum wage grades? If Yes, please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	25480		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found: In accordance with the Regulations on remuneration, additional payments may be established for employees: - for combining professions and performing duties of a temporarily absent employee; - for expanding the service area and increasing the volume of work performed; - for professional excellence. In addition, based on the results of work for the reporting month, additional incentive bonuses for production results may be paid to individual employees. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	13 % - Government tax (including social insurance).		
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Please list all deductions that have been made.	13 % - Government tax (including social insurance).		
Please list all deductions that have not been made.	n/a		
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

<p>Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Working time schedules, time sheet, records reflect all time worked.</p>
<p>Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: 14991 rubles per month according to the Ministry of Social Development of the region</p>
<p>If yes, what was the calculation method used.</p>	<p><input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage</p> <p><input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK</p> <p><input type="checkbox"/> Fair Wear Wage Ladder <input checked="" type="checkbox"/> Fairtrade Foundation</p> <p><input type="checkbox"/> Other – please give details:</p>
<p>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</p> <p>Please give details: Annually</p>
<p>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>Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Interviews with workers; Staff list; analysis of time sheets, pay slips</p>
<p>How are workers paid:</p>	<p><input type="checkbox"/> Cash <input type="checkbox"/> Cheque</p> <p><input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other</p>

Good Example		Evidence
[Back to findings summary]		
Good Example		
Status	OPEN	
Reference	ZAF600544443	
Clause	5 - Living Wages are Paid	
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	
Subcategory	Benefits & Insurance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	Organization of free delivery of employees (shuttle bus) / Организация бесплатной доставки сотрудников (развозка)	
Evidence	Interviews with employees, management	

6 - Working Hours are not Excessive
[Summary of Findings]

6: Compliance Requirements

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:
- 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined

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

Current Systems:

The organization observes requirements specified in this section. Work shifts: For administration persons: 5 days (08:00 – 17:00) / 2 days off (Lunch break (60 min) – not included during working hours). Work shift for persons of production: 3 days (08.00 – 20.00) / 3 days the day off (Lunch break (60 min) – not included during working hours).
The Company introduced a summarized accounting of working time with an accounting period of 1 quarter. Every year the organization develops and installs a shift schedule. The shift schedule is communicated to the staff and introduced by order of the Company. Based on the shift schedule, the standard working time for one employee in each shift is calculated for a calendar period (week, quarter, and year). Night work and overtime is not used, that confirms the analysis of employees pay slip, time cards and interviews with employees.

Evidence examined:

- Staffing table 01/01/2024
- Internal labor regulations 02/01/2021
- Regulations on remuneration and bonuses for employees 09/01/2020
- Regulations on wage indexation 09/01/2024
- Personnel policy 07/26/2021
- Policy on the protection of human rights and protection against discrimination 07/26/2021
- Code of Ethics 07/26/2021
- Personal files, time sheets, employee pay slips according to the audit sample

Any other comments:

None

Working hours' analysis

Systems & Processes

What timekeeping systems are used? the sheet of the account working hours

Is sample size same as in wages section? Yes No

Please give details:

Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	5
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	Maximum number of processing hours per month: 0 Maximum hours of processing per year: 0
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No evidence
Approximate percentage of total workers on highest overtime hours:	0.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: Worker interviews and agreement
Overtime premium	
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A - there is no legal requirement to OT premium Please give details: overtime is not used

Is overtime paid at a premium?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input checked="" type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other
Please give details	N/A
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	<input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <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)
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	N/A
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

7 - No Discrimination is Practiced
[Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

Compliance. No discrepancies observed during the audit. As evidenced by document checks and worker/mgmt. Interviews. The facility does not discriminate during hiring, paying wages, providing the opportunity for professional training, promotion, termination of employment or retirement. The company provides equal payment for men / women and young / elderly employees. The rules for combating discrimination in hiring, paying wages, providing training opportunities, promotion is described in the Code of Conduct, work rules and instructions for personnel of the Personnel Service.

Evidence examined:

Staffing table 01/01/2024
Internal labor regulations 02/01/2021
Regulations on remuneration and bonuses for employees 09/01/2020
Regulations on wage indexation 09/01/2024
Personnel policy 07/26/2021
Policy on the protection of human rights and protection against discrimination 07/26/2021
Code of Ethics 07/26/2021
Supplier Code 07/26/2021
Personal files, time sheets, employee pay slips according to the audit sample

Any other comments:

None

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 60.0%	Female: 40.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	8	
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	There is no discrimination in hiring, remuneration and activity. During the site and personal interviews, no evidence of physical or verbal abuse was found. Management controls discipline.	
Professional Development		
What type of training and development are available for workers?	Refresher courses and trainings, field seminars on labor protection are available to all employees on site. The company conducts a sufficient number of trainings for all personnel.	

Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)

Yes No

8 - Regular Employment Is Provided
[Summary of Findings]

8: Compliance Requirements

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current Systems:

The organization observes requirements specified in this section. The Organization concludes the Labour agreement with their workers where define the specific of the job, rates of the job and other related information. For all employees, the organization implements the same social guarantees. The organization doesn't use the subcontractors for process and homework for production. Workers pay no recruitment fee at any stage of the recruitment process. Worker contracts understood and signed by workers. The content of employment contracts has been viewed on example, 10 employees

Evidence examined:

Staffing table 01/01/2024
Internal labor regulations 02/01/2021
Regulations on remuneration and bonuses for employees 09/01/2020
Regulations on wage indexation 09/01/2024
Regulations on mentoring 03/01/2022
Regulations on the processing, storage, and distribution of personal data 03/01/2021
Policy for the protection and processing of personal data 09/01/2022
Personnel policy 07/26/2021
Policy on the protection of human rights and protection against discrimination 07/26/2021
Code of Ethics 07/26/2021
Supplier Code 07/26/2021
Personal files, time sheets, employee pay slips according to the audit sample

Any other comments:

None

Responsible Recruitment

All Workers

Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Same as actual conditions <input checked="" type="checkbox"/> Understood by workers
Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Migrant Workers	
Type of work undertaken by migrant workers:	The company does not hire migrants for any type of work
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A The company does not hire migrants for any type of work
Is there any observation on this finding?	N/A
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	N/A Agencies does not used
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A Agencies does not used
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A Agencies does not used
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)	

Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There are no any contractors on site
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There are no any contractors on site

8A - Sub-Contracting and Homeworking
[Summary of Findings]

8A: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

There is no Sub-Contracting and Homeworking

Evidence examined:

Document Review, Facility Tour, Management interview, Employee interviews.

Any other comments:

None

Summary of sub-contracting – if applicable

Is there any sub-contracting at this site? Yes No

Summary of homeworking – if applicable

Is homeworking used at this site? Yes No

9 - No Harsh or Inhumane Treatment is Allowed
[Summary of Findings]

9: Compliance Requirements

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
9.2 companies should provide access to a confidential grievance mechanism for all workers

Current Systems and Evidence Examined

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

Current Systems:

No discrepancies observed during the audit. As evidenced by document checks and worker/mgmt. interviews. According to the national legislation all workers protected from Harsh or Inhumane Treatment. There was no evidence about the existence of sexual harassment and the same was confirmed during workers interviews. Factory has a copy of the laws and understands its requirements.

Evidence examined:

Staffing table 01/01/2024
Internal labor regulations 02/01/2021
Regulations on remuneration and bonuses for employees 09/01/2020
Regulations on wage indexation 09/01/2024
Regulations on mentoring 03/01/2022
Regulations on the processing, storage, and distribution of personal data 03/01/2021
Policy for the protection and processing of personal data 09/01/2022
Personnel policy 07/26/2021
Policy on the protection of human rights and protection against discrimination 07/26/2021
Code of Ethics 07/26/2021
Supplier Code 07/26/2021
Personal files, time sheets, employee pay slips according to the audit sample

Any other comments:

None

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Directly to address to the management / compliance letter box / appeal directly to the labor inspectorate / police
If yes, are workers aware of these channels and have access? Please give details.	The workers confirmed the possibility of using these methods through interviews
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	There is a suggestion box as grievance mechanism at the Facility
Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Worker <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other
Please provide grievance mechanism details	Workers have the option of filing a grievance through the compliance letter box/ suggestion box. This was confirmed by the workers during the interview.

<p>Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:</p>
<p>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 Please give details:</p>
<p>Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>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 Please give details:</p>

10A - Entitlement to Work and Immigration
[Summary of Findings]

10A: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

No discrepancies observed during the audit. As evidenced by document checks and worker/mgmt. interviews.
Local law requirements are reflected in the Constitution as well as in the Labour Code. Factory has a copy of the laws and understands its requirements.

Evidence examined:

The facility employs only workers with a legal right to work. All workers were validated by the facility for their legal right to work by reviewing original documentation. Copies all documents are available in HR Department.
10 personal files of employees were checked.

Any other comments:

None

10B4 - Environment 4–Pillar
[Summary of Findings]

10B4: Compliance Requirements

10.B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.

10.B4.2 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.

10.B4.3 Businesses shall be aware of their end client’s environmental standards/code requirements

10.B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10.B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.

10.B4.6 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).

10.B4.7 Businesses shall make continuous improvements in their environmental performance.

10.B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation

10.B4.9 Businesses should have a nominated individual responsible for co-ordinating the site’s efforts to improve environmental performance.

10B4: Guidance for Observations

10.B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.

10.B4.11 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:

The organization as a whole observes requirements specified in this section. The organization meet necessary the requirements of local and national laws of Russian Federation “Law on protection of atmospheric air”, “Water code”, “Ground code”, “Law on bowels”, “Law on waste products of manufacture and consumption” etc.

The management of the enterprise supports all legally required environmental documents. During the audit, all licensed licenses related to environmental impact were demonstrated. The enterprise carries out continuous monitoring of its impact on the environment, including accounting and analysis of consumption and consumption of natural resources. The company pays all necessary taxes for pollution of the environment provided for by national legislation. All necessary agreements with organizations engaged in the export and utilization of wastes were demonstrated. Purchased chemicals are stored in accordance with established requirements. In accordance with national legislation, providers of waste management and disposal services have appropriate licenses for the disposal of waste and hazardous waste. Separate collection and accumulation of waste.

Evidence examined:

Environmental policy dd 20.03.21
 Goals in the field of ecology for 2024
 Top management analysis, progress towards 2023 environmental targets
 Certificate No. EHJCZDOF dated July 16, 2020, on the registration of an object that has a negative impact on the environment
 Order No. 2 dated January 15, 2021, on the appointment of persons responsible for ensuring environmental safety at the facility
 Environmental impact statement 01-0222-005042-P
 Production environmental control program 10.01.2022
 Report on the organization and results of the implementation of industrial environmental control for 2023
 Sanitary and epidemiological conclusion on the compliance of the draft standards for maximum permissible emissions of pollutants into the atmosphere 26.04.2022
 Calculation of standards for permissible emissions of pollutants into the atmosphere 14.02.2022
 Report on the inventory of stationary sources of pollutant emissions into the atmospheric air 14.02.2022
 Passport of the gas treatment plant
 Project for the inventory of generation of production and consumption waste 10.12.2021
 Instructions for the accumulation and accounting of waste of hazard classes 1-5 07.12.2021
 Inventory list of formation and places of temporary accumulation of production and consumption waste 10.12.2021
 Passports of waste 1-4 hazard classes
 Summary report on the movement of waste for 2023
 Technical report on compliance with established standards for maximum permissible emissions into the atmosphere at emission sources for 2023
 Agreement of LLC "Unified City Solid Waste Service" No. 2030 dated 10/18/2019
 Agreement "Unified City Solid Waste Service" LLC No. 2024 dated 10/11/2019
 Contract "Special Services Plus" LLC No. 832 dated May 24, 2021
 Agreement of Utilitservis LLC No. 115-P-22 dated November 18, 2022
 Agreement Autonomous Institution of the Altai Republic "Baygol Forest" w/n dated 11/15/2019
 Agreement Domichek E.V. w/n from 01/10/2023
 Agreement MUP "Eneretik" 12/1/2018 w/n

Any other comments:

None

Environmental Analysis	
Is there a manager responsible for Environmental issues (Name and Position):	Julia Chistyakova - technologist
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 Please give details: Compliance with legal requirements.
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The company's environmental system is not certified
Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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 Please give details: Environmental policy dd 20.03.21
Does the site have a Biodiversity policy?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<p>Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Not required.</p>
<p>Have all legally required permits been shown?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Environmental policy dd 20.03.21 Goals in the field of ecology for 2024 Top management analysis, progress towards 2023 environmental targets Certificate No. EHJCZDOF dated July 16, 2020, on the registration of an object that has a negative impact on the environment Order No. 2 dated January 15, 2021, on the appointment of persons responsible for ensuring environmental safety at the facility Environmental impact statement 01-0222-005042-P Production environmental control program 10.01.2022 Report on the organization and results of the implementation of industrial environmental control for 2023 Sanitary and epidemiological conclusion on the compliance of the draft standards for maximum permissible emissions of pollutants into the atmosphere 26.04.2022 Calculation of standards for permissible emissions of pollutants into the atmosphere 14.02.2022 Report on the inventory of stationary sources of pollutant emissions into the atmospheric air 14.02.2022 Passport of the gas treatment plant Project for the inventory of generation of production and consumption waste 10.12.2021 Instructions for the accumulation and accounting of waste of hazard classes 1-5 07.12.2021 Inventory list of formation and places of temporary accumulation of production and consumption waste 10.12.2021 Passports of waste 1-4 hazard classes Summary report on the movement of waste for 2023 Technical report on compliance with established standards for maximum permissible emissions into the atmosphere at emission sources for 2023 Agreement of LLC "Unified City Solid Waste Service" No. 2030 dated 10/18/2019 Agreement "Unified City Solid Waste Service" LLC No. 2024 dated 10/11/2019 Contract "Special Services Plus" LLC No. 832 dated May 24, 2021 Agreement of Utilitservis LLC No. 115-P-22 dated November 18, 2022 Agreement Autonomous Institution of the Altai Republic "Baygol Forest" w/n dated 11/15/2019 Agreement Domichek E.V. w/n from 01/10/2023 Agreement MUP "Eneretik" 12/1/2018 w/n</p>
<p>Is there a documentation process to record hazardous chemicals used in the manufacturing process?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p> <p>Please give details: Hazardous chemicals are not used in the production of products.</p>

Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: According to the application of labor protection legislation.
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 Please give details: A plan of measures to reduce energy consumption has been provided
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Contracts for waste disposal
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 Please give details: Plan schedule of control of emissions of pollutants into the atmosphere, etc.
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 checked="" type="checkbox"/> No Please give details: N/A, but will managed in accordance with legal requirements if necessary

Usage/discharge analysis		
Criteria	Previous year: 2023	Current year: 2024
Electricity Usage: Kw/hrs	727311	214905
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	0	0
Has site completed any carbon Footprint Analysis?	No	No
If Yes, please state result		
Water Sources	City central water supply	City central water supply
Water Volume Used	590	300
Water Discharged	Production, Domestic needs	Production, Domestic needs
Water Volume Discharged	590	300
Water Volume Recycled	0	0
Total waste produced	229,562 tons	103,337 tons
Total hazardous waste produced	0	0
Waste to recycling	190,262 tons	84,005 tons
Waste to landfill	39,3 tons	19.332 tons
Waste to other	0	0

Total Product Produced	385,476 tons	203,145 tons
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Good Example		Evidence
[Back to findings summary]		
Good Example		
Status	OPEN	
Reference	ZAF600544447	
Clause	10B4 - Environment 4-Pillar	
Issue Title	611 - Site has a good awareness of laws related to environment as well as customer's environmental requirements	
Subcategory	General Environmental Permits, & Management systems	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	Site has a good awareness of laws related to environment as well as customer's environmental requirements / Объект хорошо осведомлен о законах, связанных с окружающей средой, а также об экологических требованиях заказчика	
Evidence	Documents review, employees/management interview	

Good Example		Evidence
[Back to findings summary]		
Good Example		
Status	OPEN	
Reference	ZAF600544448	
Clause	10B4 - Environment 4-Pillar	
Issue Title	614 - The site has policies in place to minimise the use and / or disposal of natural resources e.g.. water, energy, waste, etc.	
Subcategory	General Environmental Permits, & Management systems	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	The site has policies in place to minimise the use and / or disposal of natural resources e.g.. water, energy, waste, etc. / На объекте действует политика, направленная на минимизацию использования и / или утилизации природных ресурсов, таких как вода, энергия, отходы и т.д.	
Evidence	Documens review, employees/management interview	

10C - Business Ethics – 4-Pillar Audit
[Summary of Findings]

10C: Compliance Requirements
 10.C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
 10.C.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.
 10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.
 10.C.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.
 10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,
 10.C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics
 10.C.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
 10.C.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.
 10.C.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:

The organization as a whole observes requirements specified in this section. During the audit and discuss with management and workers of Organization any evidences related with bribery, corruption or any other type of fraudulent, harassment or unfair business practice were not applied in the organization. There are not evidences of unethical business practice. There are established equal treatments for work personnel.

Evidence examined:

Internal labor regulations 02/01/2021
 Regulation on trade secrets / confidential information 12/05/2022
 Regulations on contract work 01/27/2023
 Personnel policy 07/26/2021
 Policy on the protection of human rights and protection against discrimination 07/26/2021
 Code of Ethics 07/26/2021
 Supplier Code 07/26/2021

Any other comments:

None

<p>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 checked="" type="checkbox"/> Policy for third parties including suppliers</p> <p>Please give details: Policy on the protection of human rights and protection against discrimination 07/26/2021 Code of Ethics 07/26/2021 Supplier Code 07/26/2021</p>
<p>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>Please give details: In employment and after each document update</p>
<p>Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: As needed</p>
<p>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>Please give details: Business ethics issues are part of supplier assessment process.</p>

Observation		Evidence
[Back to findings summary]		
Observation		
Status	OPEN	
Reference	ZAF600498052	
Clause	10C - Business Ethics – 4-Pillar Audit	
Issue Title	659 - Policy and procedures to prevent or avoid bribery, corruption and other unethical business practices have not been communicated to employees in higher risk positions such as management, finance, purchasing and logistics	
Subcategory	BE - Systems to manage compliance	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA422575095	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	N/A	
Explanation to the observation	There is no evidence of broadcasting business ethics relating to bribery, corruption or any fraudulent business practices to all relevant parties, including their own suppliers. / Отсутствуют свидетельства трансляции деловой этики, касающейся взяточничества, коррупции или любых видов мошеннической деловой практики, всем соответствующим сторонам, включая своих собственных поставщиков	
Actions	N/A	

Attachments



CAPR_ZAA600069421.pdf



Warehouse-refrigerator building.jpg



Waste collection point.jpg



Shell breaking shop.jpg



Showers.jpg



Security checkpoint.jpg



Suggestion box.jpg



Sanitary facility.jpg



Raw materials warehouse.jpg



Raw materials receiving area.jpg



Quality control area.jpg



Packing warehouse.jpg



Main production workshop.jpg



Main gates.jpg



Main production building.jpg



Packing area.jpg



Meal room.jpg



Laundry.jpg



Garbage collection in the production workshop.jpg



First aid kit (see NC's).jpg



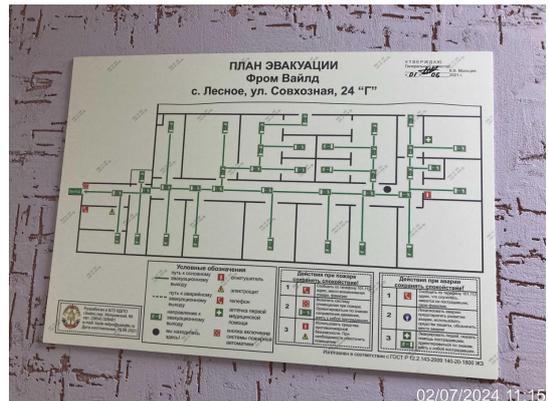
Garage.jpg



Information board.jpg



Equipment for drying raw materials.jpg



Evacuation map.jpg



Emergency exit, fire extinguisher, fire alarm button.jpg



Changing room.jpg



Drying chamber.jpg



First aid kit.jpg



Repair workshop.jpg



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

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

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