




Sedex Members Ethical Trade Audit Report

Version 6.0



| Audit Details | | | |
|---|--|--|---|
| Sedex Company Reference: <i>(only available on Sedex System)</i> | ZC: 1077731 | Sedex Site Reference: <i>(only available on Sedex System)</i> | ZS1052508 |
| Business name (Company name): | EMPRESAS LOURDES S. A. | | |
| Site name: | EMPRESAS LOURDES S.A | | |
| Site address: <i>(Please include full address)</i> | AV. SANTELICES 2830 ISLA DE MAIPO, SANTIAGO | Country: | CHILE |
| Site contact and job title: | Hector Cabrera - Head of Quality Assurance | | |
| Site phone: | +569 61399882 | Site e-mail: | hectorc@chileangrapegroup.com |
| SMETA Audit Pillars: | <input checked="" type="checkbox"/> Labour Standards | <input checked="" type="checkbox"/> Health & Safety | <input checked="" type="checkbox"/> Environment <input checked="" type="checkbox"/> Business Ethics |
| Date of Audit: | 20 th to 22 nd March , 2019 | | |

| | |
|---|---|
| Audit Company Name & Logo:  BUREAU VERITAS Bureau Veritas | Report Owner (payee): <i>(If paid for by the customer of the site please remove for Sedex upload)</i> EMPRESAS LOURDES S. A. |
|---|---|

| Audit Conducted By | | | | | |
|--------------------|-------------------------------------|--|--------------------------|-------------|--------------------------|
| Commercial | <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 6.0 April 2017 was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size):

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

Claudio Pérez Véliz

Lead auditor: Claudio Pérez Véliz

Witness auditor: Jaime Peñaloza Sepulveda

Interviewers: Claudio Pérez Véliz

Report writer: Claudio Pérez Véliz

Report reviewer: Chitra Kawale

Audit Company Report Reference: 001

Date of declaration: 8th April 2019

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

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

Non-Compliance Table

| Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i> | Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i> | | | | Record the number of issues by line*: | | | Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i> |
|---|--|--------------------------|--------------------------|--------------------------|---------------------------------------|-----|----|---|
| | ETI Base Code | Local Law | Additional Elements | Customer Code | NC | Obs | GE | |
| 0A Universal Rights covering UNGP | | | <input type="checkbox"/> | <input type="checkbox"/> | | | | |
| 0B Management systems and code implementation | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | • |
| 1. Freely chosen Employment | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | | | | • • |
| 2. Freedom of Association | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | | | | • • |
| 3. Safety and Hygienic Conditions | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | | | | • • |
| 4. Child Labour | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | | | | • • |
| 5. Living Wages and Benefits | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | | | | • |

| | | | | | | | | | |
|------|--|--------------------------|--------------------------|--------------------------|--------------------------|----|----|----|--------|
| | | | | | | | | | • |
| 6 | <u>Working Hours</u> | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | | | | • • |
| 7 | <u>Discrimination</u> | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | | | | • • |
| 8 | <u>Regular Employment</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | • • |
| 8A | <u>Sub-Contracting and Homeworking</u> | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | • • |
| 9 | <u>Harsh or Inhumane Treatment</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | • • |
| 10A | <u>Entitlement to Work</u> | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | • • |
| 10B2 | <u>Environment 2-Pillar</u> | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | NA | NA | NA | • • |
| 10B4 | <u>Environment 4-Pillar</u> | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | • • |

| | | | | | | | | | |
|---|------------------------|--|--------------------------|--------------------------|--------------------------|--|--|--|---|
| 10C | <u>Business Ethics</u> | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | : |
| General observations and summary of the site: | | | | | | | | | |
| <p>It is evident according to the sample taken, that:</p> <ul style="list-style-type: none"> - Workers have current labor contract - Wages are paid on time, the last business day of each month - It is clear that in terms of risk prevention, it has a Chief Risk Prevention, which conducts the training regarding hazards activity. - Workers have received training in first aid and fire extinguisher - Tour of facilities, adequate infrastructure, orderly, signage security and automated systems is observed. - A good working environment is emphasized. - The organization has BRC, IFC | | | | | | | | | |

**Please note the table above records the total number of Non-compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.*

Site Details

| Site Details | | |
|---|---|---|
| A: Company Name: | EMPRESAS LOURDES S. A. | |
| B: Site name: | EMPRESAS LOURDES S. A. | |
| C: GPS location: (if available) | GPS Address: AV. SANTELICES 2830 ISLA DE MAIPO, SANTIAGO | Latitude: -33.753401 Longitude: -70.904238 |
| D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections | Legal status: In conformity TIN: 79868770-0 Company name: EMPRESAS LOURDES S.A. Municipal Tax of Isla de Maipo Payment period: January to June 2019. Folio No. 000428 Production & Marketing Company of concentrate juices and wine | |
| E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc. | Elaboration of wine and concentrated must from the grape reception. Production, packaging and dispatch of bulk products. Development of dehydrated prune juice concentrate from the start. Reception of raw materials for the dispatch of finished products. | |
| F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings) | 1) Location of the site Location of the Island of Maipo, Metropolitan Region 2) Age of the site more than 30 years in the year 1989 3) Site size more than 57 hectares 573 m2 offices | |

| Production Building # | Description | Observation, in situ |
|---------------------------|--|--|
| Floor 1 | Warehouse Administrative Canteen | |
| Floor 2 | Maintenance Storage Processing facilities | 5.57 hectares of which: 3159 m2, wine cellar 2100 m2 maintenance 534 m2 stabilization 778 m2 thermal decanter 1850 m2 600 ship 548 m2 warehouse 1004 m2 finished product 364 m2 Brother Leo 499 m2 laboratories and vats Brother Leo 195 m2 dressing 132 m2 training room |
| Floor 3 | Finished products Vats or Silos | concentrates 209 m2 217 m2 canteen |
| Is this a shared building | No | |

For below, please add any extra rows if appropriate.

Visible structural integrity issues (large cracks) observed?

Yes

No

Please give details:

Does the site have a structural engineer evaluation?

Yes

No

Please give details: The organization has the legal permits established

| | |
|--|---|
| | The organization has all the valid permits consolidated in municipal patent which is up to dat |
| G: Site function: | <input type="checkbox"/> Agent <input 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 checked="" type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor |
| H: Month(s) of peak season: (if applicable) | The Harvest months: February, March, April and May |
| I: Process overview: <i>(Include products being produced, main operations, number of production lines, main equipment used)</i> | <p>Lourdes S.A. processes are:</p> <p>CONCENTRATED JUICE OF VIRGIN RED WINE</p> <p>RECEPTION OF GRAPE - 1 truck scale to weigh the loading of grapes and finished products (contract of authorized truck supplier).</p> <p>UNLOADING OF GRAPES: bridge unloading cranes with well tubs.</p> <p>ELIMINATION OF STEMS AND MOLDING</p> <p>De-stemmer machines. (One stemmer machine per well) at the same stage</p> <p>The obtaining of grape is for a pneumatic press: MACERATION OF HEAT 80-90°C</p> <p>2 tubular equipment that heat the juice at 80-90°C.</p> <p>MACERATION in vats or stainless-steel tanks where it is allowed to macerate the grape juice for 2 hours at 60-80°</p> <p>PRESSING</p> <p>Pneumatic presses</p> <p>DECANTER</p> <p>Equipment that separates the thickness of the juice.</p> <p>Centralization</p> <p>3 Centrifugal technology areas.</p> <p>Tangential filtration</p> <p>4 tangential filters that clarify the grape juice.</p> <p>CONCENTRADOR 68° BRIX</p> <p>COLD STORAGE CHAMBER, 8°C ENVIRONMENTAL</p> <p>2 cold rooms with stainless-steel tanks 316L of 200,000 liters.</p> <p>MIXTURE</p> <p>In stainless steel tanks</p> <p>COMMERCIAL STERILITY 80-90°C</p> <p>Thermodynamic equipment pasteurizer with cooling and retention of a pasteurizer, Alfa Laval 2015 Equipment</p> <p>PACKAGING</p> <p>DISPATCH</p> |
| J: What form of worker representation / union is there on site? | <input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) |

| | |
|---|--|
| | <input type="checkbox"/> None Joint Committee on Hygiene and Safety (CPHS) |
| K: Is there any night production work at the site? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| L: Are there any on site provided worker accommodation buildings e.g. dormitories | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes approx. % of workers in on site accommodation |
| M: Are there any off site provided worker accommodation buildings | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes approx. % of workers |
| N: Were all site provided accommodation buildings included in this audit | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If No, please give details |

| Audit Parameters | | | |
|---|---|--|--|
| A: Time in and time out | Day 1 Time in: 9:00 Day 1 Time out: 17:45 | Day 2 Time in: 9:00 Day 2 Time out: 17:45 | Day 3 Time in: 9:00 Day 3 Time out: 14:00 |
| B: Number of auditor days used: | 2,5 days Onsite | | |
| C: Audit type: | <input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define | | |
| D: Was the audit announced? | <input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced | | |
| E: Was the Sedex SAQ available for review? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not | | |
| F: Any conflicting information SAQ/Pre-Audit Info to Audit findings? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause | | |
| G: Who signed and agreed CAPR (Name and job title) | Héctor Cabrera - Head of Quality Assurance | | |
| H: Is further information available (If yes please contact audit company for details) | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| I: Previous audit date: | November 30 and December 1st, 2015 | | |
| J: Previous audit type: | 04 Pillars | | |
| K: Were any previous audits reviewed for this audit | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A | | |

| Audit attendance | Management | Worker Representatives | |
|--|--|---|---|
| | Senior management | Worker Committee representatives | Union representatives |
| A: Present at the opening meeting? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| B: Present at the audit? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| C: Present at the closing meeting? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i> | The organization does not have a Union The organization only has Joint Committee on Hygiene and Safety (CPHS) | | |
| E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i> | The organization does not have a Union | | |

Worker Analysis

“ The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national and where they do not intend to remain permanently 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 | 183 | 38 | 0 | 3 | 0 | 0 | 0 | 224 |
| Worker numbers – female | 42 | 6 | 0 | 1 | 0 | 0 | 0 | 49 |
| Total | 223 | 44 | 0 | 4 | 0 | 0 | 0 | 273 |
| | | | | | | | | |
| Number of Workers interviewed – male | 14 | 1 | 0 | 0 | 0 | 0 | 0 | 15 |
| Number of Workers interviewed – female | 15 | 0 | 0 | 0 | 0 | 0 | 0 | 15 |
| Total – interviewed sample size | 29 | 1 | 0 | 0 | 0 | 0 | 0 | 30 |

Note : In the case of migrant workers they occupy positions of Headquarters that is why they were not chosen in the sample, as mentioned in the detail, Nationality

| | |
|--|--|
| A: Nationality of Management | Chilean |
| B: Nationality of workers <i>Please add more rows as applicable</i> | Countries: Country 1: __Chilean__ Country 2: __España Product Manager __ Country 3: __Venezolano Quality Supervisor __ Country 4: __Peru Head Warehouse __ Country 5: __Suecia Head of COMEX __ |
| C: For the majority nationality of workers: | Nationality 1 approx % total workforce __98,52__ Nationality 2 approx % total workforce __0,37__ Nationality 3 approx % total workforce __0,37__ Nationality 4 approx % total workforce __0,37__ Nationality 5 approx % total workforce __0,37__ |

| | |
|---|--|
| <p>D: Worker remuneration (<i>management information</i>)</p> | <p>_____ % workers on piece rate</p> <p>_____ % hourly paid workers</p> <p>___100___ % salaried workers</p> <p>Payment cycle:</p> <p>_____ % daily paid</p> <p>_____ % weekly paid</p> <p>___100___ % monthly paid</p> <p>_____ % other</p> <p>If other, please give details</p> |
|---|--|

| Worker Interview Summary | |
|--|--|
| A: Were workers aware of the audit? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| B: Were workers aware of the code? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i> | 04 groups of 05 persons each |
| D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i> | Male: 05 Female: 05 |
| E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details |
| F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| G: In general, what was the attitude of the workers towards their workplace? | <input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent |
| H: What was the most common worker complaint? | No evidence of complaints |
| I: What did the workers like the most about working at this site? | Pleasant work environment Facilities granted by the administration when the staff requires permits. Freedom to perform tasks without pressure. Open door policy Good communication Closeness of the workplace Employment stability |
| J: Any additional comment(s) regarding interviews: | Good disposition of the interviewed personnel was evidenced Workers with temporary contracts were not at the time of the interview In the case of foreigners they occupy head office for that reason they were not interviewed. |

| | |
|--|--|
| K: Attitude of workers to hours worked: | In conformity, it is according to the agreement made by them |
| L. Is there any worker survey information available? | |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>If yes, please give details:</i> | |
| M: Attitude of workers: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i> | |
| The attitude of the workers was of good disposition with the audit process | |
| N: Attitude of worker's committee/union reps: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i> | |
| The attitude of the Representative of the Joint Committee on Hygiene and Safety was of well disposition | |
| O: Attitude of managers: <i>(Include attitude to audit, and audit process. Both positive and negative information should be included)</i> | |
| Management was proactive during the audit process | |

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The Organization has an integrated policy of Quality, Environment, Sustainability and Code of Good Practice approved on 10 -10- 2018.

The organization has designated a Human Resources Area and a Risk Prevention Area

Management has identified the interested parties both internally - in the development of their personnel - and externally, in compliance with current legislation.

The organization guarantees and respects the legislation established and defined in the Labor Code as well as the Prevention in matters of Safety of its workers.

When companies have a negative impact on human rights within any of their parts, they will have to face these problems and allow effective recovery.

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

Details:

Interview with Management

Interview to the area of Human Resources and Risk Prevention and Environment Area.

Its disclosure is fulfilled through the updated Internal Hygiene and Safety regulations, dated January 1, 2018 Validated by the labour inspection by letter dated February 7, 2018

Letter of validation of Internal Regulations dated February 7, 2018 addressed to the Health Seremi and hosted by this on March 7, 2018

Any other comments:
N/A

| | |
|--|---|
| <p>A: Policy statement that expresses commitment to respect human rights?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details (mainly applicable for the parent company): Integrated Management System Policy declares respect for their staff</p> |
| <p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Nombre: Roxana Moreno – Professional title: Head of Human Resources</p> |
| <p>C: Does the businesses have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: It is declared in the Internal Hygiene and Safety regulations. The management has an open-door policy</p> |
| <p>D: Does grievance mechanism meet with UNGP requirement of e.g. (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details: It is declared in the Internal Hygiene and Safety regulations. The management has an open-door policy</p> |
| <p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The information is only managed by the area responsible for it, which is Human Resources. The Contracts are handled with respect and confidentiality.</p> |

| Findings: NA | | |
|---|--|-------------------------------------|
| <p>Finding: Observation <input type="checkbox"/></p> <p>Description of observation:</p> | <p>Company NC <input type="checkbox"/></p> | <p>Objective evidence observed:</p> |

| | |
|--|--|
| <p>Local law or ETI/Additional elements / customer specific requirement:</p> <p>Comments:</p> | |
|--|--|

| | |
|--|--|
| <p>Good examples observed: NA</p> | |
| <p>Description of Good Example (GE):</p> | <p>Objective Evidence Observed:</p> |

Measuring Workplace Impact

| Workplace Impact | | |
|---|--|---|
| A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover) | Last year: _22,4_% | This year _3,6_% |
| B: 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 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2] | 9, 54 % of the personnel | |
| C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year | 9, 54 % of the personnel | |
| D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month | Last year: _0,6_% monthly average | This year _0,72_% In total, 75 days Days worked in January |
| E: Are accidents recorded? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Accident investigation procedure Accident Investigation Record Report and Minutes of the Joint Hygiene Committee on Accident Investigation | |
| F: 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: 14 (January to December) Number: 5,35 % | This year: 3 (January to March 2019) Number: 5,76% |
| G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers] | This year: 81 days | Last year: 109,2 days |
| H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers] | 6 months _4,49_% of the workers | 12 months _11,42_% of the workers |
| I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months: | 6 months _2,11_% of the workers | 12 months _8,7_% of the workers |

| | | |
|---|--------------------------------|---------------------------------|
| J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months: | 6 months ____0____% workers | 12 months ____0____% workers |
|---|--------------------------------|---------------------------------|

OB: Management system and Code Implementation
[\(click here to return to NC Table\)](#)

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

Current Systems and Evidence Examined

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

Current systems:

Management has determined that the designated leader is the Quality Manager, Mr. Jorge González
 The Code is Communicated through the Internal Regulation of Hygiene and Safety
 The Code of Ethics is disseminated to suppliers.
 Producer diffusion is carried out, dated 18-06-2018, sent by the Head of Quality, disseminating the Ethics Codes
 Training procedure, version 05 of 02-02-2018

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

Details:

Interview with the Quality Manager
 Interview with workers
 Hygiene and Safety Regulation
 Dissemination of Code.
 Acceptance record by workers

Any other comments: N/A

Management Systems:

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

Yes
 No
 Please give details: Interview to the headquarters.

B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?

Yes
 No
 Please give details: It is regularized in the Internal Regulation of Hygiene and Safety

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| <p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p> | <p>In an interview to the staff, they declare to know the different policies of respect to the workers and indicate that there are no minors working in the company</p> |
| <p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Management and workers have received the internal regulation, which defines the rules on forced labor, child labor, discrimination, harassment and abuse</p> |
| <p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Registry of reception of Internal Regulation. November 2018</p> |
| <p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: NSF BRC certificate dated January 7, 2015 in force until October 20, 2019 Certificate N ° C0244807 NSF IFS certificate dated November 2017 effective until November 4, 2019 Certificate N ° C0244807 Certificate of Sustainability Code in the Chilean Wine Industry Certificate N ° CNSV 04 20180808-200 granted on August 08, 2018 FDA USA Registration Certificate in the Chilean Wine Industry Certificate N ° CNSV 04 1957345808 granted by Registrar Corp. KOSHER certificate dated July 31, 2018 in effect until July 30, 2019 Certificate N ° C0244807 Certificate of HALA N ° 070319JMLOUR awarded to Empresa Lourdes S.A. in force until 04-28-2020</p> |
| <p>G: Is there a Human Resources manager/department? If Yes, please detail.</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Boss de RRHH</p> |
| <p>H: Is there a senior person /manager responsible for implementation of the code</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Quality manager</p> |
| <p>I: Is there a policy to ensure all worker information is confidential</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The organization has an internal Hygiene and Safety regulation with an update date of January 2018</p> |
| <p>J: Is there an effective procedure to ensure confidential information is kept confidential</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> |

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| | Please give details: The organization has a Hygiene and Safety regulation, which declares compliance according to the law |
| K: Are risk assessments conducted to evaluate policy and procedure effectiveness? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Audit program Internal audit report |
| L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The area in charge is the Risk Prevention and Environment area. The guidelines are established in the documents that are: Internal Regulation of Order Hygiene and Safety Companies Lourdes S.A. dated 01-01-2018 Code of Business Conduct Lourdes ed. February 1, 2018 |
| M: Does the facility have a policy/code which require labour standards of its own suppliers? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Code of Business Conduct Lourdes ed. February 1, 2018 |
| Land rights | |
| N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Deed of incorporation of Agrícola y Comercial Lourdes Limitada dated January 4, 1989. Signed before Notary Eduardo Pinto Resolution by change of company name of "Concentrated Juice Factory" located at 2830 Santelices street of Isla de Maipo, granted by Resolution number 15139 dated July 29, 1997 on behalf of Empresas Lourdes S.A |
| O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Deed of incorporation of Agrícola y Comercial Lourdes Limitada dated January 4, 1989. Signed before Notary Eduardo Pinto. Exempt Resolution No. 19364 dated May 5, 2009, granted by the Seremi of Health and which certifies that the request for private Drinking Water and ponds for the accumulation of Private Drinking Water from Deep Well with chlorination and 2 storage tanks of 40 M3, Certificate of Mortgages and Liens of |

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| | interdictions and prohibitions, property registered on pages 17, Number 178 of 1989, property of Sociedad grícola y Comercial Lourdes Ltda.... |
| <p>P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, how does the company obtain FPIC: If so, how to obtain the FPIC company? Certificate of Mortgages and liens of interdictions and prohibitions, property registered on page 17, Number 178 of 1989 owned by Agricultural and Commercial Society Lourdes Ltda., In force. Resolution for change of company name of "Fábrica de Jugos Concentrados" located at 2830 Santelices Street in Isla de Maipo granted by Resolution number 15139 dated July 29, 1997 on behalf of Empresas Lourdes S.A. Deed of incorporation of Agricultural and Commercial Company Lourdes Limitada dated January 4, 1989, signed before Notary Eduardo Pinto</p> |
| <p>Q: 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: Request for clarifications rectifications and/or extensions complementary to the environmental impact statement "Improvement of the Riles Treatment Plant and Optimization of Wine Storage, Juice Concentrate for Lourdes companies dated 06-11-2018</p> |
| <p>R. Does the Facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Request for clarifications rectifications and / or extensions, complementary to the environmental impact statement "Improvement of the Riles Treatment Plant and Optimization of Wine Storage, Juice Concentrate for Lourdes companies dated 06-11-2018</p> |
| <p>S: 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:</p> |

Non-compliance: NOTHING TO REPORT

| | |
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| <p>1. Description of non-compliance:</p> <p><input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law</p> <p><input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p> | <p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> |
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| Observation: NOTHING TO REPORT | |
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| <p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p> | <p>Objective evidence observed:</p> |

| Good Examples observed: NOTHING TO REPORT | |
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| <p>Description of Good Example (GE):</p> | <p>Objective evidence observed:</p> |

| 1: Freely Chosen Employment <i>(Click here to return to NC-table)</i> | |
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| <p>ETI</p> <p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.</p> | |

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

None of the workers interviewed said that they felt mistreated or forced to work for the company, that they had not kept their identity documents, that they had not given any kind of deposit and that they are free to resign if they wish

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

Details:

- Employment contracts
- Records of attendance (entry and exit of workers).
- Payrolls
- Internal hygiene and safety regulations.
- Interview with workers.

Any other comments: N/A

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| <p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details and category of workers affected:</p> |
| <p>B: Is there any evidence of a loan scheme in operation</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details and category of workers affected:</p> |
| <p>C: Is there any evidence of retention of wages /deposits</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details and category of workers affected:</p> |
| <p>D: Are there any restrictions on workers' freedom to terminate employment?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding:</p> |
| <p>E: If any part of the business is UK based or registered there & has a turnover over £36m, is there is a published 'modern day slavery statement.</p> | <p><input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: <input checked="" type="checkbox"/> Not applicable</p> |
| <p>G: 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 Please describe finding:</p> |
| <p>H: 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 If yes, please give details and category of workers affected: The organization understands these risks. Through its internal regulations, it declares that it has no forced labor, that it does not</p> |

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| | <p>work with minors and does not perform work that puts the physical or mental integrity of its workers at risk. The above was ratified by the workers in the interview.</p> <p><input type="checkbox"/> Not applicable</p> |
| <p>I: 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 describe finding: Interview with workers, Internal Regulation of Hygiene and Safety</p> |

| Non-compliance: NOTHING TO REPORT | |
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| <p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement</p> <p>Recommended corrective action:</p> | <p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> |

| Observation: NOTHING TO REPORT | |
|---|--|
| <p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p> | <p>Objective evidence observed:</p> |

| Good Examples observed: NOTHING TO REPORT | |
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| <p>Description of Good Example (GE):</p> | <p>Objective evidence observed:</p> |

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- The management declares in an interview that it has an open-door policy
 - The workers declare in an interview cordial treatment with the headquarters and open-door policy and respectful treatment given by the heads and management
- There is no evidence of any discrimination
 The Labor Code in the legislation establishes in its article 305 "the freedom of association"
 Internal Regulation of Hygiene and Safety Order establishes in Title XIII "Policy on freedom of association and collective bargaining"

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

Details:

- In an interview with workers, they declare freedom of assembly
 - Contracts of work evidenced do not have clauses of restriction in this respect.
 - Minutes of election of worker representative to the Joint Committee on Hygiene and Safety dated October 11, 2017
 - Certificate of Constitution of the Joint Committee on Hygiene and Safety dated October 23, 2017, acknowledgment made by the Labor Directorate as recorded in the Registry of said institution with No. 99938
 - Policy of the Integrated Management System for Safety and the Environment declared in Internal Regulation, Version 01 and page 14 of the same regulation, Title VII entitled "Measures against arbitrary discrimination in the workplace"
- Payrolls corresponding to the months of January and February 2019

Any other comments: N/A

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| <p>A: What form of worker representation/union is there on site?</p> | <input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None | |
| <p>B: Is it a legal requirement to have a union?</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Established in the Labor Code, workers are not required. | |
| <p>C: Is it a legal requirement to have a worker's committee?</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Supreme Decree 54 establishes "every company that owns more than 25 workers must have a Joint Committee on Hygiene and Safety" | |
| <p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Describe: Reception of the internal regulation signed by the worker. The staff interviewed stated that the organization has an open-door policy, so they feel free to ask the Administration for any issue or possible request Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| <p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: It is evidenced in an interview with the workers when they state that they are free to belong to the Joint Committee on Hygiene and Safety: the organization facilitates means of dissemination: example Bulletin Board and corporate e-mail of the Joint Committee | |
| <p>F: Name of union and union representative, if applicable:</p> | <p>N/A</p> | <p>Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p> |
| <p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p> | <p>Joint Committee on Hygiene and Safety</p> | <p>Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Voting act of election of Joint Committee on Hygiene and Safety</p> |
| <p>H: Are all workers aware of who their representatives are?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> | <p>In the interview process they are asked who the workers' representative is; they point out that the Chairman of the Joint Committee on Hygiene and Safety</p> |
| <p>I: Were worker representatives freely elected?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> | <p>Date of last election: Date of the last election of the election act of the workers' representative to the Joint Committee on Hygiene and Safety dated October 11, 2017</p> |

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| J: Do workers know what topics can be raised with their representatives? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| K: Were worker representatives/union representatives interviewed? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: the president of the Joint Committee on Hygiene and Safety is interviewed who participates in the meeting of the present audit | |
| L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i> | Joint Committee on Hygiene and Safety, October 11, 2017 Joint Committee Minute 18-03-2019 | |
| M: Are any workers covered by Collective Bargaining Agreement (CBA)? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| If Yes , what percentage by trade Union/worker representation | ___% workers covered by Union CBA | _100_% workers covered by worker rep CBA |
| If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |

| Non-compliance: NOTHING TO REPORT | |
|--|--|
| <p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p> | <p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> |

| Observation: NOTHING TO REPORT | |
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| <p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p> | <p>Objective evidence observed:</p> |

| Good Examples observed: NOTHING TO REPORT | |
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| Description of Good Example (GE): | Objective evidence observed: |

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The Organization has an area of Risk Prevention and Environment. Work plan for Risk Prevention year 2019 Workers are informed of the risks to which they are exposed. Talk: Right to Know

It is clear that the organization has an adequate infrastructure, properly trained personnel, hazards are continuously identified, and risks are evaluated to avoid accidents.

The organization has a training plan among which are the security issues, which considers all the risks to which the workers of the organization are exposed. The same is considered for new and external workers, when appropriate.

Training planning includes emergency preparedness and response, use and management of fire extinguishers, first aid.

The organization has an area of risk prevention and Environment.

They are aware of the induction of hazards and risks associated with work.

The organization is affiliated with the Chilean Security Association,

Training Record dated 03-11-2017 for members of the Committee on Planned Inspections, Investigation of accidents and Supreme Decree 54 (Regulations of the Joint Hygiene and Safety Committees

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

Details:

- Visit to the facilities.
- Interview with the workers.
- Sanitary Resolution granted to the canteen, by the Ministry of Health, Metropolitan Region according to records - - Exempt Resolution No. 29600 dated 20-05-2012 in which the canteen located in Santelices 2830 of the Sila de Maipo is authorized
- Expert's Card in Risk Prevention awarded by the Health Seremi to Mr. Cristian Vera AMP registration 4174
- 5 minutes talks.
- Risk identification matrix and risk assessment.
- Record of attendance to the training of the sampled personnel.

- ODI records for sampled personnel, November 2018.
- Emergency preparedness and response procedure.
- Simulation planning 2018 - 2019.
- Records of evacuation drills. 03 December 2018.
- List of participants in course of extinguisher management, signed by the workers.

Any other comments: N/A

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| <p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Declared in the Internal Regulation of Hygiene and Safety. The Organization has an Integrated Management System Policy. In addition, there is a corporate commitment to health, safety and the environment, which is disseminated throughout the organization and is carried out through the supervision of safety. This information is contained in the Code of Conduct that is disseminated by mail.</p> |
| <p>B: Are the policies included in workers' manuals?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Internal Regulation of Hygiene and Safety</p> |
| <p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> |
| <p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Training record "safety meetings" dated 03-14-2019; Training record of "safety meetings" dated 07-02-2019</p> |
| <p>E: Is a medical room or medical facility provided for workers?</p> <p>If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: the organization transfers its workers to the attention center of the Chilean Safety Association, to which they are affiliated.</p> |

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| <p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: In case of accident, the staff is transferred to the nearest service center. The organization has a First Aid and Botiquin unit (photo attached)</p> |
| <p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> |
| <p>H: Is secure personal storage space provided for workers in their living space and is it fit for purpose?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> |
| <p>I: Are H&S Risk assessments conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Talks on "Induction to Risk Prevention "Control measures due to exposure to UV radiation and use of sunscreen" dated 05-03-2018</p> <p>Talk "Induction law 16744, accidents at work and occupational diseases" dated 10-01-2019</p> |
| <p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Exempt Resolution No. 19364 dated May 5, 2009, granted by the Seremi of Health. It accredits the request for private drinking water and pools of accumulation of private drinking water from deep well with chlorination and 2 storage tanks of 40 M3</p> <p>Exempt Resolution No. 00150 dated January 11, 2011, granted by the Health Seremi, authorization of hazardous waste storage site</p> |
| <p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Resolution of Environmental Qualification, Improvement Project of the Rile Treatment Plant, Exempt Resolution No. 911/2009 granted on October 29, 2009 by the Regional Commission for the Environment in force to date.</p> |

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| | <p>Resolution of Registration of Boiler for Industrial Use, Mixed Feeding System before the Health Seremi, as stated in Exempt Resolution No. 018981b, of April 6, 2011 granted by the Seremi de Salud of the Republic of Chile which is valid.</p> <p>Resolution of boiler registration for industrial use, mixed feeding system before the Health Seremi according to Exempt Resolution No. 019274 dated April 7, 2014 granted by the Seremi de Health of the Republic of Chile, in force to date.</p> <p>Resolution of registration of boilers for industrial use, mixed feeding system before Health Seremi as found in Exempt Resolution No. 0390 of January 20, 2017, granted by the Seremi de Health of the Republic of Chile in force to date</p> <p>It also has a list of the chemicals used and their respective safety data sheets.</p> |
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| Non-compliance :NOTHING TO REPORT | |
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| <p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement</p> <p>Recommended corrective action:</p> <p>2. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p> | <p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> |

| Observation:NOTHING TO REPORT | |
|--|--|
| <p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Recommended corrective action:</p> | <p>Objective evidence observed:</p> |

| Good Examples observed:NOTHING TO REPORT |
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| Description of Good Example (GE): | Objective Evidence Observed: |
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4: Child Labour Shall Not Be Used

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

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

Current Systems and Evidence Examined

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

Current systems:

It is evident that the youngest person is 18 years old and a current Employment Contract. In addition, the organization establishes the minimum age for recruitment: over 18 years of age as established by current local legislation.

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

Details:

- Work contract for each worker.
- Interview with managers
- head of human resources
- Interview with workers

Any other comments: N/A

| | |
|---|--|
| A: Legal age of employment: | 18 years |
| B: Age of youngest worker found: | 18 years of contract date 11-02-2019 and date of birth 17-06-2000 |
| C: Are there children present on the work floor but not working at the time of audit? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No There is no evidence of minors |
| D: % of under 18's at this site (of total workers) | 0 % |

| | |
|---|--|
| <p>E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details N/A, There is no evidence of minors</p> |
|---|--|

| Non-compliance: NOTHING TO REPORT | |
|--|--|
| <p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p> | <p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> |

| Observation: NOTHING TO REPORT | |
|---|--|
| <p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p> | <p>Objective evidence observed:</p> |

| Good Examples observed: NOTHING TO REPORT | |
|---|--|
| <p>Description of Good Example (GE):</p> | <p>Objective Evidence Observed:</p> |

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Payroll forms of monthly payment are evidenced

Work contract

Personnel folder

Payrolls. It contains information on basic salary, pension discounts (health - social security - unemployment insurance) plus bonuses for overtime - bonuses according to what is established by law, which consists of receipt according to the worker's signature

No discounts are not applicable according to the legislation

The payroll forms are signed with acceptance of the workers

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

Details:

Interview with workers

Personnel Folder

Payrolls for the months of December 2018, January 2019 and February 2019

Control Clock, Gwantec System, recognized by the Work Directorate.

Any other comments:

N/A

Non-compliance: NOTHING TO REPORT

1. Description of non-compliance:

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

Objective evidence observed:

(where relevant please add photo numbers)

| | |
|--|--|
| <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p> | |
|--|--|

| | |
|---|--|
| Observation: NOTHING TO REPORT | |
| <p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p> | <p>Objective evidence observed:</p> |

| | |
|--|--|
| Good Examples observed: NOTHING TO REPORT | |
| <p>Description of Good Example (GE):</p> | <p>Objective Evidence Observed:</p> |

Summary Information

| Criteria | Local Law <i>(Please state legal requirement)</i> | Actual at the Site <i>(Record site results against the law)</i> | Is this part of a Collective Bargaining Agreement? |
|--|---|--|--|
| A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i> | Legal maximum: 45 hours per week | 45 hours per week | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i> | Legal maximum: 12 hours per week | máximo legal: 9 hours per week | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| C: wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i> | Legal minimum: 301000 starting on March 01, 2019 | 301000 starting on March 01, 2019 | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| D: overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i> | Legal minimum: 50% additional per hour and 150% per extra hour; established in the Labor Code, article 32, "Payment of overtime": | According to the Work Code 150% | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

| Wages analysis: (Click here to return to Key Information) | | | |
|---|---|---|--|
| A: Were accurate records shown at the first request? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| If No , why not? | N/A | | |
| B: Sample Size Checked <i>(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)</i> | 26 salary report for the month of December 2018 26 salary report for the month of February 2019 26 salary report for the month of January 2019 According to the delivery by the company. | | |
| C: Are there different legal minimum wage grades? If Yes , please specify all. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | If Yes , please give details: | |
| D: If there are different legal minimum grades, are all workers graded and paid correctly? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A | If No , please give details: | |
| E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum? | <input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above | Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> Please indicate the breakdown of the template for the earnings: All workers earn above the legal minimum wage established | |
| F: Please indicate the breakdown of workforce per earnings: | 0_% of the staff earn less than minimum wage _4,6_% of the workforce earning the minimum wage _95,4_% of profit, labor force above the minimum wage | | |
| F: Bonus scheme found: Please specify details: | Bonus Scheme found: <i>Note: full time employees and please state hour / week / month etc.</i> | | |
| H: What deductions are required by law e.g. social insurance? Please state all types: | Health (Fonasa or Isapre) AFP (Pension Fund) Unemployment Insurance | | |
| I: Have these deductions been made? Please list all deductions that have/have not been made. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | Please list all deductions that have been made. | 1.Health 2. AFP 3 Unemployment Insurance Please describe: |

| | | | |
|--|---|--|-------------------------------------|
| | | Please list all deductions that have not been made. | 1.N/A 2. Please describe: |
| J: Were appropriate records available to verify hours of work and wages? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| K: Were any inconsistencies found? (if yes describe nature) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence: | | |
| L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time) | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The control by platform of the hours worked is evidenced | | |
| M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please specify amount/time: N/A | | |
| If yes, what was the calculation method used. | <input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: | | |
| N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income). | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Salary review performed by Head of Human Resources | | |
| O: Are workers paid in a timely manner in line with local law? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| P: Is there evidence that equal rates are being paid for equal work: | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: | | |
| Q: How are workers paid: | <input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other If other, please explain: N/A | | |

6: Working Hours are not Excessive

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Work schedule is stipulated in the Work Contract, signed by the workers and their employer. These are found according to national legislation.

All the extra time is voluntary, which is verified by the workers.

The organization has a working day that amounts to 45 hours per week.

Monday to Saturday with Rest Sunday according to what is established in the local legislation

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

Details:

- Interview with the Management.
- Personal interview with workers.
- Rules of procedure

- Payrolls
- Attendance records (entry and exit) by computer system.
- Work contract with work schedule indicated.

Any other comments: N/A

Non-compliance: NOTHING TO REPORT

1. Description of non-compliance:

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

Objective evidence observed:
 (where relevant please add photo numbers)

Local law and/or ETI requirement:

Recommended corrective action:

Observation: NOTHING TO REPORT

Description of observation:

Local law or ETI requirement:

Comments:

Objective evidence observed:

Good Examples observed: NOTHING TO REPORT

Description of Good Example (GE):

Objective Evidence Observed:

| Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information) | | |
|--|--|---|
| Systems & Processes | | |
| A. What timekeeping systems are used: time card etc. | Describe: Gwantec electronic system recognized by the Labor Inspectorate | |
| B: Is sample size same as in wages section? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details | |
| C: Are standard/contracted working hours defined in all contracts/employment agreements? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: | |
| D: Are there any other types of contracts/employment agreements used? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | If YES, please complete as appropriate: |
| | <input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other | |
| | If "Other", Please define: | |
| | NA | |
| E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please detail hours, %, types of workers affected and frequency Please give details: | |
| F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period? | Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain: | Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| | Maximum number of days worked without a day off (in sample): | |
| | 6 days | |

| Standard/Contracted Hours worked | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|---|-------|------|------------|-------|---------------|--------|--------|------|--------|--------|--------|--------|--------|--------|--------------|--------|------|------|--------|------|--------|------|--------|------|---------------|--------|-----|------|--------|-----|--------|-----|--------|-----|
| G: Were standard working hours over 48 hours per week found? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | If yes, % of workers & frequency: 3.6% of workers and the monthly frequency | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | If yes, please give details: | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Overtime Hours worked | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| I: Actual overtime hours worked in sample (State per day/week/month) | Highest OT hours: | <p>December 2018 -3.4% January 2019 - 4.2 % February 2019 - 2,8 %</p> <p>Overtime is paid monthly Total por trabajador Month of February per week is 2.8% equates to a weekly average of 1.15 hours a day for a maximum of 2 hours a day</p> <table border="1"> <thead> <tr> <th>month</th> <th>Week</th> <th>Percentage</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td rowspan="4">December 2018</td> <td>Week 1</td> <td>0,85 %</td> <td rowspan="4">3.4%</td> </tr> <tr> <td>Week 2</td> <td>0,85 %</td> </tr> <tr> <td>Week 3</td> <td>0,85 %</td> </tr> <tr> <td>Week 4</td> <td>0,85 %</td> </tr> <tr> <td rowspan="4">January 2019</td> <td>Week 1</td> <td>1,05</td> <td rowspan="4">4,2%</td> </tr> <tr> <td>Week 2</td> <td>1,05</td> </tr> <tr> <td>Week 3</td> <td>1,05</td> </tr> <tr> <td>Week 4</td> <td>1,05</td> </tr> <tr> <td rowspan="4">February 2019</td> <td>Week 1</td> <td>0.7</td> <td rowspan="4">2,8%</td> </tr> <tr> <td>Week 2</td> <td>0.7</td> </tr> <tr> <td>Week 3</td> <td>0.7</td> </tr> <tr> <td>Week 4</td> <td>0.7</td> </tr> </tbody> </table> <p>The organization has a schedule control system so that the worker does not exceed what is established by law</p> | month | Week | Percentage | Total | December 2018 | Week 1 | 0,85 % | 3.4% | Week 2 | 0,85 % | Week 3 | 0,85 % | Week 4 | 0,85 % | January 2019 | Week 1 | 1,05 | 4,2% | Week 2 | 1,05 | Week 3 | 1,05 | Week 4 | 1,05 | February 2019 | Week 1 | 0.7 | 2,8% | Week 2 | 0.7 | Week 3 | 0.7 | Week 4 | 0.7 |
| month | Week | Percentage | Total | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| December 2018 | Week 1 | 0,85 % | 3.4% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Week 2 | 0,85 % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Week 3 | 0,85 % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Week 4 | 0,85 % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| January 2019 | Week 1 | 1,05 | 4,2% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Week 2 | 1,05 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Week 3 | 1,05 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Week 4 | 1,05 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| February 2019 | Week 1 | 0.7 | 2,8% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Week 2 | 0.7 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Week 3 | 0.7 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Week 4 | 0.7 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details: | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | |
|---|---|--|
| K: Approximate percentage of total workers on highest overtime hours: | ___37,76%___% | |
| L: Is overtime voluntary? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information | <p>Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:</p> <p>Workers are not required to work overtime. According to the additional hours, each of the workers voluntarily signs an overtime pact according to what is established in the Labor Code. The local legislation in Chile, Established in the Labor Code Article 32 of the Labor Code, provides: "Overtime may only be agreed to meet the needs or temporary situations of the company." These pacts must be in writing and have a temporary validity. not exceeding three months, and may be renewed by agreement of the parties (company and worker) so they will estimate it in common agreement. "</p> |
| Overtime Premiums | | |
| M: Are the correct legal overtime premiums paid? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium | <p>Please give details of normal day overtime premium as a 150 % of standard wages: The payment is verified through the Gwantec electronic overtime control platform and Previred pension payment</p> |
| N: Is overtime paid at a premium? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <p>If yes, please describe % of workers & frequency:</p> |
| O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant. | <input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other | |
| | Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other | |
| P: If more than 60 total hours per week and this is legally allowed, are there | <input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances | |

| | |
|--|--|
| <p>other considerations? Please complete the boxes where relevant.</p> | <p><input type="checkbox"/> Other reasons (please specify)</p> <p>Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> <p>Labor Code, Article 33 "establishes the payment of overtime"</p> |
| <p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details:</p> |
| <p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p> | <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> |

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

Interviews with workers indicate that in the organization there have been no cases of discrimination against the employee for any reason (for example, religion, nationality, race, language, etc.).

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

Details:

- Personnel folder
- Work contract
- Respective work attachments
- Security induction record
- Record of Reception of Internal Regulation of Hygiene and Safety

Any other comments: N/A

| | |
|--|---|
| A: Gender breakdown of Management + Supervisors (Include as one combined group) | Male: <u> 90 </u> % Female <u> 10 </u> % |
| B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst: | #: 48 Women, 225 Men 17, 58% Women and 83,93% Men |
| C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?: | <input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> access to training <input type="checkbox"/> promotion <input type="checkbox"/> termination or retirement |

| Professional Development | |
|---|--|
| A: What type of training and development are available for workers? | 2018 Training plan – Technical Competences Budget for 2019 training |

| | |
|--|---|
| B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details: |
|--|---|

| Non-compliance: NOTHING TO REPORT | |
|---|--|
| 1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: Recommended corrective action: | Objective evidence observed: (where relevant please add photo numbers) |

| Observation: NOTHING TO REPORT | |
|--|-------------------------------------|
| Description of observation: Local law or ETI requirement: Comments: | Objective evidence observed: |

| Good Examples observed: NOTHING TO REPORT | |
|---|-------------------------------------|
| Description of Good Example (GE): | Objective Evidence Observed: |

8: Regular Employment Is Provided

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

Labor contracts comply with the law, including all the details, obligations and rights of workers, at the same time, it is clear that they were accepted as they are signed by all workers. In addition, in interviews with workers, it is indicated that all the provisions of the contract are met

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

Details:

Staff interview

Staff folder

Work contract

Documentation Reception Registration

Integrated Management System Policy

Internal Regulation of Hygiene and Safety

Any other comments:

Nothing to be added

Non-compliance: NOTHING TO REPORT

1. Description of non-compliance:

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

Local law and/or ETI requirement:

Recommended corrective action:

Objective evidence observed:
(where relevant please add photo numbers)

Observation: NOTHING TO REPORT

Description of observation:

Local law or ETI requirement:

Comments:

Objective evidence observed:

Good Examples observed: NOTHING TO REPORT

Description of Good Example (GE):

Objective Evidence Observed:

Responsible Recruitment

| All Workers | |
|--|--|
| A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions? | <input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions If any are unchecked, please describe finding and specific category(ies) of workers affected: |
| B: Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please describe details and specific category(ies) of workers affected: |
| C: If yes, check all that apply: | <input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – please give details |
| D: If any checked, give details: | N/A |

| Migrant Workers: | |
|---|---|
| <p><i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national and where they do not intend to remain permanently or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i></p> | |
| A: Type of work undertaken by migrant workers: | 1 Foreign trade 1 Warehouse manager 1 GIS Coordinator 1 Regional Export Director |
| B: Migrant worker recruitment | Total number of (in country recruitment agencies) used:0 |

| | | |
|--|--|---|
| | Total number of (outside of local country) recruitment agencies used 0 | |
| C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: | Observations Only what is established by law in labor matters is deducted |
| D: Are any migrant workers in skilled, technical, or management roles <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes number and example of roles: 1 Foreign trade 1 Warehouse manager 1 GIS Coordinator 1 Regional Export Director | |

NON-EMPLOYEE WORKERS

| Recruitment Fees: | |
|----------------------------------|--|
| A: Are there any fees? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| B: If yes, check all that apply: | <input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – please give details |
| C: If any checked, give details: | N/A |

| Agency Workers (if applicable) <i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i> | |
|---|--|
| A: Number of agencies used (average): | Names if available: N/A |
| B: Were agency workers' age / pay / hours included within the scope of this audit? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| C: Were sufficient documents for agency workers available for review? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N/A |
| D: Is there a legal contract / agreement with all agencies? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A |
| E: Does the site have a system for checking labour standards of agencies? If yes, please give details. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A |

| Contractors: <i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i> | |
|--|--|
| A: Any contractors on site? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, how many contractors are present, please give details: 01 Contractors: Company Aramark - Canteen |
| B: If Yes , how many workers supplied by contractors? | 07 people |
| C: Do all contractor workers understand their terms of employment? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: Regulation for contractor companies Procedure for hiring and monitoring contractors and subcontractors, version 01 dated 09-01-2019 |
| D: If Yes , please give evidence for contractor workers being paid per law: | Labor and Social Security certificate N ° 200/2019/155724 corresponding to the company "Central de restaurantes Aramark Ltda" |

| | |
|--|--|
| | Certificate of Compliance with Labor and Social Security Obligations N ° 200, year 2019, Certificate N ° 7221344, granted by the Labor Directorate |
|--|--|

8A: Sub-Contracting and Homeworking:

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

No subcontracts and homeworking are evidenced

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

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

| Process Subcontracted | Process 1 | Process 2 |
|-----------------------|-----------|-----------|
| Name of factory | NA | NA |
| Address | NA | NA |

Details:

Interview with Risk and Environment Prevention Headquarters.
Interview with Head of Human Resources

Non-compliance: NOTHING TO REPORT

| | |
|---|--|
| <p>1. Description of non-compliance:</p> <p><input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law</p> <p><input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI /Additional Elements requirement:</p> <p>Recommended corrective action:</p> | <p>Objective evidence observed: (where relevant please add photo numbers)</p> |
|---|--|

| Observation: NOTHING TO REPORT | |
|---|--|
| <p>Description of observation:</p> <p>Local law or ETI/Additional elements requirement:</p> <p>Comments:</p> | <p>Objective evidence observed:</p> |

| Good Examples observed: NOTHING TO REPORT | |
|---|--|
| <p>Description of Good Example (GE):</p> | <p>Objective Evidence Observed:</p> |

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

| | |
|---|--|
| | If Yes , summarise details: N/A |
| E: What checks are in place to ensure no child labour is being used and work is safe? | N/A |

| Summary of homeworking – if applicable <input checked="" type="checkbox"/> Not Applicable please x | | | |
|--|--|-----------|--------------------------------------|
| A: If homeworking is being used, is there evidence this has been agreed with the main client? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , summarise details: N/A | | |
| B: Number of homeworkers | Male: 0 | Female: 0 | Total: 0 |
| C: Are homeworkers employed direct or through agents? | <input type="checkbox"/> Directly <input type="checkbox"/> Through Agents | | If through agents, number of agents: |
| | | | N/A |
| D: Is there a site policy on homeworking? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | |
| E: How does the site ensure worker hours and pay meet local laws for homeworkers? | N/A | | |
| F: What processes are carried out by homeworkers? | 0 | | |
| G: Do any contracts exist for homeworkers? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: | | |
| H: Are full records of homeworkers available at the site? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | |

9: No Harsh or Inhumane Treatment is Allowed

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

ETI

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

Additional elements:

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

| | |
|---|---|
| <p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The organization has defined a methodology to channel the complaints in case there is a situation that does not agree with the code of conduct; the communication channel is established in the internal hygiene and safety regulations</p> |
| <p>B: If Yes, are workers aware of these channels and have access? Please give details.</p> | <p>Bulletin Board of the Joint Committee on Hygiene and Safety</p> |
| <p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p> | <p>Incident / Hazard Reporting Record Communication with the Main Entrance Office of the Company</p> |
| <p>D: Which of the following groups is there a grievance mechanism in place for?</p> | <p><input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Other Please give Details: The joint committee and the Human Resources area receive complaints from workers in case they happen</p> |
| <p>E: Are there any open disputes?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details: Procedure to respond to customer complaints; workers and community, version 03 dated 03-01-2017</p> |
| <p>F: Does the site encourage its business partners (e.g., suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. help lines or whistle blowing mechanism)</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details</p> |
| <p>G: Is there a published and transparent disciplinary procedure?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please explain: Procedure to address claims of customers, workers and community, version 03 dated 03-01-2017</p> |

| | |
|--|--|
| <p>H: If yes, are workers aware of these the disciplinary procedure?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details</p> |
| <p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details</p> |

Current Systems and Evidence Examined

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

Current systems:
 The organization establishes in the internal regulations the investigation methodology in case of labor harassment and other types. The workers during the interviews indicated how to channel events of this type

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

Details:
 Interview with workers
 Interview with management
 Workers' folders
 Employment contracts

Any other comments: N/A

Non-compliance: NOTHING TO REPORT

| | |
|--|---|
| <p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p> | <p>Objective evidence observed: (where relevant please add photo numbers)</p> |
|--|---|

Observation: NOTHING TO REPORT

| | |
|---|--|
| <p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p> | <p>Objective evidence observed:</p> |
|---|--|

| | |
|---|--|
| <p>Good Examples observed: NOTHING TO REPORT</p> | |
| <p>Description of Good Example (GE):</p> | <p>Objective Evidence Observed:</p> |

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

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

Additional Elements

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

Current Systems and Evidence Examined

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

Current systems:

The organization establishes in the internal regulations the investigation methodology in case of labor harassment and other types. The workers during the interviews indicated how to channel events of this type.

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

Details:

- Interview with workers
- Interview with Management
- Workers' folders
- Employment contracts

Any other comments:

N/A

Non-compliance: NOTHING TO REPORT

1. Description of non-compliance:

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

Objective evidence observed:

(where relevant please add photo numbers)

Local law and/or ETI /Additional Elements requirement:

Recommended corrective action:

| Observation: NOTHING TO REPORT | |
|--|-------------------------------------|
| Description of observation: Local law or ETI/Additional Elements requirement: Comments: | Objective evidence observed: |

| Good examples observed: NOTHING TO REPORT | |
|---|-------------------------------------|
| Description of Good Example (GE): | Objective Evidence Observed: |

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

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

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

B.4. Compliance Requirements

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

10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.

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

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

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

10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details).

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

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

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

B4. Guidance for Observations

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

10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

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

Current Systems and Evidence Examined

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

Current systems:

The organization has established an environmental policy.

The company identifies its environmental aspects and evaluates its risks, from which operational controls are determined to mitigate the environmental impact.

The organization does not have fines or claims for compliance with current environmental regulations (Law 19300).

The organization has a methodology that allows it to identify the legal requirements pertinent to the revision and update of the legal requirements control matrix.

The authority has not carried out any audit.

The organization has a valid Municipal Patent until June 31, 2019

During the interview, it was mentioned that when hiring Chilean or foreign personnel, documentation is requested in accordance with the law.

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

Environmental policy.

Details:

Environmental policy

Resolution of Environmental Qualification, Improvement Project of the Rile Treatment Plant, Exempt Resolution No. 911/2009 granted on October 29, 2009 by the Regional Commission for the Environment

Resolution of Registration of Boiler for Industrial Use, Mixed feeding system before the Health Seremi according to the Resolution Exempt N ° 018981b, dated April 6, 2011 granted by the Seremi of Health of the Republic of Chile

Resolution of Registration of Boiler for Industrial Use, Mixed feeding system before the Health Seremi according to Resolution Exempt No. 019274 dated April 7, 2014 granted by the Seremi of Health of the Republic of Chile

Resolution of Registration of Boiler for Industrial Use, Mixed feeding system before the Health Seremi according to the Resolution Exempt No. 0390 dated January 20, 2017 granted by the Seremi of Health of the Republic of Chile

Any other comments:

N/A

Non-compliance: NOTHING TO REPORT

1. Description of non-compliance:

NC against ETI/Additional Elements

NC against Local

NC against customer code:

Objective evidence observed:

(where relevant please add photo numbers)

Local law and/or ETI/Additional Elements requirement:

Recommended corrective action:

Observation: NOTHING TO REPORT

Description of observation:

Local law or ETI/Additional elements requirements:

Objective evidence observed:

| | |
|------------------|--|
| Comments: | |
|------------------|--|

| Good examples observed: NOTHING TO REPORT | |
|--|-------------------------------------|
| Description of Good Example (GE): | Objective Evidence Observed: |

| Environmental Analysis <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i> | |
|--|--|
| A: Is there a manager responsible for Environmental issues (Name and Position): | Miguel Vera – Head of Risk Prevention and Environment |
| B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Request for clarifications, rectifications and / or extensions, complementary to the environmental impact statement "Improvement of the Riles Treatment Plant and Optimization of Wine Storage and Juice Concentrate for Lourdes companies dated 06-11-2018 |
| C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please detail. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: NSF BRC certificate dated January 7, 2015, valid until October 20, 2019, Certificate N ° C0244807 NSF IFS certificate dated November 2017, valid until November 04, 2019, Certificate N ° C0244807 Certificate of Sustainability Code in the Chilean wine industry, Certificate No. CNSV 04 20180808-200, issued on August 08, 2018 Certificate of registration FDA USA in the Chilean wine industry Certificate N ° CNSV 04 1957345808 granted by Registrar Corp KOSHER certificate dated July 31, 2018 in effect until July 30, 2019, Certificate No. C0244807 Certificate of HALA N ° 070319JMLOUR awarded to Empresas Lourdes S.A. in force until 04-28-2020 |
| D: Does the site have an Environmental policy? (For guidance, please see Measurement criteria) | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, is it publicly available? |
| E: If yes, does it address the key impacts from their operations and their commitment to improvement? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Interview with Management |
| F: Does the site have a Biodiversity policy? (For guidance, please see Measurement criteria) | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please detail. (For guidance, please see Measurement criteria) | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The organization has Clean Production Agreements. Audit report dated November 2017 with an achievement of 74% |
| H: Have all legally required permits been shown? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

| | |
|---|--|
| <p>Please detail.</p> | <p>Please give details: Resolution of Environmental Qualification, Improvement Project of the Rile Treatment Plant, Exempt Resolution No. 911/2009 granted on October 29, 2009 by the Regional Commission for the Environment</p> <p>Resolution of Registration of Boiler for Industrial Use, Mixed Feeding System before the Seremi of Health as stated in Exempt Resolution No. 018981b dated April 6, 2011 granted by the Seremi of Health of the Republic of Chile.</p> <p>Resolution of Registration of Boiler for Industrial Use, Mixed feeding system before the Seremi of Health as stated in Exempt Resolution No. 019274 dated April 7, 2014 granted by the Seremi of Health of the Republic of Chile</p> <p>Resolution of Registration of Boiler for Industrial Use, Mixed feeding system before the Seremi of Health as it is stated in Exempt Resolution No. 0390 dated January 20, 2017 granted by the Seremi of Health of the Republic of Chile</p> |
| <p>I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Please give details: List of hazardous chemical products and check-in plant with its corresponding Safety Sheet</p> |
| <p>J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:</p> |
| <p>K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A</p> |
| <p>L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Receipt record of Information System Single Window, Sidrep, dated 17-01-2019</p> |
| <p>M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Consumption of the supply chain</p> |
| <p>N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All persons who provide services to the organization are regulated according to the law of</p> |

| in line with environmental expectations of the facility? | subcontracting and must have the respective authorizations before entering the facilities | |
|--|---|---|
| Usage/Discharge analysis | | |
| Criteria | Previous year: Please state period: ___January-February 2019_____ | Current Year: Please state period: ___2018___ |
| Electricity Usage: Kw/hrs | 347959 KWhr | 5529202 KWhr |
| Renewable Energy Usage: Kw/hrs | 0 | 0 |
| Gas Usage: Kw/hrs | 251.338 mts3 | 2.090.536 mts3 |
| Has site completed any carbon Footprint Analysis? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| If Yes , please state result | | |
| Water Sources: Please list all sources e.g. lake, river, and local water authority. | <ul style="list-style-type: none"> Well water | <ul style="list-style-type: none"> Well water |
| Water Volume Used: (m ³) | 94.282 mts3 | 773.661 mts3 |
| Water Discharged: Please list all receiving waters/recipients. | <ul style="list-style-type: none"> River | <ul style="list-style-type: none"> River |
| Water Volume Discharged: (m ³) | 36000 mts3 | 316791 mts3 |
| Water Volume Recycled: (m ³) | 0 | 0 |
| Total waste Produced (please state units) | 9113 kilos | 120510 kilos |
| Total hazardous waste Produced: (please state units) | 1153 kilos | 1360 kilos |
| Waste to Recycling: (please state units) | 910 kilos | 29330 kilos |
| Waste to Landfill: (please state units) | 7050 kilos | 89820 kilos |
| Waste to other: (please give details and state units) | NA | NA |
| Total Product Produced (please state units) | 21.633.148 | 38.111.698 kilos |

10C: Business Ethics – 4-Pillar Audit

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

To be completed for a 4-Pillar SMETA Audit

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The Administration maintains direct communication with its customers, collaborators and suppliers, in order to publicize, deliver and respect good business practices. In addition, the organization delivers the guidelines it expects the parties indicated above to adopt. The internal rules contain standards on related negotiations, directly and indirectly with the company.

Management is responsible for applying internal rules and ensuring compliance. Part of its content addresses good business practices, which do not allow bribery and corruption.

In addition, the organization provides guidelines in its employment contracts and has provided training on its internal regulations, which addresses the elements of bribery and corruption and a commercial ethics policy.

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

Details:
 Interview with staff
 Interview with the address
 Internal registration

Any other comments: N/A

Non-compliance: NOTHING TO REPORT

1. Description of non-compliance:

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

Objective evidence observed:
(where relevant please add photo numbers)

Local law and/or ETI/Additional Elements requirement:

Recommended corrective action:

Observation NOTHING TO REPORT

Description of observation:

Local law or ETI/Additional elements requirement:

Comments:

Objective evidence observed:

Good examples observed: NOTHING TO REPORT

Description of Good Example (GE):

Objective Evidence Observed:

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| <p>A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p> | <p><input checked="" type="checkbox"/> Internal Policy <input type="checkbox"/> Policy for third parties including suppliers Please give details: Code of Business Conduct Lourdes ed. February 1, 2018</p> |
| <p>B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: they are specially trained with regard to standards of integrity, corruption and bribery, handling of conflicts of interest, protection of intellectual property.</p> |
| <p>C: Is the policy updated on a regular (as needed) basis?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: as needed</p> |
| <p>D: Does the site require third parties including suppliers to complete their own business ethics training</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Code of Business Conduct Lourdes ed. February 1, 2018</p> |

Other Findings Outside the Scope of the Code

None

Community Benefits

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

None

Appendix 1

Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."

Not Applicable please x

NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.

Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.

ETI Code / Additional Elements

Customer's Supplier Code equivalent

0.A. Universal Rights covering UNGP

0.A. Universal Rights covering UNGP

0.A. Guidance for Observations

0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.
 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights
 0.A.3 Businesses shall identify their stakeholders and salient issues.
 0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
 0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.
 0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.

0.B. Management Systems & Code Implementation

0.B. Management Systems & Code Implementation

0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.

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| <p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p> | |
| <p>ETI 1. Forced Labour</p> | <p>ETI 1. Forced Labour</p> |
| <p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>1.2 Workers are not required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice.</p> | |
| <p>ETI 2. Freedom of association and the right to collective bargaining are respected</p> | <p>ETI 2. Freedom of association and the right to collective bargaining are respected</p> |
| <p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.</p> | |
| <p>ETI 3. Working conditions are safe and hygienic</p> | <p>ETI 3. Working conditions are safe and hygienic</p> |
| <p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p> | |

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| <p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.</p> | |
| <p>ETI 4. Child labour shall not be used</p> | <p>ETI 4. Child labour shall not be used</p> |
| <p>4.1 There shall be no new recruitment of child labour.</p> <p>4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p> | |
| <p>ETI 5. Living wages are paid</p> | <p>ETI 5. Living wages are paid</p> |
| <p>5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</p> <p>5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.</p> <p>5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.</p> | |
| <p>ETI 6. Working Hours are not excessive</p> | <p>ETI 6. Working Hours are not excessive</p> |
| <p>6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p> | |

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| <p>6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:</p> <ul style="list-style-type: none"> - this is allowed by national law; - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; - appropriate safeguards are taken to protect the workers' health and safety; and - The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies. <p>6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.</p> | |
| <p>ETI 7. No discrimination is practised</p> | <p>ETI 7. No discrimination is practised</p> |
| <p>7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p> | |
| <p>ETI 8. Regular employment is provided</p> | <p>ETI 8. Regular employment is provided</p> |
| <p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or</p> | |

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| <p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p>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.</p> | |
| <p>8A: Sub-Contracting and Homeworking</p> | <p>8A: Sub-Contracting and Homeworking</p> |
| <p>8A.1 There should be no sub-contracting unless previously agreed with the main client. 8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p> | |
| <p>ETI 9. No harsh or inhumane treatment is allowed</p> | <p>ETI 9. No harsh or inhumane treatment is allowed</p> |
| <p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Additional elements: 9.2 companies should provide access to a confidential grievance mechanism for all workers</p> | |
| <p>10. Other Issue areas: 10A: Entitlement to Work and Immigration</p> | |
| <p>Additional Elements 10A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p> | |
| <p>10. Other issue areas 10B2: Environment 2-Pillar</p> | |

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| <p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits. 10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. <i>Note for auditors and readers, This is not a full environmental assessment but a check on basic systems and management approach.</i></p> | |
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| SMETA Extra Sections for 4 Pillar Audit: | SMETA Extra Sections for 4 Pillar Audit: |
|---|--|
| Environment Section | Environment Section |
| <p>B.4. Compliance Requirements 10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards. 10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc. 10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements 10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers. 10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details). 10B4.7 Businesses shall make continuous improvements in their environmental performance. 10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation 10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance. B4. Guidance for Observations 10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor. 10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p> | |
| Business Practices Section | |

10C. Compliance Requirements

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

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

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

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

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

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










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




10C. Guidance for Observations

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

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

Photo Form

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|  |  |  |
| <p>Loading and dispatch area</p> | <p>Control clock</p> | <p>Juices Plant</p> |
|  |  |  |
| <p>Waste colors signage</p> | <p>Storage tanks</p> | <p>Maintenance signage</p> |
|  |  |  |
| <p>Lab</p> | <p>Juice production plant</p> | <p>Production</p> |

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| <p>Emergency shower</p> | <p>Extinguisher</p> | <p>Evacuation signage</p> |

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|  |  |  |
| <p>Emergency meeting point</p> | <p>first aid kit</p> | <p>Extinguisher</p> |



For more information visit: [Sedexglobal.com](https://www.sedexglobal.com)

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

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

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