



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC5000013979	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS1000015332
Business name (Company name):	DOOCO		
Site name:	DOOCO		
Site address:	12, Dodam 8-ro Seo-gu Incheon 22667 KR	Country:	KR
Site contact and job title:	Mr. Seung Hoon Lim / Deputy General Manager of Management Support Team		
Site phone:	82-10-4116-7160	Site e-mail:	lsh@dooco.co.kr
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2023-11-15		

Audit Company Name:
UL Responsible Sourcing

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Karen Park	APSCA Number:	21702474
Additional Auditors:	Amell Yu		32200073
Date of declaration:	2023-11-16		

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

Site Representation	
Full Name:	Mr. Seung Hoon Lim
Title:	Deputy General Manager of Management Support Team
Date of declaration:	2023-11-16
Comments: <i>Any exceptions to this must be recorded here (e.g. different sample size): Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020). The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i>	
None	

Summary of Findings

[illegible]

Local Law Issues

Issue	Description
§1	<p>Act On Installation And Management Of Firefighting Systems (2021) Amendment (2023), Article 16(1) No interested party of a specific object of fire service shall engage in the following acts with respect to evacuation facilities, firefighting compartments, and fire prevention facilities under Article 49 of the Building Act, unless there is good cause: 1. Closing or destroying evacuation facilities, firefighting compartments, and fire prevention facilities; 2. Piling up articles or installing obstacles around evacuation facilities, firefighting compartments, and fire prevention facilities; 3. Hindering the use of evacuation facilities, firefighting compartments, and fire prevention facilities or impeding firefighting activities under Article 16 of the Framework Act on Firefighting Services; 4. Changing evacuation facilities, firefighting compartments, or fire prevention facilities.</p> <p>16 ① 「」 49 , . 1. , 2. , 3. , 「」 16 4. ,</p>
§2	<p>Occupational Safety and Health Act (2019) Amendment (2021), Article 114 (2) A business owner referred to in paragraph (1) shall post guidelines on managing substances subject to material safety data sheet preparation by work process of handling substances subject to material safety data sheet preparation, as prescribed by Ordinance of the Ministry of Employment and Labor.</p> <p>114 ② 1 .</p>
§3	<p>Occupational Safety and Health Act (1990) Amendment (2021), Article 115 (2) A business owner shall state warnings on a container of a substance subject to material safety data sheet preparation used in the place of business, according to the methods prescribed by Ordinance of the Ministry of Employment and Labor: Provided, That the foregoing shall not apply in cases prescribed by Ordinance of the Ministry of Employment and Labor, including where warnings are already stated on the container thereof.</p> <p>115 ② . , .</p>
§4	<p>Occupational Safety and Health Act (2019) Amendment (2020), Article 36 (1)A business owner shall identify hazardous or risk factors caused by buildings, machinery and apparatus, equipment, raw materials, gas, steam, dust, specific work behaviors of employees, or other duties and evaluate whether the degree of the risks that can cause injury and illness is within acceptable limits; take measures pursuant to this Act or orders issued pursuant to this Act based upon the results of such evaluation; and take additional measures where necessary to prevent risks to or the health impairment of employees. (2) When conducting an evaluation prescribed in paragraph (1), a business owner shall have employees at the relevant workplace participate therein, as determined and publicly notified by the Minister of Employment and Labor. (3) A business owner shall prepare and retain records on the results of an evaluation prescribed in paragraph (1) and the measures that have been taken, as prescribed by Ordinance of the Ministry of Employment and Labor. (4) The methods, procedures, and timing of evaluations prescribed in paragraph (1) and other necessary matters shall be determined and publicly notified by the Minister of Employment and Labor.</p> <p>36 ① , . , , , , . ② 1 . ③ 1 . ④ 1 , , .</p>

§5	<p>Occupational Safety and Health Act (2019) Amendment (2020), Article 80 (1) No person shall provide any power- operated machinery or apparatus prescribed by Presidential Decree for transfer, rent, installation, or use, nor shall he or she display it for the purpose of transfer or rent, without taking protective measures for preventing hazards and dangers prescribed by Ordinance of the Ministry of Employment and Labor. (2) No person shall provide any of the following power-operated machinery or apparatus for transfer, rent, installation, or use, nor shall he or she display it for the purpose of transfer or rent, without taking protective measures prescribed by Ordinance of the Ministry of Employment and Labor: 1. Any machinery or apparatus that has a protruding part on its operating unit; 2. Any machinery or apparatus that has a power-transfer part or speed-adjusting part; 3. Any machinery or apparatus that has a trapping point in its rotary machine. (3) Any business owner shall regularly inspect and maintain devices related to protective measures prescribed in paragraphs (1) and (2) to ensure that such protective measures function properly. (4) In cases prescribed by Ordinance of the Ministry of Employment and Labor, such as where a business owner and employee intend to remove the protective measures prescribed in paragraphs (1) and (2), they shall take necessary safety and health measures.</p> <p>80 ① (動力) . . . ② . . . 1. 2. 3. ③ 1 2 . ④ 1 2 .</p>
§6	<p>Food Sanitation Act (2009) Amendment (2020), Article 51 (Cooks) (1) The meal service facility operators and the food service business operators prescribed by Presidential Decree shall employ cooks: Provided, That they may choose not to employ cooks where any of the following is applicable: 1. Where a meal service facility operator or a food service business operator prepares food and drink in person as a cook; 2. Where an industrial enterprise provides meals for less than 100 persons per mealtime; 3. Where a dietician under Article 52 (1) has a cooking license.</p> <p>51() ① (調理士) . , . 1. 2. 1 100 3. 521</p>
§7	<p>Food Sanitation Act (2009) Amendment (2020), Article 52 (Dieticians) (1) Meal service facility operators shall employ dieticians: Provided, That they may choose not to employ dieticians where any of the following is applicable: 1. Where a meal service facility operator directly provides guidance on nutrition as a dietician; 2. Where an industrial enterprise provides meals for less than 100 persons per mealtime; 3. Where a cook under Article 51 (1) is licensed as a dietician.</p> <p>52() ① (營養士) . , . 1. 2. 1 100 3. 511</p>
§8	<p>Food Sanitation Act (2009) Amendment (2021), Article 40 (1) A business operator and his or her employees prescribed by Ordinance of the Prime Minister shall undergo medical examination: Provided, That where they undergo the same medical examination as that prescribed by other Acts and subordinate statutes, they shall be deemed to have undergone medical examination under this Act. (2) No person, who is recognized to have a disease likely to cause harm to third persons as a result of medical examination under paragraph (1), shall be engaged in the relevant business.</p> <p>40() ① . , . ② 1 . ③ 1 2 .</p>
§9	<p>Labor Standards Act (2007) Amendment (2021), Article 53(1) Where an agreement is made between the parties, work hours referred to in Article 50 may be extended by up to 12 hours per week.</p>
§10	<p>Labor Standards Act (2007) Amendment (2021), Article 53(1) Where an agreement is made between the parties, work hours referred to in Article 50 may be extended by up to 12 hours per week.</p> <p>53 (1) 1 12 50 .</p>

Site Details

Site Details			
Company Name	DOOCO		
Site Name	DOOCO		
GPS location (if available)	GPS Address:	12, Dodam 8-ro, Seo-Gu, Incheon, Korea, Republic of (South)	
	Coordinates:	Latitude: 37.58943° N, Longitude: 126.62205° E	
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business License number: 117-81-17171 valid from April 23, 1996		
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Plastic containers for cosmetics		
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	DOOCO is located at 12, Dodam 8-ro, Seo-Gu, Incheon, Korea, Republic of (South). The total land area occupied was approx. 8,946.80sq. meters. The facility has operated in its current location since 2019 under the current business license. With regards to facilities, the facility is occupied by 3 buildings including 1 office and production building (Building A), 1 production and warehouse building (Building B), and 1 dormitory and canteen building (Building C).		
Structure and number of buildings	Building Name:		Building A
	Floor	Description	Remark
	Floor 1	Plastic molding	None
	Floor 2	Assembly	None
	Floor 3	Office	None
	Building Name:		Building B
	Floor	Description	Remark
	Floor 1	Material storage and plastic molding	None
	Floor 2	Assembly and finished product storage	None
	Building Name:		Building C
	Floor	Description	Remark
	Floor 1	Canteen	None
	Floor 2	Dormitory	None
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: None of the structural issues were found.		

Does the site have a structural engineer evaluation?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The facility has not conducted a structural engineer evaluation.
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor
Months of peak season	
Process overview	The products manufactured are plastic containers for cosmetics. The main operations and number of production lines and equipment used are as follows; Injection molding: 27, Auto assembly line: 17, Wrapping machine for packing: 1
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None
Please give details:	There are 3 employee representatives available. No trade union is in place.
Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There is on-site dormitory at Building C. A total of 7 male employees are living in dormitory, one employee per room. The dormitory fee of KRW150,000 per month is paid by the employees.
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:

Audit Parameters					
Time in and time out	Day 1		Day 2		
	In	09:30	In	09:30	
	Out	16:30	Out	12:00	
Audit type:	FULL_INITIAL				
Was the audit announced?	ANNOUNCED				
Was the Sedex SAQ available for review?	Yes				
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No				
Who signed and agreed CAPR	Mr. Seung Hoon Lim / Deputy General Manager of Management Support Team				
Is further information available	No				

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	No	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	No union is available at the facility.		
<i>Reason for absence during the audit</i>	There were three (3) worker representatives present at the facility during the audit. The worker representative participated in the opening meeting and closing meeting. However, The worker representative was not able to participate the all-audit process due to production demands.		
<i>Reason for absence at the closing meeting</i>	No union is available at the facility.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – male	50	0	9	2	0	0	0	61
Worker numbers – female	49	0	5	3	0	0	0	57
Total	99	0	14	5	0	0	0	118
Number of Workers interviewed – male	5	0	4	2	0	0	0	11
Number of Workers interviewed – female	12	0	2	1	0	0	0	15
Total – interviewed sample size	17	0	6	3	0	0	0	26

Nationalities Structure			
Nationality of Management	186		
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1:	SOUTH_KOREAN	approx %: 96%
	Nationality 2:	CHINESE	approx %: 3%
	Nationality 3:	FILIPINO	approx %: 1%
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The facility is a non-seasonal factory without obvious peak and non-peak months.		
Worker remuneration	Workers on piece rate:	0%	
	Paid hourly:	100%	
	Salaried:	0%	
Payment cycle	Paid daily:	0%	
	Paid weekly:	0%	
	Paid monthly:	100%	
	Other:	0%	
	Details for other:	N/A	

Worker Interview Summary	
Were workers aware of the audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were workers aware of the code?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Number of group interviews:	4 groups of 5 employees
Number of individual interviews:	Male: 4 Female: 2
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	All of the interviewed employees had a positive attitude to management and site. There was no complaint.
What did the workers like the most about working at this site?	Payment without delay, and friendly management and employees.
Any additional comment(s) regarding interviews:	None
Attitude of workers to hours worked:	All overtime and holiday work are voluntarily performed. The employees can refuse to overtime or holiday work without any penalty.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:

26 employees were selected for interview including 15 females and 11 males, and they were interviewed as 6 individuals and 4 groups with 5 employees. The employees were assured of confidentiality and they spoke freely of their views of the facility. All of the interviewed employees stated that they were satisfied with their employment at the facility and that they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect. They were able to make suggestions to their supervisors and managers, and the facility well responded to their suggestions.

Attitude of worker's committee/union reps:

Interviews with the Labor-Management committee representative reported that the managers treated the employees in a good manner. Most of the suggestions were accepted by the management, and the management were willing to receive the suggestion.

Attitude of managers:

The auditors arrived at the facility at 9:30 on November 15, 2023. Upon arrival, the auditors were greeted by Mr. Seung Hoon Lim/ Deputy General Manager of Management Support Team. An opening meeting was held with Mr. Yong wook Lee/ Director of Development Team, Mr. Un Man, Jung/ Director of Management Support Team, Mr. Jang Young, Lim. Director of Injection Team, Mr. Won Seok Eom. General Manager of Production 2 Team, Mr. Sung Hwan Kim/ General Manager of Production 2 Team and Mr. Seung Hoon Lim/ Deputy General Manager of Management Support Team. The auditors explained the purpose of the visit and audit procedures, such as documentation review, private employee interviews, and health and safety walkthrough with photographs. The facility management immediately granted full access to the facility. The auditors also provided the statement of integrity, which was signed by Mr. Seung Hoon Lim/ Deputy General Manager of Management Support Team. At the end of the audit, a closing meeting was held with Mr. Yong wook Lee/ Director of Development Team, Mr. Un Man, Jung/ Director of Management Support Team, Mr. Jang Young, Lim. Director of Injection Team, Mr. Won Seok Eom. General Manager of Production 2 Team, Mr. Sung Hwan Kim/ General Manager of Production 2 Team, Mr. Seung Hoon Lim/ Deputy General Manager of Management Support Team. First of all, the auditors appreciated that the facility management cooperated in the entire audit. Then, all of the current findings and corresponding recommendations were explained to the facility management. The facility management agreed with the current findings and stated that they would improve them. Then, Mr. Seung Hoon Lim/ Deputy General Manager of Management Support Team signed the CAPR.

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

0A: Compliance Requirements

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

The facility establishes rules of employment, human rights statements, and ethics policies, and maintains them where the employees can access them freely.

There is a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. The facility establishes anonymous grievance mechanisms.

Evidence examined:

- Rules of Employment
- Human rights and ethics statements and policies
- Grievance procedure and records
- Labor-Management Committee meeting minutes

Any other comments:

None

Policy statement that expresses commitment to respect human rights?

☐ Yes ☒ No

Please give details:

The human rights policy including the commitment to respect human rights is available, but the policy has not been informed to employees.

Are the policies included in workers' manuals?

☐ Yes ☒ No

Please give details:

The policy is not included in the rules of employment.

Does the business have a designated person responsible for implementing standards concerning Human Rights?

☒ Yes ☐ No

Please give details:

Mr. Seung Hoon Lim/ Deputy General Manager of Management Support Team

Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has comment boxes and the facility's website indicates how to report confidentially via e-mail.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Personnel documents are kept in the cabinet with a locking device controlled by the Management Support Team and the authorized management by the Management Support Team can access the cabinet only.
Measuring Workplace Impact	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 1.2% This year 2.6%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	2.4%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 0.86% This year 1.1%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	1.2%
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility records injuries and accidents. The accident records with accident analysis, root cause analysis, and corrective and preventive action are available for review.
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year 0.0% This year 0.0%

Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%	
Lost day work cases per 100 workers(((Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year	0.0%
	This year	0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	15.0%
	12 month	15.0%

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

0B: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

The management system and the code implementation system are reviewed. Licenses and business permissions are up to date. However, the facility has not appointed management who is responsible for compliance with the ETI base code. Thus, the ETI Base Code has not been communicated to the employees and management.
The facility has ISO 14001 (Certificate No.:KR- 0744801, November 12, 2022, valid until November 12, 2025)

Evidence examined:

- Rules of employment
- Quality Management procedure and Health and safety management procedure
- Health and Safety training records
- Training records to prevent sexual harassment
- Management system certificate

Any other comments:

None

Management Systems

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

☐ Yes ☒ No

Please give details:

The facility has not been subjected to regulatory actions for labor practice from the local labor authority in the past year.

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

☒ Yes ☐ No

Please give details:

The policy on forced labor, child labor, discrimination, harassment & abuse is available.

If Yes, is there evidence (an indication) of effective implementation? Please give details.

The established policies are communicated to employees annually but the forced labor policy has not been communicated to all employees.

Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Managers and employees receive annual training in the standards for child labor, discrimination and harassment & abuse but the forced labor policy has not been communicated to all employees.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has ISO 14001 (Certificate No.:KR- 0744801, November 12, 2022, valid until November 12, 2025)
Is there a Human Resources manager/department?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Management Support Team is responsible for Human Resources.
Is there a senior person /manager responsible for implementation of the code?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The facility has not appointed management who is responsible for compliance with the ETI base code.
Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The policy on the confidentiality of an individual's personal information is available, and the facility maintains the employees' information securely.
Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Personnel documents are kept in the cabinet with a locking device controlled by the Management Support Team and the authorized management by the Management Support Team can access the cabinet only.
Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no risk assessment process to evaluate policy and procedure effectiveness.
Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No risk assessment process is in place. Hence, no process to address issues found when conducting risk assessment including identified risk control.
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: The facility has a code of conduct for suppliers, it includes standards of ethical, social, and environmental standards that are required of suppliers.
Land Rights	

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: The facility has the license of building and land use approval.
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: These are performed by the company's accounting and administration staffs to accepted procedures for due diligence.
Does the site have a written policy and procedures specific to land rights?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: This was conducted by the local governmental authority and the owner purchased the land according to legal channels.
Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The licence of building and land use approval indicates that the local authority reviews the impacts of the land use and acquisition. The facility has the land use approval including factory register which is issued by the local authority.
Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All the areas of the facility were legal according to the interview and document review.


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1 - Freely chosen Employment [Summary of Findings]

1: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

During the walkthrough, no practice of forced labor is detected. Documentation review, management interviews, and worker interviews confirm that there is no forced, bonded, or involuntary prison labor at the facility. There are no reports of deposits, mandatory overtime, or retention of documentation at the facility. All interviewed employees report that they can resign from the facility at any time without any deduction from the wages that they have already earned. A policy that prohibits forced labor is available for review. There is no written policy to submit their original ID. The rules of employment and labor contract include that the employees can leave with 30 days' notice with no penalty.

Evidence examined:

- Rules of Employment
- Payrolls (to check for deposits)
- Personal data files (to check for original documentation held by the facility)
- Resignation records
- Management and employee interview

Any other comments:

None

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The rules of employment and labor contract include that the employees can leave with 30 days' notice with no penalty.
If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details: N/A

Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: All interviewed employees report that they can freely leave the facility at the end of the workday.
Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: The facility establishes the code of conduct for suppliers and the facility visits the supplier each year to inspect the risk of the supplier's forced, trafficked, and bonded labor. The records are available for review.
Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No system is in place to identify and prevent various forms of modern slavery or human trafficking within its own operations.

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

2: Compliance Requirements

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

As per the facility management and employees, there is no union available. The employees report that they can directly communicate their concerns to their supervisors or management. The Labor-Management Committee is available at the facility, and the employees are aware of the worker representatives.

Evidence examined:

- Regulations of Labor-Management Committee
- Labor-Management Committee Meeting Minutes
- Rules of Employment
- Management and employee interview

Any other comments:

None

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	Labor-Management committee is established and there are 3 worker representatives available.	
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There is Health and Safety Committee, and the committee meeting is held once per quarter. The latest committee meeting was held on September 25, 2023 with 3 worker representatives and 3 management representatives.	
Is there evidence of free elections?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: No evidence to control of Labor-Management Committee by the facility is found.
Name of union and union representative, if applicable:	N/A (No union is available.)
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Labor-Management Committee is in place with 3 worker representatives elected by the employees.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All interviewed employees are aware of worker representatives.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2023-06-22
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The Labor-Management Committee Meeting is held regularly. The latest committee meeting was held on September 25, 2023 with 3 worker representatives and 3 management representatives. During the latest meeting, the employee's health check date and the planning of the workshop were discussed.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

3: Compliance Requirements

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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

Adequate emergency exits are provided throughout the work floor. However, 1 out of 3 exit route doors in the pump assembly area and 1 out of 2 exits in canteen are blocked by materials and no emergency lights are available in the stairways of Building A and the entire Building B and C. Evacuation plot plans are posted on each work floor, and assembly points are designated and marked with visible signs. However, the designated assembly point is a parking lot for clients and the assembly point is too small for the number of employees. The facility provides evacuation drills once per year as per the legal requirement. The facility is equipped with sufficient fire-fighting equipment such as fire alarms and fire extinguishers, and all of them are maintained with regular inspection records.

First aid kits with sufficient first aid supplies are maintained where workers can easily access them.

However, no PPE is available in the printing area, which is the in-house subcontractor, and one (1) wrapping machine in the warehouse has no safety guards. One (1) first aid-trained personnel is positioned during day-shift, but no first aid trained personnel is positioned during night-shift.

The electrical wires are safely encased, and inner covers are installed in the control panels when applicable. The circuit breakers are also labeled to indicate the source of power. MSDS for maintained chemicals are posted on the work floor. However, no MSDS is available in the printing area, which is the in-house subcontractor, and portable chemical containers are not labeled with hazard information and precautions. Health and safety training are regularly provided to all employees.

Evidence examined:

- Health and safety policy
- Health and safety manual
- Training records and certificates
- Fire equipment inspection records
- Fire drill records
- Working Environment Measurement Report
- Accident records
- Chemical list and MSDS for each chemical

Any other comments:

None

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

☒ Yes ☐ No

Please give details:


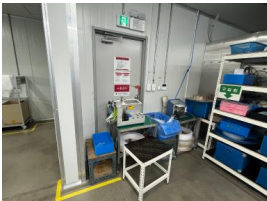
The health & safety manual is established, and all workers are provided monthly health & safety training including general occupational health & safety.

Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The health & safety policy is included in the rules of employment, and the detailed health & safety manual is maintained on the work floor as well.
Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Are visitors to the site informed on H&S and provided with personal protective equipment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: None of the site's H&S information is provided and no PPE is provided to visitors.
Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: One (1) first aid-trained personnel is positioned during day-shift, but no first aid trained personnel is positioned during night-shift.
Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility provides transportation in forms of commuter bus. The bus is safe and clean. The vehicle safety inspection is conducted every 2 years as per the law. The last inspection date is August 22, 2023.
Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Each employee provides personal secure storage in the dormitory.
Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: H&S risk assessment is conducted once a year, however, the risk assessment does not include evaluating the arrangements for workers doing overtime and using chemicals in the workplace.
Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: N/A (No wastewater and air emission are generated by the facility.)


<p>Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility's meeting minutes do not include the issue of environmental standards including the use of banned chemicals.</p>
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Actions	It is recommended to keep the exits free from any obstructions and accessible to evacuate at all times. .	


Non-Compliance		Evidence																												
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		<div></div> <p><u>NC-Assembly point is small.jpeg</u></p>																												

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600249196	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	230 - No material safety data sheet (MSDS) obtained / available	
Subcategory	Chemicals	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Occupational Safety and Health Act (2019) Amendment (2021), Article 114 (2) A business owner referred to in paragraph (1) shall post guidelines on managing substances subject to material safety data sheet preparation by work process of handling substances subject to material safety data sheet preparation, as prescribed by Ordinance of the Ministry of Employment and Labor. 114 ② 1 .	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	No MSDS is available in the printing area, which is the in-house subcontractor. () .	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended to post and maintain the MSDS where the chemical are used and stored. .	



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Non-Compliance		Evidence																															
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Explanation to the non compliance	H&S risk assessment is conducted once a year, however, the risk assessment does not include evaluating the arrangements for workers doing overtime. 1 , .																													
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit																													
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other																													
Actions	It is recommended to conduct H&S risk assessments including evaluating the arrangements for workers doing overtime. .																													

Non-Compliance		Evidence																							
[Back to findings summary]																									
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600249199</td></tr><tr><td>Clause</td><td>3 - Working Conditions are Safe and Hygienic</td></tr><tr><td>Issue Title</td><td>234 - No / inadequate chemical risk assessment in place e.g. COSHH</td></tr><tr><td>Subcategory</td><td>Chemicals</td></tr><tr><td>New or carried over?</td><td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td></tr><tr><td>Root cause</td><td><input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td>Occupational Safety and Health Act (2019) Amendment (2020), Article 36 (1)A business owner shall identify hazardous or risk factors caused by buildings, machinery and apparatus, equipment, raw materials, gas, steam, dust, specific work behaviors of employees, or other duties and evaluate whether the degree of the risks that can cause injury and illness is within acceptable limits; take measures pursuant to this Act or orders issued pursuant to this Act based upon the results of such evaluation; and take additional measures where necessary to prevent risks to or the health impairment of employees. (2) When conducting an evaluation prescribed in paragraph (1), a business owner shall have employees at the relevant workplace participate therein, as determined and publicly notified by the Minister of Employment and Labor. (3) A business owner shall prepare and retain records on the results of an evaluation prescribed in paragraph (1) and the measures that have been taken, as prescribed by Ordinance of the Ministry of Employment and Labor. (4) The methods, procedures, and timing of evaluations prescribed in paragraph (1) and other necessary matters shall be determined and publicly notified by the Minister of Employment and Labor. 36 ① , . . ' ' ' ' ' . ④ 1 , , . . ② 1 . ③ 1 ' ' ' ' ' . ④ 1 , , .</td></tr><tr><td>ETI code</td><td>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,</td></tr></table>			Non-Compliance		Status	OPEN	Reference	ZAF600249199	Clause	3 - Working Conditions are Safe and Hygienic	Issue Title	234 - No / inadequate chemical risk assessment in place e.g. COSHH	Subcategory	Chemicals	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		Local law issue	Occupational Safety and Health Act (2019) Amendment (2020), Article 36 (1)A business owner shall identify hazardous or risk factors caused by buildings, machinery and apparatus, equipment, raw materials, gas, steam, dust, specific work behaviors of employees, or other duties and evaluate whether the degree of the risks that can cause injury and illness is within acceptable limits; take measures pursuant to this Act or orders issued pursuant to this Act based upon the results of such evaluation; and take additional measures where necessary to prevent risks to or the health impairment of employees. (2) When conducting an evaluation prescribed in paragraph (1), a business owner shall have employees at the relevant workplace participate therein, as determined and publicly notified by the Minister of Employment and Labor. (3) A business owner shall prepare and retain records on the results of an evaluation prescribed in paragraph (1) and the measures that have been taken, as prescribed by Ordinance of the Ministry of Employment and Labor. (4) The methods, procedures, and timing of evaluations prescribed in paragraph (1) and other necessary matters shall be determined and publicly notified by the Minister of Employment and Labor. 36 ① , . . ' ' ' ' ' . ④ 1 , , . . ② 1 . ③ 1 ' ' ' ' ' . ④ 1 , , .	ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable,	
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	the causes of hazards inherent in the working environment.	
Explanation to the non compliance	H&S risk assessment is conducted once a year, however, the risk assessment does not include the employees who are using chemicals in the workplace. 1 , .	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended to conduct chemical risk assessments. .	

Non-Compliance		Evidence																							
[Back to findings summary]																									
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600249200</td></tr><tr><td>Clause</td><td>3 - Working Conditions are Safe and Hygienic</td></tr><tr><td>Issue Title</td><td>264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt / hand guards on other machines)</td></tr><tr><td>Subcategory</td><td>Machinery</td></tr><tr><td>New or carried over?</td><td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td></tr><tr><td>Root cause</td><td><input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td><p>Occupational Safety and Health Act (2019) Amendment (2020), Article 80 (1) No person shall provide any power- operated machinery or apparatus prescribed by Presidential Decree for transfer, rent, installation, or use, nor shall he or she display it for the purpose of transfer or rent, without taking protective measures for preventing hazards and dangers prescribed by Ordinance of the Ministry of Employment and Labor. (2) No person shall provide any of the following power-operated machinery or apparatus for transfer, rent, installation, or use, nor shall he or she display it for the purpose of transfer or rent, without taking protective measures prescribed by Ordinance of the Ministry of Employment and Labor: 1. Any machinery or apparatus that has a protruding part on its operating unit; 2. Any machinery or apparatus that has a power-transfer part or speed-adjusting part; 3. Any machinery or apparatus that has a trapping point in its rotary machine. (3) Any business owner shall regularly inspect and maintain devices related to protective measures prescribed in paragraphs (1) and (2) to ensure that such protective measures function properly. (4) In cases prescribed by Ordinance of the Ministry of Employment and Labor, such as where a business owner and employee intend to remove the protective measures prescribed in paragraphs (1) and (2), they shall take necessary safety and health measures.</p><p>80 ① (動力) . . . ② 1. . 2. . 3. . ③ 1 2 . ④ . 1 2'' .</p></td></tr><tr><td>ETI code</td><td>3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing</td></tr></table>			Non-Compliance		Status	OPEN	Reference	ZAF600249200	Clause	3 - Working Conditions are Safe and Hygienic	Issue Title	264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt / hand guards on other machines)	Subcategory	Machinery	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		Local law issue	<p>Occupational Safety and Health Act (2019) Amendment (2020), Article 80 (1) No person shall provide any power- operated machinery or apparatus prescribed by Presidential Decree for transfer, rent, installation, or use, nor shall he or she display it for the purpose of transfer or rent, without taking protective measures for preventing hazards and dangers prescribed by Ordinance of the Ministry of Employment and Labor. (2) No person shall provide any of the following power-operated machinery or apparatus for transfer, rent, installation, or use, nor shall he or she display it for the purpose of transfer or rent, without taking protective measures prescribed by Ordinance of the Ministry of Employment and Labor: 1. Any machinery or apparatus that has a protruding part on its operating unit; 2. Any machinery or apparatus that has a power-transfer part or speed-adjusting part; 3. Any machinery or apparatus that has a trapping point in its rotary machine. (3) Any business owner shall regularly inspect and maintain devices related to protective measures prescribed in paragraphs (1) and (2) to ensure that such protective measures function properly. (4) In cases prescribed by Ordinance of the Ministry of Employment and Labor, such as where a business owner and employee intend to remove the protective measures prescribed in paragraphs (1) and (2), they shall take necessary safety and health measures.</p> <p>80 ① (動力) . . . ② 1. . 2. . 3. . ③ 1 2 . ④ . 1 2'' .</p>	ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing	<div></div> <div><p>NC-No safety guard on wrapping machine.jpeg</p></div>
Non-Compliance																									
Status	OPEN																								
Reference	ZAF600249200																								
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Explanation to the non compliance	One (1) wrapping machine in the warehouse has no safety guards. 1 .	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended to install the safety guards on the wrapping machine as per the legal requirements. .	

Non-Compliance		Evidence																												
[Back to findings summary]																														
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600249201</td></tr><tr><td>Clause</td><td>3 - Working Conditions are Safe and Hygienic</td></tr><tr><td>Issue Title</td><td>276 - Workers are not issued with appropriate Personal Protective Equipment (PPE)</td></tr><tr><td>Subcategory</td><td>Personal Protective Equipment/Clothing</td></tr><tr><td>New or carried over?</td><td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td></tr><tr><td>Root cause</td><td><input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>ETI code</td><td>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.</td></tr><tr><td>Explanation to the non compliance</td><td>No PPE is available in the printing area, which is the in-house subcontractor. () .</td></tr><tr><td>Follow up method</td><td><input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit</td></tr><tr><td>Timescale</td><td><input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other</td></tr><tr><td>Actions</td><td>It is recommended to maintain the appropriate PPE in the printing area. () .</td></tr></table>			Non-Compliance		Status	OPEN	Reference	ZAF600249201	Clause	3 - Working Conditions are Safe and Hygienic	Issue Title	276 - Workers are not issued with appropriate Personal Protective Equipment (PPE)	Subcategory	Personal Protective Equipment/Clothing	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	Explanation to the non compliance	No PPE is available in the printing area, which is the in-house subcontractor. () .	Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	Actions	It is recommended to maintain the appropriate PPE in the printing area. () .
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4 - Child Labour Shall Not Be Used [Summary of Findings]

4: Compliance Requirements

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined

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

Current Systems:

A walkthrough is conducted at all production areas and non-production areas, and all of the observed employees appear to be older than the legal hiring age of 18 years, and the remediation policy is in place when found employed under the minimum working age or young people under improper conditions. All of the interviewed employees also report that their ages are above 18 years old, and they have never witnessed any minor, who is under the age of 18 years, working at the facility. The facility also provides copies of official age verification documents for the entire workforce in the form of applications with identification photos, resident registrations, and copies of photo identification cards. According to the reviewed documents and worker interviews, the youngest worker is 29 years old.

Evidence examined:

- Rules of Employment
- Personnel files
- Labour contracts
- Employee interview

Any other comments:

None

Legal age of employment:	15
Age of youngest worker found:	29
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A (No worker under 18 years is hired.)

5 - Living Wages are Paid [Summary of Findings]

5: Compliance Requirements

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

The facility is requested to provide the payroll records from November 2022 to October 2023 for 26 sampled employees. As per the facility management, there is no obvious peak month at the facility. Hence, 3 months' payroll records out of 12 months are randomly selected by the auditors; March 2023, July 2023 and October 2023.

Minimum wages are guaranteed, and overtime compensation is provided with additional 50% of regular wages. The necessary social insurance is provided to all of the eligible employees.

The interviewed employees report that they are provided with the payment on the 10th of each month along with a pay slip by bank transfer. No delay in payment is reported. The employees also report that there has been no disciplinary deduction taken at the facility.

Evidence examined:

- Rules of Employment
- Labour contracts
- Payrolls (for sampled employees)
- Time records (for sampled employees)
- Disciplinary records
- Social insurance records
- Employee interview

Any other comments:

None

Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 40.0 Per Month: null	Actual Per Day: 8.0 Per Week: 40.0 Per Month: 176.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: null Per Week: 12.0 Per Month: null	Actual Per Day: 2.4 Per Week: 32.8 Per Month: 82.9	NO

Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 76960.0 Per Week: null Per Month: 2010580.0	Actual Per Day: 76960.0 Per Week: 461760.0 Per Month: 2010580.0	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 21645.0 Per Week: 101010.0 Per Month: 194805.0	NO
Wages Analysis:			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	26 samples in March 2023, 26 samples in July 2023, and 26 samples in October 2023. (No obvious peak at the facility.)		
Are there different legal minimum wage grades? If Yes, please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	KRW9,620 per hour, KRW461,760 per week, KRW2,010,580 per month		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 31.0% of workforce earning minimum wage 69.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found:None Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	Income tax, residence tax, and social insurances, and reveal that the deductions are calculated as per the law.		
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Please list all deductions that have been made.	1. Income tax 2. Residence Tax 3. Social Insurance (National pension, national health insurance and employment insurance) 4. Dormitory fee (If applicable)		
Please list all deductions that have not been made.	None		
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Time records include all overtime and holiday work without missing.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There is an annual review when local wage rate is published.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: As per review of the rules, payroll records, and employee interviews, it is confirmed that equal rates are being paid for equal work.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

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

6: Compliance Requirements

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

The current established working hours are in 1-shift or 2-shift. 2-shift operation is from 8:00 to 20:00/ from 20:00 to 8:00 with 1 hour and 40 minutes break. 1-shift operation is from 9:00 to 18:00 with 1 hour break. The established recess hours are in compliance with the legal requirement.

Weekly work hours exceed the legal limit of 12 hours. 4 out of 26 employees work overtime maximum up to 32.8 hours in October 2023.

Lack of 7th day of rest found in 1 out of 3 sampled pay periods. 1 out of 26 employees worked maximum of up to 14 days consecutively without the 7th day of rest in October 2023.

Evidence examined:

- Rules of Employment
- Labour contracts
- Time records
- Management and employee interview

Any other comments:

None

Working hours' analysis

Systems & Processes

What timekeeping systems are used?	Fingerprint scanning system
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Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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Please give details:

Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input checked="" type="checkbox"/> No (please explain)
Please give details	One (1) employee consecutively worked maximum up to 14 days without rest day.
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):	14
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours (No obvious peak is available): 12 hours / week in March 2023 12 hours / week in July 2023 32.8 hours / week in October 2023
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: 4 out of 26 employees work maximum up to 72.8 hours (40 regular + 32.8 overtime).
Approximate percentage of total workers on highest overtime hours:	15.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: Rules of employment and labour contracts state that overtime may be requested but it should be voluntary.
Overtime premium	

Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium Please give details: 150% of regular hourly rate for overtime 150% of regular hourly rate for holiday 200% of regular hourly rate for overtime on holiday
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 100% of employees each month
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input checked="" type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other
Please give details	The local law does not allow paying less than 125% OT premium.
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	<input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input checked="" type="checkbox"/> Safeguards are in place to protect worker's health and safety <input checked="" type="checkbox"/> Site can demonstrate exceptional circumstances <input checked="" type="checkbox"/> Other reasons (please specify)
Please give details	Site shall be approved with the special permit from the local labor authority to extend overtime to 20 hours per week.
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	N/A
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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7 - No Discrimination is Practiced
[Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

All employees appear to be treated equally and given equal opportunity concerning hiring and promotion but anti-discrimination policy has not been communicated to all workers.

Evidence examined:

- Rules of Employment
- Labour contracts
- Payrolls (for sampled workers)
- Time records (for sampled workers)
- Training records

Any other comments:

None

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 79.0%		Female: 21.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	None		
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement	<input type="checkbox"/> Access to training <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	N/A		
Professional Development			
What type of training and development are available for workers?	All workers are given H&S training. Female as well as male workers are trained to become supervisors and managers.		
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

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8 - Regular Employment Is Provided [Summary of Findings]

8: Compliance Requirements

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current Systems:

Labor contracts for employees at the facility are reviewed.
Employees have a signed contract and employees are also provided with a copy of their labor contract.
The facility management states that there are three (3) in-house subcontractors for maintenance of molding, injection molding, and printing, and no labor agency is used.

Evidence examined:

- Rules of Employment
- Labour contracts
- Payrolls (for sampled workers)
- Personnel files
- Management and employee interview

Any other comments:

None

Responsible Recruitment

All Workers

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

- | | |
|--|---|
| <input checked="" type="checkbox"/> Terms & Conditions presented | <input checked="" type="checkbox"/> Understood by workers |
| <input checked="" type="checkbox"/> Same as actual conditions | |

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

- ☐ Yes ☒ No

Migrant Workers

Type of work undertaken by migrant workers:	5 migrant workers in different production departments.
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: No involuntary deductions.
Is there any observation on this finding?	N/A
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	N/A (No agencies are used.)
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A (No agencies are used.)
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A (No agencies are used.)
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)	
Any contractors on site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There are three (3) in-house subcontractors at site for maintenance of molding, injection molding, and printing.
If Yes, how many workers supplied by contractors?	14

Do all contractor workers understand their terms of employment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All contractor employees understand their terms of employment.
If Yes, please give evidence for contractor workers being paid per law	During the employee interviews, the employees mentioned that their payment was above the local minimum wages. It was consistent with payslips.

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

8A: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

The facility management states that there are four (4) subcontractors for coating, metalizing and printing but there is no policy on managing and selecting subcontractors including obtaining clients' approval and the client's requirements on social and environmental standards have not been communicated to subcontractors. No homeworker is used.

Evidence examined:

- Site tour
- Production records
- Management interview
- Employee interview

Any other comments:

None

Summary of sub-contracting – if applicable

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

Process subcontracted

Process Subcontracted	Coating
Name of factory	ECOWIN CO.
Address	30 Sudo-ro 159beon-gil, Bucheon-si, Gyeonggi-do, Korea, Republic of (South)

Process subcontracted

Process Subcontracted	Metalizing
Name of factory	DAEGYEONG VNC CO.,LTD.
Address	2F, 402 Anaji-ro, Gyeyang-gu, Incheon, Korea, Republic of (South)

Process subcontracted

Process Subcontracted	Metalizing
Name of factory	GARAM TECH CO.,LTD.
Address	7 Baekbeom-ro 701beon-gil, Seo-gu, Incheon, Korea, Republic of (South)

Process subcontracted	
Process Subcontracted	Printing
Name of factory	OS Printek Co.
Address	Room.6902, 141 Bongsu-daero, Seo-gu, Incheon, Korea, Republic of (South)
Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: No unrecorded and undeclared subcontracting is observed.
If sub-contractors are used, is there evidence this has been agreed with the main client? (If yes, please provide details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Number of sub-contractors/agents used:	4
Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
What checks are in place to ensure no child labour is being used and work is safe?	The annual social standard checklists of subcontractors are available for review. The checklist includes ensuring no use of child labor.
Summary of homeworking – if applicable	
Is homeworking used at this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

9: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

The facility has established a disciplinary procedure for workers' misbehavior which includes verbal warning, written warning and finally termination. The facility has developed a training program for all employees on the procedure. Employee interviews confirm that employees are aware of the disciplinary procedure. Anonymous grievance system is available.

Evidence examined:

- Rules of Employment
- Records of Education to Prevent Sexual Harassment
- Grievance procedures and records
- Management and employee interview

Any other comments:

None

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has comment box and posts e-mail anonymous grievance channels on their website.
If yes, are workers aware of these channels and have access? Please give details.	Workers are aware of the grievance channel.
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Anonymous grievance channel through e-mail.
Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Worker <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other
Please provide grievance mechanism details	N/A
Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:

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

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

10A: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

There are 5 foreign workers hired, and all other workers have Korean citizenship. The foreign workers have the residential visa and were hired through same hiring process with the local employees. No labor agency or broker is utilized.

Evidence examined:

- Hiring procedure
- Personnel files
- Rule of Employment

Any other comments:

None

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

10B4: Compliance Requirements

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

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

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

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

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

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

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

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

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

10B4: Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

The facility maintains all legally required environmental documents in place which prove that the production of the facility is in compliance with the related environmental regulations. All of the legally required certificates including the registration form of environmental impacts of the construction. Approval of the environmental impact assessment document and the environmental protection check, and acceptance are available and valid. Based on observation on site, wastes are classified and collected on-site.

Evidence examined:

- All legally required environmental permits and records
- Environmental policy
- Energy bills
- Water bill
- Waste transfer documentation
- Management and employee interview
- Site tour

Any other comments:

None

Environmental Analysis

Is there a manager responsible for Environmental issues (Name and Position):	Mr. Un Man Jung/ Director of Management Support Team is responsible for environmental issues
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: Environment effectiveness evaluation is conducted but no implementation of controls to reduce identified risks.
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: ISO 14001 (Certificate No.:KR-0744801, November 12, 2022, valid until November 12, 2025)
Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility annually reviews the key impacts of its operations and discusses how to improve the key impacts.
Does the site have a Biodiversity policy?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Have all legally required permits been shown?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Waste transfer permit are presented for review.
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: Records for hazardous chemicals used are available.
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Law and client requirement management procedure is available for environment.
Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No reduction target is set.
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No evidence of recycling of waste.

Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The use of consumption of key utilities of water, energy and natural resources is measured by the local authority.	
Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The required permit and business license are maintained.	
Usage/Discharge analysis		
Criteria	Previous year: 2022	Current year: 2023
Electricity Usage: Kw/hrs	3713235	3427840
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	0	0
Has site completed any carbon Footprint Analysis?	No	No
If Yes, please state result		
Water Sources	Local water authority	Local water authority
Water Volume Used	3400	3299
Water Discharged	Local water authority	Local water authority
Water Volume Discharged	3400	3299
Water Volume Recycled	0	0
Total waste produced	3.6 ton	3 ton
Total hazardous waste produced	18 kg	280010 kg
Waste to recycling	0	0
Waste to landfill	3.6 ton	3 ton
Waste to other	0	0
Total Product Produced	47,563,492 pieces	51,773,299 pieces

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

10C: Compliance Requirements

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

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

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

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

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

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

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

10C: Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

The responsible personnel is designated for implementing standards concerning Business Ethics, and that site practices are conducted without any corruption and bribery.
The facility has established a business ethics policy which is communicated to employees through meetings and training. There is an anonymous grievance process established.

Evidence examined:

- Ethics policies and statements
- Training materials and records
- Grievance procedures and records
- Management and employee interview

Any other comments:

None

Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?

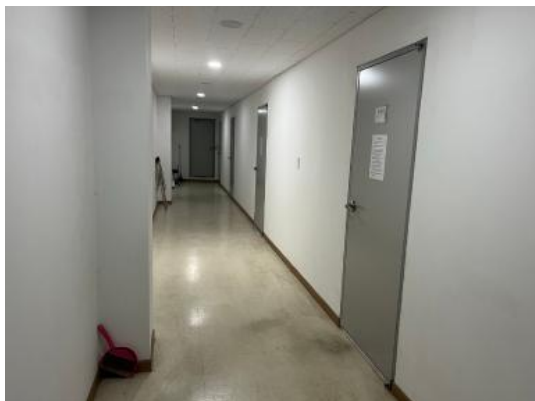
- ☒ Internal Policy
- ☒ Policy for third parties including suppliers

Please give details:

There is a written policy for internal and 3rd parties including suppliers.

Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The training is provided to the relevant personnel.
Is the policy updated on a regular (as needed) basis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The policies are not regularly updated.
Does the site require third parties including suppliers to complete their own business ethics training	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no request to third parties including suppliers to complete their own business ethics training.

Attachments



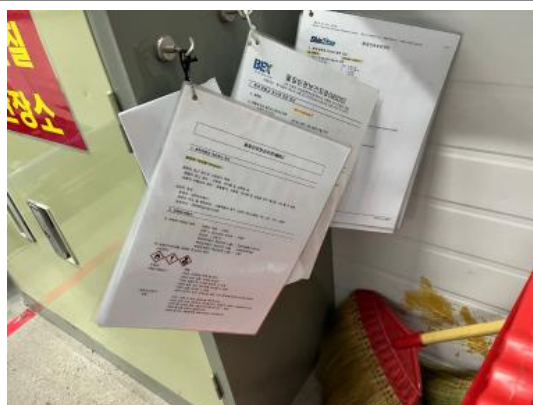
Dormitory aisle.jpeg



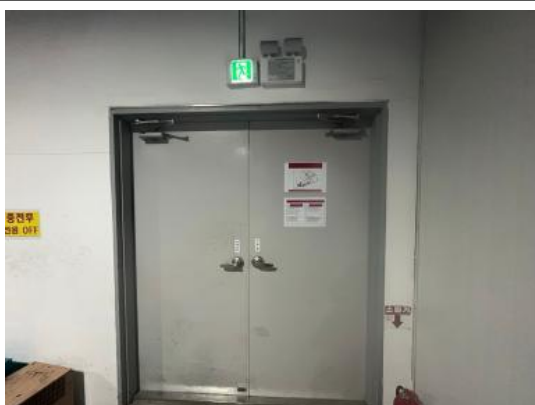
Hydrant.jpeg



First aid kit.jpeg



MSDS.jpeg



Exit.jpeg



Fire extinguisher.jpeg



Workfloor-Auto assembly line.jpeg



Facility outlook.jpeg



Evacuation plan.jpeg



Warehouse.jpeg



Dormitory.jpeg



Workfloor-Injection molding.jpeg



Facility entrance.jpeg



Canteen.jpeg



Dooco-Bubble Beauty Inc-Signed CAPR-Initial Audit-
11.15.2023-11.16.2023.pdf



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

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

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

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