




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 416511848	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 416546331	
Business name (Company name):	Douglas Fruit Company			
Site name:	Douglas Fruit			
Site address: <i>(Please include full address)</i>	110 Taylor Flats Road, Pasco Washington	Country:	United States	
Site contact and job title:	Tim Kline/Food Safety and Compliance Director			
Site phone:	+1 5093788843	Site e-mail:	timk@douglasfruit.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	September 16 and 17, 2021			

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

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact grievance@sedex.com.

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

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

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

Lead auditor: Itzel Valenzuela APSCA number: 25702597

Lead auditor APSCA status: Not registered

Team auditor: None APSCA number:

Lead auditor: Itzel Valenzuela APSCA number: 25702597

Report writer: Itzel Valenzuela

Report reviewer: Cinthya Velez, SCS Global Services

Date of declaration: September 17, 2021

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

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

Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.		Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
		ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Universal Rights covering UNGP	X		<input type="checkbox"/>	<input type="checkbox"/>		1		<ul style="list-style-type: none"> OBS-1: No policy implemented towards Human Rights section based on UNGP standards. Management is in process to conduct the policy.
0B	Management systems and code implementation	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1	2		<ul style="list-style-type: none"> NC-1: No policy implemented towards ETI Code. Management is in process to work in policies, procedures, monitoring, and trainings required for the assessment. OBS-1: No management policy towards land rights section. Management is in process to conduct the policy. OBS-2: No personal data privacy policy/procedure on site.
1.	Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> NONE
2	Freedom of Association	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	1			<ul style="list-style-type: none"> NC-1: No workers' representation on site.
3	Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	6	1		<ul style="list-style-type: none"> NC-1: There is no evidence that safety committee members (workers'

									<p>representation) were elected by the employees.</p> <ul style="list-style-type: none"> NC-2: No proper fire drill records on site, records are not dated, do not describe the type of drill, duration, and participants NC-3: Job hazard analysis for PPE is not complete. No PPE has been selected for each job position on site NC-4: No noise levels monitoring on site. NC-5: No lighting levels monitoring on site. NC-6: No ergonomic mats for employees standing for long periods in production lines. Management said that this is due safety food requirements. OBS-1: 1)5 extinguishers were found with no signage. It was corrected during the audit. 2)One emergency exit was observed locked by boxes in freezer area. It was corrected during the audit.
4	<u>Child Labour</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	1			<ul style="list-style-type: none"> NC-1: No remediation protocol in case that child labor is detected on site.
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> NONE
6	<u>Working Hours</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	1			<ul style="list-style-type: none"> NC-1: Management reported that at least 2.8% of its employees worked more than 60 hours per week in the last 6 months. Please note that this was not found in the sample reviewed by auditor.

7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				• NONE
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• NONE
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• NONE
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• NONE
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• NONE
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• NONE
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• NOT APPLICABLE
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• NOT APPLICABLE

General observations and summary of the site:

A full initial 2Pillar onsite assessment was scheduled on September 16 and 17, 2021, to Douglas Fruit Company, factory located in Pasco, Washington, USA. A female auditor was assigned on behalf of SCS Global for 2 person-days. The assessment started with an opening meeting at 09:00 of the first day in order to introduce to the purpose of the ETI code and the agenda. Following management attended:

-Pete Douglas/Owner
 -Jeff Dietz/Production Manager
 -Lindsey Peonio/HR Director
 -Tim Kline/Food Safety and Compliance Director

Factory is currently processing peaches and apples, however, it also processes cherries, apricots and nectarines, depending on the season. According to management, it can be three production lines working with 2 shifts (including night shifts). The premises are formed in 8 buildings in a land of 44.66 acres. The company does not share the premises with a different factory. Production capacity for apples is approximately 437,000 boxes and stone fruit 360,000 boxes.

Management allowed to the auditor to take pictures by herself. All the assessment was conducted with diligence and all the documentation, spaces and employees were available to be inspected/interviewed. Management showed an open and kind attitude towards the inspection with a full commitment of continuous improvement.

The audit ended at 13:00 on Sept 17, 2021. A closing meeting was conducted to present and explain the CAPR with no further comments. Mr. Kline signed the document and auditor left the premises at 17:00.

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

Site Details

Site Details																																						
A: Company Name:	Douglas Fruit Company																																					
B: Site name:	Douglas Fruit																																					
C: GPS location: (If available)	GPS Address: 110 Taylor Flats Road, Pasco Washington	Latitude: 46°18'04.82" N Longitude: 119°11'27.11" W																																				
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	-Business license, unified Business ID #: 601076565, issue date Feb 19, 2021. -Minor Work Permit #ESAC 19853 00																																					
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Apples, nectarines, peaches, apricots, cherries pack house.																																					
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	Factory under the original name was founded in 1988 in Pasco, Washington, USA. There are 8 buildings throughout the premises including cold storages, receiving and shipping areas and freezer storages (for final product). There are 2 production lines and the fruit processed depends on the season. Total land is 44.66 acres = 1945389.6 sq ft. <table border="1"> <thead> <tr> <th>Production Building no 1</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor 1</td> <td>Stone Fruit Packing Building</td> <td>24,270 sq ft</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td></td> </tr> <tr> <th>Production Building no 2</th> <th>Description</th> <th>Remark, if any</th> </tr> <tr> <td>Floor 1</td> <td>Apple Packing Building</td> <td>62,800 sq ft</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td></td> </tr> <tr> <th>Production Building no 3</th> <th>Description</th> <th>Remark, if any</th> </tr> <tr> <td>Floor 1</td> <td>Packed Cold Storage</td> <td>75,580 sq ft</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td></td> </tr> <tr> <th>Production Building no 4</th> <th>Description</th> <th>Remark, if any</th> </tr> <tr> <td>Floor 1</td> <td>CA 1-9 A,B,C,D,E Cold Storage</td> <td>63,800 sq ft</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td></td> </tr> </tbody> </table>		Production Building no 1	Description	Remark, if any	Floor 1	Stone Fruit Packing Building	24,270 sq ft	Is this a shared building?	No		Production Building no 2	Description	Remark, if any	Floor 1	Apple Packing Building	62,800 sq ft	Is this a shared building?	No		Production Building no 3	Description	Remark, if any	Floor 1	Packed Cold Storage	75,580 sq ft	Is this a shared building?	No		Production Building no 4	Description	Remark, if any	Floor 1	CA 1-9 A,B,C,D,E Cold Storage	63,800 sq ft	Is this a shared building?	No	
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	Production Building no 5	Description	Remark, if any
	Floor 1	CA 10-17	25,950 sq ft
	Is this a shared building?	No	
	Production Building no 6	Description	Remark, if any
	Floor 1	CA 18-35	65,140 sq ft
	Is this a shared building?	No	
	Production Building no 7	Description	Remark, if any
	Floor 1	CA 36-43	27,800 sq ft
	Is this a shared building?	No	
	Production Building no 8	Description	Remark, if any
	Floor 1	CA 44-65	85,692 sq ft
	Is this a shared building?	No	
<p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: No safety issues in buildings were detected.</p> <p>F3: Does the site have a structural engineer evaluation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F4: Please give details: No structural engineer evaluation on site.</p>			
G: Site function:	<input type="checkbox"/> Agent <input type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input checked="" type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor		
H: Month(s) of peak season:	July - September		

(if applicable)	
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Raw fruit receiving, cold storage, washing, selection, drying, wax, packing, freezer storage, shipping. There are two production lines on site.
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input checked="" type="checkbox"/> None
K: Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details: NA No dormitories are provided to workers on site.

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:00 Day 1 Time out: 17:30	Day 2 Time in: 09:00 Day 2 Time out: 17:30	Day 3 Time in: NA Day 3 Time out: NA
B: Number of auditor days used:	2		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define:		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Tim Kline/Food Safety and Compliance Director		
H: Is further information available (if yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	NA		
J: Previous audit type:	NA		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	NA No workers' representation on site.		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	NA Workers are not unionized.		

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*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	218	0	0	0	0	0	0	218
Worker numbers – female	268	0	0	0	0	0	0	268
Total	486	0	0	0	0	0	0	486
Number of Workers interviewed – male	13	0	0	0	0	0	0	13
Number of Workers interviewed – female	13	0	0	0	0	0	0	13
Total – interviewed sample size	26	0	0	0	0	0	0	26



A: Nationality of Management	USA	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i>	Nationalities: B1: Nationality 1: Mexico B2: Nationality 2: USA B3: Nationality 3: _____	Was the list completed during peak season? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please describe how this may vary during peak periods:
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1: 70% C1: approx % total workforce: Nationality 2: 30% C2: approx % total workforce: Nationality 3: _____	
D: Worker remuneration (management information)	D: 6.4% workers on piece rate D1: 96% hourly paid workers D2: 4% salaried workers Payment cycle: D3: _____% daily paid D4: 96% weekly paid D5: 4% monthly paid D6: _____% other D7: If other, please give details	



Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	5 groups of 4	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 3	D2: Female: 3
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	Lack of PPE provided by the company, ergonomic mats, lack of trainings.	
I: What did the workers like the most about working at this site?	Work environment, good treatment by their supervisors.	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	More hours workers, more payment they get.	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:		
M: Attitude of workers: (Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk		

Workers commented that they feel comfortable working in their workplaces and the attitude by management and supervisors is inclusive, kind and respectful. Besides, they feel that the company is committed with their payments, working hours and benefits.

N: Attitude of worker's committee/union reps:

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

No union or workers' representation on site.

O: Attitude of managers:

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

Management showed an open and kind attitude towards the inspection with a full commitment of continuous improvement and very interested in the implementation of the ETI Code and corrective actions. They accepted the CAPR with no further comments.

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

There is no management system in regards of Human Rights. During the employees' and management interview, and documentation review, it was noticed that management had not implement any management system towards Human Rights section.

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

Details:

- Workers Interviews
- Management Interviews

Any other comments:

None

A: Policy statement that expresses commitment to respect human rights?

☐ Yes

☒ No

A1: Please give details: No policy on Human Rights

B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No person responsible to implement Human Rights standards. Name: NA Job title: NA
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: No management system in HR.
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: If no, please give details: No management system in HR.
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: No data privacy procedure/policy on site.

Findings		
Finding: Observation <input checked="" type="checkbox"/>	Company NC <input type="checkbox"/>	Objective evidence observed:
Description of observation: No policy implemented towards Human Rights section based on UNGP standards. Management is in process to conduct the policy.		Documentation review
Local law or ETI/Additional elements / customer specific requirement: ETI Code 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.		
Comments: None		

Good examples observed:

Description of Good Example (GE): NONE

Objective Evidence Observed:

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2020 5.33 %	A2: This year: 2021 5.3 %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	9.8%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2020 1.76 %	C2: This year: 2021 1.38 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	2.71%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: OSHA 300 injury log	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2020 Number: 3.29	F2: This year: 2021 Number: 2.6
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	1.02	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2020 38.4	H2: This year: 2021 1.44

I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 13% workers	I2: 12 months 8.3% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 2.8% workers	J2: 12 months 1.78% workers

0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

There is no management system in regards of ETI Code. During the employees' and management interview, and documentation review, it was noticed that management had not implement any management system towards ETI Code section.

Related to land rights compliance, it was reviewed evidence that the land was property of the owners. The annual payment of taxes and ID was recorded. However, there is not a land right policy yet conducted.

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

Details:

- Employee handbook, last review on December 2020.
- Last property taxes payment for 4 parcels: 124330189, 124330018, 124330152, 505186016 on Feb 16, 2021
- Business license, unified Business ID #: 601076565, issue date Feb 19, 2021.
- Code of Conduct

Any other comments:

None

Management Systems:	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: No fines/prosecutions were detected.
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: Please give details: No forced labor policy on site.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	NA
D: 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 D1: Please give details: No record of trainings provided.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: NA
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: No international certifications in management systems on site.
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: One member.
H: Is there a senior person / manager responsible for implementation of the code	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: No management system in ETI Code implementation.
I: Is there a policy to ensure all worker information is confidential?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No I1: Please give details: No management system in ETI Code implementation.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No J1: Please give details: No management system in ETI Code implementation.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No K1: Please give details: No management system in ETI Code implementation.

L: 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 L1 Please give details: No management system in ETI Code implementation.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please give details: No management system in ETI Code implementation.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Business license, unified Business ID #: 601076565, issue date Feb 19, 2021.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: Last property taxes payment for 4 parcels: 124330189, 124330018, 124330152, 505186016 on Feb 16, 2021.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC:
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: Last property taxes payment for 4 parcels: 124330189, 124330018, 124330152, 505186016 on Feb 16, 2021
R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: Land is in an industrial sector of Pasco, Washington.
S: 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 S1: Please give details: No evidence of illegal appropriation of land.

Non-compliance:

1. Description of non-compliance:

- ☒ NC against ETI/Additional Elements
☐ NC against customer code:

☐ NC against Local Law

Objective evidence observed:

(where relevant please add photo numbers)

No policy towards ETI Code. Management is in process to work in policies, procedures, monitoring, and trainings required for the assessment.

Local law and/or ETI requirement:

ETI Code 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.

Recommended corrective action:

Ensure to implement management systems in ETI Code following the proper guidance.

Documentation review

Observation:

Description of observation:

No management system implemented towards land rights section. Management is in process to conduct the policy.

Local law or ETI requirement:

ETI Code 0.B.2 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with.

Comments:

None

Objective evidence observed:

Documentation review

Description of observation:

No personal data privacy policy/procedure on site.

Local law or ETI requirement:

ETI Code 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.

Comments:

None

Objective evidence observed:

Documentation review

Good Examples observed:

Description of Good Example (GE): NONE

Objective evidence observed:

1: Freely Chosen Employment

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

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

During the assessment, no forced labor was detected/observed/reported on site. Besides, no migrant labor was detected in the audited location (pack house). All the workers are from locations nearby the factory and mostly Peshastin/Wenatchee area.

No compulsory overtime was reported. Besides, employees expressed their freedom of movement on site.

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

Details:

- Employee handbook, last review in December 2020.
- Code of Conduct
- At-will contracts.

Any other comments:

None

A: Is there any evidence of retention of original documents, e.g. passports/ID's	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:
C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding:

E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding: No finding.
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: No finding.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected:
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: Their Human Resources and recruitment team. Since there are responsible from harvesting to packing/shipping.

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code: NONE Local law and/or ETI requirement Recommended corrective action:	Objective evidence observed: <i>(where relevant please add photo numbers)</i>

Observation:	
Description of observation: NONE Local law or ETI requirement: Comments:	Objective evidence observed:

Good Examples observed:	
Description of Good Example (GE): NONE	Objective evidence observed:

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

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

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ETI

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

Current Systems and Evidence Examined

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

Current systems:

In regards of freedom of association, it was noticed that factory had only conducted the policy but not encourage the workers to create a workers' committee.

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

Details:

- Code of Conduct.
- Policy of FOA

Any other comments:
None

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input checked="" type="checkbox"/> None
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Is there any other form of effective worker/management communication channel? (Other	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please give details: No workers' representation on site.

than union/worker committee e.g. H&S, sexual harassment)	D2: Is there evidence of free elections? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: No workers' representation on site.	
F: Name of union and union representative, if applicable:	None	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	No	G1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No workers' representation on site.
I: Were worker representatives freely elected?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	I1: Date of last election: No workers' representation on site.
J: Do workers know what topics can be raised with their representatives?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please state how many:	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	No workers' representation on site.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes , what percentage by trade Union/worker representation	M1: 0% workers covered by Union CBA	M2: 0% workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Non-compliance:

1. Description of non-compliance:
☒ NC against ETI ☐ NC against Local Law ☐ NC against customer code:

No workers' representation on site.

Local law and/or ETI requirement:

ETI Code 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.

Recommended corrective action:

None

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

Documentation review, management and workers' interview.

Observation:

Description of observation: NONE
Local law or ETI requirement:
Comments:
Objective evidence observed:

Good Examples observed:

Description of Good Example (GE): NONE

Objective evidence observed:

3: Working Conditions are Safe and Hygienic

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

ETI

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Robert Garza/HS Manager is the person in charge of this section. He was not available during the audit due he was taking vacations period.

During the tour it was observed that there are HS measures established on site, such as sprinklers system (155,750 Gal Fire Tank w/Pump), extinguishers, evacuation routes, emergency exits with light boxes and 2 assembly points for evacuation. No dangerous conditions were noted. As fire alarm, factory has 7 air horns inspected monthly.

It was noticed that workers are provided with fresh potable water and lavatories with no restrictions. Besides, they have a canteen area (with no kitchen) to enjoy their meals. However, there is not a nurse room or medical area but there are 9 first aid kits on site.

No dormitories are provided to workers. No migrant labor was identified.

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

Details:

- Emergency planning and response, last review on Sept 12, 2018.
- Hazardous energy control program, last review on Sept 21, 2018.
- Lockout/tagout procedure, last review on Sept 21, 2018.
- Emergency action plan summary, last review on Feb 6, 2012.
- Emergency response team, with 16 members.
- Evacuation procedures assignments.
- First aid team, with 11 members.
- Employee participation program: plan of action.
- Evacuation map
- Last fire drill record log, on December 10, 2020 at 7:30am

-Last sprinkler system inspection by a third party called "Inland Fire Protection, Inc" on October 1, 2020.
 -Last inspection to air horn, on September 11, 2021.
 -Storage of Hazardous Chemicals and Toxic Substances Program
 -MSDS
 -Proper use of chemical storage area, last on July 2020.
 -Monthly inspection of extinguishers, last on September 8, 2021.
 -Eye wash stations monthly check, last on September 2, 2021.
 -Safety committee, with 9 members, all from production areas. Monthly meetings, last on August 31, 2021.
 -Maintenance daily tool cleaning check off list.
 -Daily/monthly/weekly preventative maintenance checklist.
 -Equipment Monitoring and Preventative Maintenance
 -Compressed air test, last on October 2, 2020, third party "NorLad".
 -Incident reporting form for safety issues.
 -OSHA Form 300 Log of Work-Related Injuries and Illnesses from 2021, last update on August 31, 2021.
 -Accident prevention program
 -Pest control program through Sprague program, logbook is from Sept 17 2020 to Sept 17, 2021.
 -First aid training, on Feb 8, 2021. 24 trained employees.

Any other comments:
 None

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Included in employees' handbook.
B: Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Included in employees' handbook.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: No additions were conducted to original buildings.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please give details: Auditor was not informed on HS measures, and she was not provided by PPE.
E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: No medical room on site.
F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: 24 first aiders.
G: Where the facility provides worker transport - is it fit for purpose, safe,	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

maintained and operated by competent persons e.g. buses and other vehicles?	G1: Please give details: No transportation is provided by the factory.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: No dormitories are provided to workers.
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No I1: Please give details: Lack of noise and lighting monitoring.
J: 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 J1: Please give details: All permits were showed during the assessment.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Through an internal chemical compliance matrix.

Non-compliance:

1. Description of non-compliance:

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

There is no evidence that safety committee members (workers' representation) were elected by the employees.

Local law and/or ETI requirement

Washington Administrative Code, Sec. 296-800-13020 If you employ 11 or more employees on the same shift at the same location then you must: (1) Establish a safety committee. Make sure your committee: - Has employee-elected and employer-selected members. * The number of employee-elected members must equal or exceed the number of employer-selected members. * The term of employee-elected members must be a maximum of one year. (There is no limit to the number of terms a representative can serve.) * If there is an employee-elected member vacancy, a new member must be elected prior to the next scheduled meeting. - Has an elected chairperson. - Determines how often, when, and where, the safety committee will meet. - If the committee cannot agree on the frequency of meetings, the department of labor and industries regional safety consultation representative should be consulted for recommendations. (See the resources section of this book for contacts.)

Recommended corrective action:

Ensure to have evidence of employees' representatives' election on safety committee.

Objective evidence observed:

(where relevant please add photo numbers)

Documentation review, management interview.

<p>2. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: No proper fire drill records on site, records are not dated, do not describe the type of drill, duration, and participants.</p> <p>Local law and/or ETI requirement ETI Code 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>Recommended corrective action: Ensure to maintain proper reports of fire drills conducted on site with participation of all the shifts (day-night)</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>Documentation review</p>
<p>3. Description of non-compliance: <input type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Job hazard analysis for PPE is not complete. No PPE has been selected for each job position on site.</p> <p>Local law and/or ETI requirement Washington Administrative Code, Sec. 296-800-16005 You must: - Look for and identify hazards or potential hazards in your workplace and determine if PPE is necessary on the job.</p> <p>Recommended corrective action: Ensure to conduct the analysis properly and provide with PPE to workers with no cost.</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>Documentation review</p>
<p>4. Description of non-compliance: <input type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: No noise levels monitoring on site.</p> <p>Local law and/or ETI requirement 29 CFR (2008) § 1910.95(c)(1) "Hearing conservation program." (1) The employer shall administer a continuing, effective hearing conservation program, as described in paragraphs (c) through (o) of this section, whenever employee noise exposures equal or exceed an 8-hour time-weighted average sound level (TWA) of 85 decibels measured on the A scale (slow response) or, equivalently, a dose of fifty percent. For purposes of the hearing conservation program, employee noise exposures shall be computed in accordance with appendix A and Table G-16a, and without regard to any attenuation provided by the use of personal protective equipment.</p> <p>Recommended corrective action: Ensure to monitor the noise levels, implement proper PPE and conduct a hearing conservation program.</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>Documentation review</p>

<p>5. Description of non-compliance: <input type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: No lighting levels monitoring on site.</p> <p>Local law and/or ETI requirement Washington Administrative Code, Sec. 296-800-21005 You must provide and maintain adequate lighting for all work activities in your workplace. See the following table. Lighting Table Activity Minimum acceptable average lighting level (Foot-candles) Indoor task 10 Outdoor task 5 Nontask activities 3 for both indoor and outdoor</p> <p>Recommended corrective action: Ensure to monitor the lighting levels on site and adjust it if required.</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>Documentation review</p>
<p>6. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: No ergonomic mats for employees standing for long periods in production lines. Management said that this is due safety food requirements.</p> <p>Local law and/or ETI requirement ETI Code 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Recommended corrective action: Ensure to provide with adequate ergonomic mats to such employees.</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>Observation on site</p>

Observation:	
<p>Description of observation: 1)5 extinguishers were found with no signage. It was corrected during the audit. 2)One emergency exit was observed locked by boxes in freezer area. It was corrected during the audit.</p> <p>Local law or ETI requirement: ETI Code 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p>	<p>Objective evidence observed:</p> <p>Observation on site</p>

Recommended corrective action:

It is recommended to maintain emergency exits unlocked and extinguishers with signage.

Good Examples observed:

Description of Good Example (GE): NONE

Objective Evidence Observed:

4: Child Labour Shall Not Be Used

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

ETI

4.1 There shall be no new recruitment of child labour.

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

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

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

Current Systems and Evidence Examined

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

Current systems:

During the assessment no child or young labor was observed/reported on site. It was noticed that hiring age is 18 years old due the ILO convention in regards of juvenile labor in agriculture sector.

It was also noticed that the recruitment procedure requires original documentation to match with the copies provided by the workers, like ID with photo and social security card.

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

Details:

- Code of Conduct
- Employees' files.
- I9's

Any other comments:
None

A: Legal age of employment:	15
B: Age of youngest worker found:	18
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %

E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details
--	--

Non-compliance:	
1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: No remediation protocol in case that child labor is detected on site. Local law and/or ETI requirement: ETI Code 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. Recommended corrective action: Ensure to conduct the protocol.	Objective evidence observed: <i>(where relevant please add photo numbers)</i> Documentation review.

Observation:	
Description of observation: NONE Local law or ETI requirement: Comments:	Objective evidence observed:

Good Examples observed:	
Description of Good Example (GE): The company participates in the WA Apple scholarship foundation.	Objective Evidence Observed: Documentation review
Description of Good Example (GE): The company offer a scholarship to the local private high school for all employees.	Objective Evidence Observed: Documentation review

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Wages breakdown table is divided in 4 levels with a min/max established per level (4th level is for supervisors): minimum wage for level 1 is 13.69 USD per hour, and maximum wage for level 3 is 16.69 USD per hour.

Incomes are regular hours and overtime hours. Deductions are based on taxes, social security, Medicare. Employees are paid in direct deposit every Friday. They are provided with a payslip through an App where it is disclosed their increases and legal discounts (taxes, social security institute, among others). Besides, they are able to consult their PTO (hours for vacation leaves and sick leaves) through the same app.

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

Details:

- General performance evaluation per year to obtain annual bonus.
- Last payment by the employer of Social Security, on September 8, 2021, including medicare.
- Employee handbook
- Payroll and time records of September 2021, July 2021 and December 2020 of 26 workers.

Any other comments:

None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:
NONE

Objective evidence observed:

(where relevant please add photo numbers)

Local law and/or ETI requirement:

Recommended corrective action:

Observation:

Description of observation: NONE

Local law or ETI requirement:

Comments:

Objective evidence observed:

Good Examples observed:

Description of Good Example (GE):
401K retirement plan.

Objective Evidence Observed:
Documentation review

Description of Good Example (GE):
A profit share that is earned by employees who have been here a year or longer and is based off of their yearly performance review. A certain score dictates that mount they are given.

Objective Evidence Observed:
Documentation review

Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 40	A1: 40	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: None	B1: 20	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 13.69 USD per hour	C1: 13.69 USD per hour	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 150%	D1: 150%	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Wages analysis:			
(Click here to return to Key Information)			
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
A1: If No , why not?			
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	-December 2020: 4 period of 26 samples (including time records). -July 2021: 4 period of 26 samples (including time records). -September 2021: 4 period of 26 samples (including time records).		
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	C1: If Yes , please give details:	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	D1: If No , please give details:	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> 13.69 USD per hour	
F: Please indicate the breakdown of workforce per earnings:	F1: ____% of workforce earning under minimum wage F2: 70% of workforce earning minimum wage F3: 30% of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i> A profit share that is earned by employees who have been here a year or longer and is based off of their yearly performance review. A certain score dictates that amount they are given.		
H: What deductions are required by law e.g. social insurance? Please state all types:	1. Social security 2. Federal income tax 3. Medicare		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made.	1. Social security 2. Federal income tax 3. Medicare Please describe:

		I2: Please list all deductions that have not been made.	1. 2. Please describe:
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: No inconsistencies were found.		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time:		
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details:		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Such are according to legal raises of minimum wage		
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details:		
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:		

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Time recording is through an electronic device (employee card lector) for every worker on site. The shifts are very standard according to the legal suggestion of 8 hours per day, 5 days per week. Such can variate depends on the production and the raw apples and peaches arrival to the pack house. However, usually the shifts start at 07:00 and ends at 13:30 from Monday to Friday.

Workers are provided with three different breaks: 30 minutes of lunch break and 15 minutes prior and after the meal break. There are 2 rest days per week (Saturdays and Sundays).

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

Details:

-Employee handbook
-Payroll and time records of September 2021, July 2021 and December 2020 of 26 workers.

Any other comments:
None

Non-compliance:

1. Description of non-compliance:

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

Management reported that at least 2.8% of its employees worked more than 60 hours per week in the last 6 months. Please note that this was not found in the sample reviewed by auditor.

Local law and/or ETI requirement:

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

Recommended corrective action:

Ensure to establish a working hours limit of 60 hours per week, including overtime.

Objective evidence observed:

(where relevant please add photo numbers)

Documentation review, management interview.

Observation:

Description of observation: NONE

Local law or ETI requirement:

Comments:

Objective evidence observed:

Good Examples observed:

Description of Good Example (GE): NONE

Objective Evidence Observed:

Working hours' analysis

Please include time e.g. hour/week/month
(Go back to Key information)

Systems & Processes

A. What timekeeping systems are used: time card etc.

Describe: Electronic time cards

B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:		
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:			
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:			
		NA			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		E1: If yes , please detail hours, %, types of workers affected and frequency Please give details:		
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:		F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
	Maximum number of days worked without a day off (in sample):				
	6				
Standard/Contracted Hours worked					
G: Were standard working hours over 48 hours per week found?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		G1: If yes, % of workers & frequency:		
			2.8% the last six months.		
	<input type="checkbox"/> Yes		H1: If yes, please give details:		

H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input checked="" type="checkbox"/> No	
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 20	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Management reported that 2.6% of their workers have journeys more than 60 hours per week the last 6 months.	
K: Approximate percentage of total workers on highest overtime hours:	2.6%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Workers Interviews
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of standard wages: 150%
N: Is overtime paid at a premium?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	N1: If yes, please describe % of workers & frequency:
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	

	NA
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:
	NA
Q: 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 Q1: If yes, please give details:
R: 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

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

During payroll review, it was noticed that there is no discrimination in wages. Besides, there has been relevant trainings regarding this topic on site. Factory tour showed workers with different races, ages, and gender in all job positions.

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

Details:

- Job descriptions.
- Orientation training.
- Employee handbook.
- Hiring procedure
- Code of Ethics and Business Conduct.

Any other comments:

None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 69.3 % A2: Female: 30.6 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	25
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found C1: Please give details:

--	--

Professional Development	
A: What type of training and development are available for workers?	VDS optical sorting training school

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

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: NONE Local law and/or ETI requirement: Recommended corrective action:	Objective evidence observed: <i>(where relevant please add photo numbers)</i>

Observation:	
Description of observation: NONE Local law or ETI requirement: Comments:	Objective evidence observed:

Good Examples observed:	
Description of Good Example (GE): NONE	Objective Evidence Observed:

8: Regular Employment Is Provided

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

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ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

Files contains the following information: disciplinary measures, pay rate status change form, employment application, health and safety orientation, process safety management awareness documents, controlled substance testing consent form prospective employees, company policy for on-the-job injury.

Laborship is under at-will contracts. There are mostly temporary workers due production is seasonal.

There is a direct hiring by the company, no agencies/intermediaries were found/reported on site.

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

Details:

- Incident reporting form for safety issues.
- Verbal counselling verification for progressive discipline.
- Employee handbook

Any other comments:

None

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: NONE Local law and/or ETI requirement: Recommended corrective action:	Objective evidence observed: <i>(where relevant please add photo numbers)</i>

Observation:	
Description of observation: NONE Local law or ETI requirement: Comments:	Objective evidence observed:

Good Examples observed:	
Description of Good Example (GE): NONE	Objective Evidence Observed:

Responsible Recruitment

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

C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details:
D: If any checked, give details:	NA

Migrant Workers:		
<p>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</p>		
A: Type of work undertaken by migrant workers:	No migrant workers on site.	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: B2: Total number of (outside of local country) recruitment agencies used:	
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:	C2: Observations:
D: Are Any migrant workers in skilled, technical, or management roles Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, number and example of roles:	

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other B1 – If other, please give details:
C: If any checked, give details:	NA

Agency Workers (if applicable) (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.)	
A: Number of agencies used (average):	A1: Names if available: None
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

Contractors:	
<i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details:
B: If Yes , how many workers supplied by contractors?	
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: NA
D: If Yes , please give evidence for contractor workers being paid per law:	

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

No subcontracting was detected on site.

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

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

Details:

None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

NONE

Local law and/or ETI /Additional Elements requirement:

Recommended corrective action:

Objective evidence observed:

(where relevant please add photo numbers)

Observation:

Description of observation: NONE

Local law or ETI/Additional elements requirement:

Comments:

Objective evidence observed:

Good Examples observed:	
Description of Good Example (GE): NONE	Objective Evidence Observed:

Summary of sub-contracting – if applicable <input checked="" type="checkbox"/> Not Applicable please x	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe:
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: If Yes , summarise details:
C: Number of sub-contractors/agents used:	
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If Yes , summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	

Summary of homeworking – if applicable <input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If Yes , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?			

F: What processes are carried out by homeworkers?	
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No

9: No Harsh or Inhumane Treatment is Allowed

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

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: No communication channels through a third party.
B: If Yes , are workers aware of these channels and have access? Please give details.	NA
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	NA
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: Grievance procedure stated in the Employee handbook is addressed for workers. There is not any for community or suppliers.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details

I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?

☐ Yes
☒ No

II: If yes, please give details

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:

In regards of grievance procedure, the company has an open-door policy stated in their Employee Handbook in order to open a communication channel directly to supervisors/human resources area. Besides, there are suggestions boxes throughout the facility in order to raise an anonymous complaint. The procedure of tracking and closure of grievances was showed during the assessment. No complaints are open nowadays.

Moreover, during the interviews the workers commented that there is a good work environment on site, including the treatment by supervisors, and that is the thing the like the most about the company.

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

Details:

- Employee handbook.
- Orientation training, including harassment and abuse training.
- Grievance procedure.

Any other comments:

None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:
NONE

Local law and/or ETI requirement:

Recommended corrective action:

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

Observation:

Description of observation: NONE

Local law or ETI requirement:

Objective evidence observed:

Comments:	
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Good Examples observed:	
Description of Good Example (GE): NONE	Objective Evidence Observed:

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

During workers' interviews it was noticed different nationalities due the nature of migration in the United States. However, it was also verified that all the workers have current permits to work in the USA.

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

Details:

-Workers' files

-I-9

Any other comments:

None

Non-compliance:
1. Description of non-compliance:
☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

NONE

Objective evidence observed:

(where relevant please add photo numbers)

Local law and/or ETI /Additional Elements requirement:
Recommended corrective action:
Observation:
Description of observation: NONE

Local law or ETI/Additional Elements requirement:
Comments:
Objective evidence observed:

Good examples observed:

Description of Good Example (GE): NONE

**Objective Evidence
Observed:**

10. Other issue areas 10B2: Environment 2–Pillar

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

To be completed for a 2–Pillar SMETA Audit, and remove the following page which is 10B4 environment 4 pillar

10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.

10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

Current Systems and Evidence Examined

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

Current systems:

Factory showed to be in compliance with legal permits related to environmental compliance. Water use for production process is extracted from a water well, and there is a hazardous waste disposal every year by a third party. Besides, there is an internal monitoring of recycled waste that is collected by a third party as well (cardboard, wood, plastic). The organic waste is treated for different production process (juices) which is not conducted on site.

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

Details:

- Environmental monitoring program.
- Waste Collection, Handling and Disposal program.
- Wastewater permit, dated September 1, 2016.
- Sewage system operating permit, dated April 7, 2021.
- Last wastewater tests on April 8, 2021.
- Annual discharge monitoring report for wastewater.
- Evidence of waste recycling: cardboard, plastic, wood, last on July 2021.
- Evidence of hazardous waste disposal: used oil, last on Feb 12, 2019 by a third party called "Emese Emerald Services, Inc."
- Water well permit.

Any other comments:
None

Non-compliance:

1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements NONE	<input type="checkbox"/> NC against Local Law	Objective evidence observed: <i>(where relevant please add photo numbers)</i>
Local law and/or ETI/Additional Elements requirement:		
Recommended corrective action:		

Observation:	
Description of observation: NONE Local law or ETI/additional elements requirement: Comments:	Objective evidence observed:







Good examples observed:	
Description of Good Example (GE): NONE	Objective Evidence Observed:

Other findings

Other Findings Outside the Scope of the Code
NONE

Community Benefits <i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
<p>-Douglas Fruit participants in the following community benefits: participate in the WA Apple Scholarship foundation.</p> <p>-Douglas Fruit: offer a scholarship to the local private highschool for all the employees.</p> <p>-Douglas Fruit donates to 2do Harvest (food bank).</p>

Photo Form

		
<p>1.Factory outlook</p>	<p>2.Production process</p>	<p>3.Emergency exit, lightbox, extinguisher</p>
		
<p>4.Factory outlook 2</p>	<p>5.Factory outyard</p>	<p>6.Carboard boxes</p>

<p>7.Evacuation maps, first aiders</p>	<p>8.Cold storage</p>	<p>9.Sprinklers system</p>
<p>10.Final product warehouse</p>	<p>11.Break room</p>	<p>12.Ammonia tanks</p>

		
13.Time records device	14.Production area	15.Suggestion box
		
16.Labor posts.		



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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:

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](#)

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw_3d_3d

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

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

[Click here for Auditors:](#)

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