




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: (only available on Sedex System)	ZC: 1070654	Sedex Site Reference: (only available on Sedex System)	ZS: 1079515	
Business name (Company name):	Time's Up dba H & H Enterprises			
Site name:	H & H Enterprises			
Site address: (Please include full address)	6355 Sunset Corporate Dr., Las Vegas, NV	Country:	USA	
Site contact and job title:	Sherri Hall / Food Safety & Quality Manager			
Site phone:	800.873.9133 x 204	Site e-mail:	sherrih@visstun.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	August 24 – 26, 2021			

Audit Company Name & Logo: 	Report Owner (payer): Time's Up dba H & H Enterprises
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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): General photos of the production floor were not taken to protect employee privacy by ensuring there were no photos of them included.

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

Lead auditor: C. Petrovich

APSCA number: CSCA 21702995

Lead auditor APSCA status:

Certified Social Compliance Auditor (CSCA)

Team auditor: None

APSCA number: None

Interviewers: C. Petrovich

APSCA number: CSCA 21702995

Report writer: C. Petrovich

Report reviewer: Marites Bayle-Zarzuela

Date of declaration: August 26, 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			<input type="checkbox"/>	<input type="checkbox"/>		1	0	OBS: 1. No formal human rights statement that is communicated both internally and externally throughout their supply chain.
0B	Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	2	0	NC: 1. No designated personnel to communicate the Code. 2. Code not communicated to employees. OBS: 1. Code not communicated to the suppliers 2. SAQ not completed.
1.	Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
2	Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
3	Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	1	3	0	NC: 1. Employees working in high noise areas not wearing hearing protection.

									OBS: 1. Grinding machines missing one eye guard. Corrected onsite. 2. Emergency lights inoperable. Corrected onsite. 3. One (1) baler deemed as a confined space did not have confined space signage. Proper signage was placed before the end of the audit.
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
6	<u>Working Hours</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	1	0	0	NC: 1. Mandatory overtime policy.
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
9	<u>Harsh or Inhumane Treatment</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1	0	0	NC: 1. No confidential / 3rd party grievance mechanism in place
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	1	0	OBS: 1. No written or formal environmental policy.

10C	Business Ethics		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	1	0	OBS: 1. Policies on business ethics and ethical business conduct are currently not communicated to their suppliers.
General observations and summary of the site:									
<p>The facility manufactures promotional items: drinking cups and mouse pads.</p> <ul style="list-style-type: none"> • The facility has three (3) buildings in total, all of which report to their main location at 6355 Sunset Corp. Drive. All buildings are under separate business licenses. • The audit was conducted over a course of two and a half (2.5) days. • Currently there are no managers responsible for implementing the Code. • There was a total of twenty-six (26) production employees who were employed at the corporate site audited at 6355 Sunset Corp. • The youngest employee on site was twenty (20) years old. • The facility does not have a union onsite. • The facility reported their peak season is March – June; August – November. • Ten (10) employees were randomly selected for interview; they were interviewed as six (6) individual and one (1) group of four (4). Ten (10) randomly sampled employees' payrolls and attendance records were made available from August 2020 – August 2021. • Based on the provided attendance records, standard working hours in this facility were eight (8) hours per day, five (5) days a week. • Based on the provided attendance records and payrolls, overtime working was paid correctly. Employees were paid at least 150% of standard pay rate for all hours which exceeded forty (40) hours in one (1) work week. • Based on the provided attendance records, the status of overtime hours in sample was as below: <p>7/5/2021 – 7/18/2021 (random) paid 7/23/2021: 11 hours/week 7/19/2021 – 8/1/2021 (random peak) paid 8/6/2021: 19.75 hours/week 8/2/2021 – 8/15/2021 (current peak) paid 8/20/2021: 7.75 hours/week</p>									

**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:	Time's Up dba H & H Enterprises																			
B: Site name:	H & H Enterprises																			
C: GPS location: (If available)	GPS Address: 6355 Sunset Corporate Dr., Las Vegas, NV	Latitude: n/a Longitude: n/a																		
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Business License issued by Clark County, no.: 1000104-560, EXP: 8/31/2021</p> <p>Workers Compensation and Employers Liability issued by The Hartford, no.: 53 WE AC0EXJ, EXP: 10/01/2021</p>																			
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	The facility manufactures promotional marketing items: retail drinking cups.																			
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>The corporate facility is located at 6355 Sunset Corporate Dr., Las Vegas, NV and has been in operation onsite for approximately twenty (20) years. The facility, in total, has two (2) sister sites in proximity; however, are under separate business licenses. The main site at 6355 Sunset Corp. houses all documentation, including employee files, training records, and company policies and procedures.</p> <p>The facility is two (2) stories, production taking place on the first floor and the second floor reserved for office space and employee break area. The facility is made of drywall and appeared to be in sound condition.</p> <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>Production / small warehouse</td> <td>None</td> </tr> <tr> <td>Floor 2</td> <td>Office / employee break area</td> <td>None</td> </tr> <tr> <td>Floor 3</td> <td>n/a</td> <td>n/a</td> </tr> <tr> <td>Floor 4</td> <td>n/a</td> <td>n/a</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>n/a</td> </tr> </tbody> </table> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </p>		Production Building no. 1	Description	Remark, if any	Floor 1	Production / small warehouse	None	Floor 2	Office / employee break area	None	Floor 3	n/a	n/a	Floor 4	n/a	n/a	Is this a shared building?	No	n/a
Production Building no. 1	Description	Remark, if any																		
Floor 1	Production / small warehouse	None																		
Floor 2	Office / employee break area	None																		
Floor 3	n/a	n/a																		
Floor 4	n/a	n/a																		
Is this a shared building?	No	n/a																		

	<p>F2: Please give details: There were no structural integrity concerns while on tour.</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: Currently there are no formal evaluations.</p>
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
H: Month(s) of peak season: (if applicable)	March – June; August – November
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	The facility receives their raw ingredient, which is processed into one (1) out of the ten (10) cup making machines. The plastic / resin is heated in the machine, formulated to the cup size and mold, and is then sent to packing. The cups are packed into a line of cups. The facility also has approximately six (6) ink printing machines, where the labels are printed and put into rolls and put into the cup forming machines.
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 type="checkbox"/> No N1: If no, please give details: Living accommodations are not provided to employees.

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 9:00 AM A2: Day 1 Time out: 4:40 PM	A3: Day 2 Time in: 8:49 AM A4: Day 2 Time out: 3:05 PM	A5: Day 3 Time in: 8:49 AM A6: Day 3 Time out: 12:30 PM
B: Number of auditor days used:	2.5 man-days		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If No, why not? Due to the facility reregistering with SEDEX the day before the audit, they were unable to have access to the portal to complete the SAQ.		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Sherri Hall / Food Safety & Quality Assurance		
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:	August 15 – 17, 2018		
J: Previous audit type:	Full Initial		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input 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 (only complete if no worker reps present)	Not applicable as there is no worker committee.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	Not applicable as there is no union.		

Worker Analysis

The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national 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	18	0	0	0	0	0	0	18
Worker numbers – female	8	0	0	0	0	0	0	8
Total	26	0	0	0	0	0	0	26
Number of Workers interviewed – male	5	0	0	0	0	0	0	5
Number of Workers interviewed – female	5	0	0	0	0	0	0	5
Total – interviewed sample size	10	0	0	0	0	0	0	10



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: <u>USA</u> B2: Nationality 2: _____ 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: Not applicable
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 <u>100</u> C1: approx % total workforce: Nationality 2 _____ C2: approx % total workforce: Nationality 3 _____	
D: Worker remuneration (management information)	D: _____% workers on piece rate D1: <u>65.38</u> % hourly paid workers D2: <u>34.62</u> % salaried workers Payment cycle: D3: _____% daily paid D4: _____% weekly paid D5: _____% monthly paid D6: <u>100</u> % other D7: If other, please give details: biweekly paid	



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)	One (1) group of four (4)	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: four (4)	D2: Female: two (2)
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. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	<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?	Employees felt they were short staffed and as result, tension may run high from long hours.	
I: What did the workers like the most about working at this site?	Their colleagues.	
J: Any additional comment(s) regarding interviews:	None.	
K: Attitude of workers to hours worked:	Indifferent	
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		

Employees overall had positive feedback on their working conditions. They enjoy their colleagues and the work they do. Several employees reported feeling overworked and stated that at times, due to the tension caused by working long hours, may become on edge with their colleagues. Employees reported being able to quickly resolve unsettlements due to the working hours they have been assigned.

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

Not applicable as there is no worker committee or union onsite.

O: Attitude of managers:

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

Management was understanding and transparent throughout the audit. They were open to observations and commentary reported to them.

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:

Currently the facility does not have a formal human rights statement that is communicated both internally and externally throughout their supply chain. Although no formal policy regarding human rights there are three (3) corporate level managers who are responsible for maintaining a safe environment and working condition for employees: human resources, operations manager, and the owner.

The facility has an informal procedure which includes product and relationship trial: evaluating the availability of the vendor / stakeholder, their communication, pricing, and overall operations.

Currently employees and suppliers may report concerns directly to human resources; however, there are no further methods of confidential reporting they may utilize.

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

Details:

Management and employee interview

Facility tour – which includes review of employee working conditions and company postings

Any other comments:

None

A: Policy statement that expresses commitment to respect human rights?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: Currently the facility does not have a formal human rights statement that is communicated both internally and externally throughout their supply chain.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Ellie Estrada / Monique Favaro / Ed Hamilton Job title: Human Resources Manager / Operations Manager / Owner
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: Currently employees and suppliers may report concerns directly to human resources; however, there are no further methods of confidential reporting they may utilize.
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: Currently all reporting must be done directly by the person with the concern, without opportunity for anonymity.
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: All employee data is kept under one (1) office and are under lock and key. Any digital records also include a password and username create by the employees.

Findings		
Finding: Observation <input checked="" type="checkbox"/>	Company NC <input type="checkbox"/>	Objective evidence observed:
Description of observation: Currently the facility does not have a formal human rights statement that is communicated both internally and externally throughout their supply chain. Local law or ETI/Additional elements / customer specific requirement: 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. Comments:		Observed during document and management review.

The facility has confidentiality agreements and internal harassment policies however has not created a formal policy regarding human rights in the supply chain. The facility will consult their team regarding the policy.

Good examples observed:

None 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 Not provided	A2: This year: 2021 Not provided
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]	Not provided	
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 Not provided	C2: This year: 2021 Not provided
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	Not provided	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: OSHA 300 Logs are maintained onsite.	
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: 3.85	F2: This year: 2021 Number: 7.69
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]	7.69	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2020 0	H2: This year: 2021 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months _0_% workers	I2: 12 months _0_% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months _0_% workers	J2: 12 months _0_% 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:

Currently the facility has not yet communicated the ETI Code to employees and there is no member of management responsible for implementing the Code. There are elements of the code in their employee handbook, which is the only form of policy communication to employees. Currently no other forms of the Code are communicated throughout their supply chain, where reasonably practicable.

The facility operates in all legal premises, which includes facility operating licenses and environmental permits.

Observations:

1. Due to the facility reregistering with SEDEX the day before the audit, they were unable to have access to the portal to complete the SAQ.
2. Currently there is no designated personnel to communicate the Code, therefore the Code has not been communicated to employees and suppliers, as applicable.

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

Details:

Employee and management review

Policies

- H&H Enterprise Employee Handbook, sec. Employment At-Will, Equal Employment Opportunity, Immigration Reform & Control, Child Labor Policy, Working Hours, Employment Records, Wage and Salary, Pay Periods, Disciplinary Action, Appearance Standards, Attendance & Punctuality, Conflicts of Interest, Harassment, Loan & Pay Advances, Nepotism, Payroll & Timekeeping, Performance & Behavior, Problem Solving, Workplace Violence, Workplace Retaliation

Training

- New Hire Orientation records were reviewed for newly hired employees sampled, which included an acknowledgement of the Employee Handbook and Mandatory Overtime policy, as well as acknowledgement on receiving and agreeing to the Safety Orientation Checklist, which includes: Safety & Health Policy, Responsibilities, Safety Committees, Employee Disciplinary Procedures, Hazard Assessment, General safety, Electrical, Fire, Hand Tools and Equipment (Guarding), Fall

Protection, Ladder Safety, Vehicle Safety, Hazard Communication, Chemical Inventory, Emergency Action, Bloodborne Pathogen, Lockout/tagout, OSHA 300, Accidents, Forklift Safety

Documents

- The facility provided their records from the Clark County Treasurer which showed the property purchase documents from 12/2000 and tax history.
- Fire Code permits were reviewed
- Operational licenses and permits, as well as environmental records were reviewed

Any other comments:

Employee handbook revised 1/2019.

Management Systems:

A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details:
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: All harassment, child labor, and discrimination training is covered in the employee handbook.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	All employees are communicated the employee handbook upon hire and receive a paper of acknowledgement.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Management receive the same training as employees: handbook policy communication.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Handbook acknowledgement sheets were observed in employee files. Employees also confirmed having received
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: The facility has a FSSC certification.
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: There is one (1) Human Resources manager and assistant onsite.
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: Currently the Code is not communicated to employees by any member of management.
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: H&H Enterprise Employee Handbook, sec. Employment Records.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: All employee data is kept under one (1) office and are under lock and key. Any digital records also include a password and username create by the employees.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: The facility conducts internal audits.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1 Please give details: When items are identified, the facility's quality manager will make a document change which will send a request form to the specific manager head for approval or decline. When the change / update in policy is confirmed, the system will trigger a retraining for the department in order to be informed of new changes and procedures.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The facility has a supplier questionnaire which vets the operations of the facility.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	N1: Please give details: The facility provided their records from the Clark County Treasurer which showed the property purchase documents from 12/2000 and tax history.
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: The records provided by Clark County Treasurer provided tax breakdowns and due dates, which confirmed there is no pending or outdates property tax owed.
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: Clark County treasurer records and Fire Code Permits were provided, which all showed accurate and true ownership to H & H Enterprises.
R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: The facility operates in a
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: The facility operates out of a building designed for manufacturing.

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: Currently there is no designated personnel to communicate the Code. Local law and/or ETI requirement: 0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code. Recommended corrective action: It is recommended the facility appoint a member to train on the Code.	Objective evidence observed: <i>(where relevant please add photo numbers)</i> Observed during management review. Observe during management and employee interview.

2. Description of non-compliance:

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

Currently the ETI Code has not been communicated to employees.

Local law and/or ETI requirement:

0.B.4 Suppliers are expected to communicate this Code to all employees.

Recommended corrective action:

It is recommended the facility communicate the Code to personnel onsite.

Observation:

1. Description of observation:

Due to the facility reregistering with SEDEX the day before the audit, they were unable to have access to the portal to complete the SAQ.

Local law or ETI requirement:

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

Comments:

The facility was unaware of their registration had expired. The facility will ensure the SAQ is completed before the next audit.

2. Description of observation:

The facility has not yet communicated the ETI Code to suppliers.

Local law or ETI requirement:

0.B.5 Suppliers are expected to communicate this Code to all employees.

Comments:

The facility has not communicated the ETI Code or appointed a member of management to train on the Code.

Objective evidence observed:

Observed during management review.

Observed during management and employee interviews.

Good Examples observed:

None 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:

There is no forced, bonded, or involuntary prison labour used on site. Employees are not required to lodge deposits or their personal identification documents to the organization. There were no additional loan schemes or abusive payment practices that were observed or reported while onsite.

While on tour, it was observed that employees had free range to walk around, get water, and use the restroom when needed. Employees did not report any restrictions issued when needing to use the restroom or getting water. Employees did not report restrictions on foregoing legally required breaks, or the inability to terminate their employment with the company.

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

Details:

Ten (10) I-9s review

I-9 of the youngest age employee reviewed

Employee interviews

Ten (10) employee files reviewed

Ten (10) timecard and payroll records reviewed

Management review and Employee interview

Facility tour

Any other comments:

None

A: Is there any evidence of retention of original documents, e.g. passports/ID's

☐ Yes

☒ No

A1: If yes, please give details and category of workers affected:

B: Is there any evidence of a loan scheme in operation

☐ Yes

☒ No

B1: If yes, please give details and category of worker affected:

C: Is there any evidence of retention of wages /deposits

☐ Yes

☒ 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:
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the workday?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe 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: All employees are directly hired by the facility and undergo the I-9 and E-Verify process.

Non-compliance:	
None observed	

Observation:	
None observed	

Good Examples observed:	
None observed	

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

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

Currently there are no legal restrictions in the state of Nevada regarding collective bargaining. Employees are free to speak with management regarding a union, should the desire arise. All employees are hired on as "at-will" employees, meaning employment maybe terminated at any time.

The facility has a safety committee onsite to discuss any safety related concerns, and there are hotlines employees may anonymously report their concerns to, should anything arise.

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

Details:

Management and employee interviews
Facility tour – which includes review of policies posted

Policies

- H&H Enterprise Employee Handbook, sec. Employment At-Will, Equal Employment Opportunity, Conflicts of Interest, Harassment, Performance & Behavior, Problem Solving

Any other comments:

Employee handbook revised 1/2019.

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

- ☐ Union (name)
☐ Worker Committee
☐ Other (specify)
☒ None

B: Is it a legal requirement to have a union?

- ☐ Yes
☒ No

C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: The facility has an open-door policy where employees may report concerns to human resources. There is also a safety committee; however, the committee is mainly made of management members. 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 type="checkbox"/> No E1: Please give details: Not applicable	
F: Name of union and union representative, if applicable:	Not applicable	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?	There is an open-door policy onsite and a safety committee that is, however, mainly made of management.	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 type="checkbox"/> No	
I: Were worker representatives freely elected?	<input type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: Not applicable
J: Do workers know what topics can be raised with their representatives?	<input type="checkbox"/> Yes <input 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? Specify date of last meeting; topics covered; how minutes were communicated etc.	Not applicable	
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 checked="" type="checkbox"/> No	

Non-compliance:	
None observed	

Observation:	
None observed	

Good Examples observed:	
None observed	

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The facility provides a safe and hygienic working environment for employees. The facility has adopted practices of a 5-S program, where objects like electrical panels were found to have been taped in front to indicate to employees not to place items. Management appeared to be collaborating together to try and develop more organization throughout the production floor, as they have started bringing in new machinery and waste reduction technology.

Trainings are a combination of videos and in person talks: upon initial hire, employees receive in person training as well as video trainings for all the safety basics like fire extinguisher, hazard communication, lockout/tagout awareness, emergency, confined spaces, and general safety upkeep. Trainings are then held every month for some departments or every Friday in group meetings. Hygienic and safe restrooms and eating areas are provided to all employees onsite. The facility does not provide housing or have a canteen onsite.

New Hire Orientation records were reviewed for newly hired employees sampled, which included an acknowledgement of the Employee Handbook and Mandatory Overtime policy, as well as acknowledgement on receiving and agreeing to the Safety Orientation Checklist, which includes: Safety & Health Policy, Responsibilities, Safety Committees, Employee Disciplinary Procedures, Hazard Assessment, General safety, Electrical, Fire, Hand Tools and Equipment (Guarding), Fall Protection, Ladder Safety, Vehicle Safety, Hazard Communication, Chemical Inventory, Emergency Action, Bloodborne Pathogen, Lockout/tagout, OSHA 300, Accidents, Forklift Safety. Approximately every month refresher trainings are then held.

Noncompliance:

1. According to a 2018 Industrial Hygienist assessment conducted by SCATS, three (3) machines in the cupping department, lines #3, #7, and maintenance, exceed the dba threshold of 85 which require hearing protection; however, hearing protection is not mandatory but strongly recommended to be worn. It was observed employees working those lines were not wearing hearing protection.

Observations:

1. Two (2) grinding machines in the maintenance cage out of ten (10) total observed pieces of machinery were missing one (1) eye guard. The guards were placed back on before the end of the audit.
2. Two (2) emergency lights out of twelve (12) total sampled were found inoperable. The lights were replaced and in working condition before the end of the audit.
3. One (1) bailor deemed as a confined space did not have confined space signage. Proper signage was placed before the end of the audit.

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

Details:

Policies and Procedures

- Safety and Health Policy Statement, which includes the Nevada State Safety Program, which include individual policies which are covered in the new hire orientation.
- Emergency Action Plan
- Heat Illness
- Fire Prevention Plan
- Control of Hazardous Energy – Lockout/Tagout
- Hearing Conservation Program

Documents

- Safety committee meeting minutes and sign in sheets reviewed for one (1) year. The committee meets quarterly with members of management and some members of production between all three (3) buildings in proximity.
- Job Safety Analysis were reviewed, which include the job step, the hazard associated, the mitigation for risk, and the risk rating of each hazard identified with the job task.
- Forklift daily inspections were reviewed
- Periodic lockout/tagout inspections reviewed from 8/2021.

Inspections

- The facility has one (1) commercial elevator, in which received its annual servicing by Atis Elevator Inspections, LLC in 6/2021 however the new permit has not yet been issued.
- Industrial Hygienist Assessment conducted in 2018 by Nevada Safety Consultation and Training Section reviewed.
- Annual audiometric testing records conducted by Bioacoustical in 7/2021.
- Water Based Fire Protection Systems Inspection by Ace Fire Systems, records reviewed from 7/2021 and 4/2021. Additional annual records were reviewed which took place in 7/2021.

Training

- New Hire Orientation records were reviewed for newly hired employees sampled, which included an acknowledgement of the Employee Handbook and Mandatory Overtime policy, as well as acknowledgement on receiving and agreeing to the Safety Orientation Checklist, which includes: Safety & Health Policy, Responsibilities, Safety Committees, Employee Disciplinary Procedures, Hazard Assessment, General safety, Electrical, Fire, Hand Tools and Equipment (Guarding), Fall Protection, Ladder Safety, Vehicle Safety, Hazard Communication, Chemical Inventory, Emergency Action, Bloodborne Pathogen, Lockout/tagout, OSHA 300, Accidents, Forklift Safety
- Fire drill records provided from 10/2020.
- Annual fire extinguisher training for management was reviewed from 1/2021
- Fire prevention and emergency evacuation training conducted 6/2021
- Lockout/tagout awareness training conducted 8/2021
- Bloodborne pathogen annual training for designated personnel conducted 8/2021
- Forklift training includes a video on forklifts, an internally made power point covering OSHA's guidance materials, a test, and in person evaluation.

Any other comments:
None

<p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>A1: Please give details: General policies are in the employee handbook as well as kept separate in their Injury and Illness Prevention Program.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>B1: Please give details: Employees receive copies of the handbook and injury and illness program.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>C1: Please give details: Not applicable</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: Please give details: All visitors are provided with safety lenses, earplugs (although currently not required), and hairnets if entering into a food zone.</p>
<p>E: Is a medical room or medical facility provided for workers?</p> <p>If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>E1: Please give details: This is not legally required to have made available.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F1: Please give details: Supervisors and members of management are first aid trained.</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>G1: Please give details:</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>H1: Please give details: Personal accommodations are not provided.</p>

I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Job Safety Analysis were reviewed, which include the job step, the hazard associated, the mitigation for risk, and the risk rating of each hazard identified with the job task.
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: The facility provided all required licenses and permits.
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: All chemicals are registered with their local fire department in their waste management certificate.

Non-compliance:

1. Description of non-compliance:

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

According to a 2018 Industrial Hygienist assessment conducted by SCATS, three (3) machines in the cupping department, lines #3, #7, and maintenance, exceeded the dba threshold of 85 which require hearing protection; however, hearing protection is not mandatory but strongly recommended to be worn. It was observed employees working those lines were not wearing hearing protection.

Local law and/or ETI requirement:

29 CFR (2008) § 1910.95(i)

(2) Employers shall ensure that hearing protectors are worn:

(i) By an employee who is required by paragraph (b)(1) of this section to wear personal protective equipment; and

(ii) By any employee who is exposed to an 8-hour time-weighted average of 85 decibels or greater, and who:

(A) Has not yet had a baseline audiogram established pursuant to paragraph (g)(5)(ii); or (B) Has experienced a standard threshold shift.

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards.

Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

Recommended corrective action:

It is recommended the facility ensure employees are wearing proper hearing protection at all times while working the lines specified in the industrial hygienist assessment.

Objective evidence observed:

(where relevant please add photo numbers)

Observed during document review, the facility tour, and management and employee review.

Observation:	
<p>1. Description of observation: Two (2) grinding machines in the maintenance cage out of ten (10) total observed pieces of machinery were missing one (1) eye guard. The guards were placed back on before the end of the audit.</p> <p>Local law or ETI requirement: 29 CFR (2004) § 1910.212(a) (2) General requirements for machine guards. Guards shall be affixed to the machine where possible and secured elsewhere if for any reason attachment to the machine is not possible. The guard shall be such that it does not offer an accident hazard in itself</p> <p>Comments: The items were temporarily taken off by maintenance and put back on.</p>	<p>Objective evidence observed: Observed on the tour.</p>
<p>2. Description of observation: Two (2) emergency lights out of twelve (12) total sampled were found inoperable. The lights were replaced and in working condition before the end of the audit.</p> <p>Local law or ETI requirement: 29 CFR (2007) § 1910.308(b)(2) Emergency illumination shall include all required means of egress lighting, illuminated exit signs, and all other lights necessary to provide illumination. Where emergency lighting is necessary, the system shall be so arranged that the failure of any individual lighting element, such as the burning out of a light bulb cannot leave any space in total darkness.</p> <p>Comments: The items are tested monthly however it appeared the lights were missed in inspections.</p>	<p>Observed on the tour.</p>
<p>3. Description of observation: One (1) baler deemed as a confined space did not have confined space signage. Proper signage was placed before the end of the audit.</p> <p>Local law or ETI requirement: 29 CFR (1998) 1910.146(c) (2) If the workplace contains permit spaces, the employer shall inform exposed employees, by posting danger signs or by any other equally effective means, of the existence and location of and the danger posed by the permit spaces.</p> <p>Comments: The baler was recently installed.</p>	<p>Observed on the tour.</p>

Good Examples observed:	
None observed	

4: Child Labour Shall Not Be Used

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

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

ETI

4.1 There shall be no new recruitment of child labour.

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The facility does not hire anyone under the age of eighteen (18). There are no persons under the age of eighteen (18) subject to any hazardous or physically demanding conditions – the youngest age of an employee onsite was twenty (20) years old. The facility abides by the local law when hiring new employees, and their Human Rights Statement which discusses the prohibition of trafficked and child labor.

The facility tour and employee interviews confirmed there is no child labour present on site, as well as employee documents showing no evidence of historical child labor.

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

Details:

Ten (10) employee files reviewed

Ten (10) I-9s reviewed

I-9 youngest employee reviewed

Facility tour – observations made for young / young looking workers

Employee and management review

Any other comments:

None

A: Legal age of employment:	16
B: Age of youngest worker found:	20
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_%

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

Non-compliance:	
None observed	

Observation:	
None observed	

Good Examples observed:	
None observed	

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:

Employees are paid per hour and are working eight (8) hour work week, five (5) days a week. Employees all receive more than minimum wage, the lowest wage onsite being \$12.50/hour for the directly hired employees. Employees work a forty (40) hour work week with hours in excess of forty (40) hours in one (1) week are paid at 1.5x. Employees all receive state mandated benefits, as well as luncheons and paid time off.

Employees receive either direct deposit or check, in which every pay period have access to a physical pay stub or a stub online. During payroll review there were no deductions that are illegally taken out of the employees checks: all deductions include state taxes, Social Security, Medicare, and federal and state taxes. Additional deductions chosen by the employee are also taken.

Overtime was identified as follows:

7/5/2021 – 7/18/2021 (random) paid 7/23/2021: 11 hours/week

7/19/2021 – 8/1/2021 (random peak) paid 8/6/2021: 19.75 hours/week

8/2/2021 – 8/15/2021 (current peak) paid 8/20/2021: 7.75 hours/week

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

Details:

Ten (10) I-9s review

I-9 of the youngest age employee reviewed

Employee interviews

Ten (10) employee files reviewed

Ten (10) timecard and payroll records reviewed

Management review and Employee interview

Any other comments:

None

Non-compliance:	
None observed	

Observation:	
None observed	

Good Examples observed:	
None observed	

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 hours	A1: 40 hours	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: No legal maximum	B1: 19.75/week	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: USD \$9.75/hour	C1: USD \$12.50/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: 1.5x standard rate after forty (40) hours	D1: 1.5x standard rate after forty (40) hours	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?	

<p>B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</p>	<p>7/5/2021 – 7/18/2021, paid 7/23/2021: 10 records 7/19/2021 – 8/1/2021, paid 8/6/2021: 10 records 8/2/2021 – 8/15/2021, paid 8/20/2021: 10 records</p>		
<p>C: Are there different legal minimum wage grades? If Yes, please specify all.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>C1: If Yes, please give details: Low tier companies minimum wage is \$8.71/hour and high tier companies minimum wage is \$9.75/hour.</p>	
<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>D1: If No, please give details:</p>	
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> Cups sorter: \$12.50/hour</p>	
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: ____% of workforce earning under minimum wage F2: ____% of workforce earning minimum wage F3: _100_% of workforce earning above minimum wage</p>		
<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i></p> <p>Occasional discretionary bonuses determined by the owner will be given to employees. The bonuses are dependent on how well production numbers and overall work productions were for the month, in which the owner will determine how much he feels employees should receive and inform payroll to include in their checks.</p>		
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>Medicare, Social Security, Federal Taxes</p>		
<p>I: Have these deductions been made?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Please list all deductions that have been made.</p>	<p>1. Medicare 2. Social Security 3. Federal Taxes</p> <p>Please describe: All deductions were found accurately calculated.</p>
		<p>I2: Please list all deductions that have not been made.</p>	<p>Not applicable</p>

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: Punches were accurately reflecting all hours worked / missed / taken. Employees reported all time worked / meetings attended are accurately reflected.	
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: Wages are reviewed annually between the operations manager and owner to stay competitive and provide a liveable wage to employees.	
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: Employees with the same experience / department were receiving either equal or similar rates.	
Q: How are workers paid:	<input type="checkbox"/> Cash <input checked="" 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:

Working hours comply with the local law: per Nevada law, a standard workweek is forty (40) regular hours with overtime paid at 1.5x the standard rate of pay for all time worked after forty (40) hours in one (1) week.

All working hours and shifts are detailed in the site-specific working hours procedure and handbook, which every employee receives and signs a copy of the day of hire: employees work a standard eight (8) hour days, five (5) days a week. Employees also receive the facility's mandatory overtime policy upon hire, although employees stated it is not enforced and their supervisors are flexible with their work-life balances. Employees working a standard eight (8) hour day receive two (2) ten (10) minute breaks and one (1) thirty (30) minute lunch. Employees receive an additional break in a ten (10) hour shift.

Overtime was identified as follows:

7/5/2021 – 7/18/2021 (random) paid 7/23/2021: 11 hours/week
 7/19/2021 – 8/1/2021 (random peak) paid 8/6/2021: 19.75 hours/week
 8/2/2021 – 8/15/2021 (current peak) paid 8/20/2021: 7.75 hours/week

Noncompliance:

1. The facility currently has a mandatory overtime policy which may result in disciplinary action if declined and is communicated to all employees upon hire. Employee interviews confirmed

overtime is communicated as mandatory, however stated when they are unable to work it or decline it have not received disciplinary action.

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

Details:

Ten (10) I-9s review

I-9 of the youngest age employee reviewed

Employee interviews

Ten (10) employee files reviewed

Ten (10) timecard and payroll records reviewed

Management review and Employee interview

Document review – which includes employee files and overtime mandatory policy

Any other comments:

None

Non-compliance:

1. Description of non-compliance:

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

The facility currently has a mandatory overtime policy which may result in disciplinary action if declined and is communicated to all employees upon hire. Employee interviews confirmed overtime is communicated as mandatory, however stated when they are unable to work it or decline it have not received disciplinary action.

Local law and/or ETI requirement:

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.

Recommended corrective action:

It is recommended the facility's policies reflect their actual procedures of ensuring overtime is not mandatory.

Objective evidence observed:

(where relevant please add photo numbers)

Document review

Observation:

None observed

Good Examples observed:

None 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: timecard etc.	Describe: The facility has an electric timekeeping system that takes photos of their face.						
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 type="checkbox"/> Yes <input checked="" 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: Employment contracts are not legally required.					
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: <table border="1" style="width: 100%;"> <tr> <td><input type="checkbox"/> 0 hrs</td> <td><input type="checkbox"/> Part time</td> <td><input type="checkbox"/> Variable hrs</td> <td><input type="checkbox"/> Other</td> </tr> </table> If "Other", Please define: 		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other				
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: Not applicable					
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					
	Maximum number of days worked without a day off (in sample):						
	Six (6) days						

Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 7/5/2021 – 7/18/2021 (random) paid 7/23/2021: 11 hours/week 7/19/2021 – 8/1/2021 (random peak) paid 8/6/2021: 19.75 hours/week 8/2/2021 – 8/15/2021 (current peak) paid 8/20/2021: 7.75 hours/week	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	_10_%	
L: Is overtime voluntary?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: The facility has a mandatory overtime policy which is given upon hire, however employees reported the policy is not enforced.
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: 1.5x the standard rate of pay for hours after forty (40).
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: 100% of employees working overtime; weekly.
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other	<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	

<p>considerations? Please complete the boxes where relevant.</p>	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>
	<p>Not applicable</p>
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<div data-bbox="464 405 1307 573"> <input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify) </div> <div data-bbox="464 600 1469 667"> <p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> </div> <div data-bbox="464 696 660 730"> <p>Not applicable</p> </div>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<div data-bbox="464 772 549 840"> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </div> <div data-bbox="464 873 1422 938"> <p>Q1: If yes, please give details: Employees and management reported the working hours are being used to make up for increased in working orders.</p> </div>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<div data-bbox="464 1032 549 1099"> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </div>

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:

Employees did not report any behaviors or interactions of discriminative or abusive behavior. The facility abides by their Equal Employment Opportunity policy, was well as several other policies in relation to no discrimination onsite or in distributing pay. While on tour there were no obvious signs of segregated discriminative behavior with employees at their workstation.

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

Details:

Management review

Employee interview

Document review – includes a review of employee files and company policies and procedures; employee handbook.

Any other comments:

None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: _60_% A2: Female: _40_ %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	Approximately twenty-five (25) employees
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: No evidence was identified.

Professional Development

A: What type of training and development are available for workers?

All safety and company policy training is conducted onsite.

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?

☒ Yes
☐ No

If no, please give details:

Non-compliance:

None observed

Observation:

None observed

Good Examples observed:

None observed

8: Regular Employment Is Provided

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

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

Currently, the facility does not utilize any third-party programs for employment: no agency, subcontracting, homeworking, or other forms of employment other than direct hire is used. Employees are all full-time employees who receive forty (40) hour workweeks. Employees receive full benefits from the facility, in addition to other benefits such as vacation, sick leave.

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

Details:

Management and employee interview

Document review – employee file and handbook review

Facility tour – observed work floor and production capabilities

Any other comments:

None

Non-compliance:	
None observed	

Observation:	
None observed	

Good Examples observed:	
None 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:	Not applicable

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:	None	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: Not applicable B2: Total number of (outside of local country) recruitment agencies used: Not applicable	
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 checked="" type="checkbox"/> No C1: Please describe finding: Not applicable	C2: Observations: None
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 checked="" 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
C: If any checked, give details:	B1 – If other, please give details: Not applicable

Agency Workers (if applicable)	
<i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	A1: Names if available: None
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please give details: Not applicable
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: Not applicable

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: Not applicable
B: If Yes , how many workers supplied by contractors?	None
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please describe finding: Not applicable
D: If Yes , please give evidence for contractor workers being paid per law:	Not applicable

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

There is no subcontracting or homeworking that takes place onsite or offsite. Management and employee interviews confirmed all manufacturing processes: ingredient mixing, baking, packaging, and shipping takes place onsite at the facility.

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

Details:

Facility tour – observed all processes taking place onsite

Management and employee interview

Non-compliance:

None observed

Observation:

None observed

Good Examples observed:

None 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: Currently the facility has an open-door policy which requires employees and suppliers alike to report directly to management; however, are no confidential mechanisms to report concerns.
B: If Yes , are workers aware of these channels and have access? Please give details.	Open-door policy
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Open-door policy
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: The facility has an open-door policy.
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 checked="" type="checkbox"/> Yes <input 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)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No I1: 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:

The facility has two (2) human resources representatives: one (1) generalist and one (1) manager. Employees stated there is an open-door policy between them and their supervisors, riding the chain of commands to the top until they feel their concern is resolved. Currently, however, there are no separate channels for confidentiality reporting.

There is no sign or report of harsh treatment or abuse present at the facility. Employee interviews confirmed that there is no discrimination, or harassment onsite. All disciplinary procedures are detailed throughout the employee handbook and are understood by employees. Employees receive copies and signed details are maintained in each employee file.

Noncompliance:

1. Currently the facility does not have a confidential / 3rd party grievance mechanism in place for employees and suppliers alike to report concerns to.

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

Details:

Employee and management review

Document review – employee files reviewed for disciplinary practices

Policies

- H&H Enterprise Employee Handbook, sec. Employment At-Will, Equal Employment Opportunity, Immigration Reform & Control, Child Labor Policy, Working Hours, Employment Records, Wage and Salary, Pay Periods, Disciplinary Action, Appearance Standards, Attendance & Punctuality, Conflicts of Interest, Harassment, Loan & Pay Advances, Nepotism, Payroll & Timekeeping, Performance & Behavior, Problem Solving, Workplace Violence, Workplace Retaliation

Any other comments:

Employee handbook revised 1/2019.

Non-compliance:

1. Description of non-compliance:

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

Currently the facility does not have a confidential / 3rd party grievance mechanism in place for employees and suppliers alike to report concerns to.

Local law and/or ETI requirement:

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

Recommended corrective action:

Objective evidence observed:

(where relevant please add photo numbers)

Observed during management and employee interviews.

It is recommended the facility implement a 3rd party mechanism for reporting concerns both internal and externally.

Observation:

None observed

Good Examples observed:

Description of Good Example (GE):

When the facility wins awards or hits milestones the onsite graphics team develops and create shirts that they distribute to all employees free of charge.

Objective Evidence Observed:

Observed during management and employee review.

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:

All employees who work onsite have valid I-9s and E-Verify documentation. All documentation was provided and appeared accurate and fully completed.

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

Details:

Ten (10) I-9s review

I-9 of the youngest age employee reviewed

Employee interviews

Ten (10) employee files reviewed

Management review and Employee interview

Facility tour

Any other comments:

None

Non-compliance:

None observed

Observation:

None observed

Good Examples observed:

None observed

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

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

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

B.4. Compliance Requirements

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

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

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

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

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

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

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

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

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

B4. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Currently there are two (2) members of management responsible for environmental efforts: Monique Favareu / Operations Manager and Steve Sonnaburg / Safety Director. Both members are senior members who are currently in process of revamping the environmental efforts the facility currently implements onsite, although there is no formal system in place.

There is no written policy in regard to the facility's environmental effort and dedications, though they have made goals to reduce their waste and recycle as much of their product as they can and reduce electricity use. The management team is working closely with their company owner to better track and improve their environmental efforts.

Observation:

1. Currently there is no written or formal environmental policy.

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

Management and employee interview

Facility tour – which includes machinery observations and production processes

Water

- Stormwater Industrial (Multi-Sector) Permit no.: NVR050000. The facility provided their stormwater compliance inspection reports from 3/2021, conducted by HERService,
- Stormwater Pollution Prevention Plan, revised 2/2020.

Air

- Minor Source Permit issued by Clark County Department of Air Quality, source ID no.: 873, EXP: 4/24/2024. The scope includes lithographic presses, digital presses, screen presses, latex printer, and screen cylinder presses.

Waste

- Restricted Waste Management Permit issued by Southern Nevada Health District, no.: PR0029251, EXP: 12/31/2021.
- Recycling invoices were provided by Nevada Recycling, which includes gaylords, pallets, print mix, and cardboard.
- Non-hazardous waste manifests were provided, which include ink waste, press wash, and machine oil. Waste is disposed of to AET Environmental Inc.

Fire Safety Permits

- Annual Operational Renewal Permit issued by the Department of Building – Prevention Clark County, no.: 162-36-811-016, scope: hot-works, liquefied petroleum gas, and high-piled combustible storage, EXP: 11/17/2021

Any other comments:

Currently the facility is in the development of revamping their environmental efforts. They installed a bailor which helps to recycle corrugate and are getting ready to recycle all paper waste from their cups production.

Non-compliance:

None observed

Observation:
Description of observation:

Currently there is no written or formal environmental policy.

Local law or ETI requirement:

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

Comments:
Objective evidence observed:

Observed during management review.

The facility is working on revamping their overall environmental program and although have efforts and goals, do not have it formally stated in a policy. The facility will consult their management team regarding policy implementation moving forward.

Good Examples observed:

None observed

Environmental Analysis

(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)

A: Is there a manager responsible for Environmental issues (Name and Position): Monique Favareu / Operations Manager and Steve Sonnaburg / Safety Director

B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?

☒ Yes ☐ No

B1: Please give details: The facility has their waste manifest certification and stormwater prevention plan that requires annual re-evaluation and registration.

C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?
Please give details.

☐ Yes ☒ No

C1: Please give details: Currently there is no environmental management system in place, although the facility is working on developing a more formalized program.

D: Does the site have an Environmental policy?
(For guidance, please see Measurement criteria)

☐ Yes ☒ No

D1: If yes, is it publicly available?

E: If yes, does it address the key impacts from their operations and their commitment to improvement?

☐ Yes ☒ No

E1: Please give details: Currently there is no policy.

F: Does the site have a Biodiversity policy?
(For guidance, please see Measurement criteria)

☐ Yes ☒ No

G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?
Please give details.
(For guidance, please see Measurement criteria)

☐ Yes ☒ No

G1: Please give details: Currently there is no certification.

H: Have all legally required permits been shown?
Please give details.

☒ Yes ☐ No

H1: Please give details: The facility provided all their applicable permits, which includes stormwater, air

	emission, non-hazardous waste manifests and waste management certification, and fire code permits.	
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A I1: Please give details: The facility reported having no hazardous waste onsite: non-hazardous waste manifests were provided for waste chemicals found in production.	
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No J1: Please give details: All operations are conducted within the United States.	
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Efforts for waste and electrical reduction are currently in process, regarding the actual targets and implementation of new technology.	
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Manifests and invoices are maintained.	
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Invoices are maintained onsite.	
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: Please give details: No other subcontracting or business partners operate onsite.	
Usage/Discharge analysis		
Criteria	Previous year: Please state period: _2020_	Current Year: Please state period: _2021_
Electricity Usage: Kw/hrs	5,283,058	3,141,055
Renewable Energy Usage: Kw/hrs	N/A	N/A
Gas Usage: Kw/hrs	N/A	N/A

Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes , please state result		
Water Sources: <i>Please list all sources e.g. lake, river, and local water authority.</i>	<ul style="list-style-type: none"> Las Vegas Valley Water District 	<ul style="list-style-type: none"> Las Vegas Valley Water District
Water Volume Used: <i>(m³)</i>	Unavailable	Unavailable
Water Discharged: <i>Please list all receiving waters/recipients.</i>	<ul style="list-style-type: none"> Facility reported no wastewater 	<ul style="list-style-type: none"> Facility reported no wastewater
Water Volume Discharged: <i>(m³)</i>	Unavailable	Unavailable
Water Volume Recycled: <i>(m³)</i>	N/A	N/A
Total waste Produced <i>(please state units)</i>	Waste picked up by 4-yard bins monthly	Waste picked up by 4-yard bins monthly
Total hazardous waste Produced: <i>(please state units)</i>	0	0
Waste to Recycling: <i>(please state units)</i>	0	0
Waste to Landfill: <i>(please state units)</i>	Waste picked up by 4-yard bins monthly	Waste picked up by 4-yard bins monthly
Waste to other: <i>(please give details and state units)</i>	N/A	N/A
Total Product Produced <i>(please state units)</i>	140,183,176 units	92,249,182 units

10C: Business Ethics – 4-Pillar Audit

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

To be completed for a 4-Pillar SMETA Audit

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The facility maintains all business ethics policies in their handbook under 6.2 Conflicts of Interest. The policy discusses the facility's stance on bribery, operating ethically, and their take on gifts. The handbook and policy are provided upon hire and is reviewed with each new employee, which includes management and production. Currently employees and suppliers alike have the facility's open-door policy to report concerns to; however, does not provide as a confidential means to report concerns anonymously.

The human resources manager is responsible for ensuring that management and production employees operate ethically and with the highest business conduct. Employees reported that they are able to report concerns to human resources without fear of reprisal.

Observation:

1. Policies on business ethics and ethical business conduct are currently not communicated to their suppliers.

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

Details:

Employee and management review

Document review – which includes training record review and employee file review

Policies

- H&H Enterprise Employee Handbook, sec. Employment At-Will, Equal Employment Opportunity, Immigration Reform & Control, Child Labor Policy, Working Hours, Employment Records, Wage and Salary, Pay Periods, Disciplinary Action, Appearance Standards, Attendance & Punctuality, Conflicts of Interest, Harassment, Loan & Pay Advances, Nepotism, Payroll & Timekeeping, Performance & Behavior, Problem Solving, Workplace Violence, Workplace Retaliation

Any other comments:

Employee handbook revised 1/2019.

Non-compliance:

None observed

Observation:
Description of observation:

Policies on business ethics and ethical business conduct are currently not communicated to their suppliers.

Local law or ETI requirement:

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

Comments:

The facility currently has an internal vetting procedure which focuses on food safety and confidentiality but does not include business ethics. The facility will consult their management team regarding policy implementation moving forward.

Objective evidence observed:

Observed during management review.

Good Examples observed:

None observed

<p>A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy <input type="checkbox"/> Policy for third parties including suppliers</p> <p>A1: Please give details: Currently the policies are covered in the employee handbook but are no further policies for third parties.</p>
<p>B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>B1: Please give details: Employees receive handbook training upon hire.</p>
<p>C: Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please give details: Updated with each department head and the owner upon law changes or changes in company procedure.</p>
<p>D: Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>D1: Please give details: Third parties are required to sign and acknowledge the confidentiality agreement however does not include business ethics.</p>

Other findings

Other Findings Outside the Scope of the Code
None observed

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

Appendix 1

<p>Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."</p> <p><input checked="" type="checkbox"/> Not Applicable please x</p>	
<p>NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p>Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
<p>0.A. Guidance for Observations</p> <p>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.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>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.</p> <p>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.</p>	
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p>	

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

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

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

<p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p>Additional Elements: Responsible Recruitment</p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p> <p>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.</p> <p>8.5 Employment agencies must only supply workers registered with them.</p> <p>8.6 Workers pay no recruitment fee at any stage of the recruitment process.</p> <p>8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
8A: Sub-Contracting and Homeworking	8A: Sub-Contracting and Homeworking
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.</p> <p>8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
ETI 9. No harsh or inhumane treatment is allowed	ETI 9. No harsh or inhumane treatment is allowed
<p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.</p> <p>Additional elements:</p> <p>9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
10. Other Issue areas: 10A: Entitlement to Work and Immigration	
<p>Additional Elements</p> <p>10A.1 Only workers with a legal right to work shall be employed or used by the supplier.</p> <p>10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
10. Other issue areas 10B2: Environment 2-Pillar	

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

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

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

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

Photo Form

Front of building	Front of building cont.	Employee safety postings
Employee legal postings	Employee break area	Employee break area cont.
Business license	Nevada state license	Workers compensation

EMPLOYEE	DATE	AMOUNT	STATUS
...
...
...

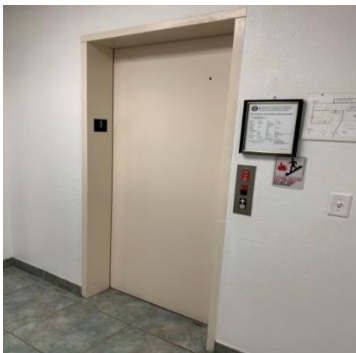
Payroll

EMPLOYEE	DATE	HOURS	RATE	TOTAL
...
...
...

Timecard



Clock in station



Commercial elevator



Flammable locker



Machine guarding












Guard rail



Emergency stop button



Standard extinguisher and electrical panel

		
<p>Fire alarm system</p>	<p>Standard first aid</p>	<p>Eyewash</p>
		
<p>Labelled chemical drum</p>	<p>Bailor</p>	<p>Broken e light #2</p>
		
<p>Broken e light #1</p>	<p>Grinding machine missing guard</p>	<p>Machine guarding missing - guard was placed back on before the end of the audit</p>



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

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

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw_3d_3d)

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw_3d_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw_3d_3d)

[Click here for Supplier \(B\) members:](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d

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