




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: ZC1088832	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: ZS1034572
Business name (Company name):	FRIGO-PAUN d.o.o.		
Site name:	FRIGO-PAUN d.o.o.		
Site address: <i>(Please include full address)</i>	Prijanovići bb, 31210 Požega	Country:	Serbia
Site contact and job title:	Mica Strainović, office manager		
Site phone:	+381 31 371 6107	Site e-mail:	office@frigo-paun.rs
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:	10-11.03.2022.		

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

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

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

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

Lead auditor: Jovan Babić APSCA number: 21704802
Lead auditor APSCA status: RA In Good Standing
Team auditor: n/a APSCA number: n/a
Interviewers: Jovan Babić APSCA number: 21704802

Report writer: Jovan Babić
Report reviewer: Agnieszka Sztobryn

Date of declaration: 11.03.2022.

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 <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>				
0B Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
2. Freedom of Association	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	1			NC: Function of worker representative exist, company has practice in periodical meetings, but records of meetings between management and worker representatives are not maintained.
3. Safety and Hygienic Conditions	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
4. Child Labour	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
5. Living Wages and Benefits	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
6. Working Hours	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>			1	GE: <ul style="list-style-type: none"> Employees have total 60 minutes for breaks during one working shift (one break of 30 minutes and two breaks of 15 minutes), while legal requirements is 30 minutes.
7. Discrimination	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				

8	Regular Employment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
8A	Sub-Contracting and Homeworking		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
9	Harsh or Inhumane Treatment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
10A	Entitlement to Work		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
10B2	Environment 2-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				n/a
10B4	Environment 4-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
10C	Business Ethics		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

General observations and summary of the site:

FRIGO-PAUN d.o.o. is one of leading companies in Serbia for producing and delivery of frozen fruit. Company is located near the city of Pozega in Western Serbia, part of country rich in fruit, specially in berry species.

Company has implemented and certified management systems in accordance with food safety standard IFS.

Company management, leading with owner and managing director Mr. Paun Petrović, has provided support to auditor for the realization of audit and the whole time of audit was available to the auditor for all necessary information. All required documents and records were present for review. Provided visit of the whole site in order to create a clear picture of conditions in the workplace.

Confidential interviews with ten freely selected workers were conducted. The interviews took place in separate meeting room where the interviewed employees felt comfortable.

During audit raised on non-conformity (in area of Freedom of association) and one GE finding (in area of working hours).

**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:	FRIGO-PAUN d.o.o.													
B: Site name:	FRIGO-PAUN d.o.o.													
C: GPS location: (If available)	GPS Address:	Latitude: 43.8604 Longitude: 20.0832												
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Company registration APR BD 30842/2005 dated 13.06.2005. (With no validity date) Tax number (PIB) 1000861698(this number is indefinite if there are no changes in company name, ownership, or activities)													
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Storage, processing, packaging, and distribution of frozen fruits.													
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Company FRIGO-PAUN was established in 1993 and represents one of the oldest companies of this type in the Western Serbia region. Company is characterized with permanent investment in technology and new equipment. Company if export oriented, main markets are EU, Israel, and Saudi Arabia. on this site.</p> <p>Size of location is about 7.900m², while size of production area (including cold chambers and tunnels) is about 3.000 m². Total capacity of cold store is 2.500 t, capacity of cold chambers (which is total 4) is 2.000t, capacity of freezing is 45t/24h (in 3 tunnels).</p> <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor 1</td> <td>Production area, cold chambers, tunnels</td> <td>None.</td> </tr> <tr> <td>Floor 2</td> <td>Wardrobes, toilets, canteen</td> <td>None.</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td></td> </tr> </tbody> </table> <p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: all facilities, equipment used by the company for its activities as well as all supporting infrastructure are in good condition, which is confirmed by visual observations during the site visit and through appropriate reports on inspections of equipment and installations.</p>		Production Building no	Description	Remark, if any	Floor 1	Production area, cold chambers, tunnels	None.	Floor 2	Wardrobes, toilets, canteen	None.	Is this a shared building?	No	
Production Building no	Description	Remark, if any												
Floor 1	Production area, cold chambers, tunnels	None.												
Floor 2	Wardrobes, toilets, canteen	None.												
Is this a shared building?	No													

	<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: Permit to work 351-21/2014 dated 07.06.2016. from Municipality of Pozega (this Permit to use is indefinite if there are no changes in company activities)</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)	July-August
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<p>Purchase, receiving, segregation, metal detector, packing, freezing of fruit (raspberry 55%, blackberry 15%, strawberry 12%, blueberry 10%, other fruits 8%).</p> <p>Four cold chambers, three freezing tunnels, two production lines.</p>
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (specify) Worker representative <input type="checkbox"/> None
K: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details N/A

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:30 Day 1 Time out: 15:30	Day 2 Time in: 09:30 Day 2 Time out: 15:30	A5: Day 3 Time in: A6: Day 3 Time out:
B: Number of auditor days used:	1,5 (one auditor during two days-each day per six hours at site)		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mica Strainović, office manager		
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:	N/A, it is first social audit		
J: Previous audit type:	N/A		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

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

B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	Worker representatives are not invited on opening and closing meeting due to COVID restrictions		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	No formed union in company.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	15	4	/	/	/	/	/	19
Worker numbers – female	27	3	/	/	/	/	/	30
Total	42	7	/	/	/	/	/	49
Number of Workers interviewed – male	3	1	/	/	/	/	/	4
Number of Workers interviewed – female	5	1	/	/	/	/	/	6
Total – interviewed sample size	8	2	/	/	/	/	/	10



A: Nationality of Management	Serbian	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities: B1: Nationality 1: Serbian B2: Nationality 2: _____ B3: Nationality 3: _____</p>	<p>Was the list completed during peak season? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: number of engaged workers is increasing for about 10% during peak of season.</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1- 100% C1: approx % total workforce: Nationality 2 _____ C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: _____% workers on piece rate D1: _____% hourly paid workers D2: 100 % salaried workers</p> <p>Payment cycle: D3: _____% daily paid D4: _____% weekly paid D5: 100 % monthly paid D6: _____% other D7: If other, please give details</p>	



Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	One group of four employees.
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 2 D2: Female: 4
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	No negative remarks were reported during interviews with workers.
I: What did the workers like the most about working at this site?	Very good communication in company, very good of approach from management side, very good organization of production process/no overtime even in peak of season.
J: Any additional comment(s) regarding interviews:	Employees are satisfied with attitude of company owner, organization of processes, internal communication, breaks during working day.
K: Attitude of workers to hours worked:	Favourable: adequate breaks (three breaks during shift); no overtime; five days' work week.
L. Is there any worker survey information available?	

- Yes
- No

L1: If yes, please give details: Analyse of employee satisfaction dated December 2022. (This is based on requirements from implemented procedure for internal communication).

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

Total ten employees are freely selected and interviewed. There were four individual interviews and one group of four employees. The interviewed employees feel comfortable during the interviews. The employees appeared to be satisfied with the working conditions, treatment and in particular with the regular payment of wages. Their attitude to management and company owner is very good.

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

During audit, conducted interview with worker representative in very open manner. Confirmed good communication with company management.

O: Attitude of managers:

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

Company management, led by owner of company Mr. Paun Petrović, demonstrated understanding that BV auditor will realize audit including confidential interviews with freely selected workers. Company management has provided support for the realization of audit and the whole time of audit was available to the auditor for all necessary information. All required documents and records were present for review. Provided visit of the whole site in order to create a clear picture of conditions in the workplace.

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:

The company has implemented Code of Conduct which includes human right and social responsibility. CSR Policy is adopted and communicated within company through intranet and communication boards. Nominated responsible person for implementing standard concerning human rights. Company has identified stakeholders and salient issues (checked List of suppliers and other interested parties and evaluation of their impact). There is not any adverse impact found on their stakeholders. The company has a transparent system in place for confidentially reporting and dealing with human rights impacts through suggestion box for remarks, phone line for reporting of any non-ethical issue and through dedicated e-mail address for communication.

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

Details:

ETI Base code (communicated through communication boards)

CSR Policy April 2021

Decision of Nomination of responsible person for personal data protection and human rights protection dated 01.09.2021. (Nominated Mrs. Mica Strainovic)

List of suppliers and other interested parties and evaluation of their impact dated April 2021

Procedure for communication FP-02-201-01, issue A

Any other comments: n/a

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: this is part of adopted CSR Policy</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: checked Decision of Nomination of responsible person for personal data protection and human rights protection Name: Mica Strainović Job title: office manager</p>
<p>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?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Installed suggestion boxes, phone line, e-mail address</p>
<p>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)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: GDPR statement is implemented, for all employees maintained personal file.</p>

Findings	
<p>Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/></p> <p>Description of observation:</p> <p>Local law or ETI/Additional elements / customer specific requirement:</p> <p>Comments:</p> <p>None</p>	<p>Objective evidence observed:</p>

Good examples observed:	
<p>Description of Good Example (GE):</p> <p>None</p>	<p>Objective Evidence Observed:</p>

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year (01.01.2021.-31.12.2021.): 2,5 %	A2: This year (01.01.2022.-28.02.2022.): 2 %
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]	2 %	
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 (01.01.2021.-31.12.2021.): 2,37 %	C2: This year (01.01.2022.-28.02.2022.): 6,8 %
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	5,4%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Register of injuries at work is maintained as required by law regulation/no injuries in last three years.	
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 (01.01.2021.-31.12.2021.): Number: 0	F2: This year 01.01.2022.-28.02.2022.): Number: 0
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]	0	
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 01.01.2021.-31.12.2021.): 0	H2: This year 01.01.2022.-28.02.2022.): 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:

The company has implemented Code of business conduct as well as CSR Policy. Exist implement procedure for control of suppliers. Code of business conduct and CSR Policy are communicated to the employees through notice boards. These documents are also part of induction training for all new employees. During interviews was confirmed that workers and familiar with their rights as well as with the code and relevant regulation.

Nominated manager responsible for compliance with Code and ethical principles.

Part of induction training for all of employees is Ethical business principles.

All suppliers have signed Ethical code for suppliers.

Company has identified stakeholders and salient issues (checked List of suppliers and other interested parties and evaluation of their impact). There is not any adverse impact found on their stakeholders.

The company has a transparent system in place for confidentially reporting and dealing with human rights impacts through box for remarks and suggestions, phone line or dedicated e mail address.

Company has procedure for law requirements follow up (checked available List of law regulation, updated February 2022-this list includes law requirements related health and safety at work, environmental protection, and labour laws). Company has periodically evaluation of compliance with law regulation, this evaluation is part of regular management review.

Permit to work and all legal required licences are provided.

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

Details:

- CSR Policy dated April 2021
- Environmental protection Policy dated 01.04.2021.
- Health and safety at work Policy dated 01.04.2021.
- Food safety Policy dated April 2021.
- Decision of responsible manager for compliance with ETI Base code nomination dated 01.09.2021. (nominated Mica Strainovic)
- Decision of forming Team for compliance with SMETA SEDEX requirements dated 22.10.2021.
- ETI Base code (communicated through communication boards)
- Internal training record dated 11.10.2021. (Theme: ETI base code)
- List of suppliers and other interested parties and evaluation of their impact dated April 2021
- Statement of ethical principles acceptance (e.g. supplier LST Poland 19.11.2021., Omladinska zadruga „Arijlje“ dated 01.12.2021., DOO Fruchtmill dated 22.11.2021.
- Procedure for communication FP-02-201-01, issue A

Permit to work 351-21/2014 dated 07.06.2016. from Municipality of Pozega
 Extract from cadastre 1448-3 from cadastre of Pozega (KO Prijanovici)

Any other comments: n/a

Management Systems:

<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: The auditor checked at the Authorities (including internet sources)</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: CSR Policy, Code of business conduct</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Part of induction training for every employee is Ethical base code. All suppliers have signed Statement of ethical principles acceptance.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: all employees have training related basic principles of socially responsible behaviour. As example, checked Training record dated 11.10.2021.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: this is part of first-introduction training for every new employee (e.g. checked training record dated 11.10.2021.), all employees have possibility to report and unethical acts (company has own legal function dedicated to this)</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: IFS certificate, certification body Eurofins, certificate valid until August 2022 Kosher, certificate valid until March 2022 Organic certificate, certification body Ecocert, certificate valid until November 2022</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: in frame of administration department is HR function</p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

	H1: Please give details: Nominated Mrs. Mica Strainović
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: Rulebook about protection of personal data
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Video surveillance 24/7. Existing Risk assessment report includes evaluation of video surveillance system as well as security procedures.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Code of business conduct, issue 1. Risk assessment realized in frame of existing management system, last revision dated December 2021 (as part of inputs for regular management review) and included Code of business conduct as well as company Rulebook about organization and systematization.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	No violations of these policies were found on the site
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 D1: Please give details: Statement of ethical principles acceptance (e.g. supplier LST Poland 19.11.2021., Omladinska zadruga „Arijje“ dated 01.12.2021., DOO Fruchtmill dated 22.11.2021.
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: Permit to work 351-21/2014 dated 07.06.2016. from Municipality of Pozega Extract from cadastre 1448-3 from cadastre of Pozega (KO Prijanovici)
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: List of law regulation updated February 2022 and Report about compliance with law regulation and other requirements, dated 23.02.2022.

<p>P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: This policy is part of internal rules. Due diligence was conducted as the part of permit to use obtaining, checked Permit to work 351-21/2014 dated 07.06.2016. from Municipality of Pozega</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: Permit to work 351-21/2014 dated 07.06.2016. from Municipality of Pozega Extract from cadastre 1448-3 from cadastre of Pozega (KO Prijanovici)</p>
<p>R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: no need because the local community did not own, occupy, or use the land.</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: Permit to work 351-21/2014 dated 07.06.2016. from Municipality of Pozega</p>

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

Observation:	
<p>Description of observation: Local law or ETI requirement: Comments: None</p>	<p>Objective evidence observed:</p>

Good Examples observed:	
<p>Description of Good Example (GE): None</p>	<p>Objective evidence observed:</p>

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:

No evidence of engagement any forced or bonded labour in company. Each employee signs an individual contract before employees.

Copies of employment contracts are kept in the workers folder. The company doesn't keep workers original documents only copies. Company demonstrated good practice in management with personal folders of employees.

Employees may resign with month notice period. No required deposits for recruitment. No evidence for any deposits.

Through review of personal files and interviews with workers confirmed all the above.

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

Details:

Interviews with ten workers

Employment rulebook, initial version dated September 2014

Rulebook about organization and systematization of work places 01.01.2019.

Internal rulebook about general data protection dated 21.08.2019.

Rulebook about whistle-blowers protection dated 08.06.2015.

Eti base code, translated version dated 01.06.2021.

Personal dossiers of employees: VŽ, PS, US, TZ, JĐ, SM, JM, DS, BR, NZ

Employment contracts: employee VŽ, date of temporary contract 31.12.2021.; employee PS, date of temporary contract 04.01.2022.; employee US, date of permanent employment contract 01.01.2019.;

employee TZ, permanent employment contract 30.01.2021.; employee JĐ, date of temporary

employment contract 01.01.2022.; permanent employment contract dated 15.09.2014. signed with SM;

permanent employment contract dated 01.07.2020. signed with JM; permanent employment contract

dated 01.07.2017. signed with employee ĐS; employment contract signed with employee BR, date of

contract 01.05.2003.

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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding:
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding:
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding:
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: Part of internal Employment rulebook

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

Observation:	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p> <p>None</p>	<p>Objective evidence observed:</p>

<p>Good Examples observed:</p>

Description of Good Example (GE): None	Objective evidence observed:
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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:

The workers have the right to joint workers unions. It is not mandatory by law to be a member of a trade union.
 In company exist function of worker representative.
 Since no adopted collective bargaining agreement, company has adopted Employment rulebook in accordance with law regulation in which are defined all aspects of working relationships between company and workers.
 During interviews with worker representatives it was confirmed that there is no any kind of discrimination and that worker representative have adequate conditions for their activities (office space, enough time...).

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

Details:
 Employment rulebook, initial version dated September 2014
 Rulebook about organization and systematization of work places 01.01.2019.
 Interviews with management
 Interview with members of worker committee
 Workers interviews.

Any other comments: n/a

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (specify) Worker representative <input type="checkbox"/> None
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: beside worker representative function, exist open door and direct communication policy D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: worker representative has possibility to use office for periodical meetings including periodical meetings with workers.	
F: Name of union and union representative, if applicable:	N/A	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?	Worker representative	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 21.10.2021.
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: interviewed one worker representative-Snežana Milivojević	
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Confirmed during interviews that employees aware who is their representative, also confirmed that they have periodical meetings, but no evidence (e.g., minutes of meetings maintained)-it was reason for NC raising.	
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: ____% workers covered by Union CBA	M2: ____% workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A	

Non-compliance:	
<p>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: Function of worker representative exist, company has practice in periodical meetings, but records of meetings between management and worker representatives are not maintained.</p> <p>Local law and/or ETI requirement: 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>Recommended corrective action: Will be maintained records from regular meetings between management and worker representatives.</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>-Inverveiws with management and worker representatives</p>

Observation:	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p> <p>None</p>	<p>Objective evidence observed:</p>
Good Examples observed:	
<p>Description of Good Example (GE):</p> <p>None</p>	<p>Objective evidence observed:</p>

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:

Adopted Health and safety policy which is communicated to the workers through communication boards within company.

Nominated QEHS Manager (Mrs. Miroslava Kaplanović).

All employees are trained for health and safety at work (trainings are based on assessed risk) as well as for fire protection. Periodical evacuation drills are conducted. Company has first aid trained staff.

During site visit observed high level of implementation of health and safety rules: firefighting equipment is posted and adequately marked, evacuation plans are posted, production and storage area is under system for early identification of fire, all exits are free of any obstacles and clearly marked with emergency lights; employees have adequate PPE which is in use on appropriate way; drinking water is available; canteen and toilets and wardrobes are clean and adequate.

Periodical medical examination is realized for all workers (not only for workers which are on working places with higher risk). Company maintained Register of injuries and appropriate reports about injuries at work, procedure for incident investigation is on place.

Risk assessment for all work places is done. Established Rules for fire protection.

Electrical cupboards are protected and marked on adequate way. Safety signs are posted on adequate way. All reports about control of electrical system and installation were available for review.

Available MSDS documents for all used chemicals (company use chemicals only for process of cleaning).

Available adequate work instruction for reaction in case of leakage as well as absorbents.

On location posted suggestion box, employees also have possibility to report any problem related health and safety directly to the management.

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

Details:

Contracts dated 01.01.2012. signed with external company MDN for provision of services in area of health and safety at work and contract dated 04.01.2018. (services in fire protection area) dated 04.01.2018.

Plan of measures during Covid 19, issue 1 14.07.2020.

Health and safety at work Policy dated 01.04.2021.

Register of first aid trained, updated January 2022. (total two trained person).

Example of "First aid training certificate" no. 615/2019 dated 02.04.2019. from Alta Medika (employee JB). "Risk assessments elaborate" last revision dated 10.02.2022. done in cooperation with external organization MDN Pozega (risk assessment is done for all work places including routine and non routine activities; one work place (fork lift manipulator) assessed as work place with higher risk). Fork lift operator training certificate dated 15.10.2018. from external authorized organization Sigmaprevent (employee SĐ).

Employees on work places with higher risk have passed regular medical examination (on yearly level), checked Medical examination no. 4473/2021 dated 25.11.2021. from Alta Medika (employee SĐ).

All employees are trained for health and safety at work in accordance with assessed risks. Realized trainings are recorded in accordance with law regulation (record "Obrazac 6") including test for checking of knowledge in area of health and safety at work (for example checked record of individual health and safety training for ten employees: employee SĐ, date of training 25.02.2022., employee SU, date of training 25.02.2022., employee RB, date of training 25.02.2022., employee JM, date of training 25.02.2022., employee SM, date of training 25.02.2022., employee SP, date of training 25.02.2022., employee ŽV, date of training 25.02.2022., employee JĐ, date of training 26.02.2022., employee MS, date of training 26.02.2022.

All employees have regular training in area of fire protection. Last training is organized as theoretical and practical fire protection training, all employees were present, checked Report of fire protection training 26.02.2022.

Company has periodical evacuation drills, checked Report of evacuation drill dated 07.03.2022. (e.g. all employees were present, evacuation time 3min).

Register of production equipment updated February 2022.

Report about periodical control of production equipment"no. 019/2022 dated 04.02.2022. from external authorized organization Sigma Prevent.

"Report about periodical control of microclimate conditions" no. 52-774/671 dated 25.05.2019. from external authorized organization Institut 1. maj;

Report of periodical control of electrical installation dated 16.01.2019. from external organization VAR.

Company maintained Register of injuries at work in accordance with law regulation, but no registered injuries in last three years.

Fire risks are assessed through adopted document Fire protection rulebook last issue dated December 2021, in accordance with this rulebook company has installed and available fire extinguishers and system for early identification and signalization of fire.

Firefighting equipment is periodically checked by authorized organizations. Checked available: Report about periodical check of fire extinguishers no. 0686 dated 28.10.2021. from external organization DVD Arilje.

Report of fire alarm system periodical control no. 46/22 dated 02.03.2022. from external organization RC.

Report about periodical check of emergency light dated 24.02.2022. (it is internal check done by maintenance engineer).

Any other comments: n/a

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

- Yes
- No

A1: Please give details: Health and safety at work Policy dated 01.04.2021.

B: Are the policies included in workers' manuals?

- Yes
- No

B1: Please give details: this policy is part of Internal codex.

<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 C1: Please give details: everything according to the law</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 D1: Please give details: General work instruction for health and safety at work includes instruction for visitors and subcontractors. On all premises clear posted signs with instruction which type of PPE are in use. Before entry in production area all visitors need to pass adequate training and take proper PPE.</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: this is not legal requirement, to have separated medical room. Provided adequate number of first aid boxes. Trained first aiders.</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 F1: Please give details: company have trained employees for first aid assistance.</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 G1: Please give details: N/A Company does not provide transport to workers</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 H1: Please give details: there are no dormitories on site</p>
<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?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: "Risk assessment elaborate" (note: one workplace (fork lift manipulator) assessed as work place with higher risk); Also checked "Risk assessment for work place: production operator", "Risk assessment for work place: hygiene maintenance operator". Risk assessment includes routine and non-routine activities, organization of working shifts and risks related to transportation from work to home.</p>
<p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Reports are sent every year to Government, no specific permits are obligated</p>
<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: No banned chemicals in use.</p>

Non-compliance:

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

Good Examples observed:	
<p>Description of Good Example (GE):</p> <p>None</p>	<p>Objective Evidence Observed:</p>

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:

There was no young nor child workers, identified during the audit. Through checking of documents, it was noted that youngest employee in company is 30 years old. In frame of existing management system company has clear procedure related verification of the age of applicants before recruitment. In process of selection, company check ID cards and keep a copy of ID card in the individual file of employee, in accordance with law regulation. Each employee dossier included photocopied ID card which list name of employee, household address and the date of birth.

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

Details:

Employment rulebook dated September 2014
 Rulebook about organization and systematization of work places, last version dated 01.01.2019.
 Interviews
 Personal files of ten workers
 Employment contracts for ten workers

Any other comments: n/a

A: Legal age of employment:	18
B: Age of youngest worker found:	30
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>
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Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p> <p>None</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>

Observation:	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p> <p>None</p>	<p>Objective evidence observed:</p>

Good Examples observed:	
<p>Description of Good Example (GE):</p> <p>None</p>	<p>Objective Evidence Observed:</p>

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Wages are paid once per month through bank transfers to the individual bank account of each worker. Each worker gets a pay slip on email with detailed information of the wage calculation at the end of each pay period.

There is no delay in payment.

Workers interviewed found that they were aware about the salary scheme, including amount deductible for social insurance etc. They confirmed there are no deduction as disciplinary measures exist. Interviewed workers confirmed good communication with company in case of necessity for additional information related calculation of payment.

In case of overtime, it is always voluntary and OT payment is in line with law regulation (126%)

Obligation of company related wages and benefits are defined in and personal contracts.

Incentives and bonuses based on the achieved monthly results based on decision of the director

Only the applicable legal deductions are made from the monthly remuneration such as social and health security and income tax.

The monthly remuneration equals the basic wage plus the fixed additional payments.

Evidence for the payment of social insurances were presented.

The requested payrolls were presented.

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

Details:
 Interviews with ten workers
 Payslips and working hours register for three different months
 Employment rulebook

Any other comments: n/a

Non-compliance:

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

Good Examples observed:	
<p>Description of Good Example (GE):</p> <p>None</p>	<p>Objective Evidence Observed:</p>

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 8h/day, 40h/week, 176h/month	A1: 8h/day, 40h/week, 176h/month	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 4 hours per day, 8 hours per week, 32 hours per month	B1: 0 hours per day, 0 hours per week, 0 hours per month	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 201,22 RSD/h	C1: 220 RSD/h	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 126%	D1: 126%	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?	N/A		
B: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	10 records for December 2021 10 records for July 2021 10 records for February 2022		
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	C1: If Yes , please give details: n/a	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	D1: If No , please give details: n/a	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> 220 RSD/h; 8.800 RSD/week; 38.720 RSD/month	
F: Please indicate the breakdown of workforce per earnings:	F1: ___% of workforce earning under minimum wage F2: ___% of workforce earning minimum wage F3: _100___% of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i> All workers received as a bonus free transportation allowance		
H: What deductions are required by law e.g. social insurance? Please state all types:	Social assurance, health assurance and unemployment		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made.	1. social assurance 2. health assurance 3. Unemployment Please describe: according to the law
		I2: Please list all deductions that have not been made.	1. 2. Please describe: N/A

<p>J: Were appropriate records available to verify hours of work and wages?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type</p> <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:
<p>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)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>L1: Please give details: Record reflect all time worked</p>	
<p>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></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>M1: Please specify amount/time: N/A</p>	
<p>M2: If yes, what was the calculation method used.</p>	<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 <p>Other – please give details: N/A</p>	
<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>N1: Please give details: As minimum once a year, considering local law regulation related minimum wage</p>	
<p>O: Are workers paid in a timely manner in line with local law?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>P1: Please give details: checked by reviewing payslips, contracts and with interviewed employees</p>	
<p>Q: How are workers paid:</p>	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other <p>Q1: If other, please explain:</p>	

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:

Company operates in two shifts in production (first shift from 07am to 15pm, second 15pm to 23)

Administration and management working in one shift from 07am to 15pm.

Employees have 30 minutes break for meal and two additional breaks for 15 minutes.

The company has carnets system for registration of working hours.

Adequate evidence for three different months for compliance with working time requirements were presented (10 records for February 2022, December 2021 and July 2021-peak of season).

All of the above was confirmed by the workers during the interviews.

The company has adequate management system that ensures compliance with law regulation (overtime is very rare in practice), all contracts are based on 40 hours per week, in case of overtime it is always voluntary and paid as premium. Adequate breaks are assured during working shifts (one break of 30 minutes and two additionally breaks of 15 minutes), sufficient rest time between two shifts (minimum 12 hours), weekly rest day is quarantined, annual leave is defined in Employment rulebook.

Conducted risk assessment for all workplaces which includes measures related organization of working shifts in order to prevent fatigue.

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

Details:

- Employment rulebook
- Rulebook about organization and systematization
- Payslips and register of working hours
- Employment contracts
- Interviews

Any other comments:

PF: VŽ

Employment contracts: employee VŽ, date of temporary contract 31.12.2021.; employee PS, date of temporary contract 04.01.2022.; employee US, date of permanent employment contract 01.01.2019.; employee TZ, permanent employment contract 30.01.2021.; employee JĐ, date of temporary employment contract 01.01.2022.; permanent employment contract dated 15.09.2014. signed with SM; permanent employment contract dated 01.07.2020. signed with JM; permanent employment contract dated 01.07.2017. signed with employee ĐS; employment contract signed with employee BR, date of contract 01.05.2003.

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI requirement:

Recommended corrective action:

None

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

Observation:

Description of observation:

Local law or ETI requirement:

Comments:

None

Objective evidence observed:

Good Examples observed:

Description of Good Example (GE):

Objective Evidence Observed:

Employees have total 60 minutes for breaks during one working shift (one break of 30 minutes and two breaks of 15 minutes), while legal requirements is 30 minutes.	-Interviews, checking of time sheet records
---	---

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)			
Systems & Processes			
A. What timekeeping systems are used: time card etc.	Describe: carnets (manual system for working hours registration)		
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details		
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:	
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:	
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time
		<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:	
		N/A	
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: N/A		
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
		Maximum number of days worked without a day off (in sample):	

		6
Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:
		N/A
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:
		N/A
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours / day/ week/ month: No OT found for February 2022 and December 2021, maximum number of OT hours in July 2021 was 8 hours on monthly level February 2022: 0 OT hours per day, 0 OT hours per week, 0 OT hours per month December 2021: 0 OT hours per day, 0 OT hours per week, 0 OT hours per month July 2021: 0 OT hours per day, 8 OT hours per week, 8 OT hours per month	
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information
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: 126%
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: it is clearly defined in company rules and employment contracts. Over rate is 126% (which is in line with law requirement), over time is very rare (maximum number of

		overtime hours was 8 hours on monthly level for 10% of workers – all properly paid)
<p>O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p>	<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 N/A	
	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>	
	N/A	
<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>	<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)	
	<p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p>	
	N/A	
<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>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details: N/A	
<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>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

No discrimination policy is part of Employment rulebook.
 All workers are treated equally.
 Nothing has been identified or reported by interviewed workers as harsh or inhumane treatment.
 The workers didn't report any cases of harsh or inhumane treatment on behalf of the management.
 Workers confirmed there is no discrimination in hiring, compensation, access to training, promotion, termination or retirement.

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

Details:

- Ethical code
- Corporate social responsibility policy
- Employment rulebook
- Persona files
- Interviews

Any other comments: n/a

<p>A: Gender breakdown of Management + Supervisors (Include as one combined group)</p>	<p>A1: Male: __ 33__ % A2: Female __ 67__ %</p>
<p>B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:</p>	<p>4 (Finance, general administration, HR, production & technology)</p>
<p>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?:</p>	<p> <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: Employment rulebook </p>

Professional Development

A: What type of training and development are available for workers?
 Health and safety, fire protection, getting to know the company (general company information plus company policies)

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?
 Yes
 No
 If no, please give details:

Non-compliance:

1. Description of non-compliance:
 NC against ETI NC against Local Law NC against customer code:
Local law and/or ETI requirement:
Recommended corrective action:
 None

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

Observation:

Description of observation:
Local law or ETI requirement:
Comments:
 None

Objective evidence observed:

Good Examples observed:

Description of Good Example (GE):
 None

Objective Evidence Observed:

8: Regular Employment Is Provided

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

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

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:

The employees are contracted for indeterminate/determinate duration. This is stated in all labour contracts, which conforms to the legal requirements. Contracts are signed by the employee and the Managing director.

No agency employment in use.

All interviewees confirmed a copy of the contract was given to them upon hire.

Checked ten personal files and all reviewed files contained valid and complete employment contracts

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

Details:

Interviews

Personal files

Employment contracts

Rulebook about work

Any other comments: n/a

Non-compliance:

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

Good Examples observed:	
<p>Description of Good Example (GE):</p> <p>None</p>	<p>Objective Evidence Observed:</p>

Responsible Recruitment

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

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:	N/A

Migrant Workers: <i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>	
A: Type of work undertaken by migrant workers:	N/A
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: B2: Total number of (outside of local country) recruitment agencies used:
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:
D: Are Any migrant workers in skilled, technical, or management roles <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, number and example of roles:

NON-EMPLOYEE WORKERS

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

Agency Workers (if applicable)	
<i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	A1: Names if available: N/A
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details:

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

<p>A: Any contractors on site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>A1: If yes, how many contractors are present, please give details:</p>
<p>B: If Yes, how many workers supplied by contractors?</p>	
<p>C: Do all contractor workers understand their terms of employment?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please describe finding:</p>
<p>D: If Yes, please give evidence for contractor workers being paid per law:</p>	<p>N/A</p>

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

No sub-contracting and homeworking practised by the factory. No evidence for sub-contractors found during the audit.

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

Details:

Interview

Documentation review

Non-compliance:

1. Description of non-compliance:

NC against ETI/Additional Elements

NC against Local Law

NC against customer code:

Objective evidence observed:

(where relevant please add photo numbers)

Local law and/or ETI /Additional Elements requirement:

Recommended corrective action:

None

Observation:

Description of observation:

Local law or ETI/Additional elements requirement:

Comments:

Objective evidence observed:

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

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

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

<p>E: How does the site ensure worker hours and pay meet local laws for homeworkers?</p>	
<p>F: What processes are carried out by homeworkers?</p>	
<p>G: Do any contracts exist for homeworkers?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>G1: Please give details:</p>
<p>H: Are full records of homeworkers available at the site?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Can be reported orally to the top management, as well as comment box is implemented
B: If Yes , are workers aware of these channels and have access? Please give details.	Workers are aware of the anonymous communication channel and implemented procedure.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Comment box
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Other D1: Please give details: comment box
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:

Employees were aware of the disciplinary practice which is controlled in their contracts also.
 Any grievances can be reported, but no evidence about grievances.
 There were not any exemplar of abuse or harassment.
 All employees are trained in field of ethics behaviour in order to assure fair treatment for each worker and prevent any type of harassment.
 A third-party operated whistle-blower hotline is also available.

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

Details:
 Interviews
 Site tour
 Internal rules

Any other comments: n/a

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI requirement:

Recommended corrective action:

None

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

Observation:

Description of observation:

Local law or ETI requirement:

Comments:

None

Objective evidence observed:

Good Examples observed:

Description of Good Example (GE):

Objective Evidence Observed:

None	
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10 A: Entitlement to Work and Immigration

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 workers with a legal right to work are employed.

All workers, are validated by the company for their legal right to work by reviewing original documentation

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

Details:

Personal files

Interviews

Any other comments: n/a

Non-compliance:

1. Description of non-compliance:

NC against ETI/Additional Elements

NC against Local Law

NC against customer code:

Objective evidence observed:

(where relevant please add photo numbers)

Local law and/or ETI /Additional Elements requirement:

Recommended corrective action:

None

Observation:

Description of observation:

Local law or ETI/Additional Elements requirement:

Comments:

None

Objective evidence observed:

Good examples observed:

Description of Good Example (GE): None	Objective Evidence Observed:
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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:

Adopted Environmental policy

Nominated manager responsible for environmental protection (Mrs. Vera Petrović).

For review was available part of SAQ related to environmental protection.

Because of nature of processes, no air emission nor wastewater emission.

Part of regular management review is periodical evaluation of environmental impact (e.g., energy consumption, noise in environment, generation of waste).

Company has practice in periodical evaluation of compliance with law and other requirements (checked available Report of evaluation). Company maintained List of valid law requirements.

Contract for waste disposal is in place. Waste is collected and sorted in the company.

Site was not subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations since beginning of production activities at this site.

Defined environmental protection goals in frame of existing certified management system.

Company has defined KPIs related environmental protection (e.g., 0,1% lower energy consumption in comparison with last year; no environmental accidents; no negative remark from the authority; complete compliance with law regulation).
 Company has internal system for recording and follow up of environmental impacts, including consumption of resources and discharges.

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

Details:

- Environmental study February 2016
- During audit realized interview with manager responsible for environmental issues (Mrs. Vera Petrovic).
- Confirmation form Municipality of Pozega no. 504-04/16 dated 25.03.2016. (No needed environmental permit-this is confirmed based on Environmental study)
- Procedure for environmental protection FP-05-215-01, issue A, dated April 2021
- Work instruction for waste management FP-05-305-01, issue A, dated April 2021
- Environmental protection Policy
- List of environmental aspects dated February 2022.
- Environmental goals 25.05.2021. (e.g., electrical energy consumption reduction for 0,5%, reduction of water consumption for 0,1 on yearly level, installation of solar panels until end 2023.)
- Plan for realization of defined goals
- Register of waste materials updated January 2022.
- Yearly report of waste production for 2021. Dated 05.01.2022.
- Contract for dangerous waste disposal dated 01.07.2021. signed with authorized waste operator Bozic i sinovi
- Contract for non-dangerous waste disposal dated 08.01.2021. signed with authorized waste operator Eko Green Servis
- Document of waste movement no. dated 16.03.2021. from waste operator Bozic i Sinovi (e.g. waste quantity 0,08t, waste type: electronic waste)
- Document of waste movement no. dated 15.12.2021. from waste operator Bozic i Sinovi (e.g. waste quantity 938kg, waste type: paper and plastic waste)

Any other comments: n/a

Non-compliance:

1. Description of non-compliance:

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

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

Local law and/or ETI/Additional Elements requirement:

Recommended corrective action:

None

Observation:

Description of observation:

Local law or ETI/Additional elements requirements:

Comments:

Objective evidence observed:

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

Environmental Analysis <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Mrs. Vera Petrović, deputy of general manager
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Checked List of environmental aspects, updated January 2022.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details:
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? Environmental protection policy, available through web site.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: addressed commitment for continual improvement and prevention of pollution. Key impacts from company operations are evaluated through Analyses of environmental aspects (e.g. as key impact highlighted energy consumption, waste generating)
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please gives details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: company has certified food safety management systems according to IFS and Organic.
H: Have all legally required permits been shown? Please gives details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: company has Permit to work, but no need any environmental permit because of nature of processes (no air emission, no emission wastewater from processes).
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: Register of chemicals for cleaning updated 01.03.2022. Analyses of chemicals consumption dated 01.03.2022.
J: Is there a system for managing client's requirements and legislation in the destination	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

countries regarding environmental and chemical issues?	J1: Please give details: List of law regulation, version dated 14.005.2021., Periodical evaluation of compliance dated February 2022.
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: one of KPIs is reduction of energy consumption for 0,1%
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: company has system for monitoring and recording of generated waste quantities (using record required by law DEO 1) while disposal of waste is confirmed through Document of waste movement issued by contracted waste operators.
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Accounting department tracks on monthly basis.
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: not applicable because no engaged sub-contracting agencies.

Usage/Discharge analysis

Criteria	Previous year: Please state period: 01.01.2021.-31.12.2021.	Current Year: Please state period: 01.01.2022.-28.02.2022.
Electricity Usage: <i>Kw/hrs</i>	790.000	65.000
Renewable Energy Usage: <i>Kw/hrs</i>	0	0
Gas Usage: <i>Kw/hrs</i>	0	0
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	n/a	n/a
Water Sources: <i>Please list all sources e.g. lake, river, and local water authority.</i>	Local water supply	Local water supply
Water Volume Used: <i>(m³)</i>	386	29

Water Discharged: <i>Please list all receiving waters/recipients.</i>	Own well	Own well
Water Volume Discharged: <i>(m³)</i>	350	25
Water Volume Recycled: <i>(m³)</i>	0	0
Total waste Produced <i>(please state units)</i>	25,8t	3,9t
Total hazardous waste Produced: <i>(please state units)</i>	0.012t	0
Waste to Recycling: <i>(please state units)</i>	25,8t	3,9t
Waste to Landfill: <i>(please state units)</i>	77m3	13m3
Waste to other: <i>(please give details and state units)</i>	0	Data is not consolidated for 2022.
Total Product Produced <i>(please state units)</i>	1800t	330t

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:

Company conducts their business ethically without bribery, corruption, or any type of unethical business practice.

Adopted Anti-corruption rulebook.

There is access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.

Designated person responsible for implementing standards concerning Business Ethics, Mrs. Vera Petrović. Site was not subject to (of pending) any fines or prosecutions against business ethics regulation.

Organized training for all staff from commercial department and company management (e.g. checked Training record dated 03.03.2022.)

Suppliers have signed Statement about ethical code acceptance.

Installed suggestion boxes for reporting in case of any deviation.

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

Details:
 CSR Policy dated April 2021
 Anti-corruption rulebook, April 2021.
 List of suppliers and other interested parties and evaluation of their impact dated April 2021
 Statement of ethical principles acceptance (e.g. supplier LST Poland 19.11.2021., Omladinska zadruga „Arijlje“ dated 01.12.2021., DOO Fruchtmill dated 22.11.2021.
 Procedure for communication FP-02-201-01, issue A
 Permit to work 351-21/2014 dated 07.06.2016. from Municipality of Pozega
 Extract from cadastre 1448-3 from cadastre of Pozega (KO Prijanovici)
 Internal training record dated 11.10.2021. (theme: ETI base code)
 Interview with responsible person for business ethics (Mrs. Vera Petrovic)

Any other comments: n/a

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

Observation	
<p>Description of observation:</p> <p>Local law or ETI/Additional elements requirement:</p> <p>Comments:</p> <p>None</p>	<p>Objective evidence observed:</p>

Good examples observed:	
<p>Description of Good Example (GE):</p> <p>None</p>	<p>Objective Evidence Observed:</p>

<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 A1: Please give details: CSR Policy dated April 2021 Anti-corruption rulebook, April 2021. List of suppliers and other interested parties and evaluation of their impact dated April 2021 Statement of ethical principles acceptance</p>
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<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: part of initial training (after beginning of employment) is ethical codex</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: CSR Policy is periodically reviewed, last version adopted April 2021.</p>
<p>D: Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: Please give details: Supplier statement about ETI code acceptance (e.g. Omladinska zadruga Arijlje date of signature 04.02.2022.; Ari Fruct date of signature 03.03.2022., Frigo Junior date of signature 02.03.2022.</p>

Other findings

Other Findings Outside the Scope of the Code
None.

Community Benefits <i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
Company is very active in local community project. During Covid pandemic company donated central system for oxygen distribution in local hospital Pozega (observed Thanks-note from the Hospital of Pozega dated January 2021).

Appendix 1

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

Not Applicable please x

Photo Form

<p>General view</p>	<p>General view-production area</p>	<p>General view-administration</p>
<p>Communication board</p>	<p>Posted Eti Base Code</p>	<p>Suggestion box</p>
<p>Disinfection point</p>	<p>Exit in production area</p>	<p>Instruction for proper usage of PPE</p>
<p>Production area</p>	<p>Production area</p>	<p>Production area</p>

<p>Production area</p>	<p>Production area</p>	<p>Production area</p>
<p>Production area-metal detector</p>	<p>Production area-cold chamber</p>	<p>Production area-cold chamber</p>
<p>Storage of packing material</p>	<p>First aid box</p>	<p>Evacuation plan</p>
<p>Assembly point</p>	<p>Fire extinguisher in production</p>	<p>Fire alarm in production area</p>

<p>Fire alarm central station</p>	<p>Emergency exit</p>	<p>Wardrobe</p>
<p>Ladies toilet</p>	<p>Men's toilet</p>	<p>Canteen</p>
<p>Chemical storage I</p>	<p>Waste segregation in production area</p>	<p>Non-dangerous waste storage</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:](#)

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

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

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

[Click here for Auditors:](#)

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