



# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC1022181	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS176840933	
Business name (Company name):	Excel Nobleza SAPI de CV			
Site name:	EXCEL NOBLEZA			
Site address:	CARRETERA FEDERAL PUEBLA TEHUACAN KM 101 Tehuacan 75800 MX	Country:	MX	
Site contact and job title:	José Angel Govela / Printing Outsourcing Manager Building 3			
Site phone:	2383837433	Site e-mail:	Pedro.Garcia@excelnobleza.com.mx	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2024-06-14			

Audit Company Name:
UL Responsible Sourcing

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

## Audit Content:

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

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

### **2-Pillar SMETA Audit**

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

### **4-Pillar SMETA**

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

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

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

## SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Maria de Los Angeles Lopez Tlahuiz	APSCA Number:	21703261
Additional Auditors:	Luis Betanzos		21704269
Date of declaration:	2024-06-14		

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

Site Representation	
Full Name:	José Angel Goveia
Title:	Printing Outsourcing Manager Building 3
Date of declaration:	2024-06-14
<b>Comments:</b> <i>Any exceptions to this must be recorded here (e.g. different sample size):</i> <i>Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).</i> <i>The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i>	
In order to give priority in the sampling to the internal workers of the plant, it was decided to select only 2 from the canteen contractor and 2 from the inks contractor.	



## Summary of Findings

Issue <small>(please click on the issue title to go direct to the appropriate audit results by clause)</small>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>0A - Universal rights covering UNGP</u>			0	0	0	
<u>0B - Management systems and code implementation</u>			0	0	0	
<u>1 - Freely chosen employment</u>			0	0	0	
<u>2 - Freedom of association and right to collective bargaining are respected</u>	2.2		1	0	0	NC - ZAF600496876
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1	§1 §10 §11 §12 §2 §3 §4 §5 §6 §7 §8 §9	14	1	0	NC - ZAF600496878 NC - ZAF600496879 NC - ZAF600496880 NC - ZAF600496881 NC - ZAF600496882 NC - ZAF600496883 NC - ZAF600496884 NC - ZAF600496885 NC - ZAF600496886 NC - ZAF600496889 NC - ZAF600496890 NC - ZAF600496896 NC - ZAF600496898 NC - ZAF600496899 Obs - ZAF600496894
<u>4 - Child labour shall not be used</u>	4.3		1	0	0	NC - ZAF600496887
<u>5 - Living wages are paid</u>	5.1		1	0	0	NC - ZAF600496900
<u>6 - Working hours are not excessive</u>	6.1 6.3 6.4	§13	3	0	0	NC - ZAF600496877 NC - ZAF600496892 NC - ZAF600496895
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>	8.1 8.1 8.7	§14 §15 §16	3	0	0	NC - ZAF600496891 NC - ZAF600496893 NC - ZAF600496897
<u>8A - Subcontracting and homeworking</u>			0	0	0	
<u>9 - No harsh or inhumane treatment is allowed</u>			0	0	0	
<u>10A - Entitlement to work and immigration</u>			0	0	0	
<u>10B2 - Environment 2-pillar</u>			0	0	0	
<u>10B4 - Environment 4-pillar</u>	10.B4.2	§17	1	0	0	NC - ZAF600496888
<u>10C - Business ethics 4-pillar</u>			0	0	0	

## Local Law Issues

Issue	Description
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§1	NOM-002-STPS-2010, Art. 5.10 Obligations of the employer: Equip, in the areas of the workplace classified as ordinary fire risk, detection methods and anti-fire equipment, and in the areas with high fire risk, fixed systems of protection against fires and fire alarms. NOM-002-STPS-2010, Art. 5.10 Obligaciones del patrón: Contar en las áreas de los centros de trabajo clasificadas con riesgo de incendio ordinario, con medios de detección y equipos contra incendio, y en las de riesgo de incendio alto, además de lo anteriormente señalado, con sistemas fijos de protección contra incendio y alarmas de incendio, para atender la posible dimensión de la emergencia de incendio, mismos que deberán ser acordes con la clase de fuego que pueda presentarse.
§2	NOM-025-STPS-2008, Art. 5.2 Obligations of the employer: Have the lighting levels in work areas or tasks in accordance with Table 1 of Chapter 7. Contar con los niveles de iluminación en las áreas de trabajo o en las tareas visuales de acuerdo con la Tabla 1 del Capítulo 7.
§3	NOM-017-STPS-2008, Sec. 5.2 Employer is obligated to identify and analyze the risks of work to which workers are exposed to in each area of work and workplace. This information should be recorded and kept updated until tools and processes are modified. NOM-004-STPS-2020, Art. 5.2 Obligations of the employer: To establish a study to analyze the potential risk generated by the machinery and equipment, in which an inventory must be made of all the factors and dangerous conditions that affect the health of the worker. NOM-017-STPS-2008, Sec. 5.2 Obligaciones del patrón: Identificar y analizar los riesgos de trabajo a los que están expuestos los trabajadores por cada puesto de trabajo y área del centro laboral. Esta información debe registrarse y conservarse actualizada mientras no se modifiquen los implementos y procesos de trabajo. NOM-004-STPS-2020, Art. 5.2 Obligaciones del patrón: Analizar y estimar el riesgo potencial generado por la maquinaria y equipo que se use en el centro de trabajo, de conformidad con lo establecido en el Capítulo 7 de la presente Norma, que contemple: b) Un nuevo análisis de riesgos potenciales, para las nuevas condiciones, cuando la maquinaria y equipo sea cambiada de ubicación, sufra una alteración, se incluya un nuevo elemento o se cambie la energía de alimentación.
§4	NOM-025-STPS-2008, Art. 5.11 Obligations of the employer: To install systems of electrical emergency illumination, in those areas of the workplace where there is a risk presented by the interruption of the source of light. NOM-025-STPS-2008, Art. 5.11 Obligaciones del patrón: Instalar sistemas de iluminación eléctrica de emergencia, en aquellas áreas del centro de trabajo donde la interrupción de la fuente de luz artificial represente un riesgo en la tarea visual del puesto de trabajo.
§5	NOM-017-STPS-2008, Art. 5.7 Verify that during the workday employees utilize PPE, in accordance with provided training. NOM-017-STPS-2008, Art. 5.7 Supervisar que durante la jornada de trabajo, los trabajadores utilicen el equipo de protección personal proporcionado, con base a la capacitación y adiestramiento proporcionados previamente.

§6	NOM-001-SEDE-2012, Art. 110-26 Around all electrical equipment space for the access and work must be maintained, enough to allow fast operation and maintenance of such equipment. NOM-029-STPS-2011, Art. 10.2 (a) In places where contact with electrical equipment, or the proximity of such equipment, can pose a danger to workers, there must be placed safety warnings conforming with NOM-026-STPS-1998. Federal Regulation on Health and Safety in the Workplace (2014), Art. 18 (XII) Related to the buildings, premises, facilities and areas of the work center, these being permanent or temporary, the employer shall: XII. Maintain in order and cleanliness in the work area, external halls to the buildings, parking lots and other common areas of the work center. NOM-017-STPS-2008, Art. 5.7 Supervisar que durante la jornada de trabajo, los trabajadores utilicen el equipo de protección personal proporcionado, con base a la capacitación y adiestramiento proporcionados previamente. NOM-001-SEDE-2012, Art. 110-26 Alrededor de todo equipo eléctrico debe existir y mantenerse un espacio de acceso y de trabajo suficiente que permita el funcionamiento y el mantenimiento rápido y seguro de dicho equipo. Reglamento Federal de Seguridad y Salud en el Trabajo 2014, Art. 18 (XII) En relación con los edificios, locales, instalaciones y áreas en los Centros de Trabajo, ya sean temporales o permanentes, los patrones deberán: Mantener con orden y limpieza permanentes las áreas de trabajo y los pasillos exteriores a los edificios, estacionamientos y otras áreas comunes del Centro de Trabajo.
§7	NOM-029-STPS-2011, Art. 9.3 j) The grounding system of the entire electrical installation is subject to the ground resistance and continuity test, at least once a year, and its values are recorded. NOM-029-STPS-2011, Art. 9.3 j) Se someta el sistema de puesta a tierra de toda la instalación eléctrica a la prueba de resistencia a tierra y de continuidad, al menos una vez por año, y se registren sus valores.
§8	Federal Regulation on Health and Safety in the Workplace (2014), Art. 18 (XI) Hygienic places should be available for consumption of food. Reglamento Federal de Seguridad y Salud en el Trabajo 2014, Art. 18 (XI) Tener lugares higiénicos para el consumo de alimentos, en su caso.
§9	Federal Regulation on Health and Safety in the Workplace 2014, Art. 7 (IX) Order the application of medical exams to the workers occupationally exposed, required by the present regulation and its norms. Reglamento Federal de Seguridad y Salud en el Trabajo 2014, Art. 7 (IX) Ordenar la aplicación de exámenes médicos al Personal Ocupacionalmente Expuesto, requeridos por el presente Reglamento y las Normas.
§10	NOM-002-STPS-2010, Art. 5.8 Obligations of the employer: Compose an annual theoretical-practical training program focusing on fire prevention and emergency attention, conforming with that laid out in Chapter 11 of this norm, in order to train employees and the members of anti-fire brigades based on said program. NOM-002-STPS-2010, Art. 5.8 Obligaciones del patrón: Elaborar un programa de capacitación anual teórico-práctico en materia de prevención de incendios y atención de emergencias, conforme a lo previsto en el Capítulo 11 de esta Norma, así como capacitar a los trabajadores y a los integrantes de las brigadas contra incendio, con base en dicho programa.
§11	NOM-005-STPS-1998, Art. 10.1 In the work areas where flammable or combustible substances are handled, transported, or stored, the walls, floors, ceiling, and foundation must be made of fire resistant materials. NOM-005-STPS-1998, Art. 10.1 En las áreas del centro de trabajo donde se manejen, transporten o almacenen estas sustancias, las paredes, pisos, techos, instalaciones y cimentaciones deben ser de materiales resistentes al fuego.
§12	NOM-002-STPS-2010, Art. 7.17 Install extinguishers in the work centers in accordance with the following: Mount them no higher than 1.5 meters from the floor to the highest part of the extinguisher. NOM-002-STPS-2010, Art. 7.17 Instalar extintores en las áreas del centro de trabajo, de acuerdo con lo siguiente: Colocarlos a una altura no mayor de 1.50 m, medidos desde el nivel del piso hasta la parte más alta del extintor.

§13	Federal Labor Law 2023, Art. 73 Workers are not required to work on rest days. If this disposition is broken, the employer, in addition to the salary owed for the rest day, must, independent from their base salary, pay them double for their work. Ley Federal del Trabajo 2023, Art. 73 Los trabajadores no están obligados a prestar servicios en sus días de descanso. Si se quebranta esta disposición, el patrón pagará al trabajador, independientemente del salario que le corresponda por el descanso, un salario doble por el servicio prestado.
§14	Federal Labor Law 2023, Art. 424 In the formation of the regulation, the following norms will be observed: I. It will be formulated by a commission of mixed representation, with both workers and the employer. Ley Federal del Trabajo 2023, Art. 424 En la formación del reglamento se observarán las normas siguientes: I. Se formulará por una comisión mixta de representantes de los trabajadores y del patrón.
§15	Federal Labor Law 2023, Art. 24 Work conditions must be recorded in writing when there is no applicable collective contract. At least two (2) copies will be made, of which one will remain for each party. Ley Federal del Trabajo 2023, Art. 24 Las condiciones de trabajo deben hacerse constar por escrito cuando no existan contratos colectivos aplicables. Se harán dos ejemplares, por lo menos, de los cuales quedará uno en poder de cada parte.
§16	Federal Labor Law 2023, Art. 68 Workers are not required to provide their services for any time greater than that stated in this chapter. Ley Federal del Trabajo 2023, Art. 68 Los trabajadores no están obligados a prestar sus servicios por un tiempo mayor del permitido de este capítulo.
§17	Regulations of the Law for the Protection of the Natural Environment and Sustainable Development State of Puebla in Matters of Environmental Impact and Risk Assessment, Art. 5 Those who intend to execute any of the works or activities indicated in article 38 of the Law, as well such as those indicated below, must have, prior to their execution, authorization regarding environmental impact and, where applicable, environmental risk: IV. Construction or expansion of industrial buildings. Reglamento de la Ley para la Protección del Medio Ambiente Natural y el Desarrollo Sostenible del Estado de Puebla en Materia de Evaluación de Impacto y Riesgo Ambiental, art. 5 Quienes se propongan ejecutar cualquiera de las obras o actividades señaladas en el artículo 38 de la Ley, así como las que a continuación se indican, deberán contar, previamente a su ejecución, con autorización en materia de impacto ambiental y, en su caso, de riesgo ambiental: IV. Construcción o ampliación de naves industriales.

## Site Details

Site Details		
Company Name	Excel Nobleza SAPI de CV	
Site Name	EXCEL NOBLEZA	
GPS location (if available)	GPS Address:	Carretera PueblaTehuacán Km 101, Tepanco de López, Puebla, Mexico.
	Coordinates:	Latitude: 18° 32'5.3" Longitude: 97° 32'23.6"
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business license # MTL/DES/2024; Hazardous waste register: NRA ENO6E2115611; Environmental license: LF-054/2022	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Plastic film, non-woven tissue, polybags, baby food sachets and caps.	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The site is located at Carretera Federal Puebla-Tehuacan Km 101 s/n Tepanco de López, Puebla, Mexico, with one building one storey for security booth. All the buildings (eight dedicated to production) are made of concrete, metal structure, roofs made of acrylic and tin sheets. The client products are manufactured in the building # 3 non-woven printing.	



Structure and number of buildings	Building Name:		Building # 3	
	Floor	Description	Remark	
	1	Raw material storage area, printing, cutting, inspection, packaging, storage and shipping	There are other eight production buildings, but none of them is used for manufacturing the client products.	
	Building Name:		Building # 1	
	Floor	Description	Remark	
	1	Printing, laminating, plastic bags, engraving.	Mezzanine for administrative offices.	
	Building Name:		Building #2	
	Floor	Description	Remark	
	1	Lathe workshop, packaging, laminated, finished product warehouse, chemical room.	Mezzanine for administrative offices	
	Building Name:		Building # 4	
	Floor	Description	Remark	
	1	Extrusion, laminated.	Mezzanine for administrative offices.	
	Building Name:		Building # 5	
	Floor	Description	Remark	
	1	Raw materials warehouse.	None.	
	Building Name:		Building # 6	
	Floor	Description	Remark	
	1	Chemical warehouse.	None.	
	Building Name:		Building # 7	
	Floor	Description	Remark	
	1	Printing, refining, washing, inks rooms.	None.	
	Building Name:		Building # 8	
	Floor	Description	Remark	
	1	Special printing.	This building is not operating.	

	Building Name:		Building # 9 (and 10)	
	Floor	Description	Remark	
	1	Baby food pouches, and a new area for finished product warehouse	A warehouse for finished products was built at the back, but without physical division between the workfloor and the warehouse.	
	Building Name:		Solvent recuperation and general services	
	Floor	Description	Remark	
	1	At the fornth there is a solvent recuperation area, and at the back rooms for gadeners materials and tools.	None	
	Building Name:		hazardous waste storage	
	Floor	Description	Remark	
	1	hazardous waste storage building	None	
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The buildings seemed to be in good conditions, not observed cracks or structural damage.			
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: A structural assessment was elaborated by an entity named "Ingeniero Arquitecto Marco Antonio Díaz S", on March 5th, 2023, declaring the buildings are in good conditions.			
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor			
Months of peak season	Select a month to Select a month			
Process overview	Production processes are:For film and non-woven tissue processes: raw material reception, ink preparation, printing, rolling, cutting, quality inspection, storage and shipping. For baby food sachets: raw materials reception, inspection, mixing, injection, assembly, inspection, packaging, storage and shipping.			
What form of worker representation is there on site?	<input checked="" type="checkbox"/> Union <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None			

Please give details:	An internal union has been established.
Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A There are no dormitories on/off site.

Audit Parameters			
Time in and time out	Day 1		
	In	08:40	
	Out	16:00	
Audit type:	PARTIAL_FOLLOW_UP		
Was the audit announced?	ANNOUNCED		
Who signed and agreed CAPR	José Angel Goveia / Printing Outsourcing Manager Building 3		
Is further information available	No		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	No	No
B: Present at the audit?	Yes	No	Yes
C: Present at the closing meeting?	Yes	No	Yes
<i>Reason for absence at the opening meeting</i>	No worker representative. The union representative was on duty during the opening meeting, joining to the assessment one hour later.		
<i>Reason for absence during the audit</i>	No worker representative.		
<i>Reason for absence at the closing meeting</i>	No worker representative.		



## 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	572	0	10	0	0	0	0	582
Worker numbers – female	154	0	17	0	0	0	0	171
Total	726	0	27	0	0	0	0	753
Number of Workers interviewed – male	3	0	2	0	0	0	0	5
Number of Workers interviewed – female	3	0	2	0	0	0	0	5
Total – interviewed sample size	6	0	4	0	0	0	0	10

Nationalities Structure		
Nationality of Management	Mexican	
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Mexican	approx %: 100%
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A. No peak or non-peak season.	
Worker remuneration	Workers on piece rate:	0%
	Paid hourly:	100%
	Salaried:	0%
Payment cycle	Paid daily:	0%
	Paid weekly:	100%
	Paid monthly:	0%
	Other:	0%
	Details for other:	N/A

Worker Interview Summary			
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Number of group interviews:	One group of 4 workers.		
Number of individual interviews:	Male:	3	Female: 3
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:		
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
In general, what was the attitude of the workers towards their workplace?	<input type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input checked="" type="checkbox"/> Indifferent		
What was the most common worker complaint?	On this occasion, no consistent complaint was detected among the interviewees.		
What did the workers like the most about working at this site?	Workers like the fact that payment is always on time.		
Any additional comment(s) regarding interviews:	None		
Attitude of workers to hours worked:	The attitude of the workers is positive. Workers comment that, since the last audit, the company has reduced the number of overtime hours.		
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:		

Attitude of workers:

Mostly positive: The workers agreed to participate in the audit and to be interviewed. During the interviews they described how their work has been, hours worked and wages paid. In general they were indifferent, highlighting that payments are on time and there is less overtime nowadays. Negative: N/A

Attitude of worker's committee/union reps:

Mostly positive: The union representative agreed to participate in the interviews and described the entire representative election process. He also commented that there is a good relationship with company management and that they explained to him what being a union representative entails. Negative: N/A

Attitude of managers:

Mostly positive: Management was cooperative during the audit and willing to improve the current working conditions. Negative: N/A

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

**0A: Compliance Requirements**

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

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

The site has established policies on harassment, discrimination, forced labour, child labour, freedom of association, and human rights.

The terms and conditions for employees are stated in the employee handbook and internal regulations. There is a HR manager, and he is in charge of the ETI code implementation.

**Evidence examined:**

- Management interview
- Employee interviews
- Personnel files reviewed
- Site policies and procedures
- Human rights policy.
- Training records.

**Any other comments:**

This is a partial follow-up audit. There were no findings in this section of the previous audit, therefore this section is not applicable to this audit.

Policy statement that expresses commitment to respect human rights?

☒ Yes ☐ No

Please give details:

The top management elaborated a policy on human rights and its commitment to respect them.

Are the policies included in workers' manuals?

☒ Yes ☐ No

Please give details:

The site included the policy into the employees' handbook, and information is provided at the time of hiring.

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

☒ Yes ☐ No

Please give details:

The HR Manager Mr. Pedro García.



Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There are mailboxes located in all the production buildings.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Employees' personal information is kept by the HR department, and only heads of the payroll and HR can access the information. Employees also can access it.
<b>Measuring Workplace Impact</b>	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year                      4.7% This year                        3.5%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	3.5%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year                      1.0% This year                        1.0%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	1.0%
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There is a medical service department which is in charge of registering the accidents in a logbook.
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year                      2.43% This year                        0.0%

Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%	
Lost day work cases per 100 workers(((Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year	16.8%
	This year	0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

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

**0B: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

There is an ethic code of conduct established at the site, which is communicated to the workers. There is a Human Resource responsible for providing training to all their employees in topics related to H&S, ethic code, and environment once a year and at the time of hiring new personnel. In addition, the suppliers also are required to provide training to their employees regarding the site code and other customers' code of conduct which are also published on a noticeboard at the entrance of the production floor and at the entrance of the site.

**Evidence examined:**

-Employee interview  
-Personal files reviewed  
-Site policies and procedures

**Any other comments:**

This is a partial follow-up audit. There were no findings in this section of the previous audit, therefore this section is not applicable to this audit.

**Management Systems**

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

☐ Yes ☒ No

Please give details:

The auditor searched into government official sites and no instances of fines were found.

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

☒ Yes ☐ No

Please give details:

The site has a policy of non-discrimination in the selection process and to be employed according to job profiles. It was also noted that the applicants are required to present official identifications to work in the factory and once verified, are returned.

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

-Employee interview  
-Personal files reviewed  
-Site policies and procedures

Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Training is provided at the time of hiring.
If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Training records were provided; most recent was granted on February 16th, 2024.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: IFor building (where the client products are manufactured) ISO 45001:2018 issued by EQA valid until May 13, 2026.
Is there a Human Resources manager/department?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The HR Manager is Mr. Pedro García.
Is there a senior person /manager responsible for implementation of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The HR Manager Mr. Pedro García, and Mr. Otoniel Olivares/Coordinator of the Management System and Safety.
Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: As per the Mexican law, all workers are notified by a written statement on personal data privacy.
Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Information is kept in a secure area at the HR department
Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The site conducts annual internal audits.
Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Once the audit is conducted, a remediation plan is established.
Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The site developed its own Ethical code which their own suppliers must follow; the ETI code is also adopted by the site.
Land Rights	

Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory has an updated business license, use of land permit.
Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The Corporate Headquarter oversees the legal process for the land acquisitions.
Does the site have a written policy and procedures specific to land rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has all documents in accordance to the local law requirements.
Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory has the official title deed, which validates that the property was acquired in a legal way.
Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has an updated land property document.
Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The management presented the legal documents for land use and property.



## 1 - Freely chosen Employment [Summary of Findings]

### 1: Compliance Requirements

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

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

### Current Systems and Evidence Examined

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

#### Current Systems:

The facility has a policy regarding no use of forced labour, which is presented to the employees at the time of hiring, and on private interviews, all the interviewees (39 direct employees, one canteen employee, and two employees from the ink providers) mentioned they can resign at any time, keeping their personal documents presenting only copies of ID, birth certificate, proof of address, taxpayer register, and social security number. Exits are not locked, and employees are free to leave at the end of their working shift. There is no retention of original of identification documents and no deposits are left with management.

#### Evidence examined:

Employee interviews  
Employee files  
Company Code of Conduct regarding Freely Chosen Employment

#### Any other comments:

This is a partial follow-up audit. There were no findings in this section of the previous audit, therefore this section is not applicable to this audit.

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: It was observed on employees' files that two of them resigned years ago, and were re-hired.
If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details: N/A

Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Interviewed idrect employees and contractors' employees stated they can leave the site once their shifts ends.
Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: The management is aware of these issues, and shared the ETI code with thir suppliers.
Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Internal audits started to be applied last year in order to ensure the site follows the ETI code.

## 2 - Freedom of Association and Right to Collective Bargaining are Respected

### [Summary of Findings]

#### 2: Compliance Requirements

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

### Current Systems and Evidence Examined

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

#### Current Systems:

-The facility has a freedom of association policy, which states that workers are free to associate, also that will be no reprisals to the representatives and that the facility will facilitate installation for their meetings.

-During the documentation review it was noted that on May 27, 2024, ballots were cast for the election of the union representative. The company submitted various documents, from the invitation to nominate, to evidence of the voting day, ballots and the results that have already been published in common areas of the site.

#### Evidence examined:

Employees' interviews.  
Management interviews  
Call for nominations. Email dated April 15, 2024. Sample ballot.  
List of workers eligible to vote.  
Voting on May 27, 2024  
Vote counting meeting. May 27, 2024. Results of May 27, 2024.  
Appointment meeting on June 3, 2024.

#### Any other comments:

None.

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input checked="" type="checkbox"/> Union <input type="checkbox"/> Other	<input type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	It is an internal union named "Excel", and integrated by a committee, with one leader.	
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Mailboxes located in all production buildings.	
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The internal union can carry out activities at site.
Name of union and union representative, if applicable:	It is an internal union named "Excel". Carlos Hernández is the union representative.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	During the documentation review it was noted that on May 27, 2024, ballots were cast for the election of the union representative. The company submitted various documents, from the invitation to nominate, to evidence of the voting day, ballots and the results that have already been published in common areas of the site.
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Workers recognized during interviews who their representative is.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2024-05-27
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Employees' interviews. Management interviews Call for nominations. Email dated April 15, 2024. Sample ballot. List of workers eligible to vote. Voting on May 27, 2024 Vote counting meeting. May 27, 2024. Results of May 27, 2024. Appointment meeting on June 3, 2024.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Non-Compliance		Evidence																																		
<a href="#">[Back to findings summary]</a>																																				
<table><thead><tr><th colspan="2">Non-Compliance</th></tr></thead><tbody><tr><td>Status</td><td>CLOSED</td></tr><tr><td>Reference</td><td>ZAF600496876</td></tr><tr><td>Clause</td><td>2 - Freedom of Association and Right to Collective Bargaining are Respected</td></tr><tr><td>Issue Title</td><td>134 - Unions are not in compliance with the national / local laws including their formation, operation, registration, recruitment of members, collection of fees, etc.</td></tr><tr><td>Subcategory</td><td>Trade Union</td></tr><tr><td>New or carried over?</td><td><input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over</td></tr><tr><td>Raised by audit</td><td>ZAA422333558</td></tr><tr><td>Resolved by audit</td><td>ZAA600069292</td></tr><tr><td>Root cause</td><td><input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td>N/A</td></tr><tr><td>ETI code</td><td>2.2 - The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</td></tr><tr><td>Explanation to the non compliance</td><td>During document review, the management presented a document in which is written that one production worker offered to be the union representative; no elections have taken place yet. The management said this was a temporary action until elections are called. This is not in compliance with the law.n supervisor who was elected eight years ago. There is a union at the site; however, there have not been elections to choose the representatives as required by the law. Existe un sindicato en el sitio, sin embargo, no ha habido elecciones para elegir a sus representantes, como lo indica la ley.</td></tr><tr><td>Follow up method</td><td><input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit</td></tr><tr><td>Timescale</td><td><input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input checked="" type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other</td></tr><tr><td>Actions</td><td>Ensure the employees are informed about their union, their representatives election process.</td></tr><tr><td>Additional</td><td>Se elige al nuevo representante, se dejan evidencias</td></tr></tbody></table>		Non-Compliance		Status	CLOSED	Reference	ZAF600496876	Clause	2 - Freedom of Association and Right to Collective Bargaining are Respected	Issue Title	134 - Unions are not in compliance with the national / local laws including their formation, operation, registration, recruitment of members, collection of fees, etc.	Subcategory	Trade Union	New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	Raised by audit	ZAA422333558	Resolved by audit	ZAA600069292	Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	Root cause - Other	N/A	ETI code	2.2 - The employer adopts an open attitude towards the activities of trade unions and their organisational activities.	Explanation to the non compliance	During document review, the management presented a document in which is written that one production worker offered to be the union representative; no elections have taken place yet. The management said this was a temporary action until elections are called. This is not in compliance with the law.n supervisor who was elected eight years ago. There is a union at the site; however, there have not been elections to choose the representatives as required by the law. Existe un sindicato en el sitio, sin embargo, no ha habido elecciones para elegir a sus representantes, como lo indica la ley.	Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input checked="" type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	Actions	Ensure the employees are informed about their union, their representatives election process.	Additional	Se elige al nuevo representante, se dejan evidencias	
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comments	<p>de selección y reuniones</p> <p>An internal union is in the site; however, only 100 employees voted for it in May 2023. In the interviews, five employees (out of 39 direct employees interviewed) of the company, stated that they had voted and knew the name of their union representative; the remaining 34 mentioned not having voted since they were working another shift, not knowing who their representative is.</p> <p>Hay un sindicato interno en la empresa, y solo 100 empleados votaron por el mismo. En las entrevistas, de 39 empleados directos de la empresa, solo 5 manifestaron haber votado y conocer el nombre de su representante sindical; los restantes 34 mencionaron no haber votado ya que estaban trabajando en otro turno, y no saben quién es su representante.</p> <p>An internal union is in the site; however, only 100 employees voted for it. In the interviews, five out of 39 direct employees of the company, stated that they had voted and knew the name of their union representative; the remaining 34 mentioned not having voted since they were working another shift, not knowing who their representative is.</p> <p>Hay un sindicato interno en la empresa, y solo 100 empleados votaron por el mismo. En las entrevistas, de 39 empleados directos de la empresa, solo 5 manifestaron haber votado y conocer el nombre de su representante sindical; los restantes 34 mencionaron no haber votado ya que estaban trabajando en otro turno, y no saben quién es su representante.</p> <p>Only 100 employees participate in the election process; there are 438 employees at the site. During the documentation review it was noted that on May 27, 2024, ballots were cast for the election of the union representative. The company submitted various documents, from the invitation to nominate, to evidence of the voting day, ballots and the results that have already been published in common areas of the site.</p> <p>/Durante la revisión documental se notó que el 27 de mayo de 2024 se realizaron las votaciones para la elección del representante sindical. La compañía presentó diversos documentos, desde la invitación a postulación, hasta evidencia del día de las votaciones, boletas y los resultados que ya han sido publicados en áreas comunes del sitio.</p> <p>During the documentation review it was noted that on May 27, 2024, ballots were cast for the election of the union representative. The company submitted various documents, from the invitation to nominate, to evidence of the voting day, ballots and the results that have already been published in common areas of the site. /Durante la revisión documental se notó que el 27 de mayo de 2024 se realizaron las votaciones para la elección del representante sindical. La compañía presentó diversos documentos, desde la invitación a postulación, hasta evidencia del día de las votaciones, boletas y los resultados que ya han sido publicados en áreas comunes del sitio.</p>	
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### 3 - Working Conditions are Safe and Hygienic [Summary of Findings]

#### 3: Compliance Requirements

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

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

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

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

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

### Current Systems and Evidence Examined

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

#### Current Systems:

There is a H&S responsible for the whole site, and a responsible at building # 3 where production items are made for the client. A documented H&S policy was presented to the auditor. The site has the following assessments for each production building: machinery risk, PPE, noise, illumination, occupational health, fire prevention, approval for emergency firefighting plan, records for monthly inspections of extinguishers and fire hoses system, psychosocial risk, hearing conservation program, LOTO procedure and permits, skill certificates for under pressure vessels operators and electricians, H&S verification tours' records, among others. In addition, a sick bay with medical attention is provided to all workers.

During the Follow up audit tour (June 14, 2024) it was observed that the electrical power room was cleared of all obstacles, and the whole working area were observed organized, employees using their PPE; there is no more chemical room in building 9, and the area is used now for maintenance activity.

The site has established a plan to install the anti-fire fixed system in the whole site by May 2025, since it is a significant investment; a quotation issued by an entity named "TITE" was presented as well as a purchase order for the services of "TITE" to install the system. Water tanks are installed.

The firefighting team (18 employees) received training on March 19th, 2024.

An illumination assessment for building #9 was conducted by a credited entity named "Seguridad e higiene industrial y PC" on April 19th, 2024, displaying the building meets the light levels set by the law.

An electrical grounding assessment was elaborated by an entity named "PROSMET" on March 4th, 2024, for buildings # 2, #7 (there is no production process for the client in these buildings) showing the areas are in compliance with the law.

The HSE department updated the PPE assessment for building #1, as well as the machinery and equipment risk assessment for buildings # 2 and # 9 (no production process are in place in these buildings).

Medical exams were conducted for 199 employees (spirometry) and 209 hearing tests, as per the job risks they are exposed to. The medical department has established an annual plan for these exams, and communicating the calendar and employees to be subject for such exams. An external credited laboratory named "El Chopo" conducted the exams.

Employees received a refreshment training regarding the use of PPE while working; only one accident happened in April 2024, due to an employee in building # 3 did not use his safety glove while using a cutter. The employee has been working at the site for one year.

#### Evidence examined:

- Health and safety policy
- Health and safety manual
- Training records and certificates
- Fire equipment maintenance records
- Fire drill record
- Assessments for illumination, noise level, electrical system, work environment pollutants, machinery and equipment risk, PPE, ergonomics, list for under pressure vessels and permits.
- Occupational health program, hearing preservation program, occupational medical exams.
- Chemical handling program and risk analysis.
- Chemical list and MSDS for each chemical.
- Safe operation machine training.
- LOTO and hazardous activities permits.
- Accident and incident reports.

Follow up assessment June 14, 2024.

- Medical exams.
- Annual plan for medical exams.
- Mails sent by the medical department to managers and employees for medical appointment.
- Quotation for anti-fire fixed system.
- Purchase order for anti-fire fixed system.
- Updated assessments for PPE, machinery and equipment risk.
- Electrical grounding and illumination assessments.
- Training records for firefighting team.

**Any other comments:**


None.

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is a H&S policy, please see non-compliances.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The employee handbook provides guidelines on H&S issues.
Are there any structural additions without required permits/inspections (e.g. floors added)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: A warehouse was built in the building # 9 (known as building #10) and the environmental impact assessment was rejected by the authority for the construction of the building before submitting the assessment.
Are visitors to the site informed on H&S and provided with personal protective equipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There is a billboard at the security booth providing safety instructions to visitors, and a small card with safety procedures are granted to visitors. No PPE was provided.
Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There is sick bay with a medicine doctor, who provide medical attention during the day shift; there are first aiders for the second and night shifts.

Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There is a doctor, and trained first aiders.
Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory provides free transport to the workers and the buses were observed in good condition and clean.
Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: N/A There are no living areas at the site.
Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The HR department has established a reduction on overtime hours, allowing enough time for resting between shifts.
Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Environment permits were present, as well as tests for discharged water, air emissions, and all hazardous waste is collected by an authorized entity.
Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The site only uses raw materials approved by the Health authority and its clients.

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	de 2022 muestra que las nueve naves están clasificadas con alto riesgo de incendio; por norma mexicana, los sitios bajo esta clasificación deben estar equipados con un sistema fijo contra incendio (rociadores, mangueras contra incendios); sin embargo, sólo las naves 2, 4, 6 y 3 (ésta última es en donde se manufacturan los productos del cliente) están equipados con una manguera conectada a una motobomba, los restantes seis no.			
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Actions	Ensure to install firefighting equipment in all the buildings in accordance to the fire risk. Asegurarse de instalar equipo contra incendio en todas las naves conforme al grado de riesgo.			





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	naves y áreas en el estudio.	
Additional comments	The facility has conducted the illumination assessment. La empresa ha efectuado el estudio de iluminación. The assessment was conducted on April 19th, 2024, by a third credited entity named "Seguridad e higiene industrial y PC", showing the building 9 meets the law requirements.	





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	associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	The PPE assessment for building #1 is not updated, since machinery was reallocated into this building during 2023. Also, the machinery and equipment risk assessment is not updated for buildings # 2 and # 9 (no production process are in place in these buildings). El estudio de EPP de la nave 1 no está actualizado, ya que se reubicó maquinaria en ésta nave durante el 2023. De igual forma, el estudio de riesgo de maquinaria y equipo no está actualizado para las naves 2 y 9 (no se llevan acabo procesos de producción para el cliente en estas naves)	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Ensure to update the assessment in case of modifying the layout, installing and/or re-allocating machinery . Asegurarse de actualizar el estudio en caso de modificar la distribución, instalar/reubicar la maquinaria.	
Additional comments	The HSE department included into the PPE assessment for building #1the machinery reallocated during 2023 (core cutting machines). Also, the machinery and equipment risk assessment was updated for buildings # 2 and # 9 (no production process are in place in these buildings). Both were made in April 2024. No additional comments.	

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At building # 9, the eyewash/shower station was observed not connected to a water line, and there is a chemical storage room in the area; the management mentioned that the area is moving, and because of that the station was not in use. 1; no production processes for the client are in place in these buildings. La estación lavaojos del área de tintas de la nave 2 se encontró vacía. 2. La estación lavaojos de la nave 6 se encontró obstruida con pallets llenos de materia prima. 3. No había estación lavaojos en el área de almacén del taller de mantenimiento (parte trasera externa de la nave 3). Se colocó durante la auditoría. 4. 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	<p>área; la gerencia comenta que se está cambiando el proceso de producción a otra área, y por ese motivo se desconectó la estación. No se lleva a cabo ningún proceso de producción para el cliente en estas naves.</p>	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	<p>Ensure having functional eyewash/shower stations where chemicals are used/handled/stored.          Asegurarse de tener estaciones lavaojos/regaderas funcionales en las áreas en donde se usen/manejen/almacenen sustancias químicas.</p>	
Additional comments	<p>The eyewash staitons were observed functioning in all buildings.          Eyewash stations were tested during the facility tour in all buildings (two eye wash stations in each building at least). All were functional.</p>	


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Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other			
Actions	Ensure emergency lights are installed in accordance with the law. Asegurarse de que las lámparas de emergencia estén instaladas conforme a la norma.			
Additional comments	During factory tour it was observed that five emergency exit doors in building 9 were equipped with functional emergency lights; in building #7 three emergency exit doors were observed with emergency lights; all were free of obstruction. Emergency lights in all buildings were observed free of obstacles, and in buildings # 7 and # 9 were tested, working properly.			




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Timescale	Immediate      30 days      60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Ensure the employees use their PPE while working. Asegurarse de que los empleados usen su EPP mientras laboran.	
Additional comments	Site employees were observed using their PPE while working. Each building responsible is monitoring the use of PPE on workforce.	



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Explanation to the non compliance	In building # 5, the power room was observed used as a warehouse; a pile of carton boxes were placed in front of high voltage station, also paint buckets, ladders, and metallic parts. In addition, three electrical extension cords were observed connected from an outlet leading to the production area. The area was cleaned and organized during the assessment. One electrical panel box in the kitchen was observed open, not labeled and blocked with a refrigerator. The panel was closed during the assessment. En la nave #5 el cuarto de transformadores se usa como bodega; se observó un montón de cajas de cartón apiladas frente de una estación de alto voltaje, además de cubetas de pintura, escalares, y partes metálicas. Además de se observó la conexión de 3 extensiones eléctricas (una después de la otra). El área se limpió y ordenó durante la auditoría. En la cocina se encontró un panel eléctrico abierto, sin señalizar, y obstruido con un refrigerador. El panel se cerró durante la auditoría.
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit
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Actions	Ensure that all areas where electrical equipment is installed and operating meet the law; also, that all electrical panel boxes are identified as per the norm, and closed if not under maintenance. Asegurarse de que todas las áreas en donde haya equipo eléctrico instalado y funcionando, cumplan con los requerimientos de la norma; asegurarse de que los paneles eléctricos estén señalizados conforme a la norma, y cerrados en caso de que no estén en mantenimiento.
Additional comments	The power room has been cleared of objects; the electrical panel box in the kitchen was observed closed, and free of obstacles, with the voltage and warning signals posted. The power room was observed organized and clean; electrical panel box was released of obstacles, and labeled properly.

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Actions	Ensure the site meets the requirements of the norm. Asegurarse de que el sitio cumpla con los requerimientos de la norma.	
Additional comments	The site conducted a new assessment on March 3rd, 2024 by a credited entity named "PROSMET", showing the building meets the law requirements. No additional comment.	

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Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other																													
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Local law issue	Federal Regulation on Health and Safety in the Workplace 2014, Art. 7 (IX) Order the application of medical exams to the workers occupationally exposed, required by the present regulation and its norms. Reglamento Federal de Seguridad y Salud en el Trabajo 2014, Art. 7 (IX) Ordenar la aplicación de exámenes médicos al Personal Ocupacionalmente Expuesto, requeridos por el presente Reglamento y las Normas.																													
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Explanation to the non compliance	Occupational medical exams were not applied in 2022 for eight occupationally exposed employees (spirometry/audiometry). Also, during 2023 only 149 audiometry were applied while there are 241 employees who should go under this test, and 57 had their spirometry, and there are 93 employees who should have it. En 2022 no se aplicaron exámenes médicos ocupacionales a ocho empleados ocupacionalmente expuestos (espirometría/audiometría). Asimismo, durante 2023 solo se aplicaron 149 audiometrías mientras que hay																													



	241 empleados que deberían realizarse esta prueba, y 57 tuvieron su espirometría, y hay 93 empleados que deberían hacérsela.		
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit		
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Actions	Ensure to conduct the medical examinations as per the law. Asegurarse de efectuar los exámenes médicos conforme a la ley.		
Additional comments	Hearing and spirometry medica exams were applied in April 18-24th, 2024 for 202 and 199 employees respectively. The medical department has established two periods during the year for applying medical exams: July and December, and also notifies to the managers about the dates where the employees must attend the exams. The medical tests were conducted by a credited laboratory named "El Chopo".		

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Actions	Ensure granting training to the brigade members as per the norm. Asegurarse de capacitar a los brigadistas conforme a la norma	
Additional comments	Training to firefighting team was granted. Training to the firefighting brigade was granted on March 19th, 2024, to 18 members if the said brigade.	

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Actions	There is not enough room in the warehouse to store the tanks. No hay espacio suficiente en el almacén para resguardar los tanques Ensure all chemical containers are stored properly. Asegurarse de que todos los contenedores de sustancias químicas sean almacenados de manera	
Additional comments	Gas tanks are not anymore stored outside of the warheouse. A designated area outdoors has been set for the storage, and it is covered.	

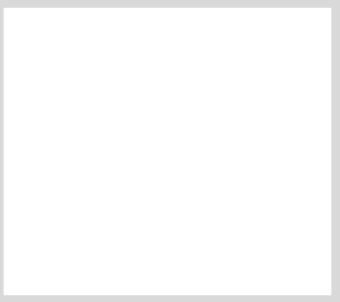
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Actions	The extinguisher was reallocated during the assessment within the height, during the assessment. Ensure the extinguishers are installed within the maximum height. El extintor se reubicó dentro de la altura máxima durante la auditoría. Asegurarse de que los extintores se encuentren dentro de la altura marcada por la norma.	
Additional comments	During the factory tour it was observed that extinguishers were installed within the maximum height set by law. No addiitonal comments.	



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	procedimientos de operación segura de maquinaria mientras laboran.
Additional comments	The HSE deparment is in charge of monitoring that during the workshift the employees use their PPE as well as service providers. During factory tour all employees were observed using their PPE, and postings regarding its use were observed.



#### 4 - Child Labour Shall Not Be Used [Summary of Findings]

##### 4: Compliance Requirements

4.1 There shall be no new recruitment of child labour.

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

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

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

#### Current Systems and Evidence Examined

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

##### Current Systems:

The facility has a policy for hiring people who are at least 18 years old and a policy on no use of child labour. The facility screens applicants and maintains proof of age documentation in their files to prevent and demonstrate that no child labour takes part at the facility. The youngest employee at the site is 19 years old. Each employee file includes age documentation, such as photocopied birth certificate and photocopied national identification card.

The facility has developed a child labor remediation policy, coded as RH-IT-01-10 issued on February 20th, 2024, providing training to suppliers and employees on April 26th, 2024.

The site has established an agreement with an NGO named "World Vision", distributing information regarding the no use of child labor in work centers.

Postings at the main accesses indicating minors are not allowed to enter into the premises were observed in the security booth, in the main access for employees and visitors.

No child was observed during the walkthrough or disclosed during the current audit.

##### Evidence examined:


Management interview  
Employees interviews  
Employee files  
Remediation Child Labour Policy  
Hiring policy  
Training record for supplier and employees on child labor.

##### Any other comments:

None

Legal age of employment:	15
Age of youngest worker found:	19
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:  N/A All direct employees and supplier's workers (ink and canteen) are above 18 years old, which is the legal age (without restrictions to work).



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Actions	Ensure that contractors/service suppliers do not hire or accompany them at the site with people under the age of 18 years old to conduct any sort of job in the premises. Asegurarse de que los contratistas/prestadores de servicios no contraten ni sean acompañados por personas menores de 18 años, a fin de efectuar cualquier trabajo dentro de las instalaciones.	
Additional comments	<p>The facility addressed the boy to a pshycological service which is provided by the site; also, the boy has returned to formal school, and his performance is also monitored by the site.</p> <p>The boy's father, owner of "Recicladora Mihuatlán" has attended a training session regarding child labor granted by the site on April 26th, 2024. In addition, the site established an agreement with an NGO named "World Vision" regarding child labor in workplaces.</p> <p>A child remediton policy coded RH-IT-01-10, issued on Feb 20th, 2024 has been established, security guards have received training on such policy, and postings outside of the facility indicates that children are not allowed to enter to the site.</p>	

## 5 - Living Wages are Paid [Summary of Findings]

### 5: Compliance Requirements

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

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

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

## Current Systems and Evidence Examined

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

### Current Systems:

All workers' wages are calculated by daily salary and paid every week via bank transfer. The management issued a pay slip to all workers where their name, job position, taxpayer number, unique population code number, payment date, daily salary, income, and deductions, among other information displayed.

Benefits include annual leave, maternity/paternity/sick leave, and social security. The site grants performance bonus and grocery bonus. All workers are enrolled into the Social Security Institute (IMSS). No illegal deductions were found.

Minimum wage at the facility was \$257.01 MXN per day which follows the minimum legal wage (\$248.93MXN per day).

Note: Since previous finding raised related to excessive working hours, company decided to establish a limit of 56 total working hours at site per week for intern workers, which needs to be followed by supervisors at the different production areas that are part of the company.

### Evidence examined:

-Time records (Sample of 10 workers from April 2024, May 2024 and June 2024)

-Pay slips (Sample of 10 workers from April 2024, May 2024 and June 2024)

-Worker interviews

-Management interview

### Any other comments:

None.


## Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: null	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 192.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 7.5 Per Week: 7.5 Per Month: 15.0	NO

Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 248.93 Per Week: null Per Month: null	Actual Per Day: 257.01 Per Week: 1799.07 Per Month: 7196.28	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 481.89 Per Week: 481.89 Per Month: 963.78	NO
<b>Wages Analysis:</b>			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	No peak or no peak season. 10 samples each month. Periods reviewed included April 2024, May 2024, and June 2024 (recent periods at site)		
Are there different legal minimum wage grades? If Yes, please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	Minimum wage at the facility was \$257.01 MXN per day which follows the minimum legal wage (\$248.93MXN per day).		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found: Site also pays punctuality bonus, assistance bonus, and production bonus. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	Deductions are made in conformance with the law, including social security, federal taxes, federal housing (for those who have such benefit).		
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Please list all deductions that have been made.	Social security, federal taxes, federal housing (for those who had such benefit).		
Please list all deductions that have not been made.	N/A All law deducitons have been made as per the law.		
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		



Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Time records reviewed reflect all time worked.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Once a year.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: On payroll and paylips the same job cateogry is paid with the same salary; on private interviews, employees mentioned not being subject to discriminatory practices.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

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Resolved by audit	ZAA600069292																																	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other																																	
Root cause - Other	The canteen owner is the one who register the times, and not aware about having accurate time records. El dueño del servicio de comedor no sabía acerca de mantener registros precisos de tiempo de sus empleados.																																	
ETI code	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.																																	
Explanation to the non compliance	The canteen employee weekly time records are not accurate because the same hour for entrance and exit appears (6:00 am, 2:00 pm) in for all days; in additon, not all the registers are signed by the employee. Hence, it is not feasible to verify if the employee's salary is paid accordingly. Los registros semanales de tiempo de la empleada del comedor no son exactos, ya que parece la misma hora de entrada y salida (6:00 am, 2:00 pm) todos los días. Además, no todos los registros están firmados por el empleado. Por lo tanto, no es factible verificar si el salario del empleado se paga adecuadamente.																																	
Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit																																	
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Actions	Ensure time records display in an accurate manner the time in/out for each employee. Asegurarse de																																	

	que los registros de tiempo sean precisos, y muestren la hora de entrada/salida correcta de los empleados	
Additional comments	<p>During the documentation review it was noted that the canteen contractor's time records for the months of April 2024, May 2024 and June 2024 contain the exact times workers clocked in and out, as well as the signatures of the workers themselves. / Durante la revisión documental se notó que los registros de tiempo del contratista del comedor de los meses de Abril 2024, Mayo 2024 y Junio 2024 contienen las horas exactas de entrada y salida de los trabajadores, así como la firma de los mismos trabajadores.</p> <p>During the documentation review it was noted that the canteen contractor's time records for the months of April 2024, May 2024 and June 2024 contain the exact times workers clocked in and out, as well as the signatures of the workers themselves. / Durante la revisión documental se notó que los registros de tiempo del contratista del comedor de los meses de Abril 2024, Mayo 2024 y Junio 2024 contienen las horas exactas de entrada y salida de los trabajadores, así como la firma de los mismos trabajadores.</p>	

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

### 6: Compliance Requirements

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

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

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

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

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

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

## Current Systems and Evidence Examined

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

### Current Systems:

The site has established three shifts of work Monday to Sunday, with a day of rest during the week, and overtime can be conducted during the work week and/or on Sunday. The HR Department is monitoring the working hours to advise the excess of working hours per week advising each building manager names of employees who are about to exceed the total worked hours.

Note: Since previous finding raised related to excessive working hours, company decided to establish a limit of 56 total working hours at site per week for intern workers, which needs to be followed by supervisors at the different production areas that are part of the company.

### Evidence examined:

-Time records (Sample of 10 workers from April 2024, May 2024 and June 2024)  
-Pay slips (Sample of 10 workers from April 2024, May 2024 and June 2024)  
-Worker interviews  
-Management interview

### Any other comments:

None.

## Working hours' analysis

### Systems & Processes

What timekeeping systems are used?	Face scan clock is used by the site employees to register their worked hours; suppliers' employees (canteen and ink) use handwritten registers.
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Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:
--	---

Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
---	---

Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days	<input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Maximum number of days worked without a day off (in sample):	6	
<b>Standard/Contracted Hours worked</b>		
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:	
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>Overtime Hours worked</b>		
Actual overtime hours worked in sample (State per day/week/month)	Maximum overtime hours found per week accounts for a total of 7.5.	
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Weekly hours are no more than 60 hours.	
Approximate percentage of total workers on highest overtime hours:	0.1%	
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: Workers commented during interviews that overtime is voluntary	
<b>Overtime premium</b>		
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A - there is no legal requirement to OT premium Please give details: By Mexican law 200% over hourly daily salary rate for the first 9 OT hours conducted during the same work week, and 300% over hourly daily salary rate for any hours above 9 OT hours conducted during the same work week.	
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 100% of employees whenever overtime applies.	

<p>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>	<div> <input type="checkbox"/> No         <input type="checkbox"/> Consolidated pay         <input type="checkbox"/> Collective Bargaining agreements       </div> <div> <input checked="" type="checkbox"/> Other       </div>
<p>Please give details</p>	<p>N/A. By Mexican law 200% over hourly daily salary rate for the first 9 OT hours conducted during the same work week, and 300% over hourly daily salary rate for any hours above 9 OT hours conducted during the same work week.</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. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)</p>	<div> <input checked="" type="checkbox"/> Overtime is voluntary         <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary         <input type="checkbox"/> Safeguards are in place to protect worker's health and safety       </div> <div> <input type="checkbox"/> Site can demonstrate exceptional circumstances         <input type="checkbox"/> Other reasons (please specify)       </div>
<p>Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other</p>	<p>Workers commented during interviews that overtime is voluntary.</p>
<p>Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<div> <input type="checkbox"/> Yes         <input checked="" type="checkbox"/> No       </div>
<p>If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?</p>	<div> <input checked="" type="checkbox"/> Yes         <input type="checkbox"/> No       </div>

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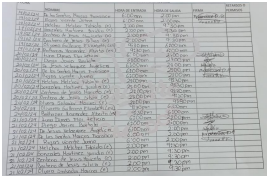
	<p>the sample) worked between 63.56 up to 71.25 hours per week during December 27th, 2023, and January 2nd, 2024. The employees are from buildings #2 and # 3 in both cases (client production process are performed in building # 3)</p> <p>En los registros de tiempo se observó que ocho (de 39 empleados directos de la muestra) trabajaron entre 60 hasta 86.50 horas semanales durante el 15 - 21 de marzo de 2023; cinco empleados (de 39 empleados directos de la muestra) trabajaron entre 63.56 y 71.25 horas semanales durante el 27 de diciembre de 2023 y el 2 de enero de 2024. Los empleados son de las naves 2 y 3 en ambos casos. (procesos de producción del cliente se efectúan en la nave 3)</p> <p>None</p> <p>It was noticed that employees worked in excess of 60 hours per week as following:</p> <p>For December 27th, 2023, to January 2nd, 2024:</p> <p>Employee A 48 regular hours + 15 OT hours = 63</p> <p>Employee B 48 regular hours + 23 OT hours = 71</p> <p>Employee C 48 regular hours + 23 OT hours = 71</p> <p>Employee D 48 regular hours + 15 OT hours = 63</p> <p>Employee E 48 regular hours + 15 OT hours = 63</p> <p>For March 15-21, 2023</p> <p>Employee F 48 regular hours + 23 OT hours = 71</p> <p>Employee G 48 regular hours + 22 OT hours = 70</p> <p>Employee H 48 regular hours + 38 OT hours = 86</p> <p>Employee I 48 regular hours + 23 OT hours = 71</p> <p>Employee J 48 regular hours + 23 OT hours = 71</p> <p>Employee K 48 regular hours + 38 OT hours = 86</p> <p>Employee L 48 regular hours + 15 OT hours = 63</p> <p>Employee M 48 regular hours + 14 OT hours = 62</p> <p>The Payroll responsible Mr. Genaro Méndez mentioned his department has established a monitoring system to identify those employees who are about to reach 12 hours of overtime, sending an email to the Production managers as a warning, in order to avoid the excess of hours, but there is not an enforcement for that.</p> <p>There is still an excess of hours worked per week as described above.</p> <p>During the documentation review of 6 of 6 internal company employees, it was noted that none exceeded 50 total hours of work in a week within the time periods of April 2024, May 2024 and June 2024, and the company showed documentary evidence of the follow-up they have given to each work area to avoid exceeding the total of 60 hours of work per week.</p> <p>/Durante la revisión documental de 6 de 6 trabajadores internos de la compañía se notó que ninguno rebasó de 50 horas total de trabajo en una semana dentro de los periodos de tiempo revisados de abril 2024, mayo 2024 y junio 2024. Además la compañía mostró evidencia documental del seguimiento que le han dado a cada área de trabajo para evitar que se rebase el total de 60 horas de trabajo a la semana.</p> <p>During the documentation review of 6 of 6 internal company employees, it was noted that none exceeded 50 total hours of work in a week within the time periods of April 2024, May 2024 and June 2024, and the company showed documentary evidence of</p>	
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Actions	Ensure employees are paid for working on their day of rest as per the law. Asegurarse de pagar a los empleados por el día de descanso trabajado conforme a la ley.	
Additional comments	<p>During the documentation review it was noted that 1 of 6 interns worked on a holiday, May 1, 2024. The payment made was double, which means that it is in compliance with the law. / Durante la revisión documental se notó que 1 de 6 trabajadores internos laboró en día feriado , 01 de mayo de 2024. El pago que se le hizo fue del doble lo cual significa que está en cumplimiento con la ley.</p> <p>During the documentation review it was noted that 1 of 6 interns worked on a holiday, May 1, 2024. The payment made was double, which means that it is in compliance with the law. / Durante la revisión documental se notó que 1 de 6 trabajadores internos laboró en día feriado , 01 de mayo de 2024. El pago que se le hizo fue del doble lo cual significa que está en cumplimiento con la ley.</p>	

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## 7 - No Discrimination is Practiced [Summary of Findings]

### 7: Compliance Requirements

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

### Current Systems and Evidence Examined

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

#### Current Systems:

The facility has posted its non-discrimination policy and communicated to the employees at the time of hiring, providing additional information on how to identify it and reporting it. Management interviewed stated that discrimination is not allowed. The site does not require female workers to do a pregnancy test to get the job. There is an internal grievance policy and procedure, and workers are aware of that. There was no evidence of any sort of harassment.

#### Evidence examined:

Facility tour  
Management interview  
Employees' interviews  
Non-discrimination Policy  
Hiring policies  
Leave applications  
Employees' files

#### Any other comments:

This is a partial follow-up audit. There were no findings in this section of the previous audit, therefore this section is not applicable to this audit.

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 81.0%Female: 19.0%		
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	There are seven male managers, three female managers, six male directors, 107 male and 50 female administrative employees, including supervisors.		
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring  <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation  <input type="checkbox"/> Termination or retirement	<input type="checkbox"/> Access to training  <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	No instance s of discrimination were found.		
Professional Development			
What type of training and development are available for workers?	Employees receive technical trainng, and can apply for a higher or different job position when there is a vacancy; internal performance assessments are conducted for such.		
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		



## 8 - Regular Employment Is Provided [Summary of Findings]

### 8: Compliance Requirements

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

## Current Systems and Evidence Examined

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

### Current Systems:

All production workers were recruited by the factory directly and there are ink and canteen workers from service providers. The HR Department is responsible for monitoring the labour law changes and compliance of their suppliers. No use of subcontractors was observed/reported. Employee's contracts and personal files were available during the audit process for every employee of the sample. Contracts state wage, working hours, and holidays. All the required labour benefits are endorsed.

### Evidence examined:

- The hiring and termination practises (formalised)
- Personnel files
- Payroll records
- Contracts

### Any other comments:

None.

## Responsible Recruitment

### All Workers

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

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

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

☐ Yes ☒ No

### Migrant Workers



Type of work undertaken by migrant workers:	N/A There are no migrant employees.
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: N/A There are no migrants.
Is there any observation on this finding?	N/A There are no migrants.
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Non-employee workers</b>	
<b>Recruitment Fees</b>	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</b>	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	N/A There is no use of agencies.
Were agency workers' age / pay / hours included within the scope of this audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: N/A There are no use of agencies.
Does the site have a system for checking labour standards of agencies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: N/A There are no use of agencies.
<b>Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)</b>	
Any contractors on site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There are two main contractors at the site: canteen named "Aguirre", and ink company named "Tintas Flint Group".
If Yes, how many workers supplied by contractors?	27

Do all contractor workers understand their terms of employment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Interviewed contractor employees (two canteen, two for ink company) were able to explain their terms of employment.
If Yes, please give evidence for contractor workers being paid per law	Site tour Employees and management interviews.

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Explanation to the non compliance	A copy of the individual labor contract is not provided to the employees of the company "Tintas Flint Group" (the employees work in building #2 in the ink warehouse). Also, the vacation periods is not updated, still appear 6 days for the first year, etc. while currently are 12 days for the first year. No se entrega copia del contrato laboral individual a los empleados de la empresa "Tintas Flint Group" (los empleados trabajan en el edificio #2 del almacén de tintas). Además, los periodos de vacaciones no se actualizan, siguen apareciendo 6 días para el primer año, etc. mientras que actualmente son 12 días para el primer año.																																		
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Timescale	Immediate      30 days      60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Ensure to provide a copy of the contract, and its content meets the law. Asegurarse de dar una copia del contrato a los empleados, y que su contenido cumpla con la ley.	
Additional comments	<p>2 of 2 employees of the ink contractor signed an addendum to the individual employment contract specifying that they are entitled to at least 12 days of vacation once the work year is completed. Also, in the employment contract there is already the legend that they were given a copy of their individual employment contract. /</p> <p>2 de 2 trabajadores del contratista de tintas firmaron un adendum al contrato individual en donde se especifica que tienen derecho a mínimo 12 días de vacaciones una vez cumplido el año de trabajo. También en el contrato de trabajo viene ya la leyenda que se les entregó copia de su contrato individual de trabajo.</p> <p>2 of 2 employees of the ink contractor signed an addendum to the individual employment contract specifying that they are entitled to at least 12 days of vacation once the work year is completed. Also, in the employment contract there is already the legend that they were given a copy of their individual employment contract. / 2 de 2 trabajadores del contratista de tintas firmaron un adendum al contrato individual en donde se especifica que tienen derecho a mínimo 12 días de vacaciones una vez cumplido el año de trabajo. También en el contrato de trabajo viene ya la leyenda que se les entregó copia de su contrato individual de trabajo.</p>	

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Additional comments	<p>During the documentation review it was noted that 2 out of 2 labor contracts of the canteen contractor's workers state that overtime must be agreed upon by both parties. / Durante la revisión documental se notó que 2 de 2 contratos de trabajo de los trabajadores del contratista del comedor establecen que el tiempo extraordinario debe ser acordado entre ambas partes.</p> <p>During the documentation review it was noted that 2 out of 2 labor contracts of the canteen contractor's workers state that overtime must be agreed upon by both parties. / Durante la revisión documental se notó que 2 de 2 contratos de trabajo de los trabajadores del contratista del comedor establecen que el tiempo extraordinario debe ser acordado entre ambas partes.</p>	



**8A - Sub-Contracting and Homeworking**  
**[Summary of Findings]****8A: Compliance Requirements**

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

No production is subcontracted. All processes are done at the facility. No homeworking is disclosed.

**Evidence examined:**

-Site tour  
-Material in/out records  
-Management interview  
-Workers interviews

**Any other comments:**

This is a partial follow-up audit. There were no findings in this section of the previous audit, therefore this section is not applicable to this audit.

**Summary of sub-contracting – if applicable**

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

**Summary of homeworking – if applicable**

Is homeworking used at this site? ☐ Yes ☒ No

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

**9: Compliance Requirements**

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

Management had established a disciplinary procedure for workers' misbehaviour which included verbal warning, written warning, and finally, termination, which is contained into the Internal regulations' booklet which is available on workflow.

The facility provides all its employees with information about no harsh practices and management interviewed stated that this type of practice is not allowed.

**Evidence examined:**

Employees interviews  
Management interview  
Policy on harassment and abuse  
Internal grievance procedure  
Training records  
Internal regulations booklet.

**Any other comments:**

This is a partial follow-up audit. There were no findings in this section of the previous audit, therefore this section is not applicable to this audit.

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: There are mailboxes available for employees at each production area and warehouse.
If yes, are workers aware of these channels and have access? Please give details.	On private interviews, the employees were aware of the mailboxes.
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	There is a grievance committee at the site which in charge to check the mailboxes every week, analyse the complaints, and solve them.
Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Worker <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other
Please provide grievance mechanism details	The grievance complaint system is currently available for employees only.
Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:

Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Management does not include other parties for such grievance system, but are open to receive complaints from the contractors employees through the HR department.
Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

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

### 10A: Compliance Requirements

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

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

## Current Systems and Evidence Examined

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

### Current Systems:

As per document review, factory management interview, and worker interviews, it was noticed that all workers at the factory are Mexican citizens. The youngest employee was 19 years old. All of them were recruited directly by the factory.

### Evidence examined:

Hiring procedure

-Personnel files

-Employee files

-Management and employee interviews.

### Any other comments:

This is a partial follow-up audit. There were no findings in this section of the previous audit, therefore this section is not applicable to this audit.

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

##### 10B4: Compliance Requirements

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

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

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

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

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

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

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

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

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

##### 10B4: Guidance for Observations

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

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

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

#### Current Systems and Evidence Examined

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

##### Current Systems:

The facility management maintained environmental documents in place. The site has an environmental policy, as well as goals and metrics. Based on worker interviews, they were trained on environmental protection.

The environmental responsible Mr. Uriel Martínez presented the re-submission of the environmental impact assessment made before the authority on April 4th, 2024; the State Environmental authority visited the site on May 8th, 2024, who left a report of the visit, also presented to the audit team. The environmental impact assessment has not been approved by the authority, since the site must follow an administrative process which will take one year as per the plan made by Mr. Martínez. A procedure to follow by the site in case building new areas was developed in order to meet the law requirements.

##### Evidence examined:

- Environmental license  
- Hazardous waste register  
- Air emissions tests.  
- Wastewater tests.  
- Hazardous waste plan submitted before the authority  
- Environmental policy.  
- Energy bills.  
- Water bill.  
- Worker and management interviews.  
- Site tour.  
Follow up June 14th, 2024.  
Submission request made before the authority.  
Visit record card issued by the authority  
Annual plan for getting the environmental impact assessment.

**Any other comments:**

None

#### Environmental Analysis

Is there a manager responsible for Environmental issues (Name and Position):	Mr. Uriel Martínez/Environmental Management System Responsible
Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The assessment was elaborated and submitted before the authority on August 22nd, 2023, but it was rejected by the authority due to the site first built an extension of the production building # 9, and later elaborated the assessment.
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The site obtained the ISO 14001:2015 certificate by an entity named "EQA", and valid until July 17, 2025.
Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The site has policy on environmental subjects, endorsed by the top management, and committed to reduce the impact of the site in the environment.
Does the site have a Biodiversity policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: N/A No wood items are used at the site.

Have all legally required permits been shown?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The Environmental authority rejected the environmental impact assessment, since the site had already built an extension of the production building # 9, before presenting the said assessment.	
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: There is a chemical program and risk analysis.	
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The chemicals used are approved by the customers.	
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 Please give details: The site establishes annual goals for reduction of gas, electricity, water.	
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The site recycles metal junk, plastic, carton and paper.	
Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The environmental department is in charge of regsitring and monitoring all the resources used at the site.	
Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: N/A There is no use of subcontracting.	
<b>Usage/Discharge analysis</b>		
Criteria	Previous year: 2023	Current year: 2024
Electricity Usage: Kw/hrs	13558923	3703184
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	270	664
Has site completed any carbon Footprint Analysis?	No	No
If Yes, please state result		
Water Sources	Well	well
Water Volume Used	10596	2588

Water Discharged	Ground	Ground
Water Volume Discharged	0	0
Water Volume Recycled	0	0
Total waste produced	380 ton	53 ton
Total hazardous waste produced	Not disclosed	130 ton
Waste to recycling	522 ton	61 ton
Waste to landfill	0	0
Waste to other	Not disclosed	Not disclosed
Total Product Produced	21442 ton	Not disclosed



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Root cause - Other																												
Local law issue	Regulations of the Law for the Protection of the Natural Environment and Sustainable Development State of Puebla in Matters of Environmental Impact and Risk Assessment, Art. 5 Those who intend to execute any of the works or activities indicated in article 38 of the Law, as well such as those indicated below, must have, prior to their execution, authorization regarding environmental impact and, where applicable, environmental risk: IV. Construction or expansion of industrial buildings. Reglamento de la Ley para la Protección del Medio Ambiente Natural y el Desarrollo Sostenible del Estado de Puebla en Materia de Evaluación de Impacto y Riesgo Ambiental, art. 5 Quienes se propongan ejecutar cualquiera de las obras o actividades señaladas en el artículo 38 de la Ley, así como las que a continuación se indican, deberán contar, previamente a su ejecución, con autorización en materia de impacto ambiental y, en su caso, de riesgo ambiental: IV. Construcción o ampliación de naves industriales.																											
ETI code	10.B4.2 - Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.																											
Explanation to the non compliance	The Environmental authority rejected the environmental impact assessment, since the site had already built an extension of the production building # 9, before presenting the said assessment. La autoridad de medio ambiente rechazó el estudio de impacto ambiental para la extensión de la nave 9, ya que el sitio construyó la extensión antes de presentar dicho estudio.																											

Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Ensure the site obtain approval for the environmental risk assessment. Asegurarse de obtener la aprobación del estudio de impacto ambiental.	

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

#### 10C: Compliance Requirements

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

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

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

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

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

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

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

#### 10C: Guidance for Observations

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

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

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

### Current Systems and Evidence Examined

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

#### Current Systems:

The facility has an internal code of conducted which includes anti-bribery policy, corruption, no money laundry, and ethical competence.

#### Evidence examined:

-Internal code of ethics  
-Training records  
-Management interview

#### Any other comments:

This is a partial follow-up audit. There were no findings in this section of the previous audit, therefore this section is not applicable to this audit.

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



Internal Policy



Policy for third parties including suppliers

Please give details:

The internal policy is shared with their contractors.

Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?



Yes



No

Please give details:

Management received training on the policy.

Is the policy updated on a regular (as needed) basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: At least once a year a revision is made.
Does the site require third parties including suppliers to complete their own business ethics training	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The code is provided to the suppliers, but no training is provided.

## Attachments



Approval for firefighting procedures.jpg



Building 3 outdoor view.jpg



Building 3 production area.jpg



Business license.jpg



Hazardous storage area.jpg



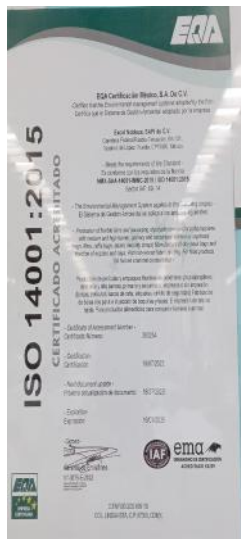
Ink warehouse building 3.jpg



Internal audit report.jpg



Premises exterior view.jpg



Environmental ISO certificate.jpg



Internal union members.jpg



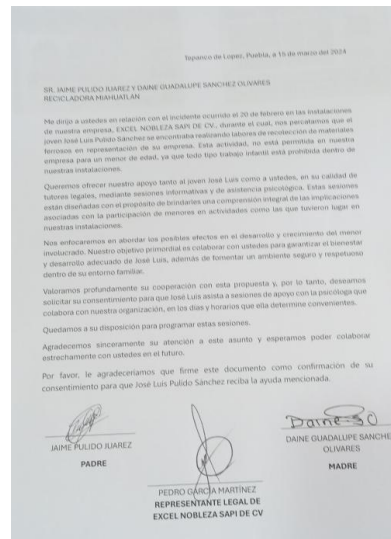
NC closed - Interior of chemical warehouse.jpg



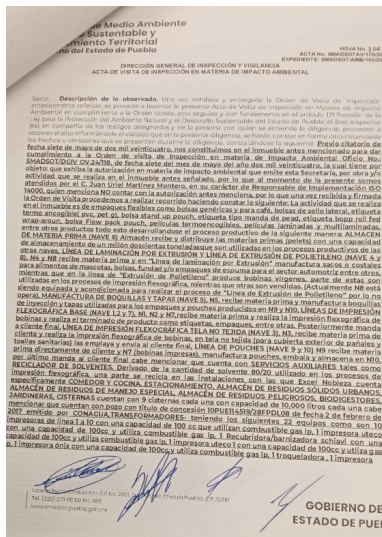
NC closed - Chemical warehouse built.jpg



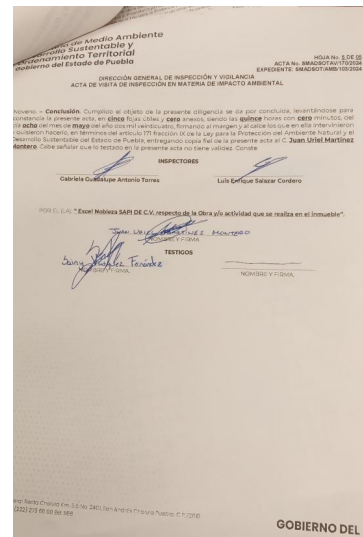
CAP signed.pdf



Agreement with recycling owner for providing support to his young son.jpg



Authority environmental visit record 1.jpg



Authority environmental visit record 2.jpg



EXCEL NÓBLEZA REMEDIACIÓN DE TRABAJO INFANTIL Rn-IT-01-10 Edición 1 Página 1 de 2

1. **PROPÓSITO:** Garantizar el cumplimiento del no trabajo infantil con base a uno de los principios del Código ETL. Cumplir con todas las leyes y regulaciones relacionadas con el empleo de menores, aplicables tanto a la empresa como a los proveedores de servicios externos.

2. **ALCANCE:** Todas las divisiones de Excel Nobleza y proveedores.

3. **TÉRMINOS Y DEFINICIONES:**  
Remediación: Proceso de corregir, mejorar o remediar una situación o problema.  
Proveedores: Una entidad o individuo que suministra bienes o servicios.

4. **RESPONSABILIDADES:**

Responsable de	Puesto
Elaborar, controlar y modificar la instrucción de trabajo	Gerente de Recursos Humanos
Aplicar esta instrucción de trabajo	Responsables de área

5. **CONDICIONES NECESARIAS:**

Documentos	Equipo y Herramientas	Equipo y Medidas de Seguridad
N/A	N/A	N/A

6. **PROCEDIMIENTO:**

6.1 Identificación del hallazgo: Detectar y documentar cualquier hecho o evidencia de trabajo infantil en la empresa. Esto puede incluir la presencia de menores de edad trabajando en el lugar, informes de empleados o denuncias de terceros sobre la participación de menores en actividades laborales, ya sea directamente por parte de la empresa o de sus proveedores.

6.2 Notificación a las autoridades competentes: Informar a gerencia de Recursos Humanos sobre el hallazgo de trabajo infantil para llevar a cabo las medidas necesarias.

6.3 Protección del menor: Prioritar la protección y el bienestar del menor afectado. Esto puede implicar sacar al menor del entorno laboral de manera inmediata para evitar cualquier riesgo adicional.

6.4 Investigación interna: Realizar una investigación interna para comprender la naturaleza y la extensión del problema. Esto puede incluir registros, expedientes, identificaciones y cualquier otra actividad necesaria para determinar las circunstancias que llevaron al trabajo infantil en la empresa (N-IT-14-01).

6.5 Implementación de medidas correctivas: Tomar medidas inmediatas para detener y prevenir cualquier forma de trabajo infantil en la empresa. Esto puede incluir la revisión y el fortalecimiento de las políticas y procedimientos internos, así como la capacitación del personal en la identificación y prevención del trabajo infantil. Esto quedará documentado en el formato GC-FR-04-01 "Acción Correctiva" para su seguimiento, eficacia.

Child labor remediation policy.jpg

EXCEL NÓBLEZA LISTA DE ASISTENCIA Rn-FR-01-01 Edición 1 Página 1 de 2

1. **PROPÓSITO:** Registrar la asistencia de los empleados de la empresa y de los proveedores de servicios externos.

2. **ALCANCE:** Todos los empleados de la empresa y de los proveedores de servicios externos.

3. **TÉRMINOS Y DEFINICIONES:**  
Asistencia: Presencia física del empleado en el lugar de trabajo durante el horario establecido.

4. **RESPONSABILIDADES:**

Responsable de	Puesto
Elaborar, controlar y modificar la instrucción de trabajo	Gerente de Recursos Humanos
Aplicar esta instrucción de trabajo	Responsables de área

5. **CONDICIONES NECESARIAS:**

Documentos	Equipo y Herramientas	Equipo y Medidas de Seguridad
N/A	N/A	N/A

6. **PROCEDIMIENTO:**

6.1 Identificación del hallazgo: Detectar y documentar cualquier hecho o evidencia de trabajo infantil en la empresa. Esto puede incluir la presencia de menores de edad trabajando en el lugar, informes de empleados o denuncias de terceros sobre la participación de menores en actividades laborales, ya sea directamente por parte de la empresa o de sus proveedores.

6.2 Notificación a las autoridades competentes: Informar a gerencia de Recursos Humanos sobre el hallazgo de trabajo infantil para llevar a cabo las medidas necesarias.

6.3 Protección del menor: Prioritar la protección y el bienestar del menor afectado. Esto puede implicar sacar al menor del entorno laboral de manera inmediata para evitar cualquier riesgo adicional.

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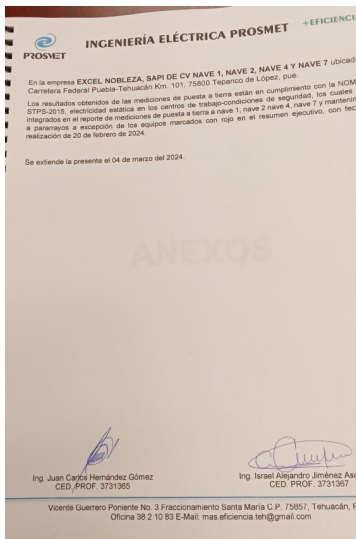
Child labor training record.jpg



Electrical panel box labeled.jpg



Designated storage area for forklift gas tanks.jpg



Electrical grounding assessment.jpg



Electrical panel box labeled.jpg



Electrical power room cleared.jpg



Employee using his PPE.jpg



Extinguisher and first aid kit free of obstacles.jpg



Eyewash station at ink area.jpg



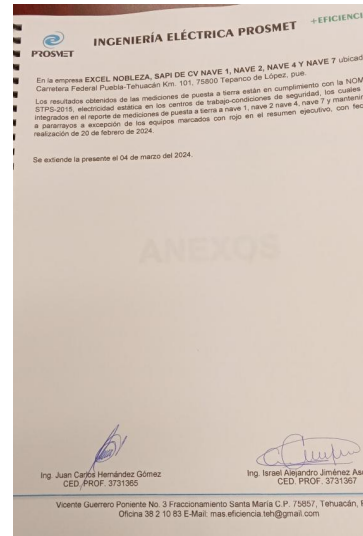
Eyewash station at maintenance workshop.jpg



Eyewash.jpg



Fire extinguisher installed within the height set by the law.jpg



Electrical grounding assessment.jpg

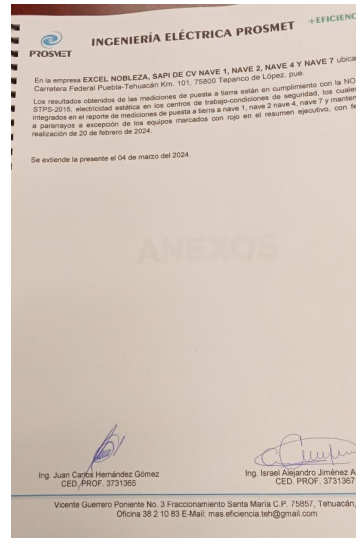
Light assessment.jpg

Machinery and equipment risk assessment.jpg

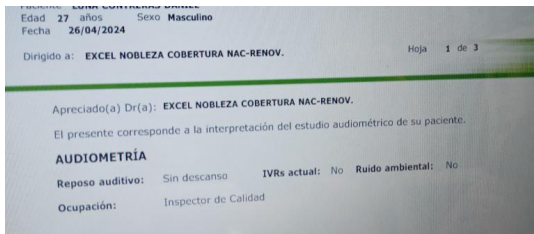




Fire extinguisher installed within the height set by the law.jpg



Electrical grounding assessment.jpg



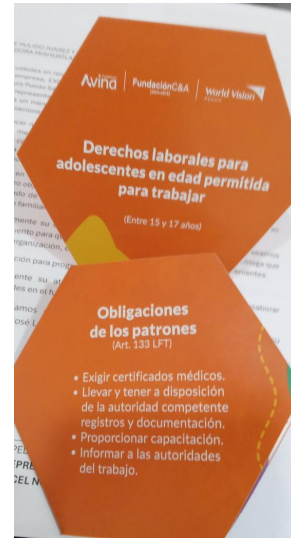
Hearing test.jpg

AUDIOMETRÍA												
A	B	C	D	E	F	G	H	I	J	K	L	M
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33170214	#	E	M	#	N	L	A	U	I	CA 0	/	Uadyher15
33170216	#	E	P	#	N	L	A	U	I	CA 0	/	Upfjbl@ho
33170220	#	E	J	#	N	L	A	U	I	CA 0	/	U pachecojo
33170222	#	E	D	#	N	L	A	U	I	CA 0	/	U pumas311
33170228	#	E	V	#	N	L	A	U	I	CA 0	/	U misaeltrir
33170231	#	E	F	#	N	L	A	U	I	CA 0	/	U calcoetin53
33170233	#	E	C	#	N	L	A	U	I	CA 0	/	U cele-guti
33170234	#	E	C	#	N	L	A	U	I	CA 0	/	U marriony
33170235	#	E	C	#	N	L	A	U	I	CA 0	/	U khrixx25
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33170242	#	E	C	#	N	L	A	U	I	CA 0	/	U cristianla
33170243	#	E	F	#	N	L	A	U	I	CA 0	/	U housecre
33170246	#	E	F	#	N	L	A	U	I	CA 0	/	U felixloga
33170248	#	E	C	#	N	L	A	U	I	CA 0	/	U charly.92
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33170275	#	E	J	#	N	L	A	U	I	CA 0	/	U moralesp
33170285	#	E	J	#	N	L	A	U	I	CA 0	/	U luisdemi
33170360	#	E	L	#	N	L	A	U	I	CA 0	/	U luisdemi

List of employees who undergo hearing tests.jpg

A detailed risk assessment table for machinery and equipment. The table is organized into columns for different types of equipment and their associated risks. It includes sections for 'Machinery and equipment', 'Safety', and 'Health'. The table lists various pieces of equipment and their potential hazards, along with the measures taken to mitigate these risks. The table is color-coded with blue and green headers and footers.

Machinery and equipment risk assessment.jpg



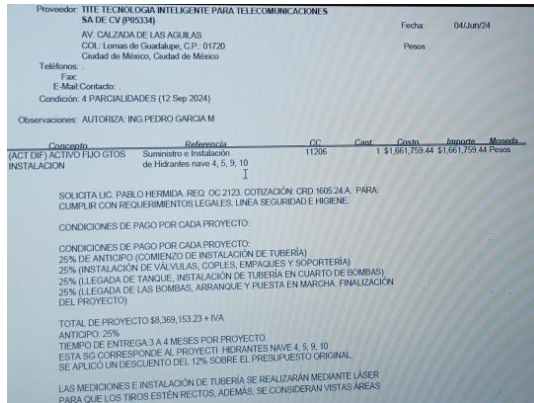
NGO material regarding no use of child labor.jpg



No access to minors' vehicle access posting.jpg



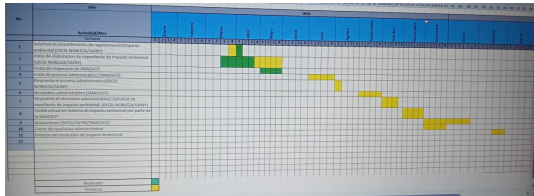
No child labor posting at main access.jpg




Purchase order for installation of anti fire fixed system.jpg



Noise assessment building 9.jpg



Plan for getting authority approval for environmental impact assessment.jpg



**3.º General**

**EXCIPTA**

**INOLETA**

**LISTA DE ASISTENCIA**

**Hoja 1, de 1**

**Edición 2**

*Temario: Asistencia en línea Abril 2021 Temas 1, 2 y 3 Forma 1, 2 y 3*

**Clase Temática**

☐ Clase teórica

☐ Clase práctica

☐ Clase mixta

**Modalidad**

☐ Presencial

☐ Virtual

**Lugar del evento: Sala de aulas aula 7**

**Dirigido a:**

**Investigador:** Quimicos y auxiliares de producción

**Interno:** Quimico **Externo:** Mag. LITPS

**Capítulo de la carrera:** Química General A

**Forma**

☐ Teórica

☐ Práctica

☐ Mixta

**Hora de inicio:** 11:00

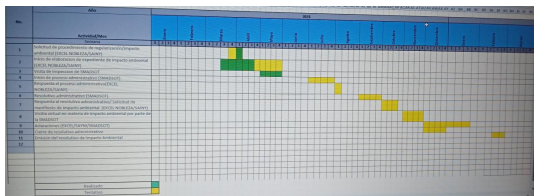
**Hora de terminación:** 15:00

**Duration:** 4 h

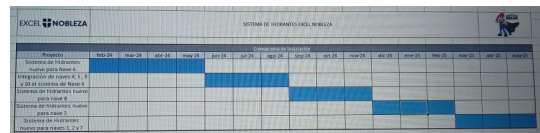
**Asistencia clasificada:** Nova Gallegos

Núm. inscripción	Nombre	Encomendado	Firma	Cuid
21166	<u>A. Irujo - María</u>	<u>ROSA</u>	<u>[Firma]</u>	
2324	<u>José de los ríos</u>	<u>ROSA</u>	<u>[Firma]</u>	
2325	<u>María Juana López</u>	<u>ROSA</u>	<u>[Firma]</u>	
17111	<u>Yolanda Escamilla</u>	<u>ROSA</u>	<u>[Firma]</u>	
21171	<u>Estelita López</u>	<u>ROSA</u>	<u>[Firma]</u>	
21176	<u>Jose María López</u>	<u>ROSA</u>	<u>[Firma]</u>	
21216	<u>Sergio Víctor</u>	<u>ROSA</u>	<u>[Firma]</u>	
21217	<u>Francisco</u>	<u>ROSA</u>	<u>[Firma]</u>	
21218	<u>Francisco</u>	<u>ROSA</u>	<u>[Firma]</u>	
21219	<u>Francisco</u>	<u>ROSA</u>	<u>[Firma]</u>	
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21262	<u>Francisco</u>	<u>ROSA</u>	<u>[Firma]</u>	
21263	<u>Francisco</u>	<u>ROSA</u>	<u>[Firma]</u>	
21264	<u>Francisco</u>	<u>ROSA</u>	<u>[Firma]</u>	
2				

Refreshment to employees regarding use of PPE.jpg



Plan for getting authority approval for environmental impact assessment.jpg

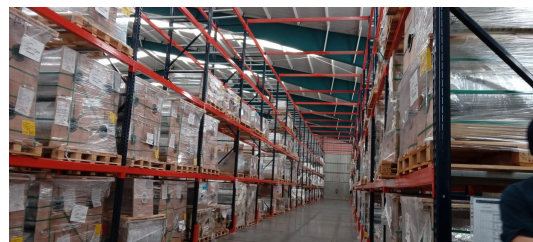


Plan for installation of anti fire fixed system.jpg



9) IDENTIFICACION DE RIESGOS POR PUESTO DE TRABAJO NAVE 1												
RIESGOS IDENTIFICADOS												
Nº	DESCRIPCION DE LA ACTIVIDAD DE LA OPERACION	Atmósfera	Envolvente	Elementos eléctricos	Elementos mecánicos	Elementos térmicos	Elementos químicos	Elementos biológicos	Elementos físicos	Elementos de radiación	Elementos de ruido	Elementos de vibración
1	Operación de la máquina elevadora	X		X	X							
	Transferencia de cables de tracción pesados								X	X		
	Levante de cables de tracción pesados en el muelle								X	X		
2	Levante de cables de tracción pesados para la colocación de nuevos tramos de cable	X	X	X	X				X	X		
	Cambio de tracción en la marjeada	X							X	X		
	Operación de la marjeada cable										X	
	Colocación de cable nuevo en los puentes de la marjeada metalizadora	X	X	X	X				X	X		
3	Operación de la marjeada hidráulica	X		X								
	Operación de la marjeada	X		X								
	Operación de la marjeada de la marjeada hidráulica	X	X	X					X			

PPE Assessment for building 1.jpg



Raw materials warehouse.jpg

Parametro		Previo					Puntajes en Z	
Pred	LLN	Mejor Prueba	6 Pruebas	3 Pruebas	5 Pruebas	%Pred	%Pred	
		02:54:58 02:54:25 02:54:46						
		p.m. p.m. p.m.						
Time								
PVC [L]	5.24	4.39	4.67	4.57	4.62	4.59	89 -1.31	
FEV1 [L]	4.45	3.76	4.37	4.37	4.27	4.27	97 -0.26	
FEV1/FVC	0.854	0.763	0.936	0.936	0.923	0.931	110 1.45	
FEF25-75 [L/s]	4.98	3.56	5.46	5.46	5.32	5.30	110 1.49	
PEF [L/s]	9.89	7.40	10.24	9.81	10.24	9.52	104 0.23	
PEF [s]			3.3	3.3	3.7	3.3		
Calidad de la sesión		Previo A (FEV1 Var=0.10L (2.2%); FVC Var=0.04L (0.9%))						

Spirometry test.jpg



Trap in kitchen.jpg

[illegible]

Union and management meeting record.jpg

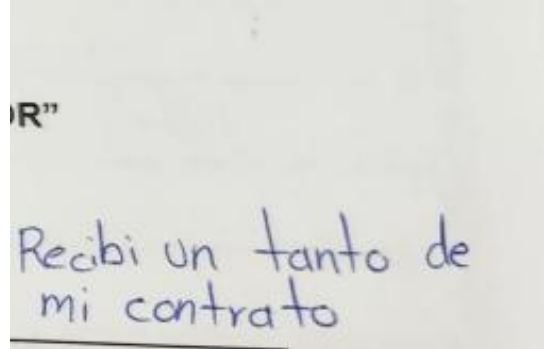
[illegible]

Union delegate voting posting.jpg





Water tank for fire system.jpg



Corrective action- copy of labour contracts is provided by ink company.jpg

CLÁUSULA

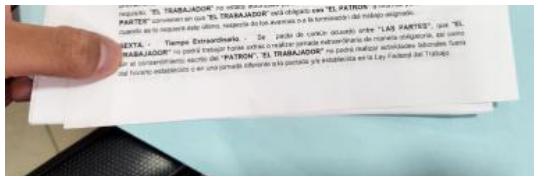
PRIMERA.- Se modifica la Cláusula Décima únicamente por lo que respecta a los días de vacaciones a que tendrá derecho de disfrutar "EL EMPLEADO", de conformidad con los años que lleve prestando sus servicios personales y subordinados para FLINT, conforme a la tabla siguiente:

AÑOS CUMPLIDOS.	DÍAS DE VACACIONES.
1	12
2	14
3	16
4	18
5	20

Corrective action- Ink company establishes new annual leave.jpg

PERCEPCIONES		DEDUCCIONES	
P001	1.8 HORAS EXTRA DOLRES	1,799.07	500.00
P003	PREMIO DE PUNTUALIDAD	36.88	500.00
P014	PREMIO DE ASISTENCIA	300.71	500.00
P016	6.8 DESCANSO LABORADO DOBLE	247.73	500.00
P022	FONDO DE AHORRO EMPRESA	114.82	500.00
P027	BONIFICACIÓN DE METAS Y	190.20	500.00
P060	VALOR DE SEGURIDAD	36.00	500.00
P081	APORTE PARA ALIMENTOS	30.18	500.00
Total Percepciones		1,477.56	500.00
Total Dedicaciones		2,905.14	500.00
Neto Pagado		2,905.14	500.00

Corrective action-Payment of holidays.jpg



Corrective action- OT is voluntary in canteen labour contract.jpg



Pending resolution from authority regarding internal work regulations.jpg



Corrective action- Evidence of recent election of representative.jpg

[illegible]

Corrective action - no excessive working hours.jpg

Ingres	06:04	06:07	06:03	06:02	06:01	06:00	00:00:48.96
Ingres	10:31	10:30	10:32	10:34	10:34	10:32	
Ingres	11:03	11:00	11:04	11:04	11:04	11:01	
Ingres	14:00	14:01	14:04	14:04	14:02	14:01	
Ingres	<b>07:56</b>	<b>07:58</b>	<b>08:01</b>	<b>08:01</b>	<b>08:00</b>	<b>08:00</b>	Dias Lab: 5
Ingres	06:01	06:02	06:00	06:01	06:00	06:00	00:00:47.59
Ingres	10:32	10:31	10:34	10:34	10:33	10:33	
Ingres	11:02	11:01	11:00	11:04	11:02	11:04	
Ingres	14:03	14:01	14:03	14:01	14:02	14:03	
Ingres	<b>08:02</b>	<b>07:58</b>	<b>08:03</b>	<b>07:58</b>	<b>07:59</b>	<b>08:01</b>	Dias Lab: 5
Ingres	06:01	06:00	06:02	06:04	06:01	06:04	00:00:45.05
Ingres	10:31	10:32	10:30	10:32	10:33	10:30	
Ingres	11:02	11:01	11:00	11:00	11:01	11:02	
Ingres	14:01	14:01	14:04	14:00	14:02	14:04	
Ingres	<b>07:59</b>	<b>08:04</b>	<b>07:57</b>	<b>07:58</b>	<b>08:00</b>	<b>08:00</b>	Dias Lab: 5
Ingres	14:01	14:04	14:00	14:03	14:03	14:01	00:00:47.59
Ingres	18:32	18:53	18:04	18:00	18:02	18:04	
Ingres	18:34	18:30	18:34	18:32	18:34	18:30	
Ingres	21:31	21:31	21:34	21:33	21:32	21:32	
Ingres	<b>07:29</b>	<b>07:26</b>	<b>07:33</b>	<b>07:29</b>	<b>07:29</b>	<b>07:30</b>	Dias Lab: 6
Ingres	14:01	14:01	14:00	14:03	14:03	14:00	00:00:45.00
Ingres	18:00	18:01	18:01	18:04	18:00	18:04	
Ingres	18:30	18:33	18:32	18:30	18:32	18:31	
Ingres	21:30	21:31	21:32	21:32	21:32	21:30	
Ingres	<b>07:29</b>	<b>07:30</b>	<b>07:32</b>	<b>07:28</b>	<b>07:28</b>	<b>07:30</b>	Dias Lab: 6
Ingres	14:04	14:03	14:04	14:01	14:00	14:00	00:00:44.59
Ingres	18:00	18:01	18:04	18:03	18:04	18:03	
Ingres	18:31	18:30	18:30	18:30	18:31	18:30	
Ingres	21:32	21:33	21:30	21:32	21:33	21:33	

Corrective action-new time records from  
canteen.jpg



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

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

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

**[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)**

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw\\_3d\\_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

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

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY\\_2brg\\_3d\\_3d](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)

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