




# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 1078995	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 1088135
Business name (Company name):	<b>PRINTMASTERS SRL</b>		
Site name:	<b>PRINTMASTERS SRL</b>		
Site address: <i>(Please include full address)</i>	83X, DN1C, Cicarlau Village, Cicarlau Commune, Maramures County	Country:	Romania
Site contact and job title:	Cosmin Lucean – Innovation & Sourcing Manager		
Site phone:	0730.503.655	Site e-mail:	cosmin.lucean@xdconnects.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	18-20/10/2022		

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

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact [grievance@sedex.com](mailto:grievance@sedex.com).

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

## Audit Content:

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

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

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

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

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

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

Lead auditor: Daniela-loana Alecu, Audit Manager	APSCA number: RA 21700765
Lead auditor APSCA status:	APSCA Registered Auditor
Team auditor: -	APSCA number: -
Interviewers: Daniela-loana Alecu, Audit Manager	APSCA number: RA21700765

Report writer: Daniela-loana Alecu, Audit Manager

Report reviewer: Gangadharaiah.MK – Report Reviewer

Date of declaration: 20/10/2022

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

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

## Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A <a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>		0	0	• •
0B <a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	1	<b>GE</b> 1. The company is applying an integrated system ISO 9001, ISO 14001, and ISO 45001, certified by external company, under UKAS accreditation; the company is also FSC certified and elements of 5S and Kaizen methods are followed.
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	• •
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	• •
3. <a href="#">Safety and Hygienic Conditions</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	1	0	<b>OBS</b> • It was noticed that one evacuation route (out of 4) in the RABELINK LOGISTIC (warehouse) area is partial blocked by goods pallets.

P4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	• •
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	1	<b>GE</b> • The company voluntary provides for all employees the following: meal tickets, 100% transportation expenses for all employees, provides fidelity bonus, additional health insurance for employees of more than 1 year in the company, weekly fruits free supply in the factory, free coffee and tea, household expenses (twice a year), bonus for Christmas and Easter, the 13th salary, financial support occasioned by school opening, Child Day, St. Nicholas, one additional salary at retirement.
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	• •
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	• •
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	• •
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	• •
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	• •
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	• •

10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	• •
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<b>GE</b> • The company has assessed the energetic building performance; yearly intercompany environmental reports are issued to support the conformity certification held by mother company.
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• •

General observations and summary of the site:

- The activity on site is decoration of promotional industrial products by printing transfer, engraving, embroidery, hot stamp, doming.
- Overall responsibility for meeting the standards is taken by Mr. Cosmin Lucean – Innovation & Sourcing Manager.
- A total of 444 employees are currently working in the company, which includes 354 production employees (282 female and 72 male), 5 management employees and 85 non-production employees.
- There are 442 employees with individual open ending agreements and 2 employees with fixed term contracts for 90 days.
- The youngest worker on site is 18 years and 5 months old, female. She is employed since July 2022.
- There is no union in the company, but 4 WR.
- There is evidence that both male and female are in management and among supervisors. The gender distribution of management is: Male 40%, Female 60%.
- The peak season is during of September - December.
- Site uses no subcontractors.
- 26 workers were selected for interview including 8 male and 18 female employees; they were interviewed as 4 groups of 5 and 6 workers were interviewed individually.
- 26 records to show wages and hours were taken from September 2022 (last concluded month), April 2022 (non-peak month) and November 2021 (peak month).
- All workers are paid above the minimum local wage of 2550 RON/month, the minimum wage inside the company is 2700 RON/month, for 30 employees (newly employed).

- Correct OT hours is paid - either compensated with time off paid within 12 months after it was made or paid at a premium rate of +200% out of the negotiated wage for weekdays and rest days. In the peak season, the OT hours are paid with 230%.  
Overtime hours in sample was:
  - 50 hour/month – September 2022
  - 20 hours/month – April 2022
  - 42 hours/month – November 2021

In view of the findings, no non-conformity, one (1) observation on Working Conditions – ETI 5 has been found and 3 good examples have been identified.

**Observation:**

**Working Conditions – ETI 3:**

1. It was noticed that one evacuation route (out of 4) in the RABELINK LOGISTIC (warehouse) area is partial blocked by goods pallets.

**Good examples:**

**GE1 - ETI 0B - Management systems and code implementation**

1. The company is applying an integrated system ISO 9001, ISO 14001, and ISO 45001, certified by external company, under UKAS accreditation; the company is also FSC certified and elements of 5S and Kaizen methods are followed.

**GE2 - Living Wages and Benefits – ETI 5:**

1. The company voluntary provides for all employees the following: meal tickets, 100% transportation expenses for all employees, provides fidelity bonus, additional health insurance for employees of more than 1 year in the company, weekly fruits free supply in the factory, free coffee and tea, household expenses (twice a year), bonus for Christmas and Easter, the 13th salary, financial support occasioned by school opening, Child Day, St. Nicholas, one additional salary at retirement.

**GE3 - ETI 10B4 - Environment 4–Pillar**

1. The company has assessed the energetic building performance; yearly intercompany environmental reports are issued to support the conformity certification held by mother company.

Additional Auditor Remark:

None

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



## Site Details

Site Details														
A: Company Name:	PRINTMASTERS SRL													
B: Site name:	PRINTMASTERS SRL													
C: GPS location: (If available)	GPS Address: NA	Latitude: 47,680723 Longitude: 23,412478												
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business License J24/12/ 08.01.2008 VAT Registration number RO23013450 / 09.01.2008 both with no limit validity													
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Decoration of promotional industrial products by printing transfer engraving, embroidery, hot stamp, doming													
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>PRINTMASTERS SRL is a Dutch company (XD CONNECTS 100% shares), founded in 1986, is in the northern part of Romania, in 83X, DN1C, Cicarlau village, Cicarlau commune, Maramures county, and operates at this site since 2014. The company's premise is rented, was built on 2014 and has ground floor and partial first floor; it includes production areas and warehouses. The building is made of concrete and metallic structure. The company doesn't have any dormitory.</p> <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor 1</td> <td>Production lines and workshops, warehouses, logistics office, improvement department, mechanical workshop, heating unit, eating room, toilets, locker rooms</td> <td>4256 sqm</td> </tr> <tr> <td>Floor 2</td> <td>Offices, printer room, warehouses, toilets, archive</td> <td>1183 sqm</td> </tr> <tr> <td>Is this a shared building?</td> <td>Yes</td> <td>The building is shared with a logistic company – RABELINK Logistics – PRINTMASTERS works together with RABELINK Logistics for logistics and deliveries.</td> </tr> </tbody> </table>		Production Building no	Description	Remark, if any	Floor 1	Production lines and workshops, warehouses, logistics office, improvement department, mechanical workshop, heating unit, eating room, toilets, locker rooms	4256 sqm	Floor 2	Offices, printer room, warehouses, toilets, archive	1183 sqm	Is this a shared building?	Yes	The building is shared with a logistic company – RABELINK Logistics – PRINTMASTERS works together with RABELINK Logistics for logistics and deliveries.
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Is this a shared building?	Yes	The building is shared with a logistic company – RABELINK Logistics – PRINTMASTERS works together with RABELINK Logistics for logistics and deliveries.												

	<p>F1: Visible structural integrity issues (large cracks) observed?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: premise is in good condition</p> <p>F3: Does the site have a structural engineer evaluation?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>F4: Please give details: Building Certificate 42/ 12.05.2014, Eng. David Adrian, Arch. Morosanu Zoltan (WINCON SRL)</p>
<p>G: Site function:</p>	<p><input type="checkbox"/> Agent  <input checked="" type="checkbox"/> Factory Processing/Manufacturer  <input checked="" 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</p>
<p>H: Month(s) of peak season: (if applicable)</p>	<p>September - December</p>
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p><b>Activity fields of Facility</b> are: Decorating of industrial &amp; Promotional Products  <b>The main production processes</b> are: un-pack –printing transfer engraving / hot stamp / doming / embroidery – re-pack  <b>The main equipments</b> are: screen printing equipment, thermo – transfer equipment, pad printing equipment, embroidery machines  <b>The production capacity is:</b> ~ 29.416.101 decorations / year (printing/embroidery).  <b>Production manpower:</b> 354 employees in production, from the total of 444. Recruiting process is on going.  During the audit the plant was operational.</p>
<p>J: What form of worker representation / union is there on site?</p>	<p><input type="checkbox"/> Union (name)  <input checked="" type="checkbox"/> Worker Committee  <input type="checkbox"/> Other (specify)  <input type="checkbox"/> None</p>
<p>K: Is there any night production work at the site?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  L1: If yes, approx. % of workers in on site accommodation</p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  M1: If yes, approx. % of workers</p>

N: Were all site-provided accommodation buildings included in this audit

Yes

No

N1: If no, please give details: no accommodation provided

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 10:30 A2: Day 1 Time out: 18:00	A3: Day 2 Time in: 9:00 A4: Day 2 Time out: 17:30	A5: Day 3 Time in: 9:00 A6: Day 3 Time out: 13:00
B: Number of auditor days used:	1 auditor, 2,5 men-days		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other  If other, please define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail:    weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Cosmin Lucean – Innovation & Sourcing Manager		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	20-22/10/2021		
J: Previous audit type:	4 Pillars SMETA audit - Periodic		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <input type="checkbox"/> N/A		

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

B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	NA		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	NA - There is no Trade Union in the company - but 4 WR freely elected by employees.		

## 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	109	0	0	1	0	0	0	110
Worker numbers – female	331	0	0	3	0	0	0	334
Total	440	0	0	4	0	0	0	444
Number of Workers interviewed – male	8	0	0	0	0	0	0	8
Number of Workers interviewed – female	17	0	0	1	0	0	0	18
Total – interviewed sample size	25	0	0	1	0	0	0	26



A: Nationality of Management	Dutch, Romanian	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: Romanian            B2: Nationality 2: Moldavian            B3: Nationality 3: Morocco            B4: Nationality 4: Ukrainian</p>	<p>Was the list completed during peak season?</p> <p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods:</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1: ~96%            C1: approx % total workforce: Nationality 2: ~1%            C2: approx % total workforce: Nationality 3: ~1%            C3: approx % total workforce: Nationality 4: ~1%</p>	
D: Worker remuneration (management information)	<p>D: 0% workers on piece rate            D1: 100% hourly paid workers            D2: 0% salaried workers</p> <p>Payment cycle:</p> <p>D3: 0% daily paid            D4: 0% weekly paid            D5: 0% monthly paid            D6: 100% other            D7: If other, please give details: twice a month (on each 10<sup>th</sup> and 25<sup>th</sup>)</p>	



Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	4 groups of 5
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 2      D2: Female: 4
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	No complaint raised
I: What did the workers like the most about working at this site?	Stability; payment without any delay
J: Any additional comment(s) regarding interviews:	NA
K: Attitude of workers to hours worked:	Employees work 40 hours/week, 5 days/week; the OT is voluntary and no more than 8 hours/week.
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:	
M: Attitude of workers: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>	



The employees were assured of interviews' confidentiality and all the interviewees were favourable with the management and factory environment and no negative information was raised. The employees were opened to discuss. The employees also declared their trust in the management company and their fidelity for this company

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

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

The workers' representative was favourable with the management and no negative information was raised.

**O: Attitude of managers:**

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

The factory management is cooperative throughout the audit and provided all information and documents requested to auditor. At the opening meeting took part:

Cosmin Lucean – Innovation & Sourcing Manager

Jan De Boer – Director

Norina Bogdana– HR Responsible

Ciprian Brumar– H&S Responsible

Dorian Brahaita – Ecologist, Environment Responsible

Daniela-Ioana Alecu – Lead Auditor

During the company tour, the auditors were accompanied by Cosmin Lucean – Innovation & Sourcing Manager. Documents of the company were reviewed by the Lead Auditor as following: those related to HR, with HR Responsible, those related to H&S, Fire Prevention and Environmental, with H&S Responsible and Fire Fighting and Prevention Responsible.

All documents are kept in order and were easy to be found at auditor's request. The documents are correlated and, from cross checking, the same information resulted, no evidence for double documentation.

## Audit Results by Clause

### 0A: Universal Rights covering UNGP

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

#### 0.A. Guidance for Observations

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

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

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

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

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

A.1 The company have a policy that states respecting human rights – according to Romanian Constitution, communicated to all parties.

0.A.2 Management responsible for implementing standards concerning Human rights is Mr. Cosmin Lucean – Innovation & Sourcing Manager

0.A.3 The company identified salient issues for all employees, in respect of Human rights.

0.A.4 All employees have access to a transparent system for confidentially reporting (constant contact with WR) and dealing with any Human Rights issues without fear of reprisals. They know how the system works.

0.A.5 No adverse impacts on Human rights.

0.A.6 There is a clear communication on how to deal with any salient human rights issues.

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

1. Internal Rules,
2. Training

#### Details:

Internal Rules with human rights statement, transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter, grievance box.

Any other comments: None

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  A1: Please give details: According to company's Social Policy and Romanian legislation - Romanian Constitution</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please give details:                  Name: Marius Cosmin Lucean                  Job title: Innovation &amp; Sourcing Manager</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  C1: Please give details: constant contact with WR and grievance box</p>
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  D1: If no, please give details: Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  E1: Please give details: The HR department have privacy procedures workers' information.</p>

Findings	
<p><b>Finding: Observation</b> <input type="checkbox"/>      <b>Company NC</b> <input type="checkbox"/></p> <p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI/Additional elements / customer specific requirement:</b> Not applicable</p> <p><b>Comments:</b> Not applicable</p>	<p><b>Objective evidence observed:</b>  Not applicable</p>

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

Not applicable

## Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2021 1%	A2: This year:2022 0,5%
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	0,5	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2021 0,5%	C2: This year: 2022 0%
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	0%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe:	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2021 Number: 1	F1: Last year: 2022 Number: 1
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0,29	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2021 2,25	H2: This year: 2022 1,17
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0% workers	I2: 12 months 0% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 0% workers	J2: 12 months 0% workers
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<p><b>0B: Management system and Code Implementation</b>  <a href="#">(Click here to return to summary of findings)</a></p>
<p>0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.          0.B.2 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with          0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.          0.B.4 Suppliers are expected to communicate this Code to all employees.          0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>

<p><b>Current Systems and Evidence Examined</b></p> <p><i>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.</i></p>
<p><b>Current systems:</b></p> <p>0.1 The factory implements and maintains systems for delivering compliance to different ethical codes with the same provisions as ETI Code and International Labor Standards. The policies and procedures ensure the site meets freedom of association, discrimination, and the human rights standards. During the audit the company provided evidence that it is compliant with provisions of ETI Code version 6.0. The evidence is noted in the next sections of the report under each provision of ETI code.</p> <p>0.2 Management responsible with ETI Code implementation and maintaining was appointed to be Mr. Cosmin Lucean – Innovation &amp; Sourcing Manager. Beside ETI Code the company assumed to respect different clients' codes.</p> <p>0.3 The factory communicates ETI code. The employees are familiar with some other ethical codes of company clients. The interviews demonstrated that the workers knew the provisions of ETI code and were familiar with their rights related labour law requirements.</p> <p>0.4 The company communicates the Code to all its suppliers.</p> <p><b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b></p> <ol style="list-style-type: none"> <li>1. Internal Rules,</li> <li>2. Different Clients Ethical Codes,</li> <li>3. Training,</li> <li>4. ETI Base Code.</li> </ol> <p>Details: The site has all applicable business licenses and all legally required permits &amp; licenses to operate. Also, site has all required land rights, licenses, and permission, under legal ownership.</p> <p>Any other comments: None</p>

<b>Management Systems:</b>
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<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  A1: Please give details: No fines received</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  B1: Please give details: According to Internal Rules</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Workers stated no forced labour, no child labour was found (through interview and document checks), discrimination, harassment or abuse.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  D1: Please give details: induction - during hiring process and periodically – if any updates are issued.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  E1: Please give details: there are trainings recorded of induction on internal rules and an acknowledgment form signed by each employee at the hiring moment</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits).  Please detail (Number and date).</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  F1: Please describe: Integrated Management System ISO 9001, ISO 14001, ISO 45001, certified by accredited company, under UKAS. FSC system is certified; WCA assessed by several clients</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  G1: Please describe: The HR department has 2 representatives at the audit moment.</p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  H1: Please describe: Mr. Cosmin Lucean – Innovation &amp; Sourcing Manager</p>
<p>I: Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  I1: Please give details: Internal rules</p>
<p>J: Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  J1: Please give details: Internal rules</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>

	K1: Please give details: self-assessment
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: procedure to implement measures for reducing possible identified risks
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: PRINTMASTERS Code
<b>Land rights</b>	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: legally rented
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: internal rules
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: according to internal rules – the company respect and undertakes to obtain FPIC.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: The Company rented the built facility (with all required certificates) – no upgrading has been made
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: The Company rented the facility building along with the associated land – no adverse impacts
S: 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 S1: Please give details: no illegal appropriation of land

Non-compliance:	
<p><b>1. Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI/Additional Elements      <input type="checkbox"/> NC against Local Law</p> <p><input type="checkbox"/> NC against customer code:</p> <p>None observed</p> <p><b>Local law and/or ETI requirement:</b> Not applicable</p> <p><b>Recommended corrective action:</b> Not applicable</p>	<p><b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i> Not applicable</p>

Observation:	
<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI requirement:</b> Not applicable</p> <p><b>Comments:</b> Not applicable</p>	<p><b>Objective evidence observed:</b> Not applicable</p>

Good Examples observed:	
<p><b>Description of Good Example (GE):</b> The company is applying an integrated system ISO 9001, ISO 14001 and ISO 45001, certified by external company, under UKAS accreditation; also, FSC system is certified and elements of 5S and Kaizen methods are followed.</p>	<p><b>Objective evidence observed:</b> Documents review, management Interview, site tour</p>



## 1: Freely Chosen Employment

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

### ETI

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

1.1 From documents evaluated during the audit result that no forced, bonded, or involuntary prison labour is used in company. The employees have individual labour contracts. All the employees signed and have kept an original exemplar of their labour contracts, the contracts are registered in REVISAL program of authorities (Online Electronically Register for Evidence of Employees).

HR files contains:

- ID in copy
- Employment contract in which it is clearly stated the notice period; the days for their annual leave, working hours, etc.
- addendums of labour contract if it is the case
- job description with clear content about the skills, about to whom are subordinated, with whom relates for the fulfilment of tasks, the personnel duties and responsibilities are defined in job descriptions
- documents of studies in copy
- certificates of qualification if it is necessary
- Acknowledgment form for Internal Rules
- Employee's agreement to perform OT in case is necessary.
- employee's declaration for availability for performing OT

1.2 During the audit 2 ending contracts were evaluated. The ending was based on employee's request with both parts agreement without performing of notice period by employees.

The file contains: employee's notification of resignation, the approval of management for resignation, the termination of working relationship.

All ending contracts evaluated during the audit were found in compliance with Labour Code 53/2003.

No original personal documents of employees are maintained in HR file such as identity cards or qualification certificates.

From the review of payrolls, it was clear that people received their wages on time and in compliance with the worked hours and negotiated wages. No additional taxes other than legal ones are retained from the wages as pay deposit.

The employees declared during the interviews that they are free to leave the workplace at the end of the working program or in their break with no restriction. If an employee might have urgency, they can leave the company during the working program with permission from their superiors.

In case of OT is requested by management, extra hours are voluntarily as per interview with management and employees. The employee who cannot perform extra hours is not discriminated or punished. As per

internal rules and CBA, OT are compensated with paid free time in the same worked month or paid at premium rate of +200% (in the peak season, the premium rate is 230%) for regular days and for rest days.

The working time is automatically registered by card reader system; at the end of the month, the HR department transfers the presence information to electronic system for wage calculation and the final version of working time record, which is kept into Wages dossier, is issued. All employees have access at the working time records to verify if these are accurate. The working hours are also present into the payslips.

No prison labour used in company.

For hiring the company uses LUGERA RECRUITMENT SERVICES SRL – Cluj-Napoca, for recruitment services, based on Business Contract no. S&S20224481, concluded on 24/06/2022, valid until 31/12/2022. All recruitment taxes and commissions are paid by PRINTMASTERS, according to management declaration, documents reviewed and employees' interviews.

No evidence of forced or prison labour was found during the audit.

Company found compliant against Freely Chosen Employment requirements.

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

1. The facility's policy related to employment is stated into Internal Rules and ensures that employment is freely chosen.
2. HR Individual Dossier evaluated demonstrate that the company did not withhold employees' ID cards;
3. Individual labour contract contain provision for notice period.
4. Management interview and employee interview
5. Facility tour showed no sign of employees being under pressure.

**Details:**

No issues related to employment occurred since the company was established, according to management declaration or employees' interviews.

Any other comments: None

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  A1: If yes, please give details and category of workers affected:</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  B1: If yes, please give details and category of worker affected:</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  C1: If yes, please give details and category of worker affected:</p>
<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  D1: Please describe finding: no restrictions according to internal rules</p>
<p>E: If any part of the business is UK based or registered there &amp; has a turnover over £36m, is there a published a 'modern day slavery statement'?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No  <input checked="" type="checkbox"/> Not applicable                  E1: Please describe finding:</p>

<p>F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  F1: Please describe finding: no restrictions according to internal rules, management &amp; employees' interviews</p>
<p>G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Not applicable                  G1: If yes, please give details and category of workers affected: The Company requires suppliers - to certify that materials incorporated into the products comply with the laws regarding slavery and human trafficking and engages in verification of product supply chains - to evaluate and address risks of forced human trafficking and bonded labour (slavery).</p>
<p>H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                  Not applicable                  H1: Please describe finding:</p>

Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law:    <input type="checkbox"/> NC against customer code:                  None observed  <b>Local law and/or ETI requirement</b>                  Not applicable  <b>Recommended corrective action:</b>                  Not applicable</p>	<p><b>Objective evidence observed:</b>                  (where relevant please add photo numbers)                   Not applicable</p>

Observation:	
<p><b>Description of observation:</b>                  None observed  <b>Local law or ETI requirement:</b>                  Not applicable  <b>Comments:</b>                  Not applicable</p>	<p><b>Objective evidence observed:</b>                   Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE):                  None observed</p>	<p><b>Objective evidence observed:</b>                  Not applicable</p>

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

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

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- 2.1 The company's management respects and does not restrict the right of employees to join Trade Unions or to elect freely their representative for bargaining the collective labour contract or to represent the employees in front of the management.  
Through the factory management and workers' interviews, it was noted that there was not trade union in the factory. Workers can raise their concerns directly to management or to their workers' representatives. WR elections were democratically conducted and 4 WR were elected, at the election were present 217 employees, from 240, as per minute of election on 09/10/2020. WR have participated at negotiations for CBA, according to management declaration and approved schedule. Negotiation sessions took part during 21/10 – 17/11/2020 and the final version was signed on 09/12/2020 for the period of December 2020-December 2022. The CBA was sent to Territorial Labour Agency and registered under no. 82/09.12.2020. On 28/05/2021, new WR elections were held for replacing one of the WR who left the company. At the audit moment, the management is organizing new WR elections in order to prepare new negotiations and signing new CBA.  
Managers are constantly in contact with employees and WR.  
During the interviews the employees declared that they were free to elect their representatives and the direct discussions with the management were also a practice in the company. The managers are daily in contact to employees. The employees' complaints are submitted to their direct supervisors to be transmitted to the top management or directly to general manager.
- 2.2 There is no trade union in the company, but the management has an open attitude and good communication with WR. The employees confirm during interviews that they did not intend to form or join Trade Unions, but they elect their representatives in a free manner.
- 2.3 The WR have the right to carry out their representative functions in the workplace during working program.  
No discrimination occurred against any WR. During the interview with one WR she declares that no discrimination occurred against them. The dialog and access to management is open as per need.
- 2.4 Parallel means are not necessary in Romania  
Company found compliant against Freedom of Association and Right to Collective Bargaining requirements.

**Evidence examined – to support system description (Documents examined & relevant comments. Include**

**renewal/expiry date where appropriate):**

1. WR Election minutes
2. Management decision of termination labour contract
3. Internal Rules
4. CBA negotiation minutes and Addendum
5. CBA
6. Management interview, WR and employees' interviews

Details:

No issues related to freedom of association and right to collective bargaining occurred since the company was established, according to management declaration or employees' interviews.

Any other comments: None

<p>A: What form of worker representation/union is there on site?</p>	<p><input type="checkbox"/> Union (name)  <input checked="" type="checkbox"/> Worker Committee  <input type="checkbox"/> Other (specify)  <input type="checkbox"/> None</p>	
<p>B: Is it a legal requirement to have a union?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>	
<p>C: Is it a legal requirement to have a worker's committee?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>	
<p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&amp;S, sexual harassment)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  D1: Please give details: grievance box, permanent contact means, information board</p> <p>D2: Is there evidence of free elections?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  E1: Please give details: No discrimination occurred against the WR and she has the right to carry out her functions</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>Not applicable</p>	<p>F1: Is there evidence of free elections?  <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p>		<p>G1: Is there evidence of free elections?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>H: Are all workers aware of who their representatives are?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>I: Were worker representatives freely elected?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>I1: Date of last election: 28/05/2021</p>

J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: 1	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	Minutes of WR election on 09/10/2020, 28/05/2021. Written invitation for election meetings were previously posted in the premise; topics of meetings are summarised in the meeting protocols signed by WR and shared with workers after meeting. Last meeting, on 21/07/2022.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If <b>Yes</b> , what percentage by trade Union/worker representation	M1: 0% workers covered by Union CBA	M2: 100% workers covered by worker rep CBA
M3: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI    <input type="checkbox"/> NC against Local Law    <input type="checkbox"/> NC against customer code:                  None observed  <b>Local law and/or ETI requirement:</b>                  Not applicable   <b>Recommended corrective action:</b>                  Not applicable</p>	<p><b>Objective evidence observed:</b>                  (where relevant please add photo numbers)                  Not applicable</p>

Observation:	
<p><b>Description of observation:</b>                  None observed  <b>Local law or ETI requirement:</b>                  Not applicable  <b>Comments:</b>                  Not applicable</p>	<p><b>Objective evidence observed:</b>                  Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE):                  None observed</p>	<p><b>Objective evidence observed:</b>                  Not applicable</p>

**3: Working Conditions are Safe and Hygienic**

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

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

**ETI**

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

**Current Systems and Evidence Examined**

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

**Current systems:**

3.1 A safe and hygienic working environment is provided.  
 One accident happened in the last 12 months, as shown by the accidents and injury register kept by the company, in line with Romanian law.  
 Protective equipment is assured by the Company on its expense. The working conditions are assured in compliance with legislation (Law 319/2006; HG 1091/2006 and HG 1048/2006) and include spaces for serving food and clean toilets.  
 Extinguishers are periodically verified and were found valid in their term of viability.  
 The exit doors are kept open during the working program and can be accessed from inside to outside.  
 The signs for exits are appropriately placed.  
 The company has 18 employees appointed to be part of first aid team. The training for first aid team is assured by Centrul de Ajutor Maltez in Romania (on 01/07/2021 and 15/07/2021). General labour medicine services are provided by SANAS MED SRL (Dr. Lavinia Stanescu – occupational physician), last verification done on 28/07/2022.

All employees are apt to work as per medical check from the hiring moment. This medical certificate of each employee is valid one year. During the audit 26 medical certificates were verified. All 26 certificates evaluated were found valid. No occupational disease and working accident recorded in the last 12 months.  
 The risk assessment was performed for all position of the company to determinate the risk of accidents and occupational diseases and to identify and prevent workplace hazards and risks and to seek continual improvement including sensitive groups (pregnant, young workers, persons with disabilities). The last update of Risk Assessment was done internally, in 2022, based on FMEA techniques; a chart is developed per each type of working place.  
 The company yearly performed checking of the working conditions – on noise and VOC, last, on 29/07/2021 – the results are in the requested limits.

The yearly Prevention and Protection Plan was re-issued (10/01/2021). It is approved by the Administrator and applied.

Annual ground plugs checking was performed, last on 18/01/2022, by TRIEM SERV SRL - Seini.

The potable water dispensers are yearly checked by authorised company (Mabo POWER SRL, last, on 14/09/2022).

The electrician protection equipment (gloves & boots) is supplied and twice a year verified.

The company has an H&S Committee, initially established on 2014 and updated on 23.01.2019 (Protocol 282) with the following members: 4 WR, 4 management representatives and occupational doctor (Dr. Lavinia Stanescu). The Committee meetings are held as per Romanian legislation at each 3 months. Quarterly Meetings of the Committee are held, and Protocol is recorded after each session and a copy is sent to the Labour Territorial Agency, for registration; the most recent session was held on 28/09/2022. From the interviews it was noted that the employees have the right to remove themselves from imminent danger without seeking permission from the company and they were notified with occasion of trainings.

For special jobs the employees are trained and authorised. During the audit the authorisation dossier for the electrician and lift operators were reviewed and were found in good order. Besides technical examination, also medical examination is available at dossier.

3.2 Workers receive regular and recorded Health & Safety training.

The training related with OHSAS is performed at the hiring, periodically and after a long absence from work. During the audit, were checked 26 booklets for periodically training, from different job position which demonstrates that the trainings for H&S and for fire prevention are performed at the hiring and at the working place. For firefighting and prevention, the training is periodically conducted and the last training was performed on 05/10/2022.

The company has a Fire License endorsed by local fire service authority, no 101/17/SU-MM/14.07.2017, as up-date to initial one, no.268/14/SU-MM/24.11.2014.

The central fire alarm system is periodically checked - the most recent checking was performed on 04/10/.2022 by ELECTROCENTER DUE SRL – external specialized company.

Fire drills are performed every 6 months, according to Fire Prevention Plan, the last ones were performed on 23/02/2022 and 02/08/2022, for both shifts.

3.3 Access to clean toilet facilities and to potable water are assured. Also, a proper dining room for serving food from home is provided and food storage.

3.4 No accommodation provided for employees.

3.5 The company assigned one responsible for both Health & Safety and firefighting and prevention - Mr. Ciprian Brumar.

Company found compliant against Working Conditions requirements.

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

- 1.H & S policy and procedures
- 2.H & S risk assessment
- 3.Safety trainings and records
- 4.H & S committee statutory rules; management decision for constitution and meetings
- 5.Machinery safety record
- 6.First aid
- 7.Fire evacuation plans
8. Training records
9. Verification bulletins of plugs grounding
10. Medical report of occupational doctor and individual medical evaluation of employees
11. Accident register



12. Interviews with H&S responsible and Fire Fighting Technical Responsible  
 13. Employees' interviews  
 14. Emergency preparedness plan

Details:  
 No issues related to working conditions occurred since the company was established, according to management declaration or employees' interviews.

Any other comments: None

<p>A: Does the facility have general and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  A1: Please give details: The Company has H&amp;S policies and procedures fitted for every job. All workers are informed about the H&amp;S policies and procedure through "job description", handed to each one at the hiring day and through periodically performed H&amp;S trainings, recorded.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  B1: Please give details: according to job description</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  C1: Please give details: premise is in line with approved plans</p>
<p>D: Are visitors to the site informed on H&amp;S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  D1: Please give details: H&amp;S procedure</p>
<p>E: Is a medical room or medical facility provided for workers?                   If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  E1: Please give details: A medical clinic is in the near vicinity (in Baia Mare – 7 minutes driving).</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  F1: Please give details: 18 persons are qualified in first medical aid. The company has a medical room where medical periodical checks are provided by qualified physician.</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  G1: Please give details: authorised transportation company is contracted, conform buses and licenced drivers are used.</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  H1: Please give details: Cloak rooms gender separated</p>

I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The risk assessments issued, last update, in 2020 and is to be periodically conducted and whenever changes occur in the production processes, to reduce any identified risk
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: environment authorization
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: No banned chemicals used inside the premise.

<b>Non-compliance:</b>	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI    <input type="checkbox"/> NC against Local Law    <input type="checkbox"/> NC against customer code:                      None observed  <b>Local law and/or ETI requirement:</b>                      Not applicable   <b>Recommended corrective action:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)                      Not applicable</p>

<b>Observation:</b>	
<p><b>1. Description of observation:</b>                      It was noticed that one evacuation route (out of 4) in the RABELINK LOGISTIC (warehouse) area is partial blocked by goods pallets.</p> <p><b>ETI requirement</b>                      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 during work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Local law</b>                      According to Order #163/28.02.2007 of Administration &amp; Internal Affairs Ministry: Art. 107 - To ensure conditions for evacuation and rescue of employers in the event of fire safety following measures will be taken: b) Keeping escape routes free and in-use parameters that were designed and built.</p> <p><b>Recommended corrective action:</b>                      During audit, the evacuation route was unblocked.</p>	<p><b>Objective evidence observed:</b>                       On site tour</p>

**Good Examples observed:**

Description of Good Example (GE):  
None observed

**Objective Evidence Observed:**  
Not applicable

**4: Child Labour Shall Not Be Used**

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

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

**ETI**

- 4.1 There shall be no new recruitment of child labour.
- 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

**Current Systems and Evidence Examined**

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

**Current systems:**

4.1 The recruiting procedure established stipulates the age of hiring, there are no employees bellow 18 years old hired in factory. Hiring is well controlled by HR Department in line with Romanian legislation and in line with the technical skills requested for completing the job tasks.  
The youngest employee is a female, and she is 18 years and 5 months old.  
Evidence with all personal numbers of employees issued by Ministry of Internal Affairs (this number contains the year of birth also) was provided by HR department. From this evidence it was easy to establish the age of all employees to determine if some employees are minor.  
4.2 – 4.4 No evidence of child labour or young labour was found during the audit  
Company found compliant against Child Labour requirements.

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

- 1. The employee's personnel files were provided for review. Each employee file includes ID copy with age documentation. The card lists the employee's name, household address and the date of birth.
- 2. Internal Rules state the hiring condition that excludes child labour under the age of 16 years old.
- 3. List of employees
- 3. Facility tour
- 4. Management interview

**Details:**

No issues related to **child labour** occurred since the company was established, according to management declaration or employees' interviews.

Any other comments: None

A: Legal age of employment:	16 or 15 (with parents' approval)
B: Age of youngest worker found:	18 years and 5 months
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

D: % of under 18's at this site (of total workers)	0%
E: Are workers under 18 subject to hazardous work assignments? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable E1: If yes, give details

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed <b>Local law and/or ETI requirement:</b> Not applicable  <b>Recommended corrective action:</b> Not applicable	<b>Objective evidence observed:</b> (where relevant please add photo numbers) Not applicable

Observation:	
<b>Description of observation:</b> None observed <b>Local law or ETI requirement:</b> Not applicable <b>Comments:</b> Not applicable	<b>Objective evidence observed:</b>  Not applicable

Good Examples observed:	
<b>Description of Good Example (GE):</b>  None observed	<b>Objective Evidence Observed:</b> Not applicable

**5: Living Wages are Paid**

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

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

**ETI**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

5.1 Employee's wages for production employees are calculated on hourly basis system for all employees. The OT is compensated with free time in the period of next 12 months or paid with a +200% premium rate during week regular days and in rest days. In the peak season, the OT is paid with 230%. The company assures at least the minimum wage in line with Romanian law. All employees receive above minimum wage (2550 RON) for the sample evaluated. The minimum wage inside the company is 2700 RON/month, for 30 employees (newly employed). Beside wages the company voluntary provides for all employees the following: meal tickets, 100% transportation expenses for all employees, provides fidelity bonus, additional health insurance for employees of more than 1 year in the company, weekly fruits free supply in the factory, free coffee and tea, household expenses (twice a year), bonus for Christmas and Easter, the 13th salary, financial support occasioned by school opening, Child Day, St. Nicholas, one additional salary at retirement.

The wages are paid twice a month on each 25<sup>h</sup> and 10<sup>th</sup>. The wages are paid by bank transfer. During the interviews the employees confirmed that the wages are paid without any delay and that OT is paid at agreed premium rate.

All employees are paid above minimum legal wage.

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

Benefits such as social insurance, annual leave, and child-bearing leave are provided to workers with each wage by payrolls and by payslip. The payrolls and payslips provide all necessary information in order to check the calculation: working hours, OT, annual leave, medical leave, taxes, allowances,

5.3 No disciplinary deductions were made accordingly to employee's declaration and documents review. No money deposits for warehouse administrators to recover the potential lose is practiced.

No other deduction besides the legal one is taken from the wages.

Company found compliant against Living Wages requirements.

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):** records of previous 12 months were available for review.

1. Payroll and attendance for September 2022 (last concluded month), April 2022 (non-peak month) and November 2021 (peak month) were sampled for review.
2. Production records
3. Payment order for wage taxes
4. Employee and management interviews
5. Leave records
6. Labour contracts for all employees (to examine agreed wage rates)
7. Resignation records
8. Payslips of all workers interviewed
9. Decision for reducing some bonuses

**Details:**

No issues related to wages occurred since the company was established, according to management declaration or employees' interviews.

Any other comments: None

**Non-compliance:**

**1. Description of non-compliance:**

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

None observed

**Local law and/or ETI requirement:**

Not applicable

**Recommended corrective action:**

Not applicable

**Objective evidence observed:**

*(where relevant please add photo numbers)*  
Not applicable

**Observation:**

**Description of observation:**

None observed

**Local law or ETI requirement:**

Not applicable

**Comments:**

Not applicable

**Objective evidence observed:**

Not applicable

**Good Examples observed:**

**Description of Good Example (GE):**

The company voluntary provides for all employees the following: meal tickets, 100% transportation expenses for all employees, provides fidelity bonus, additional health insurance for employees of more than 1 year in the company, weekly fruits free supply in the factory, free coffee and tea, household expenses (twice a year), bonus for Christmas and Easter, the 13th salary, financial support occasioned by school opening, Child Day, St. Nicholas, one additional salary at retirement.

**Objective Evidence Observed:**

Documents' review; Management and employees' interviews

### Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal minimum: 8 hours/day, 40 hours /week	A1: 8 hours/day, 40 hours /week	A2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal minimum: 8 hours/week; 32 hours/month; By exception, the duration of work, including overtime, may be extended beyond 48 hours per week with the condition that the average working hours, calculated over a 12-month reference calendar, does not exceed 48 hours per week. (Excluded annual leave period)	B1: max. 50hours/month (in peak month)- the average working hours, calculated over a 12-month reference calendar, does not exceed 48 hours per week. (Excluded annual leave period)	B2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 2550 RON/month	C1: 2700 RON/month	C2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 175%	D1: 175% for weekdays and 200% for rest days	D2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

<b>Wages analysis:</b> <a href="#">(Click here to return to Key Information)</a>	
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



A1: If <b>No</b> , why not?	Not applicable		
B: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	26 record samples from Septembert 2022 (last concluded month), April 2022 (randomly selected month) and November 2021 (randomly selected month).		
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	C1: If <b>Yes</b> , please give details:	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	D1: If <b>No</b> , please give details:	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> All employees receive above the legal minimum wage of 2550 RON/month The minimum wage inside the company is 2700 RON/month.	
F: Please indicate the breakdown of workforce per earnings:	F1: 0% of workforce earning under minimum wage F2: 0% of workforce earning minimum wage F3: 100% of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: Not applicable <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i>		
H: What deductions are required by law e.g. social insurance? Please state all types:	Social Security Contribution (25%) Health insurance fund (10%); Income tax (10%)		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that <b>have</b> been made.	1. Social Security Contribution (25%) 2. Health insurance fund (10%); 3. Income tax (10%)  Please describe: all deductions are made according to legislation
		I2: Please list all deductions that <b>have not</b> been made.	1. None 2.

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

**6: Working Hours are not Excessive**

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

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

**ETI**

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

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

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

6.1 The production sections employees work five days/week, 2 shifts, from 05:30 to 14:00 and 14:00 to 22:30, including 3 breaks of a total of 30 min. The rest of employees, from 08:30 to 17:00, 30 min of breaks included. The working hours are automatically recorded by card readers.

6.2 Working hours are stipulated in the individual labor contract, Internal Rules and are 8 hours per day, 5 days per week, 40 hours per week.

6.3 Through management and employees' interview, OT is performed voluntary and is compensated with free time in the period of next 12 months or it is paid at premium rate of +200% in regular days and in rest days. In the peak season, the OT is compensated with a premium rate of 230%. An acceptance to perform OT form is signed by employees in case the OT is requested by management.

From Internal Rules there is clear that OT is voluntary and can be performed only with employee's agreement. Also, in the Internal Rules, the payment condition or compensation with equivalent time off is clearly stated.

OT is performed by all types of employees if it is the case.

6.4 No more than 60 hours/7 days worked into the sample evaluated during the audit. The highest OT performed founded in the sample was 50 hours/month in September 2022 (current month, peak month), 20 hours/month in April 2022 (non-peak month) and 42 hours/month in November 2021 (peak month). The OT is in the allowable legal limits - during peak seasons approx. 8% of employees performed more than 8 OT hours/week, but the average on 12 consecutive months is under 8 hours/week, according to Romanian Labor Code (Law 53/2013, Art 114 and CBA).

6.5 No situation in which are performed more than 60 hours in 7 days period.

6.6 There are 2 rest days per week.  
Company found compliant against Working Hours requirements.

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):** records of previous 12 months were available for review.

Details:

1. Attendance records from September 2022 (current month), April 2021 (non-peak month) and November 2021 (peak month) were sampled for review; also, payrolls for the same months were reviewed.
2. Attendance sheets.
3. Employees' interviews.
4. Quality and production records to cross check hours
5. Sample payslips with recorded hours all workers interviewed.

Details:

No issues related to working hours occurred since the company was established, according to management declaration or employees' interviews.

Any other comments: None

**Non-compliance:**

**1. Description of non-compliance:**

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

None observed

**Local law and/or ETI requirement:**

Not applicable

**Recommended corrective action:**

Not applicable

**Objective evidence observed:**

(where relevant please add photo numbers)  
Not applicable

**Observation:**

**Description of observation:**

None observed

**Local law or ETI requirement:**

Not applicable

**Comments:**

Not applicable

**Objective evidence observed:**

Not applicable

Good Examples observed:	
Description of Good Example (GE): None observed	<b>Objective Evidence Observed:</b> Not applicable

Working hours' analysis	
Please include time e.g. hour/week/month <i>(Go back to Key information)</i>	
Systems & Processes	
A. What timekeeping systems are used: time card etc.	Describe: timecard validated to card readers
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details
C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:
D: Are there any other types of contracts/employment agreements used?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If YES, please complete as appropriate:
	<input type="checkbox"/> 0 hrs <input checked="" type="checkbox"/> Part time <input type="checkbox"/> 0 hrs <input type="checkbox"/> Other
	If "Other", Please define: 2 part-time contracts for 4 hours/day and 1 for 6 hours/day
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If <b>yes</b> , please detail hours, %, types of workers affected and frequency Please give details:
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:
	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

		Maximum number of days worked without a day off (in sample):
		5 days worked in a row – there are 2 days off in every 7 days period
<b>Standard/Contracted Hours worked</b>		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: - 50 hours/month – September 2022 - 20 hours/month – April 2022 - 42 hours/month – November 2021	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	2,5% - September 2022 2,8% – April 2022 3,80% – November 2021	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	<i>L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: The internal rules contain relevant information about the payment of OT in case is performed There is a written statement that the OT is voluntary. During management and employees' interviews and document reviews result that OT is voluntary. Written statement is in internal rules, OT cannot be performed without employees' agreement". All employees declared that all OT is voluntary performed</i>
<b>Overtime Premiums</b>		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal	<i>M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages paid free time off in the period of next 12 months or with premium rate of +200% for weekdays</i>

	requirement to OT premium	and rest days. In the peak season, the OT is compensated with 230%.
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<i>N1: If yes, please describe % of workers &amp; frequency:</i> Workers performed OT: 35% - September 2022 – 230% paid at the premium rate 4% - April 2022 – 200% paid at the premium rate 21% - November 2021 – 230% paid at the premium rate
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input checked="" type="checkbox"/> Collective Bargaining agreements– OT rate is mentioned in the CBA, and it is in line with local Labour Code <input type="checkbox"/> Other	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	
	OT rate is mentioned in the Internal Rules, and it is in line with local Labour Code	
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> <b>Overtime is voluntary</b> <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify) Not applicable	
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:	
	NA	
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details:	
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

**7: No Discrimination is Practiced**

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

7.1 According to the scope of activity, the most of employees are women and this aspect is not related with discrimination but with nature of activity.  
 There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement. The provisions related with these items are stipulated within Internal Rules.  
 The factory provides the same pay for equal work to male/female employees, with no exception.  
 The hiring process is not discriminatory and is orientated mainly to technical skills and abilities to be able to perform the activity.  
 From the employees' interviews, it was confirmed that people have not been object to any kind of discrimination (gender, age, religion, nationality, caste, and political view, ethnic or social origin). Besides that, during the interviews, new hired employee confirmed that no discrimination was done on his hiring process. They were recommended by other employees who work inside the company and the hiring was based on their experience in this field.  
 Avoiding discrimination is stated in internal rules.  
 Company found compliant against No Discrimination requirements.

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

1. Employment contracts were provided for review, and they showed that male and female employees are on the same pay grade.
2. Payrolls and attendance sheets
3. Termination contracts
4. Facility tour
5. Management interview and employees' interviews

**Details:**

No issues related to discrimination occurred since the company was established, according to management declaration or employees' interviews.

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 40 % A2: Female: 60 %
B: Number of women who are in skilled or technical roles e.g. where specific	3



<p>qualifications are needed i.e. machine engineer / laboratory analyst:</p>	
<p>C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:</p>	<p> <input type="checkbox"/> Hiring  <input type="checkbox"/> Compensation  <input type="checkbox"/> Access to training  <input type="checkbox"/> Promotion  <input type="checkbox"/> Termination or retirement  <input checked="" type="checkbox"/> No evidence of discrimination found         </p> <p>C1: Please give details:</p>

Professional Development	
<p>A: What type of training and development are available for workers?</p>	<p>Skills improvement</p>

<p>B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?</p>	<p> <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No         </p> <p>If no, please give details: Transparent criteria and legal requirements</p>
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Non-compliance:		
<p><b>1. Description of non-compliance:</b></p> <p> <input type="checkbox"/> NC against ETI/Additional Elements  <input type="checkbox"/> NC against customer code:         </p> <p>None observed</p> <p><b>Local law and/or ETI requirement:</b> Not applicable</p> <p><b>Recommended corrective action:</b> Not applicable</p>	<p> <input type="checkbox"/> NC against Local Law         </p>	<p><b>Objective evidence observed:</b> (where relevant please add photo numbers) Not applicable</p>

Observation:	
<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI requirement:</b> Not applicable</p> <p><b>Comments:</b> Not applicable</p>	<p><b>Objective evidence observed:</b>  Not applicable</p>

**Good Examples observed:**

Description of Good Example (GE):  
None observed

**Objective Evidence Observed:**  
Not applicable

**8: Regular Employment Is Provided**

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

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

**ETI**

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

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

**Additional Elements: Responsible Recruitment**

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

8.1 Work performed is based on recognized employment relationship established through national law and practice – individual contracts.

A total of 444 employees are currently working in the company, employees are currently working in the company, which includes 354 production employees (282 female and 72 male), 5 management employees and 85 non-production employees.

441 employees have individual open ending agreements and 3 of them have completed fixed term contracts of 90 day.

There are 4 migrants (foreign) inside the company – 1 female employee from Republic of Moldavia, one male from Holland, and 1 male from Morocco and one female from Ukraine – all of them have been employed directly by the company and have permanent contracts, according to Romanian legislation. The company does not use homework or apprentice's scheme.

8.2 Legal taxis and social assurance for wages are retained from employees and are paid to the state funds on time. Social security contribution – 25%; health insurance fund 10% and income tax: 10%. are retain from to workers' wages at each month and paid to state budget. The company provides the certificate issue by local authority ANAF in which states that the company has no debts for legal taxes. The last payment was performed on 25.09.2022 for August 2022 as required by Romanian Legislation Company found compliant against Regular Employment requirements.

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

<p>1. Personal files were checked, and they all include a copy of employee's contract                  2. VAT compensation decision                  3. Management interview and employees' interviews</p> <p>Details:                  No issues related to employment occurred since the company was established, according to management declaration or employees' interviews.</p> <p>Any other comments: None</p>
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Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI/Additional Elements      <input type="checkbox"/> NC against Local Law  <input type="checkbox"/> NC against customer code:</p> <p>None observed</p> <p><b>Local law and/or ETI requirement:</b>                  Not applicable</p> <p><b>Recommended corrective action:</b>                  Not applicable</p>	<p><b>Objective evidence observed:</b>                  (where relevant please add photo numbers)</p> <p>Not applicable</p>

Observation:	
<p><b>Description of observation:</b>                  None observed</p> <p><b>Local law or ETI requirement:</b>                  Not applicable</p> <p><b>Comments:</b>                  Not applicable</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>

Good Examples observed:	
<p><b>Description of Good Example (GE):</b>                  None observed</p>	<p><b>Objective Evidence Observed:</b>                  Not applicable</p>

### Responsible Recruitment

All Workers	
<p>A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?</p>	<p>Description of Good Example (GE):                  None observed</p>
<p>B: Did workers' pay any fees, taxes, deposits or bonds for the</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>

purpose of recruitment/placement?	B1: If yes, please describe details and specific category(ies) of workers affected:
C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details:
D: If any checked, give details:	NA

<b>Migrant Workers:</b> <i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>	
A: Type of work undertaken by migrant workers:	Production – digital print and packaging; Commercial officer, development officers
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: 0 B2: Total number of (outside of local country) recruitment agencies used: No recruitment agencies used – the company directly recruited the migrant (foreign) employees.
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: no deductions applied to migrant employees C2: Observations:
D: Are Any migrant workers in skilled, technical, or management roles	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

<p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	<p>D1: If yes, number and example of roles: one digital print and packaging specialist; one commercial officer, 2 development officers.</p>
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**NON-EMPLOYEE WORKERS**

<b>Recruitment Fees:</b>	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other  B1 – If other, please give details:
C: If any checked, give details:	Not applicable

<b>Agency Workers (if applicable)</b>	
<i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	A1: Names if available: Not applicable
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable

<p>C: Were sufficient documents for agency workers available for review?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                  Not applicable</p>
<p>D: Is there a legal contract / agreement with all agencies?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                  Not applicable                   D1: Please give details:</p>
<p>E: Does the site have a system for checking labour standards of agencies?                  If yes, please give details.</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                  Not applicable                   E1: Please give details</p>

<p><b>Contractors:</b>  <i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i></p>	
<p>A: Any contractors on site?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  A1: If yes, how many contractors are present, please give details:</p>
<p>B: If <b>Yes</b>, how many workers supplied by contractors?</p>	<p>Not applicable</p>
<p>C: Do all contractor workers understand their terms of employment?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                  Not applicable                  C1: Please describe finding:</p>
<p>D: If <b>Yes</b>, please give evidence for contractor workers being paid per law:</p>	<p>Not applicable</p>

**8A: Sub-Contracting and Homeworking**

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

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

8A.1 There should be no sub-contracting unless previously agreed with the main client.  
 8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.  
*Note to auditor on homeworking:  
 Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.  
 Note to auditor on subcontracting: auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers*

**Current Systems and Evidence Examined**

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

**Current systems:**

8A.1. – 8A.2 Company doesn't use home working. Also, no activities are subcontracted.  
 Company found compliant against Sub-Contracting and Homeworking requirements.

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

1. Production records were provided for review and there was no sign of sub-contracting or home working.
2. Facility tour
3. Management interview and employees' interviews

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

**Details:**

No issues related to sub-contracting or homeworking occurred since the company was established, according to management declaration or employees' interviews.

Any other comments: None

**Non-compliance:**

**1. Description of non-compliance:**

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

None observed

**Local law and/or ETI /Additional Elements requirement:**

Not applicable

**Recommended corrective action:**

Not applicable

**Objective evidence observed:**

*(where relevant please add photo numbers)*

Not applicable



Observation:	
<b>Description of observation:</b> None observed <b>Local law or ETI/Additional elements requirement:</b> Not applicable <b>Comments:</b> Not applicable	<b>Objective evidence observed:</b>  Not applicable

Good Examples observed:	
Description of Good Example (GE): None observed	<b>Objective Evidence Observed:</b> Not applicable

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

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

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

**9: No Harsh or Inhumane Treatment is Allowed**  
[\(Click here to return to summary of findings\)](#)

**ETI**

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 <sup>rd</sup> party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Complaint procedure included in internal rules, Grievance box
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	According to grievance procedure The workers can communicate with Workers Representatives, can use complain procedure as per Internal Rules and to address direct (verbal or written) complains
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Grievance box
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other  D1: Please give details: grievance box
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  H1: If no, please give details

<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>II: If yes, please give details</p>
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**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:**

9.1 From the evidence concerning personnel salary and files, no situation was identified related to any salary deduction or dismissal of personnel because of disciplinary sanctions. From the interviews with employees and with their representatives resulted that no disciplinary measures were taken against employees and no physical or verbal violence, punishment and psychological abuse were reported. In the Internal Rules the company states a progressive disciplinary system in line with law 53/2003 which starts from verbal warning, to written warning, decreasing wage and even termination of the labour contract for major deviation. The company did not use the disciplinary penalties against its employees besides the verbal warning by now. The company assures the right for rehabilitation to its employees.

9.2 Besides the WR, the employees can raise their complaints through the grievance box. Company found compliant against Harsh or Inhumane Treatment requirements.

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

1. Internal Rules (including disciplinary policy)
2. Ethical Policy
3. Individual Labour Agreements
4. Job descriptions
5. Grievance Box procedure and records
6. Payrolls (deduction from wages)

Details:  
 No issues related to harsh or inhumane occurred since the company was established, according to management declaration or employees' interviews.

Any other comments: None

Non-compliance:	
<p><b>1. Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p>None observed</p> <p><b>Local law and/or ETI requirement:</b></p> <p>Not applicable</p> <p><b>Recommended corrective action:</b></p> <p>Not applicable</p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p> <p>Not applicable</p>

Observation:	
<b>Description of observation:</b> None observed <b>Local law or ETI requirement:</b> Not applicable <b>Comments:</b> Not applicable	<b>Objective evidence observed:</b>  Not applicable

Good Examples observed:	
<b>Description of Good Example (GE):</b> None observed	<b>Objective Evidence Observed:</b> Not applicable

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

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

**Additional Elements**

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

10A1 All company's employees has above 18 years old, the HR files of each employees contain the ID in copy, also each labour contract is registered in REVISAL which is an electronic register of employees with free access for labour authority. The registration of each contract is requesting the personal number issued by Internal Affairs Ministry and which is containing the birth date. If the personal number is wrong and not correspondent with the name, the registration in REVISAL is rejected

10A2 There are 4 migrant (foreign) employees – one each from Republic of Moldavia, Holland, Morocco and from Ukraine – they are directly employed by PRINTMASTERS and have open ending, full-time contracts, concluded according to Romanian legislation.

For hiring the company uses LUGERA RECRUITMENT SERVICES SRL – Cluj-Napoca, for recruitment services, based on Business Contract no. S&S20224481, concluded on 24/06/2022, valid until 31/12/2022. All recruitment taxes and commissions are paid by PRINTMASTERS, according to management declaration, documents reviewed and employees' interviews. At the audit moment, there are 42 employees employed using LUGERA RECRUITMENT SERVICES. All the employees signed an individual labour contract; the contracts are open ending with provision for notice period.

For the hiring process the following documents are necessary: ID card, study certificates, medical check, to prove that the person can work. ID will assure the identification of the person and will assure to meet the requirements of the Romanian law regarding minimum age for hiring, qualifications. Company found compliant against Entitlement to Work and Immigration requirements.

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

1. Internal Rules were reviewed, and it contain the provisions that only employees with a legal right to work will be employed by the company,
2. LUGERA RECRUITMENT SERVICES SRL – Cluj-Napoca contract,
3. Management and employees' interviews

**Details:**

No issues related to entitlement to work and immigration since the company was established, according to management declaration or employees' interviews.

Any other comments: None

Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI/Additional Elements      <input type="checkbox"/> NC against Local Law  <input type="checkbox"/> NC against customer code:                      None observed  <b>Local law and/or ETI /Additional Elements requirement:</b>                      Not applicable  <b>Recommended corrective action:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)                       Not applicable</p>

Observation:	
<p><b>Description of observation:</b>                      None observed  <b>Local law or ETI/Additional Elements requirement:</b>                      Not applicable  <b>Comments:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>                       Not applicable</p>

Good examples observed:	
<p>Description of Good Example (GE):                      None observed</p>	<p><b>Objective Evidence Observed:</b>                      Not applicable</p>

**10. Other issue areas 10B4: Environment 4–Pillar**

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

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

**B.4. Compliance Requirements**

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

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

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

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

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

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

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

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

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

**B4. Guidance for Observations**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

The company has the Environmental Authorisation no. 69/02.06.2020 and Water Administration Authorisation no. 113/10.11.2020.

All the environmental subjects are administrated by Mr. Dorian Brahaita, Ecologist, Environment Responsible.

The chemical materials are correctly used inside the company.

The company has agreements with specialised companies for collecting recyclable materials (paper, cardboard, plastics), domestic waste and hazardous waste and technological water

The waste is well stored in dedicated places.

Drinking water and that for technological purposes come from own underground source, 4 wells with a depth of 70 meters each; water is counted; technological water refers to that used to wash paint screens; washing uses an installation of closed system for water recirculation, Impro-Tiger Clean type, the screens are daily washed; Waste water is filtered through the indoor filter system of the plant; monthly, the



exhausted solution is taken over by authorized companies. At the audit moment, the company started to reduce the washed paint screens quantity by using new ones, for reducing the water consumption. The paints used are water based, but also contain organic solvents according to MSDS. Domestic wastewater is discharged into an Otto-Graf Carat-Tank Biological Meat Biological Time, from where it is then periodically drained by specialized and authorized company. For air conditioning, fan coils, chiller are used; ventilation of production section is provided by 3 air-conditioning systems.

Specific EMS elements are applied, guided by associated documents: Manual for Integrated Management System, IMS Policy - includes pollution prevention, management of waste, compliance with legal and other requirements, decrease of negative impact of activities upon resources (water, ground, air); it is communicated internally to employees, to suppliers and to other interested parties; Workers have been trained to minimize resources wasting, such as switching off the lights or machinery when not needed.

QHSE Management Programme– includes environment objectives, targets, measures, responsibilities, deadlines, financial resources / needed investment  
 Environment assessment procedure; SEA (significant environment aspects):  
 Waste – paper, cardboard, hazardous waste (bins from paints and solvents, fabrics for cleaning of paints), fire events, air emission of VOC, CO2 (Carbon Footprint)  
 Monitoring and measuring of environment parameters: Testing Report for air emission (VOC and other), issued by Authorized Laboratory of Public Health Authority Satu-Mare  
 Monitoring of energy use – monthly invoice; Monitoring of water consumption - monthly  
 Compliance with legal& other requirements procedure is yearly provided; no nonconformities issued  
 Clients' environment requirements are related to type of paint and colour.  
 Emergency preparedness and response procedure is applied; emergency drills exercised.  
 Operational Control procedure; Chemicals & Hazardous substances list/register  
 MSDS for paints, inks and solvents – available at working site  
 Hazardous waste (empty bins from inks) – disposed by authorized suppliers,  
 Authorization for use of water and discharge of wastewater: available for owner of premises.  
 No fines received from authorities.

The management declared that before starting a contract the clients submit to factory their requirements including environmental requirements. After acknowledgment the factory is complying with all clients' request. All substances are used in a controlled manner, according to producer's recommendations, legal and client's requirements; positive results have been achieved during the controls provided by the local environmental guard.  
 Yearly intercompany environmental reports are issued to support the conformity against certification held by mother company.  
 Company found compliant against Environment requirements.

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

Details:

- 1.Contracts with collecting waste companies
- 2.Environmental authorization
- 3.Workers' interviews
- 4.Management interviews
5. List of chemicals used in company
6. Clients' requirements related to chemical substances
7. Waste policy
8. Waste Management Qualification Certificate of Responsible Person

Details:

No issues related to environment since the company was established, according to management declaration or employees' interviews.

Any other comments: None

**Non-compliance:**

**1. Description of non-compliance:**

NC against ETI/Additional Elements  
None observed

NC against Local Law

**Local law and/or ETI/Additional Elements requirement:**

Not applicable

**Recommended corrective action:**

Not applicable

**Objective evidence observed:**

*(where relevant please add photo numbers)*

Not applicable

**Observation:**

**Description of observation:**

None observed

**Local law or ETI/additional elements requirement:**

Not applicable

**Comments:**

Not applicable

**Objective evidence observed:**

Not applicable

**Good examples observed:**

**Description of Good Example (GE):**

The company has assessed the energetic building performance; yearly intercompany environmental reports are issued to support the conformity certification held by mother company.

**Objective Evidence Observed:**

Documents review and management interviews.

<b>Environmental Analysis</b> <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Mr. Dorian Brahaita, Ecologist, Environment Responsible
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: periodical checks on emissions from heating station, recyclable wastes transferred to specialised companies; process run according to internal procedure "identification and evaluation of environmental aspects"
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: ISO 14001, EMS certified by accredited certification body.
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? Yes, policy / 2020, for integrated QEHS management system; posted in the premise, and www site
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: all interested parts are covered
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: FSC system certified (FSC-C170293, valid until 12.09.2026), Environment Authorisation 69/02.06.2020 yearly revalidated, Water Administration 113-MM/10.11.2020, valid until 10.11.2023
H: Have all legally required permits been shown? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Environment Authorisation 69/02.06.2020 yearly revalidated, Water Administration 113-MM/10.11.2020, valid until 10.11.2023
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: hazardous substances list, specific working procedure PS_04 ver1.0 Management of chemical substances
J: 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 J1: Please give details: only authorised chemicals by client and law are used; all MSDS are sent to the client prior production starts. REACH system applied

<p>K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No                      K1: Please give details: According the Management Program – decreasing of generated hazard wastes, decreasing of quantity of technological water                      For continual improvement the Plan for environmental factors monitoring – F01_PS 13 and the Plan for waste prevention and reduction PS 18 ed 1 are applied.</p>	
<p>L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No                      L1: Please give details: monthly reports, monthly invoices, transportation approvals and material movement forms issued per each transport; waste administration records are monthly issued (based on local legislation HG 856/202) and monthly reports are sent to Environment Found.</p>	
<p>M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No                      M1: Please give details: monthly quantities are monitored, by using counters for water, electric energy and methane gas.</p>	
<p>N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No                      N1: Please give details: transport vehicles are registered from the beginning, when they enter the premise territory, the drivers are instructed about the rules, the warehouse responsible supervises the vehicles inspection; environmental authorisations of the companies which take the wastes are checked.</p>	
<p><b>Usage/Discharge analysis</b></p>		
<p>Criteria</p>	<p>Previous year: Please state period: 2021 Jan – Dec 2021</p>	<p>Current Year: Please state period: 2022 Jan – Sept 2022</p>
<p>Electricity Usage: Kw/hrs</p>	<p>1.289.664 kW/hrs</p>	<p>1.097.062 kW/hrs</p>
<p>Renewable Energy Usage: Kw/hrs</p>	<p>NA</p>	<p>NA</p>
<p>Gas Usage: Kw/hrs</p>	<p>561.767 kW/hrs</p>	<p>254.761 kW/hrs</p>
<p>Has site completed any carbon Footprint Analysis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>If <b>Yes</b>, please state result</p>	<p>784,7 tCO<sub>2</sub>e</p>	<p>NA</p>
<p>Water Sources: Please list all sources e.g. lake, river, and local water authority.</p>	<ul style="list-style-type: none"> <li>• 4 drilled wells</li> </ul>	<ul style="list-style-type: none"> <li>• 4 drilled wells</li> </ul>

Water Volume Used: (m <sup>3</sup> )	4.785 m3	2.968 m3
Water Discharged: <i>Please list all receiving waters/recipients.</i>	<ul style="list-style-type: none"> <li>cesspool</li> </ul>	<ul style="list-style-type: none"> <li>cesspool</li> </ul>
Water Volume Discharged: (m <sup>3</sup> )	4.333 m3	2.629 m3
Water Volume Recycled: (m <sup>3</sup> )	0 m3	0 m3
Total waste Produced <i>(please state units)</i>	66.14 to	71.05 to
Total hazardous waste Produced: <i>(please state units)</i>	16,148 to	16,148 to
Waste to Recycling: <i>(please state units)</i>	41,995 to	30,240 to
Waste to Landfill: <i>(please state units)</i>	50,4 to	37,8 to
Waste to other: <i>(please give details and state units)</i>	NA	NA
Total Product Produced <i>(please state units)</i>	18.707.957 prints	20.416.101 prints

**10C: Business Ethics – 4-Pillar Audit**

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

To be completed for a 4-Pillar SMETA Audit

**10C. Compliance Requirements**

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

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

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

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

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

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

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

**10C. Guidance for Observations**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

10C.1 The Facility has Internal Rules and Code of Conduct which cover Business Practices.

There is a clear and transparent system of worker and management communications. This includes meetings between management and employees, information about Client's Code which are communicated and posted inside production areas.

During the audit the company demonstrated through records that it signed to respect several ethical codes of clients.

10C.2; 10C.3 During the opening meeting the management signed the Intertek Integrity Letter and respected its provision to the end of the audit without any violation. Business integrity policy is included in facility policies and posted on website.

10C.1 There is not any evidence of bribery, corruption or any other type of fraudulent or unfair business practice.

10C.2; 10C.3 Business integrity policy is included in facility policies and posted on website.

10C.4 The policy is communicated to all employees during induction training and regular training. The facility has a transparent system in place for confidentially reporting, and dealing with, unethical business practices, without fear of reprisals towards the reporter. Details are noted in the procedure of solving the employees' individual requests or compliance.

10C.5 The facility is familiar with national regulations/laws concerning business integrity standards.

10C.6; 10.C.7 Mr. Cosmin Lucean – Innovation & Sourcing Manager is appointed as senior manager responsible for implementing standards concerning Business Practices. Company found compliant against Business Ethics requirements.

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

1. Internal policies and procedures:
2. Anti-corruption policy, Compliance Guidelines, Anti-cartel legislation, Vision, and Mission,
3. Code of Conduct
4. Employee and management interviews

Details:

No issues related to business ethics occurred since the company was established, according to management declaration or employees' interviews.

Any other comments: None

**Non-compliance:**

**1. Description of non-compliance:**

NC against ETI/Additional Elements       NC against Local Law  
None observed

**Local law and/or ETI/Additional Elements requirement:**

Not applicable

**Recommended corrective action:**

Not applicable

**Objective evidence observed:**

*(where relevant please add photo numbers)*  
Not applicable

**Observation**

**Description of observation:**

None observed

**Local law or ETI/additional elements requirement:**

Not applicable

**Comments:**

Not applicable

**Objective evidence observed:**

Not applicable

**Good examples observed:**

**Description of Good Example (GE):**

None observed

**Objective Evidence Observed:**

Not applicable

<p>A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy  <input type="checkbox"/> Policy for third parties including suppliers  A1: Please give details: Internal Rules, commercial statements</p>
<p>B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  B1: Please give details: Induction and periodical trainings</p>
<p>C: Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  C1: Please give details: Policy MSMI yearly reanalysed</p>
<p>D: Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  D1: Please give details:</p>



Other findings

**Other Findings Outside the Scope of the Code**

None observed

**Community Benefits**

*(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)*

None reported

## Appendix 1

<p><b>Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."</b></p> <p><input checked="" type="checkbox"/> Not Applicable please x</p>	
<p><b>NOTE:</b> The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p><b>Instruction to Audit Company:</b> fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
<b>ETI Code / Additional Elements</b>	<b>Customer's Supplier Code equivalent</b>
<b>0.A. Universal Rights covering UNGP</b>	<b>0.A. Universal Rights covering UNGP</b>
<p><b>0.A. Guidance for Observations</b></p> <p>0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.</p> <p>0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.</p>	
<b>0.B. Management Systems &amp; Code Implementation</b>	<b>0.B. Management Systems &amp; Code Implementation</b>
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p>	

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

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

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

<p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p><b>Additional Elements: Responsible Recruitment</b>              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.</p>	
<p><b>8A: Sub-Contracting and Homeworking</b></p>	<p><b>8A: Sub-Contracting and Homeworking</b></p>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.              8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<p><b>ETI 9. No harsh or inhumane treatment is allowed</b></p>	<p><b>ETI 9. No harsh or inhumane treatment is allowed</b></p>
<p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.              Additional elements:              9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<p><b>10. Other Issue areas: 10A: Entitlement to Work and Immigration</b></p>	
<p><b>Additional Elements</b>              10A.1 Only workers with a legal right to work shall be employed or used by the supplier.              10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
<p><b>10. Other issue areas 10B2: Environment 2-Pillar</b></p>	

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

**10C. Compliance Requirements**

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

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

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

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

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

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

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













**10C. Guidance for Observations**

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

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



# Photo Form

 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude:185.9m Speed:2.0km/h 18 Oct 2022 15:05:02</p>	 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude:199.6m Speed:0.0km/h 18 Oct 2022 15:10:45</p>	 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude:199.6m Speed:0.0km/h 18 Oct 2022 15:10:48</p>
<p>Company's building and main gate</p>		
 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude:189.0m 18 Oct 2022 12:29:32</p>	 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude:189.0m 18 Oct 2022 12:29:32</p>	 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude:189.0m 18 Oct 2022 12:38:57</p>
<p>Production areas</p>		
 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude:211.6m Speed:0.0km/h 18 Oct 2022 12:39:16</p>	 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude:206.0m Speed:0.0km/h 18 Oct 2022 12:39:32</p>	 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude:189.0m 18 Oct 2022 12:44:46</p>
<p>Tomographic</p>	<p>Embroidery</p>	<p>Engraving</p>
 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude:189.0m 18 Oct 2022 12:43:19</p>	 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude:189.0m 18 Oct 2022 12:44:26</p>	 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude:189.0m 18 Oct 2022 12:43:33</p>
<p>Dark room and PPE used</p>		



83x DN1C  
Cicariău, Comuna Cicariău 437095  
Romania  
Altitude: 189.0m  
18 Oct 2022 12:46:26



83x DN1C  
Cicariău, Comuna Cicariău 437095  
Romania  
Altitude: 226.0m  
Speed: 0.0km/h  
18 Oct 2022 13:01:29



83x DN1C  
Cicariău, Comuna Cicariău 437095  
Romania  
Altitude: 189.0m  
18 Oct 2022 12:38:31

Serigraphic printing area and small quantities of chemical used

Production preparation kits



83x DN1C  
Cicariău, Comuna Cicariău 437095  
Romania  
Altitude: 189.0m  
18 Oct 2022 12:36:57



83x DN1C  
Cicariău, Comuna Cicariău 437095  
Romania  
Altitude: 189.0m  
18 Oct 2022 12:37:15



83x DN1C  
Cicariău, Comuna Cicariău 437095  
Romania  
Altitude: 189.0m  
18 Oct 2022 12:38:20

Production preparation kits and PPE used



83x DN1C  
Cicariău, Comuna Cicariău 437095  
Romania  
Altitude: 189.0m  
18 Oct 2022 12:26:53



83x DN1C  
Cicariău, Comuna Cicariău 437095  
Romania  
Altitude: 189.0m  
18 Oct 2022 12:26:56



83x DN1C  
Cicariău, Comuna Cicariău 437095  
Romania  
Altitude: 189.0m  
18 Oct 2022 12:26:24

Raw material warehouse



363 E58  
Ibba, Comuna Cicariău  
Romania  
18 Oct 2022 12:26:34

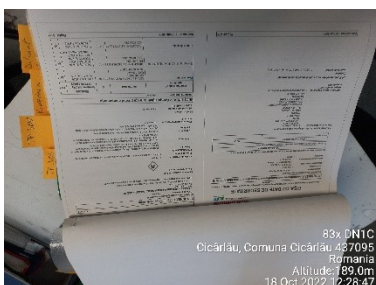


83x DN1C  
Cicariău, Comuna Cicariău 437095  
Romania  
Altitude: 189.0m  
18 Oct 2022 12:27:19



83x DN1C  
Cicariău, Comuna Cicariău 437095  
Romania  
Altitude: 189.0m  
18 Oct 2022 12:27:22

Chemicals warehouse and retention container used



83x DN1C  
Cicariău, Comuna Cicariău 437095  
Romania  
Altitude: 189.0m  
18 Oct 2022 12:28:47

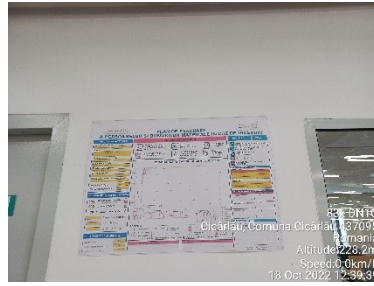
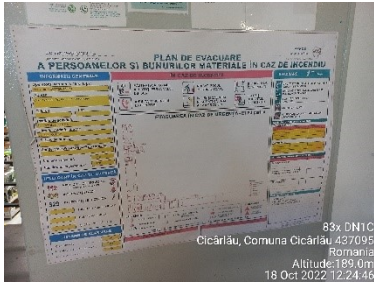


83x DN1C  
Cicariău, Comuna Cicariău 437095  
Romania  
Altitude: 189.0m  
18 Oct 2022 12:28:28

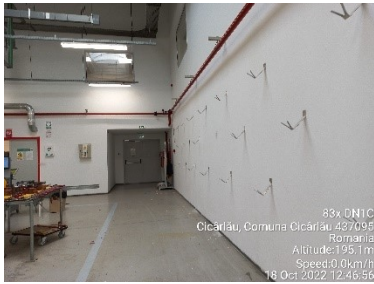


83x DN1C  
Cicariău, Comuna Cicariău 437095  
Romania  
Altitude: 189.0m  
18 Oct 2022 12:26:15

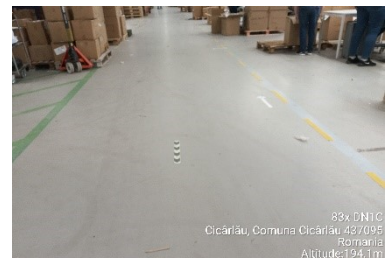
MSDS, eye washer and PPE used in the chemicals warehouse



Evacuation plans

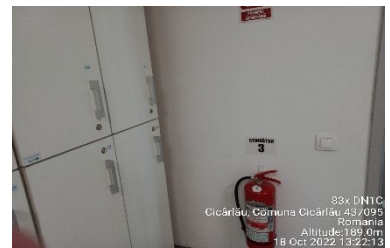


Emergency exits

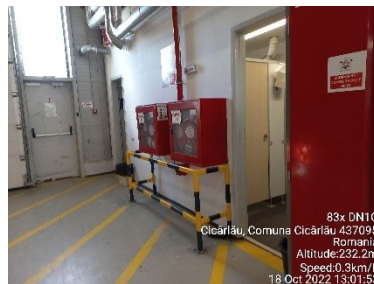
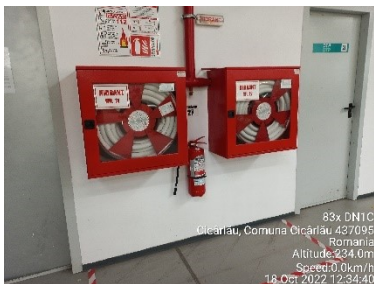


Evacuation route

OBS – evacuation route partially blocked






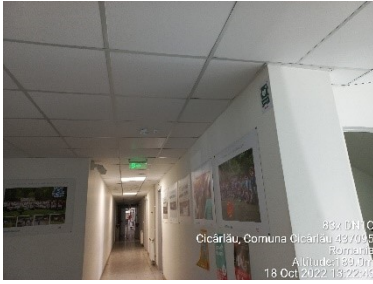








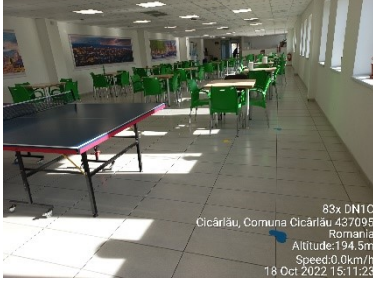


Extinguishers



Internal hydrants

External hydrant

 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude: 222.1m Speed: 0.0km/h 18 Oct 2022 13:07:46</p>	 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude: 201.3m Speed: 0.0km/h 18 Oct 2022 12:51:00</p>	 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude: 199.0m 18 Oct 2022 12:31:53</p>
<p>Fire alarm button</p>	<p>Smoke hatch</p>	<p>Smoke detector</p>
 <p>363 E58 Ilba, Comuna Cicariău Romania 18 Oct 2022 13:23:08</p>	 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude: 229.7m Speed: 0.0km/h 18 Oct 2022 12:41:22</p>	 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude: 199.0m 18 Oct 2022 13:22:55</p>
<p>Central fire alarm system</p>	<p>Electrical panel</p>	<p>Emergency light</p>
 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude: 189.0m 18 Oct 2022 13:17:50</p>	 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude: 189.0m 18 Oct 2022 13:18:00</p>	 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude: 189.0m 18 Oct 2022 12:25:15</p>
<p>First aid kits</p>		
 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude: 189.0m 18 Oct 2022 13:23:23</p>	 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude: 189.0m 18 Oct 2022 13:22:25</p>	 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude: 189.0m 18 Oct 2022 13:22:05</p>
<p>Cloak room</p>		
 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude: 189.0m 18 Oct 2022 13:21:30</p>	 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude: 189.0m 18 Oct 2022 13:21:09</p>	 <p>83x DN1C Cicariău, Comuna Cicariău 437095 Romania Altitude: 194.5m Speed: 0.0km/h 18 Oct 2022 15:11:23</p>
<p>Dining room</p>		

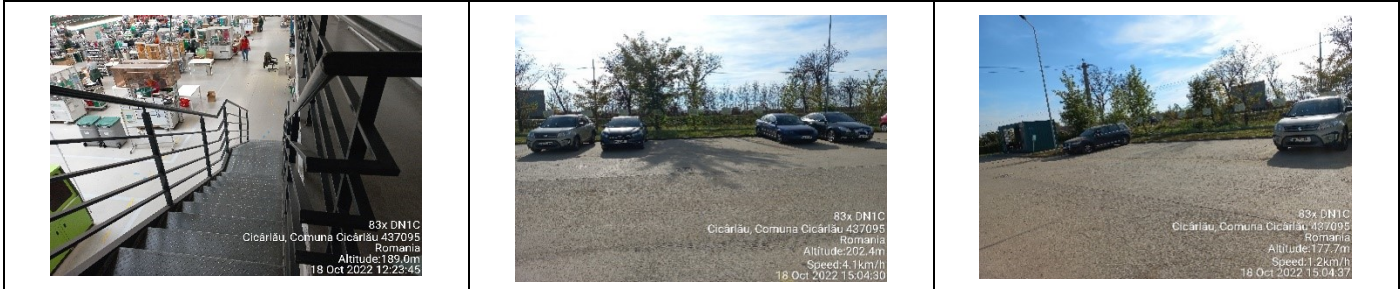


Washing hands and toilet area



Potable water in the production area

Timecard system

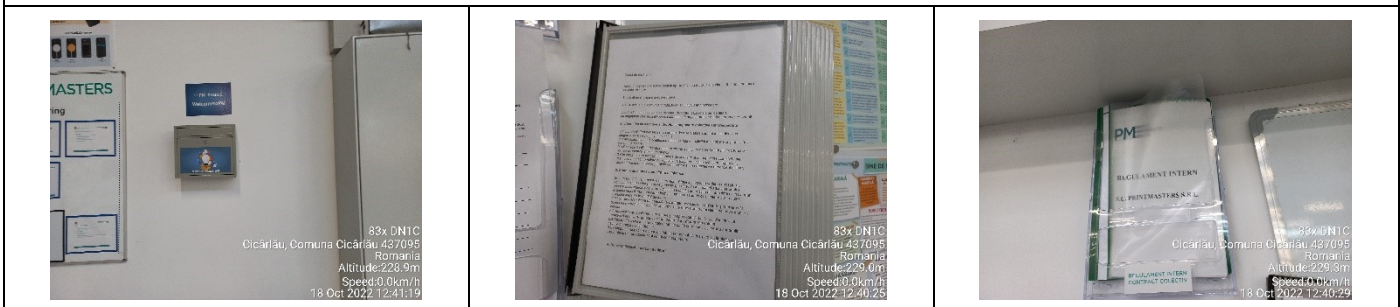


Staircase with handrail

Assembly points



Selective waste collection



Grievance box

ETI Code, Internal Rules and CVA displayed on notice board



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:](#)**

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

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

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\\_2brg\\_3d\\_3d](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

**[Click here for Auditors:](#)**

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

A handwritten signature in blue ink, appearing to be "J. J. J.", is located in the lower right quadrant of the page.