

# SMETA Corrective Action Plan Report (CAPR)

Version 6.1





Audit Details									
Sedex Company Reference: (only available on System)		ZC:	92		Sedex Site Re (only available System)		ZS:		
Business name (0 name):	Company								
Site name:					Co.,ltd				
Site address: (Please include full address)			ľ	Country: China					
Site contact and	d job title:		facto	ry mo	anager		22		
Site phone:				Site e-mail:					
SMETA Audit Pillars:		Standards Safe		Health & Description Environment 2-    Description		nent [	Business Ethics		
Date of Audit:		02/09	/2021				1.5		
Audit Company Name & Logo:  Eurofins CPA  Consumer Products Assurance						Report Own d for by the co ase remove for	ustomer of	the site	
			Audit (	Cond	ucted By				
Affiliate Audit Company	$\boxtimes$	Purchaser			Reto				
Brand owner		NGO			☐ Trade U		nion		
Multi– stakeholder				100	Combined Audit (select all that apply)				

## Audit Content:

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

#### 2-Pillar SMETA Audit

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

#### 4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

# **SMETA Declaration**

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

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

Any exceptions to this must be recorded here (e.g. different sample size):

- The factory was very small, occupied by the whole facility is about 1180 square meter, total 7 employees and only 6 employees were present on the audit day. The documents were well classified and well prepared, so the audit was not complete 8 hours.
- As total 7 employees for this factory, and 6 were present on the audit day, so the interview was conducted individually

Auditor Team (s) (please list all including all interviewers): Lead auditor: Lili Cai APSCA number: CSCA21704532

Team auditor: N/A Interviewers: Lili Cai

Report writer: Lili Cai

Report reviewer: Lutfor Rahman

#### Date of declaration:02/09/2021

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

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

Date: 02/09/2021



# **Audit Parameters**

	Audit Parameters	5				
A: Time in and time out	Day 1 Time in: 8:40 Day 1 Time out:15:30		Day 2 Time in: Day 2 Time ou		Day 3 Time in: Day 3 Time out:	
B: Number of auditor days used:	l auditor*l day					
C: Audit type:	Full Initial Periodic Full Follow-up Partial Follow-Up Partial Other If other, please define	<b>:</b> :				
D: Was the audit announced?	□ Announced     □ Semi – announced     □ Unannounced	d: Wind	dow detail: w	veeks		
E: Was the Sedex SAQ available for review?	☐ Yes ☐ No If No, why not The factory management said they were not required to fill SAQ before the audit.					
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes ☑ No If <b>Yes</b> , please capture	e detai	l in appropriate	e audi	t by clause	
G: Who signed and agreed CAPR (Name and job title)	factory	mana	ger			
H: Is further information available (if yes, please contact audit company for details)	☐ Yes ☑ No					
I: Previous audit date:	12/03/2019					
J: Previous audit type:	Periodic					
K: Were any previous audits reviewed for this audit	☐ Yes ☒ No ☐ N/A					
Audit attendance	Management	Work	er Representativ	ves		
	Senior management	190000000000000000000000000000000000000	er Committee sentatives	Unic	on representatives	

A: Present at the opening meeting?	⊠ Yes □ No	⊠ Yes □ No	☐ Yes ⊠ No		
B: Present at the audit?	⊠ Yes □ No	⊠ Yes □ No	☐ Yes ⊠ No		
C: Present at the closing meeting?	⊠ Yes □ No	⊠ Yes □ No	☐ Yes ⊠ No		
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	N/A				
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	The factory didn't have union.				

# Guidance

The Corrective Action Plan Report summarises the site audit findings and a corrective, and preventative action plan that both the auditor and the site manager believe is reasonable to ensure conformity with the ETI Base Code, Local Laws and additional audited requirements. After the initial audit, the form is used to rerecord actions taken and to categorise the status of the non-compliances.

N.B. observations and good practice examples should be pointed out at the closing meeting as well as discussing non-compliances and corrective actions.

To ensure that good practice examples are highlighted to the supplier and to give a more 'balanced' audit a section to record these has been provided on the CAPR document (see following pages) which will remain with the supplier. They will be further confirmed on receipt of the audit report.

#### Root cause (see column 4)

Root cause refers to the specific procedure or lack of procedure which caused the issue to arise. Before a corrective action can sustainably rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

See SMETA BPG Chapter 7 'Audit Execution' for more explanation of "root cause".

#### **Next Steps:**

- The site shall request, via Sedex, that the audit body upload the audit report, non-compliances, observations and good examples. If you have not already received instructions on how to do this then please visit the web site <a href="https://www.sedexglobal.com">www.sedexglobal.com</a>.
- 2. Sites shall action its non-compliances and document its progress via Sedex.
- Once the site has effectively progressed through its actions then it shall request via Sedex that the
  audit body verify its actions. Please visit <a href="www.sedexglobal.com">www.sedexglobal.com</a> web site for information on how to
  do this.
- 4. The audit body shall verify corrective actions taken by the site by either a "Desk-Top" review process via Sedex or by Follow-up Audit (see point 5).
- 5. Some non-compliances that cannot be closed off by "Desk-Top" review may need to be closed off via a "1 Day Follow Up Audit" charged at normal fee rates. If this is the case, then the site will be notified after its submission of documentary evidence relating to that non-compliance. Any follow-up audit must take place within twelve months of the initial audit and the information from the initial audit must be available for sign off of corrective action.
- 6. For changes to wages and hours to be correctly verified it will normally require a follow up site visit. Auditors will generally require to see a minimum of two months wages and hours records, showing new rates in order to confirm changes (note some clients may ask for a longer period, if in doubt please check with the client).

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# **Corrective Action Plan**

	Corrective Action Plan – non-compliances								
Non- Compliance Number The reference number of the non- compliance from the Audit Report, for example, Discrimination No.7	New or Carried Over Is this a new non- compliance identified at the follow-up or one carried over (C) that is still outstanding	<b>Details of Non-Compliance</b> Details of Non-Compliance	Root cause (completed by the site)	Preventative and Corrective Actions Details of actions to be taken to clear non-compliance, and the system change to prevent re- occurrence (agreed between site and auditor)	Timesc ale (Immedi ate, 30, 60, 90,180,3 65)	Verification Method Desktop / Follow-Up [D/F]	Agreed by Management and Name of Responsible Person: Note if management agree to the non- compliance, and document name of responsible person	Verification Evidence and Comments Details on corrective action evidence	Status Open/Closed or comment
NC1 0: Management Systems	8	Auditor noted that the factory did not provide training on ethical code to workers. 审核员发现工厂没有给员工提供关于ETI的培训。	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	It is recommended that management adopt practices and controls to ensure that training on ethical code are provided workers. 建议工厂给员工提供关于ETI的培训。	60	Desktop	Ms Factory manager		
NC2 3: Health & safety		Auditor noted that the factory didn't set an emergency assembly point. 审核员发现工厂没有设置紧急集合点。	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	Auditor noted that the factory didn't set an emergency assembly point. 审核员发现工厂没有设置紧急集合点。	30	Desktop	Ms Factory manager		
NC3 3: Health & safety		Auditor noted that a large number of flammable material (e.g. cartons) was laid beside one electric switch box in injection workshop.	☐ Training ☐ Systems ☐ Costs ☐ lack of workers	It is recommended that management adopt practices and controls to ensure that all electric boxes in the injection	30	Immediate	Ms Factory manager		

	注塑车间1个电开关盒下方堆放了大量 的易燃纸箱。	Other – please give details:	workshop are free of obstruction. 建议工厂确保注塑车间内所有电箱都不被阻挡,应留有足够的安全通道和工作空间。				
NC4 3: Health & safety	Auditor noted that 1 out of 2 exits in screen printing workshop was partially blocked by semi-product. 审核员发现丝印车间1/2个安全出口被半成品部分堵塞了。	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	It is recommended that management adopt practices and controls to ensure that all exits in the screen printing workshop are free of obstruction. 建议工厂确保丝印车间内所有的安全出口不受阻挡。	30	Follow up	Ms Factory manager	
NC5 3: Health & safety	Auditor noted that the last inspection for 10% emergency lights and the safety exits was in July 2021 not on a monthly basis. 审核员发现工厂的,10%安全出口标志灯,应急灯最近一次的检查时间在2021年7月,而不是每月对其做检查。	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other — please give details:	It is recommended that management adopt practices and controls to ensure that the fire-safety inspection for fire-fighting equipment the emergency lights and the safety exits are conducted on monthly basis. 建议工厂对安全出口标志灯,应急灯每月进行检查。	30	Desktop	Ms Factory manager	
NC6 3: Health & safety	Auditor noted that no material safety data sheet for products (MSDS) was available for the chemicals (e.g. detergent) being used in the injection workshop. 审核员发现注塑车间使用的清洁剂没有提供化学品安全技术说明书(MSDS)。	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	It is recommended that management adopt practices and controls to ensure that all chemicals being used in the factory have complete material safety data sheet for products (MSDS) which are also provided to the relevant employees handling chemicals in the factory. 建议所有在工厂使用的化学品都具备完整的化学品安全技术	30	Desktop	Ms Factory manager	

			说明书(MSDS),并提供给工厂内使用化学品的相关员工。				
NC7 3: Health & safety	Auditor noted that hazardous chemicals such as printing ink detergent were posted with content labels not safety labels. 审核员发现危险化学品例如油墨,清洗剂张贴的是内容标签而不是安全标签。	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	It is recommended that management adopt practices and controls to ensure that all hazardous chemicals stored or being used in the factory is posted with safety labels. 建议所有在工厂内储存和使用的危险化学品都有张贴安全标签 标签的内容要完整。	30	Desktop	Ms Factory manager	
NC8 3: Health & safety	Auditor noted that there was no anti-leakage facility (e.g. secondary container) in the chemical material storage for detergent and glue (Hazardous chemical). 审核员发现工厂没有为清洗剂和胶水 (危险化学品)设置防渗漏设施/二次容器。	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	It is recommended that management adopt practices and controls to ensure that the antileakage facility (e.g. secondary container) is used for detergent and glue. 建议工厂为存放的清洗剂和胶水设置防渗漏设施/二次容器。	30	Desktop	Ms Factory manager	
NC9 3: Health & safety	Auditor noted that the eyewash facility installed in chemical used area but the water pressure was insufficient. 工厂有在化学品使用区域安装洗眼器,但是现场测试该洗眼器水压不足	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	It is recommended that management adopt practices and controls to ensure that the installed eye wash facility was functional. 建议安装的洗眼器有效。	30	Desktop	Ms Factory manager	
NC10 3: Health & safety	Auditor noted that printing ink was using in screen printing workshop which might cause occupational diseases to employee in that workshop. However factory did	☐ Training ☐ Systems ☑ Costs ☐ lack of workers	It is recommended that management adopt practices and controls to ensure to entrust an occupational health	30	Desktop	Ms Factory manager	

	not conduct testing of factors of occupational hazards in screen printing workshop.  审核员发现工厂丝印车间使用油墨,对员工存在潜在的职业病危害。但工厂并未对该车间进行职业危害因素检测。	Other – please give details:	technical service institution with the corresponding qualification to conduct testing of factors of occupational hazards at least once a year. 建议工厂至少每年一次检测职业病危害因素。				
NC11 3: Health & safety	Auditor noted that the factory did not provide regular occupational health checks to one employee in screen printing workshop who was in contact with hazardous materials.  审核员发现工厂没有给丝印车间使用危险化学品的一名员工提供职业病体检。	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	It is recommended that management adopt practices and controls to ensure that regular occupational health checks are provided to all employees handling hazardous materials. 建议工厂给接触有毒有害物质的员工提供定期体检。	30	Desktop	Ms Factory manager	
NC12 6: Working Hours	Auditor noted that all 7 employees worked in excess of the statutory overtime hour limits. A review of 7 employees' time records (7 employees from current month July 2021 previous month February 2021 and December 2020 respectively) yielded the following: 7 out of 7 employees worked in excess of 36 overtime hours per month (i.e. 40 to 48 hours) in July 2021 which was not in compliance with the legal requirement 4 out of 7 employees worked in excess of 36 overtime hours per month (i.e. 48 to 50 hours) in December 2020 which was not in compliance with the legal requirement in the legal requi	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	It is recommended that factory management adopt practices and controls to ensure that employee overtime hours do not exceed the statutory limits. 建议工厂确保员工的加班时间符合法律要求。	60	Followup	Ms Factory manager	

	在2020年12 月的月加班为48-50小时。						
NC13 8: Regular employment	Auditor noted that according to the employment contracts employees were paid hourly wage and the hourly rate was not defined. However according to the payroll records provided it was noted that employees were paid monthly wage although their monthly wage was equal to the local minimum wage standard (RMB2010 per month in all tested periods.) 审核员发现根据合同员工以计时来计算工资,但是没有定义时薪。然而根据工资表所有员工都是月薪制,虽然他们的月薪工资和最低工资相同。	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	It is recommended that management adopt practices and controls to ensure that employees are properly compensated according to the employment contracts or the contracts are updated according to actual payment system. 建议工厂按照劳动合同的约定给员工正确支付工资,或者按照实际工资支付方式更新劳动合同。	30	Desktop	Ms Factory manager	
NC14 10B: Environment	Auditor noted that waste chemical drums(HW49) were generated in the factory. However the factory management was unable to provide the hazardous waste entrust disposal contract and relevant transfer manifest of these hazardous wastes for review. 审核员发现工厂有化学品空桶(HW49)产生但工厂不能提供相关的合法处置文件(与有资质回收商的合同与危废转移联单)。	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other - please give details:	It is recommended that management adopt practices and controls to ensure that the hazardous waste is disposed by qualified contractors. 建议工厂使用符合资质的危险废物回收商进行危险废物处理。	30	Desktop	Ms Factory manager	
NC15 10B: Environment	Auditor noted that the wastewater generated from screen printing boards washing was not well disposed. The factory let the wastewater to evaporate. 审核员发现工厂清洗丝印网版的废水没有合适的处理,工厂让其自行蒸发。	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other - please give details:	It is recommended that management adopt practices and controls to ensure that wastewater generated from screen printing boards washing is well disposed. 建议工厂确保清洗丝印网版产生的废水有经合适的处理。	30	Follow up	Ms Factory manager	



ė.	Corrective Action Plan – Observations						
Observation Number The reference number of the observation from the Audit Report, for example, Discrimination No.7	New or Carried Over Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding	<b>Details of Observation</b> Details of Observation	Root cause (completed by the site)	Any improvement actions discussed (Not uploaded on to SEDEX)			
Nil	Nil	Nil	Nil	Nil			

	Good examples					
Good example Number The reference number of the good example from the Audit Report, for example, Discrimination No.7	Details of good example noted	Any relevant Evidence and Comments				
Nil	Nil	Nil				

Date: 02/09/2021



# Confirmation

Please sign this document confirming that the above findings have been discussed with and understood by you: (site management)  If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.						
A: Site Representative Signature:		Title Factory manager				
		Date 02/09/2021				
B: Auditor Signature:	Lili Cai	Title Auditor				
		Date 02/09/2021				
C: Please indicate below if you, the site	management, dispute any of the findings. No ne	eed to complete D-E, if no disputes.				
D: I dispute the following numbered nor Nil	n-compliances:					
E: Signed:		Title Factory manager				
(If <u>any</u> entry in box D, please complete a signature on this line)		Date 02/09/2021				
F: Any other site Comments: Nil						

# **Guidance on Root Cause**

#### **Explanation of the Root Cause Column**

If a non-compliance is to be rectified by a corrective action which will also prevent the non-compliance re-occurring, it is necessary to consider whether a system change is required.

Understanding the root cause of the non-compliance is essential if a site is to prevent the issue reoccurring.

The root cause refers to the specific activity/ procedure or lack of activity /procedure which caused the non-compliance to arise. Before a corrective action can rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

Since this is a new addition, it is not a mandatory requirement to complete this column at this time. We hope to encourage auditors and sites to think about Root Causes and where they are able to agree, this column may be used to describe their discussion.

### Some examples of finding a "root cause"

#### Example 1

Where excessive hours have been noted the real reason for these needs to be understood, whether due to production planning, bottle necks in the operation, insufficient training of operators, delays in receiving trims, etc.

#### Example 2

A non-compliance may be found where workers are not using PPE that has been provided to them. This could be the result of insufficient training for workers to understand the need for its use; a lack of follow-up by supervisors aligned to a proper set of factory rules or the fact that workers feel their productivity (and thus potential earnings) is affected by use of items such as metal gloves.

#### Example 3

A site uses fines to control unacceptable behaviour of workers.

International standards (and often local laws) may require that workers should not be fined for disciplinary reasons.

It may be difficult to stop fines immediately as the site rules may have been in place for some time, but to prevent the non-compliance re-occurring it will be necessary to make a system change.

The symptom is fines, but the root cause is a management system which may break the law. To prevent the problem re-occurring it will be necessary to make a system change for example the site could consider a system which rewards for good behaviour

Only by understanding the underlying cause can effective corrective actions be taken to ensure continuous compliance.

The site is encouraged to complete this section so as to indicate their understanding of the issues raised and the actions to be taken.





For more information visit: 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

Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\_2brg\_3d\_3d

Click here for Auditors:

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

Date: 02/09/2021