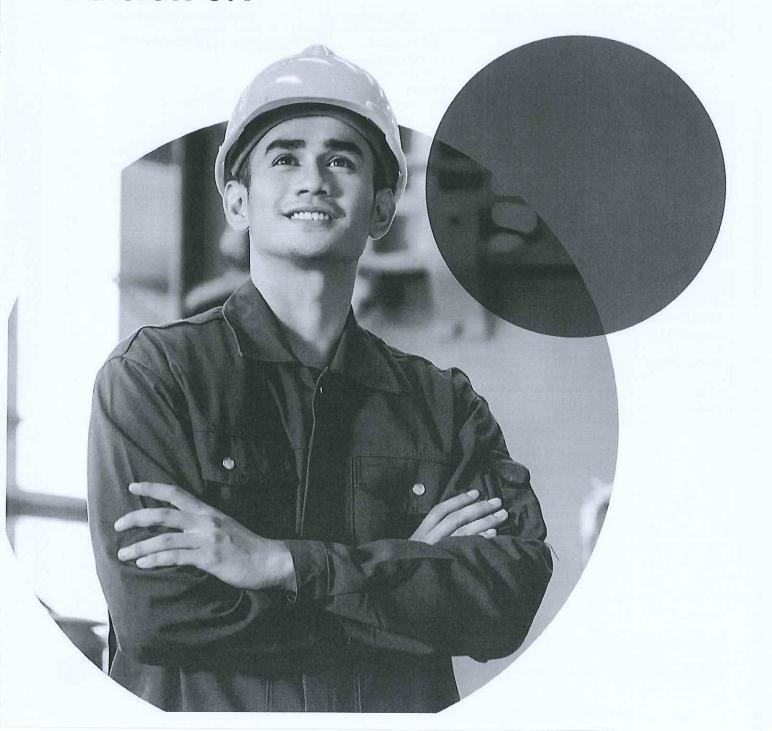


SMETA Corrective Action Plan Report (CAPR)

Version 6.1





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.



Audit Parameters

	Audit Pa	rameters	
A: Time in and time out	A1: Day 1 Time in: 11.00 A2: Day 1 Time out: 16.30	A3: Day 2 Time in: 9.00 A4: Day 2 Time out: 17.00	A5: Day 3 Time in: A6: Day 3 Time out:
B: Number of auditor days used:	2 auditor X 1,5-man days		
C: Audit type:	Full Initial Periodic Full Follow-up Partial Follow-Up Partial Other If other, please define		
D: Was the audit announced?	Announced Semi – announced: Wi Unannounced	ndow detail: weeks	2
E: Was the Sedex SAQ available for review?	☐ Yes ☐ No E1: If No, why not?		
F: Any conflicting information SAQ/Pre- Audit Info to Audit findings?	Yes No If Yes , please capture det	ail in appropriate audit by	/ clause
G: Who signed and agreed CAPR (Name and job title)	STEFANIA OTTAVIANI QUA	ALITY MANAGER	
H: Is further information available (If yes, please contact audit company for details)	☐ Yes ☑ No		
I: Previous audit date:	25-26/10/2022		
J: Previous audit type:	SMETA 6.1 – 4 PILLAR		
K: Were any previous audits reviewed for this audit	☐ Yes ☒ No ☐ N/A		

Audit attendance	Management	Worker Representatives
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Audit company: SGS ITALIA Report reference: 202119944 Date: 18/19.09.2023



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:

- 1. 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 www.sedexglobal.com.
- 2. Sites shall action its non-compliances and document its progress via Sedex.
- 3. Once the site has effectively progressed through its actions then it shall request via Sedex that the audit body verify its actions. Please visit www.sedexglobal.com 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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	Any improvement actions discussed (Not uploaded on to SEDEX)	It is recommended that these agreements also be validated with the trade unions	t is recommended that a criterion be defined for keeping contractor documentation up-to-date and available at all times.
ions	Root cause (completed by the site)	difficulty in finding qualified maintenance personnel only for the tomato campaign period	Lack of procedures
Corrective Action Plan – Observations	Details of Observation Details of Observation	The company has implemented specific actions to reduce the overtime hours of certain figures (maintenance workers, logistics workers) during the tomato campaign period. More staff have been hired and working hours have been varied. Finally, specific contracts were signed with some of the workers concerned to establish a lump sum for overtime hours worked during the tomato campaign period. It is recommended that these agreements also be validated with the trade unions	Although the contract signed between the company and the supplier Mow Service stipulates that copies of occupational health and safety certificates and specific qualifications (e.g. forklift qualification) must also be delivered to the company, this documentation is not always available.
	New or Carried Over Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding	> Z	} © Z
	Observation Number The reference number of the observation from the Audit Report, for example, Discrimination No.7	OB1 6 Cotal hours exceed 60 hours but ETI requirements	OB2 OB No / inadequate system in place to monitor the site's own suppliers against social



Confirmation

lease sign this document confirming the actual signatures are not possible in e	lease sign this document confirming that the above findings have been discussed with and understood by you: (site management) actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating t	lease sign this document confirming that the above findings have been discussed with and understood by you: (site management) 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:	STEFANIA OTTAVIANI	Title QUALITY MANAGER
	Felan Uto	Date 19.09.2023
s: Auditor Signature:	DANIELA BONDI	Title LEAD AUDITOR
	Ind a	Date 19.09.2023
: Please indicate below if you, the site	: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes.	eed to complete D-E, if no disputes.
3: I dispute the following numbered non-compliances: NONE RAISED	n-compliances: NONE RAISED	
: Signed: If <u>any</u> entry in box D, please complete signature on this line)		Title Date
: Any other site Comments:		



Sedex

For more information visit: Sedexglobalcom

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