

Issue Titles

Issue Titles provide detail about the nature of a non-conformance or non-compliance. Issue titles have an assigned criticality which define the severity of the finding. Auditors do not determine criticalities, these are fixed to the Issue Titles and pre-determined by Sedex. Auditors are not provided the criticalities within the SMETA Platform, and so will not disclose NC criticalities to the site management during an audit. Auditors will select Issue Titles based on their relevance to the issue found, rather than the criticality

Note: The Issue Title ID is a numerical value which supports easy identification and data analysis. Where an Issue Title has been carried over from SMETA 6.1, the ID remains the same. Issue Titles introduced under SMETA 7.0 have been assigned their own unique value. The values do not follow a linear pattern.

ETI Code & Sedex Addition	Workplace Requirement ID	Workplace Requirement Description	Issue Title ID	Issue Title	Verification Method	Recommended Completion Timescale
0: Enabling accurate assessment	0.A	Allow the auditor to conduct and complete the audit without obstruction to all requested documents, interviewees and the facility itself (including outbuildings and accommodation). Provide the auditor with genuine and authentic records.	1	The audit was fully not completed due to an intentionally obstructive practice (e.g. the auditor was denied access to relevant documents or areas of the site, permission to interview workers, etc.)	Follow-up	Immediate
			963	The audit was partially not completed due to an intentionally obstructive practice (e.g. the auditor was denied access to relevant documents or areas of the site, permission to interview workers, etc.)	Follow-up	Immediate
			2	Audit completed in full, but management deliberately attempted to hinder the audit process	Follow-up	Immediate

			3	Management refused union/worker representative involvement in the audit	Follow-up	Immediate
			4	Evidence that workers were coached to mislead the auditor, or denied the ability to speak freely	Follow-up	Immediate
			5	Falsified, duplicate or intentionally incomplete records including verified inconsistencies	Follow-up	Immediate
			800	Inaccurate or incomplete records, significantly impacting the progress of the audit	Follow-up	Immediate
			802	Evidence that some workers were deliberately hidden to avoid the assessment	Follow-up	Immediate
	0.B	Not offer bribes to or threaten the auditor, nor in any way induce the auditor to be dishonest.	657	Evidence that auditor was offered a bribe or other inducement to be dishonest	Follow-up	Immediate
	0.C	Provide an accurate site description and Sedex site profile declared prior to or during the audit.	801	Worker numbers are significantly different from those declared on the site profile, or worker numbers at the time of audit are significantly below the indicated peak number	Follow-up	Immediate
			7	Site description provided to the auditor does not match Sedex Site Profile or site profile does not match the actual situation onsite	Follow-up	Immediate
	0.D	Maintain a written human rights policy statement that is approved at the most	803	No/inadequate written human rights policy statement in place.	Desktop	30 days

		senior level, communicated to all personnel, and trained to relevant personnel.	804	Written human rights policy in place but does not meet the full requirement to be approved at the most senior level, communicated to all personnel, and trained to relevant personnel.	Desktop	60 days
1: Employment is freely chosen	1.A	Not seek to profit from forced labour, human trafficking, debt bondage/ bonded labour or any other form of modern slavery.	67	Evidence of forced labour, human trafficking, debt bondage/bonded labour or other form of modern slavery	Follow-up	Immediate
			68	Evidence of forced labour, human trafficking, debt bondage/bonded labour or other form of modern slavery at subcontractor level	Follow-up	Immediate
			63	No/inadequate systems (or measures) in place to identify and prevent various forms of modern slavery or human trafficking within own operations	Follow-up	30 days
	1.B	Not control workers through threats, penalties, coercion, physical force, violence, or harsh or inhumane treatment.	69	Workers are led to believe that if they do not comply with what is being asked of them they or their family will be subject to negative physical, social or financial consequences	Follow-up	Immediate
			70	Workers are controlled through threats, penalties, coercion, physical force, or harsh or inhumane treatment	Follow-up	Immediate
			87	Undocumented migrant workers have been subjected to threats of being returned to their home country and/or reported to authorities if they leave employment	Follow-up	Immediate

			79	Employer or recruiter uses coercive practices to physically or psychologically control the worker during the recruitment process.	Follow-up	Immediate
1.C	Ensure that workers can freely leave the workplace and living accommodation (where provided), allowing for what is reasonable (e.g. for safety or security in hazardous worksites). Security guards or other authoritative figures should not restrict workers' freedom of movement beyond what is reasonable.	97	Workers' movements are controlled by the employer, an agent or other third party	Follow-up	Immediate	
		98	Workers are restricted from freely leaving or re-entering the workplace and/or living accommodation beyond what is necessary for safety/security (or without lodging a deposit, obtaining permission, etc.)	Follow-up	30 days	
1.D	Ensure that any surveillance (primarily human but also electronic, such as CCTV or facial recognition), if used, is not excessive or for the purpose of controlling or intimidating workers.	101	Workers are under constant or excessive surveillance (particularly human but also electronic, such as CCTV cameras) for the purpose of control or intimidation	Follow-up	60 days	

1.E	Not unreasonably prevent workers from communicating with others inside or outside the workplace, deny workers social interaction or otherwise intentionally subject workers to isolation.	113	Workers are isolated/have no means of contacting the outside world because of a practice enforced on them (e.g. confiscation of mobile phones or other communication devices)	Follow-up	Immediate
1.F	Not retain workers' original passport, travel or identity documents or any other valuable item. In cases where workers fear the theft or loss of personal items (for example, at on-site or dormitory housing), provide a safe, documented, voluntary storage option, with unrestricted access for workers.	103	Workers do not have free and unrestricted access to their original identification or travel documents (e.g. passports)	Follow-up	Immediate
		104	Workers do not have free and unrestricted access to their valuable personal possessions/feel that they cannot leave the job without risking their loss	Follow-up	Immediate
		805	Original identification or travel documents are retained where there is a legal requirement to do so, but workers are not given free and unrestricted access to retrieve them	Follow-up	30 days
		964	Storage of workers personal items is not documented	Desktop	60 days
1.G	Allow workers to resign at the end of their contract or at any time, without paying a fee, and receiving the full wages owed including any holiday pay/benefits,	91	Notice period required from the worker is contrary to law	Follow-up	60 days
		93	Workers are not permitted to resign without prior management approval	Desktop	60 days

	provided they give a period of notice in line with applicable law or not greater than one month, whichever period is shorter.	92	No standard notice period defined	Desktop	60 days
		88	Workers are required to pay fees upon early termination of employment (or fail to receive money owed, e.g. security deposits)	Follow-up	60 days
		89	Workers cannot terminate their contract until after a specified period of time has passed after mandatory training	Follow-up	60 days
1.H	Pay workers according to a regular pay schedule, in line with applicable law and not more than on a monthly basis.	806	Pay schedule is less frequent than that mandated by law.	Follow-up	90 days
		807	Pay schedule is legally compliant, but less frequently than on a monthly basis.	Follow-up	90 days
1.I	Not intentionally place workers in debt. For example, by undervaluing the work performed, inflating interest rates or charging workers above market rates (e.g. for food or housing). Any loans or advances must be minimal and to the worker's benefit,	72	Workers cannot leave employment until they have worked to pay off debts owed to the employer.	Follow-up	Immediate
		808	Workers are compelled to make use of stores or services operated by the employer, where access to other stores or services is otherwise not possible.	Follow-up	30 days
		809	Workers are charged above market rate for stores or services, where access to other stores or services is not possible.	Follow-up	30 days

	for repayment on mutually agreed and acceptable terms.	810	Processes are in place which systematically lead to workers being placed in significant debt	Follow-up	30 days
1.J	Not charge or withhold part of a worker's salary as a deposit, or require workers to post bonds or repay government levies.	82	Workers are required to lodge deposits (financial or personal documents) for employment	Follow-up	30 days
		811	Workers are required to post bonds or repay government levies	Follow-up	60 days
1.K	Not withhold any payments until a worker's term of work is complete (forced savings), delay payments, or implement any other financial scheme that prevents workers from leaving their employment.	76	Forced savings programs are in place and workers do not have access until term of work is complete	Follow-up	60 days
		75	Practice of wage withholding, imposing financial penalties, forced savings or other financial schemes denies workers the opportunity to leave or change employers until after a specified period/length of service	Follow-up	Immediate
		77	Legally required payments to workers are not paid if worker does not complete a set period of work	Follow-up	60 days
1.L	Ensure that workers can achieve the legal minimum wage without breaching applicable laws or the terms of collective bargaining agreements on working hours, overtime and rest days.	812	Workers cannot achieve legal minimum wage without breaching applicable laws/terms of collective bargaining agreements on working hours, overtime and rest days	Follow-up	60 days

1.M	Carry out appropriate due diligence to minimise the risk of workers being placed in a situation of forced labour by third parties.	64	No/inadequate systems (or measures) in place to identify and prevent various forms of modern slavery or human trafficking within third parties.	Follow-up	60 days
1.N	Ensure any prison labour is voluntary and the site undertakes appropriate due diligence to ensure the workers meet the requirements of the ETI Base Code	109	Evidence of involuntary and/ or illegal prison labour on site or in the supply chain	Follow-up	Immediate
		110	Evidence of voluntary prison labour, employed as per the law but fails to meet ethical standards (i.e. ILO/ETI guidance)	Follow-up	30 days
1.O	Comply with all other applicable laws that impose conditions on Code Area 1.	71	Workers are coerced to fraudulently claim social security benefits and/or take out loans/credit arrangements	Follow-up	30 days
		78	Loans exceed the legally allowed maximum limit	Follow-up	60 days
		62	Failure to comply with laws on forced labour and modern slavery but no human rights violation identified (e.g. failure to meet reporting requirements)	Desktop	30 days

			813	A deliberate, systemic or severe breach of a local law which represents a danger to workers or others, or which denies a basic human right (relating to Code Area 1: Employment is Freely Chosen but which cannot be captured under another Workplace Requirement)	Follow-up	30 days
			814	A systemic breach of a local law that could present a danger to workers or violate upon a human right (relating to Code Area 1: Employment is Freely Chosen but which cannot be captured under another Workplace Requirement)	Follow-up	60 days
			815	An isolated breach of local law which represents low risk to workers (relating to Code Area 1: Employment is Freely Chosen but which cannot be captured under another Workplace Requirement)	Desktop	90 days
1.A: Responsible recruitment and entitlement to work	1.A.A	Review original photographic identification to validate that all workers (including non-directly hired workers) have the legal right to work, or require any labour provider and on-site subcontractor to do the same, and put in place effective due	593	No process or system established to validate that workers have a right to work	Follow-up	30 days
			594	Site requires labour providers/ on-site subcontractors agencies/recruitment partners to check right to work, but does not have adequate due diligence in place to monitor such checks.	Desktop	30 days
			816	Site requires agencies/recruitment partners to check right to work, but does not have adequate due diligence in place to monitor	Follow-up	90 days

	diligence to monitor that they do so.		such checks (i.e. random sampling not conducted)		
		592	Workers engaged in work without the legal right to work - Systemic	Follow-up	Immediate
		817	Workers engaged in work without the legal right to work - Isolated	Follow-up	60 days
1.A.B	Retain records necessary to demonstrate that all workers have the legal right to work.	818	Documentation demonstrating workers have the right to work not available - Systemic	Follow-up	30 days
		819	Documentation demonstrating workers have the right to work not available - Isolated	Follow-up	60 days
1.A.C	Ensure that the nature of work, working conditions, living conditions, employment terms, living costs, wages and benefits accurately reflect those communicated to workers during recruitment.	83	Workers were given false, misleading, or incomplete information at the point of recruitment (e.g. regarding wages and working conditions, or the type of work, housing and living conditions, acquisition of regular migration status, job location, identity of the employer etc.)	Follow-up	30 days
		84	Contractual terms agreed or communicated during recruitment have been changed or replaced with less favourable terms for the worker without the worker's knowledge or consent (i.e. contract substitution or supplemental agreements)	Desktop	30 days
		85	Job adverts (particularly for jobs requiring migration) are misleading about the job, job location, employer, working conditions, employment contract terms, wages or earnings	Desktop	30 days

1.A.D	Include appropriate requirements and protections for children and young workers within service agreements with employment agencies and recruitment partners.	961	Agreements with employment agencies and labour brokers do not include sufficient protections for children and young workers	Desktop	30 days
1.A.E	Have systems in place to verify that all workers are recruited legally and fairly, including conducting appropriate due diligence to verify that any third-party employment agencies or other recruitment brokers are following ethical practices.	550	Agreements with labour providers or on-site subcontractors do not include sufficient protections for children and young workers	Follow-up	60 days
		965	Systems are in place to verify that any labour providers or on-site subcontractors are following ethical recruitment practices, but these are inadequate or not consistently applied/demonstrable	Follow-up	60 days
		966	No systems in place to verify that any labour providers or on-site subcontractors are following ethical recruitment practices.	Follow-up	60 days
		967	Systems are in place to ensure direct recruitment is conducted ethically, but these are inadequate, or not consistently applied/demonstrable.	Follow-up	60 days
		968	No systems are in place to ensure direct recruitment is conducted ethically.	Follow-up	60 days
		969	Documentary evidence necessary to verify third party employed workers' working conditions not available during audit - Systemic	Follow-up	60 days

			551	Documentary evidence necessary to verify third party employed workers' working conditions not available during audit - Isolated	Desktop	60 days
			552	Site does not have correct legal licences for engagement of third party employed workers	Follow-up	30 days
			555	Labour providers used do not hold the legally required license to operate as a labour provider	Desktop	30 days
	1.A.F	Ensure that payment to employment agencies and other recruitment partners is adequate to cover the costs to the agency of recruitment.	821	Site does not have an adequate system to assess the compliance of third party employed workers' terms of engagement/employment	Follow-up	30 days
			822	There is no payment made to labour provider or on-site subcontractor by the supplier to cover legal and contractual costs to the agency of recruitment	Follow-up	30 days
	1.A.G	Undertake due diligence to understand the type and value of recruitment fees and related costs of recruitment which workers have paid (legal or otherwise, as defined by the ILO and including travel and visa costs). Where international travel takes place, this must include both the departure and	823	No due diligence is undertaken to understand the type and value of recruitment fees and related costs of recruitment which workers have paid (legal or otherwise, as defined by the ILO and including travel and visa costs)	Follow-up	60 days
			824	Some due diligence is undertaken to understand the type and value of recruitment fees and related costs of recruitment which workers have paid (legal or otherwise, as defined by the ILO and including travel and visa costs), but this is insufficient to meet the	Follow-up	120 days

	destination countries. This due diligence should include interviews or surveys of a sample of workers.		SMETA Workplace Requirements of this code section		
1.A.H	Include provisions within service agreements that hold labour providers or on-site subcontractors contractually responsible to ensure no recruitment fees or related costs are incurred or charged to workers and specifies the responsible party for reimbursing workers accordingly if they incur fees or costs.	825	Collaborative Action Required: Service agreements do not hold labour provider or on-site subcontractor responsible for ensuring no recruitment fees or related costs are incurred or charged to workers, and/or do not specify the responsible party for reimbursing workers accordingly if they incur fees or costs.	Collaborative Action Required	Collaborative Action Required
		826	Collaborative Action Required: Service agreements are in place that hold labour providers or on-site subcontractors responsible for ensuring no recruitment fees or related costs are paid, but these are not in line with ILO definitions of recruitment fees and costs.	Collaborative Action Required	Collaborative Action Required
1.A.I	Verify that workers who are found to pay recruitment fees or related costs (legal or otherwise, as defined by the ILO and including travel and visa costs), are fully reimbursed in a timely manner.	827	Collaborative Action Required: Recruitment fees and/or costs have been paid, contrary to law, and there is no plan in place to fully reimburse workers	Collaborative Action Required	Collaborative Action Required
		828	Collaborative Action Required: Recruitment fees and/or costs have been paid, not contrary to law, and there is no plan in place to fully reimburse workers	Collaborative Action Required	Collaborative Action Required

			829	Collaborative Action Required: Recruitment fees and/or costs have been paid, contrary to law, there is a plan to fully reimburse workers, but the site has not done so	Collaborative Action Required	Collaborative Action Required
			830	Collaborative Action Required: Recruitment fees and/or costs have been paid, not contrary to law, there is a plan to fully reimburse workers, but the site has not done so fully at the time of audit	Collaborative Action Required	Collaborative Action Required
	1.A.J	Comply with all other applicable laws that impose conditions on Code Area 1.A	554	Agency workers not receiving the same benefits as permanent employees, and this is contrary to law	Follow-up	30 days
			596	Records for right to work in black & white copies only, contrary to local law	Desktop	60 days
			831	A deliberate, systemic or severe breach of a local law which represents a danger to workers or others, or which denies a basic human right (relating to Code Area 1.A: Responsible recruitment and entitlement to work, but which cannot be captured under another Workplace Requirement)	Follow-up	30 days
			832	A systemic breach of a local law that could present a danger to workers or violate upon a human right (relating to Code Area 1.A: Responsible recruitment and entitlement to work, but which cannot be captured under another Workplace Requirement)	Follow-up	60 days
			833	An isolated breach of local law which represents low risk to workers (relating to	Desktop	90 days

				Code Area 1.A: Responsible recruitment and entitlement to work, but which cannot be captured under another Workplace Requirement)		
2: Freedom of association and right to collective bargaining are respected	2.A	Ensure that all workers understand their legal rights in relation to trade unions, collective bargaining agreements and worker committees.	117	Workers are not informed of their rights to join or form a worker committee/trade union or to bargain collectively (or refrain from doing so) free from retaliation.	Desktop	30 days
			960	Workers are informed of their rights to join or form a worker committee/trade union or to bargain collectively, but they are not aware of/do not understand these rights.	Desktop	60 days
			115	No policy on freedom of association and the right to collective bargaining	Desktop	60 days
	2.B	Not prohibit, discourage or interfere with workers' rights to join a trade union of their own choosing or other form of worker representation, including worker committees or similar arrangements where the right to freedom of association is restricted under law. This should include the fair and free selection and election of representatives, and their	121	Employer denies workers the right to freely associate (form and join organisations of their own choosing)	Follow-up	30 days
			123	Employer proactively discourages workers from joining or forming unions (e.g. through contracts, handbooks, internal rules etc.)	Desktop	30 days
			129	Worker/union representatives are not freely elected (e.g. they are assigned by management)	Desktop	30 days

	rights to engage in collective bargaining.				
2.C	Have an established and regular method of communication with trade unions or other form of worker representation.	122	Employer does not recognise the principal trade union present	Follow-up	30 days
		126	There is not an established and regular method of communication with trade unions or other forms of worker representation	Follow-up	60 days
		128	No evidence of action taken by management to address concerns reported by workers through the established trade union/worker committee	Desktop	30 days
		127	There is an established method of communication with worker representatives, but it does not meet regularly or is otherwise ineffective	Desktop	60 days
2.D	Give appropriate time and space for worker representatives to operate. Ensure all workers are aware of who their representative is, their activities and how they can engage with them.	130	No/inadequate training provided to worker representatives	Desktop	90 days
		137	A committee exists but workers do not know about the worker committee, its function and/or who their representatives are	Desktop	60 days
		834	Worker representatives are not given appropriate time and space to operate, including access to the workers they represent	Follow-up	60 days
2.E	Comply with all other applicable laws that impose conditions on Code Area 2.	835	Legal requirements relating to worker committees are not met	Desktop	60 days
		118	Evidence of strikes which have not been appropriately resolved in line with local law	Follow-up	30 days
		124	Employer does not comply with other legal requirements for engagement with worker	Desktop	30 days

			committees/unions (e.g. workers not given time off to fulfil duties) – systemic		
		125	Employer does not comply with other legal requirements for engagement with worker committees/unions (e.g. workers not given time off to fulfil duties) – isolated	Desktop	60 days
		134	Unions are not in compliance with the national/local laws including their formation, operation, registration, recruitment of members, collection of fees, etc.	Follow-up	60 days
		141	No evidence of a collective bargaining agreement (CBA) contrary to law	Desktop	30 days
		142	Company does not comply with collective bargaining agreement (CBA)	Desktop	30 days
		143	Collective bargaining agreement (CBA) is not created, communicated, maintained and/or submitted to the appropriate authority as required by law	Desktop	30 days
		836	A deliberate, systemic or severe breach of a local law which represents a danger to workers or others, or which denies a basic human right (relating to Code Area 2: Freedom of Association but which cannot be captured under another Workplace Requirement)	Follow-up	30 days
		837	A systemic breach of a local law that could present a danger to workers or violate upon a human right (relating to Code Area 2: Freedom of Association but which cannot be	Follow-up	60 days

				captured under another Workplace Requirement)		
			838	An isolated breach of local law which represents low risk to workers (relating to Code Area 2: Freedom of Association but which cannot be captured under another Workplace Requirement)	Desktop	90 days
3: Working conditions are safe and hygienic	3.A	Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.	146	Lack of detailed health and safety policy that is communicated to workers	Desktop	90 days
			297	Workers exposed to dangerous fumes/dangerous gas levels	Follow-up	30 days
			298	Work is performed under conditions that are degrading (i.e. humiliating or dirty)	Follow-up	Immediate
			299	No/inadequate availability of clean drinking water (that meets the World Health Organisation standard for potable water)	Desktop	Immediate
			300	Workers who are pregnant or breastfeeding working in unsafe/unsuitable conditions, including handling hazardous substances (e.g. chemicals and pesticides)	Follow-up	Immediate
			301	Failure to put in place measures to protect workers from/prevent the spread of viruses or diseases, as required by law	Follow-up	Immediate
			302	Overcrowded work stations e.g. insufficient space per person as required by law, including 'breathing space'	Desktop	30 days
			303	No/inadequate assessment of temperature levels	Desktop	30 days
			304	No/inadequate testing of water for potability	Desktop	30 days

			305	No/inadequate air quality test	Desktop	60 days
			306	No/inadequate dust level survey	Desktop	60 days
			307	No/inadequate noise assessment conducted	Desktop	60 days
			839	No/inadequate health and safety procedures around bodies of water on site, creating significant risk of death or injury	Follow-up	30 days
			840	No/inadequate health and safety procedures around bodies of water on site, creating some risk to health	Follow-up	60 days
			841	No/inadequate emergency evacuation equipment or survival gear around bodies of water on site	Follow-up	30 days
			308	Insufficient action taken to improve conditions following air quality, dust level, noise or temperature assessment where necessary	Desktop	30 days
			309	No valid health license in place	Desktop	60 days
			311	No/inadequate procedures to clean up biohazards (e.g. blood spill)	Desktop	30 days
			312	No nurse and/or doctor on site as required by law	Desktop	30 days
			313	Nurse on site, but does not cover all necessary shifts/insufficient for the size of site/inadequately trained	Desktop	60 days
			314	Medical facilities do not meet legal requirements	Desktop	30 days
			317	No medical examinations or regular occupational health checks, including disease checks, of workers in hazardous situations (e.g. exposed to noise or dust) or working with	Desktop	30 days

			hazardous substances (e.g. chemicals and pesticides)		
		318	Inadequate/isolated failure in conducting medical examinations or occupational health checks, including disease checks, of workers in hazardous situations(e.g. exposed to noise or dust) or working with hazardous substances (e.g. chemicals and pesticides)	Desktop	60 days
		319	Lack of records/missing documentation for medical examinations or occupational health checks of workers in hazardous situations (e.g. exposed to noise or dust) or working with hazardous substances (e.g. chemicals and pesticides)	Desktop	60 days
		320	Ergonomic support not given to employees adequate to their job including mats for standing, back rest for seats, other materials to support	Desktop	60 days
		396	Onsite child care facilities compromise children's safety (e.g. through inadequate emergency preparedness and procedures, building safety issues including location of the childcare facility, inadequate security measures or exposure to maltreatment)	Follow-up	Immediate
		397	Childcare facilities are not provided in alignment with legal requirements	Desktop	30 days
		842	Working conditions are not adequate, creating an immediate or widespread risk to health	Follow-up	Immediate

		843	Working conditions are not adequate, creating a significant risk to health	Follow-up	30 days
		844	Working conditions are not adequate, creating some risk to health	Follow-up	60 days
		845	Isolated failures of health check processes not causing an immediate or significant risk of injury	Desktop	90 days
		846	Undue pressures in the workplace causes significant risk to health	Desktop	90 days
3.B	Conduct risk assessments regarding the potential hazards arising from work. The risk assessment shall be reviewed whenever processes change and at least annually considering any incidents and findings.	151	No health and safety risk assessment conducted	Desktop	30 days
		152	Health and safety risk assessment conducted, but not suitable, sufficient and/or documented	Desktop	30 days
3.C	Appoint a suitably qualified manager responsible for health and safety with the appropriate knowledge and authority to effectively implement health and safety systems and processes.	145	The site has not assigned responsibility for health and safety to a competent senior management representative	Desktop	30 days
3.D	Form a health and safety committee (or include H&S in worker committees) which includes workers,	847	There is no health and safety committee which includes workers, and/or their representatives, where this is not required by law	Desktop	90 days

		and/or their representatives.	147	No/inadequate health and safety committee or representative(s) as required by law	Desktop	60 days
			148	No/inadequate fire safety committee or representative(s) as required by law	Desktop	60 days
			149	No/inadequate emergency planning committee or representative(s) as required by law	Desktop	60 days
			150	Health and safety, fire safety or emergency planning committee members or representative(s) are not freely elected	Desktop	60 days
	3.E	Provide and record health and safety training to all new workers, prior to exposure to risks. Provide continued training to existing workers, as appropriate for the hazards and levels of risk identified.	161	No/inadequate health and safety training provided to workers in relation to processes (including handling hazardous substances e.g. chemicals and pesticides) which may cause serious injury or death - systemic	Follow-up	Immediate
			162	No/inadequate health and safety training provided to workers in relation to processes (including handling hazardous substances e.g. chemicals and pesticides) which may cause serious injury or death - isolated	Desktop	30 days
			163	No/inadequate health and safety training provided to workers in relation to processes (including handling hazardous substances e.g. chemicals and pesticides) unlikely to cause serious injury or death - systemic	Desktop	30 days
			164	No/inadequate health and safety training provided to workers in relation to processes (including handling hazardous substances e.g.	Desktop	60 days

				chemicals and pesticides) unlikely to cause serious injury or death - isolated		
			165	Health and safety training is not delivered in a language that all workers understand	Desktop	30 days
			166	No/inadequate health and safety training for managers	Desktop	30 days
			168	Health and safety training conducted, but lack of suitable training records kept in an accurate and retrievable form	Desktop	30 days
			169	Health and safety training conducted, but isolated incidents of missing training records	Desktop	60 days
	3.F	Have a system in place to measure the effectiveness of health and safety training carried out. Ensure training content is understood/implemented by workers.	848	There is no system to measure the effectiveness of health and safety training or there are systemic failures	Desktop	60 days
			849	There is a system to measure the effectiveness of health and safety training, but there are isolated failures	Desktop	90 days
	3.G	Provide sufficient first-aid supplies onsite, and ensure that adequately trained personnel are available during all shifts.	167	No or inadequately trained first aiders	Desktop	30 days
			287	First aid boxes not available/accessible anywhere on site	Desktop	30 days
			288	First aid boxes not available/accessible in certain areas	Desktop	60 days
			289	First aid box available but contents are missing, out of date or otherwise inadequate	Desktop	60 days
			291	First aiders in place but not enough for the size of site (including not covering all shifts)	Desktop	60 days

3.H	Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).	276	Workers are not issued with Personal Protective Equipment, or it is not appropriate to the risk – systemic	Desktop	30 days		
		277	Workers are not issued with Personal Protective Equipment, or it is not appropriate to the risk – isolated	Desktop	30 days		
		962	Workers are not issue with appropriate Personal Protective Equipment, and this creates a clear risk of serious harm	Desktop	30 days		
		278	Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate	Desktop	30 days		
		281	Lack of adequate/appropriate signage in high risk areas on usage of PPE (e.g. importance of ear plugs for high noise or specific PPE for chemical use/handling)	Desktop	30 days		
		279	No/inadequate training in how to use Personal Protective Equipment (PPE)	Desktop	60 days		
		280	Personal Protective Equipment (PPE) not adequately cleaned/maintained/stored	Desktop	60 days		
		282	Necessary working equipment for the job not provided (e.g. scissors)	Desktop	60 days		
		3.I	Record all accidents and near misses and ensure these are investigated. Ensure accident/incident log is routinely reviewed by appropriate personnel and appropriate corrective and	284	No/inadequate recording of accidents and incidents at the site	Desktop	30 days
				850	Accidents are recorded but investigation/corrective action is not conducted	Desktop	60 days

		preventative actions are taken.				
	3.J	Permit workers to stop working, seek safety or leave the premises, without the threat or fear of retaliation, when they believe hazards in the workplace have placed them in imminent danger.	851	Workers suffer or fear retaliation for refusing to undertake hazardous work (i.e. where there is a real and apparent threat of serious injury or death)	Follow-up	Immediate
	3.K	Ensure that all premises are safe and have valid safety certifications for their current layout and use. If it is currently not possible for a required license or certificate to be obtained, implement inspections by appropriate third parties to ensure building safety.	248	Structural issues observed that indicate potentially imminent and life-threatening conditions (e.g. a potential building collapse)	Follow-up	Immediate
			249	Structural irregularities observed that should be evaluated by an expert to determine structural integrity	Desktop	30 days
			251	Premises constructed for a different purpose than its current use (e.g. residence turned to production facility), and no subsequent confirmation of structural safety has been obtained	Follow-up	Immediate
			252	Premises used for combined purposes (e.g. commercial or residential premises) and therefore could pose a safety threat	Follow-up	Immediate
			253	Residential building converted to industrial with no evidence that legal requirements have been met	Desktop	30 days

			254	Evidence of asbestos in a state that could cause harm (e.g. exposed and/or crumbling)	Desktop	30 days
			255	No asbestos assessment/survey conducted where required	Desktop	30 days
			256	No/inadequate ventilation systems	Desktop	30 days
			257	Low level/inadequate lighting in all areas of the site including production area	Desktop	30 days
			258	Low level/inadequate lighting in parts of the site	Desktop	60 days
			259	Hazardous materials/heavy equipment or items are located or stored on the rooftop	Desktop	30 days
			260	No/inadequate measures to ensure security at site (e.g. access control, security guards, etc.)	Desktop	30 days
			261	Premises require minor repairs that may affect personal safety (e.g. missing handrails)	Desktop	60 days
			262	Inadequate control of pests/insects	Desktop	60 days
			852	Buildings at the site have neither legal or third party certification of their safety (e.g. none of house property construction safety appraisal reports or construction acceptance reports)	Desktop	60 days
			853	Buildings at the site are missing key legal permissions/certifications but do have third party certification assuring their safety (e.g. the site has the Construction Safety Appraisal Report, but no Building Construction Acceptance Report or House Property Certificate)	Desktop	90 days
			854	Buildings at the site are missing key safety documents but this does not imply significant	Desktop	90 days

				or immediate risk (e.g. the site has the house property certificate but cannot demonstrate the building construction acceptance report or the construction safety appraisal report)		
	3.L	Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.	172	Fire licence, inspection or certificates not in place as required by law	Desktop	30 days
			173	Fire risk assessment not conducted	Desktop	30 days
			174	Fire risk assessment conducted, but no/inadequate action taken	Desktop	30 days
			175	Workers are not given appropriate fire safety, fire prevention and/or evacuation training	Desktop	30 days
			176	Fire safety, fire prevention and evacuation training conducted, but lack of suitable training records kept in an accurate and retrievable form	Desktop	30 days
			177	Fire safety, fire prevention and evacuation training conducted, but isolated incidents of missing training records	Desktop	60 days
			178	Workers are ill-equipped (or unaware of how) to summon emergency services	Desktop	60 days
			179	There is no mechanism available (does not exist or is not operational) to summon emergency services	Desktop	30 days
			180	No sufficiently trained person appointed to oversee fire safety, fire prevention and fire evacuation procedure (e.g. 'fire marshal') as required by law	Desktop	30 days
			181	Insufficient number of responsible people appointed to oversee fire safety, fire	Desktop	30 days

			prevention and fire evacuation procedure at the workplace (e.g. fire marshals) as required by law		
		182	Smoking occurs in prohibited/restricted areas including unrestricted smoking anywhere on site	Desktop	30 days
		183	No fire fighting equipment on site or equipment is not sufficient to address the type or severity of risk	Follow-up	Immediate
		184	Fire fighting equipment is locked or otherwise not accessible at all times	Desktop	Immediate
		185	Firefighting equipment is not operational or is poorly maintained	Desktop	Immediate
		187	Fire extinguishers not inspected/checked regularly/out of date	Desktop	30 days
		188	Fire extinguishers incorrectly installed, e.g. placed at an inappropriate height/on floor	Desktop	60 days
		189	Inadequate hose reel installation and maintenance	Desktop	30 days
		190	No fire fighting equipment signage/labelling/instructions	Desktop	30 days
		191	Fire fighting equipment signage/labelling, instructions are not sufficient in detail, language, etc.	Desktop	60 days
		192	Absence of functional fire alarms/smoke detectors	Desktop	30 days
		193	Fire alarms/smoke detectors in place but isolated case of non-functional equipment	Desktop	30 days

			194	Sprinkler system does not meet legal requirements	Desktop	30 days
			195	Emergency notification system (e.g. fire alarm) is not set up to notify all workers at the site, including on multiple floors	Desktop	30 days
			196	Access to fire alarm blocked/obstructed	Desktop	Immediate
			197	Inadequate signage/instructions of fire alarm	Desktop	30 days
			198	No system in place to verify functionality of smoke detectors, alarms, emergency exit signage, firefighting equipment, etc.	Desktop	30 days
			199	Insufficient controls to prevent machinery from overheating (e.g. inadequate ventilation to prevent dust from entering machinery)	Desktop	30 days
			200	No/inadequate controls to prevent explosions, where appropriate	Desktop	30 days
			201	Fire exits are inadequate or less than required by law, causing a significant and widespread risk to life	Follow-up	Immediate
			202	Fire exits are inadequate or less than required by law, causing a significant risk to life	Desktop	30 days
			203	Fire exits are not adequate, causing an elevated risk to life	Desktop	30 days
			204	Systemic occurrence of locked fire exits	Follow-up	Immediate
			205	Isolated occurrence of locked fire exits	Follow-up	Immediate
			206	Systemic occurrence of blocked fire exits	Follow-up	Immediate
			207	Isolated or partial occurrence of blocked fire exits causing an elevated but not significant risk	Desktop	30 days

		208	No emergency exits are properly marked and lighted	Desktop	30 days
		209	Not all emergency exits are properly marked and lighted	Desktop	30 days
		210	Inadequate/poorly functioning emergency lighting	Desktop	60 days
		211	Emergency notification and exit lighting systems not connected to secondary power source	Desktop	60 days
		212	Multi-story building does not have two vertical exit routes	Desktop	30 days
		213	Multi-story building does not have enclosed stairs	Desktop	30 days
		214	No evacuation plan or designated emergency exit route	Desktop	30 days
		215	Evacuation plan not adequately communicated to workers	Desktop	30 days
		216	No/inadequate fire assembly point (e.g. too small for the number of workers, situated in an unsuitable location, etc.)	Desktop	30 days
		217	Regular fire drills are not conducted	Follow-up	30 days
		218	Missing records of fire drills and evacuations	Desktop	60 days
		219	Fire drills do not include the evacuation of all occupants of the building	Desktop	30 days
		855	Fire safety processes are not adequate, creating an immediate or widespread risk of death or injury	Follow-up	Immediate
		856	Fire safety processes are not adequate, creating a significant risk of death or injury	Follow-up	30 days

			857	Fire safety processes are not adequate, creating some risk of injury	Follow-up	60 days
			858	Isolated failures of fire safety processes not causing an immediate or significant risk of injury	Desktop	90 days
			859	Inadequate evacuation plan/emergency route plan/unclear signage including marking of fire assembly points	Follow-up	60 days
			860	Fire drill/evacuation did not cover all workers e.g. night shift/foreign workers	Desktop	30 days
	3.M	Ensure all machinery is installed, maintained, and used in a safe manner.	263	Machinery on site is being used in a manner that constitutes a serious danger to workers' health and/or safety	Follow-up	Immediate
			264	Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt/hand guards on other machines)	Desktop	30 days
			265	Minor repairs required to machinery	Desktop	60 days
			266	Incidents of incorrect use of machinery constituting a minor risk	Desktop	60 days
			267	No/inadequate certificates for inspections of machinery, or machines not registered as required by law	Desktop	30 days
			268	Lapses in inspections/maintenance of machinery (used in production or otherwise, e.g. boilers)	Desktop	30 days
			269	No/inadequate policy for on-going control management /inspection/maintenance of machinery	Desktop	60 days

		270	No licence or inadequate experience/training of company/engineer providing machinery maintenance	Desktop	30 days	
		271	Lack of appropriate equipment/machinery - creating a serious risk to workers	Desktop	30 days	
		272	Lack of appropriate equipment/machinery - creating a moderate risk to workers	Desktop	30 days	
		273	Safety functions on machinery not present/not functioning e.g. alarm/safety stop buttons etc.	Follow-up	30 days	
		274	Proper safeguards not used to prohibit unauthorised access/use of dangerous machinery (e.g. panels left open/keys left in forklift etc.)	Desktop	30 days	
		861	Machinery safety processes are not adequate, creating an immediate or widespread risk of death or injury	Follow-up	Immediate	
		862	Machinery safety processes are not adequate, creating a significant risk of death or injury	Follow-up	30 days	
		863	Machinery safety processes are not adequate, creating some risk of injury	Follow-up	60 days	
		864	Isolated failures of machinery safety processes not causing an immediate or significant risk of injury	Desktop	90 days	
	3.N	230	Maintain a log of all hazardous substances (e.g. chemicals and pesticides) on site. Ensure that these are managed	No material safety data sheet (MSDS) obtained/available	Desktop	60 days
		231		Material safety data sheet (MSDS) is incomplete/inaccurate/not in worker language/not understood by workers	Desktop	60 days

appropriately at all times in line with safety instructions, including storage, use and disposal.	232	Non-hazardous chemicals are stored unlabelled or labelling is incorrect	Desktop	60 days
	233	Hazardous substances (e.g. chemicals and pesticides) are stored unlabelled or labelling is incorrect	Desktop	30 days
	234	No/inadequate chemical risk assessment in place e.g. COSHH	Desktop	60 days
	235	Legally required chemical licence expired/not in place including any reporting to government bodies on list of hazardous chemicals on site	Desktop	30 days
	236	No/inadequate records/registration on distribution, handling and use of hazardous substances (e.g. chemicals and pesticides)	Desktop	60 days
	237	Improper storage of hazardous substances (e.g. chemicals and pesticides)	Desktop	30 days
	238	Hazardous substances (e.g. chemicals and pesticides) stored without restricted access	Desktop	30 days
	239	No/inadequate explosion proof lighting as required by law	Desktop	30 days
	240	No/inadequate safety measures/anti-explosion measures for chemicals (e.g. no anti-leaking system/secondary container/unbundled)	Desktop	30 days
	241	No/inadequate spill kit provided for handling chemical spillage and leakage	Desktop	30 days
	242	No/inadequate eye wash/shower station in hazardous environments including chemical areas	Desktop	30 days

			865	No/inaccessible wash area or changing facilities for workers that handle or come into contact with hazardous substances (e.g. chemicals and pesticides)	Desktop	30 days
			243	No/inadequate emergency plan/emergency drill for hazardous substances (e.g. chemicals and pesticides)	Desktop	30 days
			866	Chemical safety processes are not adequate, creating an immediate or widespread risk of death or injury	Follow-up	Immediate
			867	Chemical safety processes are not adequate, creating a significant risk of death or injury	Follow-up	30 days
			868	Chemical safety processes are not adequate, creating some risk of injury	Follow-up	60 days
			869	Isolated failures of chemical safety processes not causing an immediate or significant risk of injury	Desktop	90 days
	3.0	Implement an appropriate electrical safety program to ensure that electrical hazards are reduced and controlled by appropriately qualified personnel.	220	Failure to comply with legal requirements for electrical safety e.g. inspections	Desktop	30 days
			221	Inadequate electrical safety inspections conducted, including on lighting	Desktop	30 days
			222	Combustible/flammable materials located near a source of fire, heat or spark	Desktop	Immediate
			223	Systemic occurrence of incorrect/damaged insulation in electricals including burnt/damaged wiring and plugs	Desktop	30 days
			224	Isolated occurrence of incorrect/damaged insulation in electricals including burnt/damaged wiring and plugs	Desktop	60 days

			225	No/inadequate PAT/electric safety testing/electrical safety risk assessment	Desktop	30 days
			226	Blocked access to electricity panels	Desktop	30 days
			227	Unmarked/incorrect labels/signage/instructions for electrics	Desktop	30 days
			228	Unsafe handling of electrical equipment e.g. no rubber mats in front of electricity panels	Desktop	30 days
			870	Electrical safety processes are not adequate, creating an immediate or widespread risk of death or injury	Follow-up	Immediate
			871	Electrical safety processes are not adequate, creating a significant risk of death or injury	Follow-up	30 days
			872	Electrical safety processes are not adequate, creating some risk of injury	Follow-up	60 days
			873	Isolated failures of electrical safety processes not causing an immediate or significant risk of injury	Desktop	90 days
	3.P	Develop emergency preparedness and response plans for risks identified (including natural disasters and other potential emergencies). Where worker evacuation is required, drills should be conducted at least annually (or more frequently if required by law).	874	The emergency preparedness plans and procedures are inadequate in relation to identified risks	Desktop	60 days
			875	The emergency preparedness plans and procedures are inadequate in relation to identified risks and there is a significant risk to life	Follow-up	30 days

	3.Q	Implement systems to ensure workers are safe from risks associated with extreme weather conditions, including heat stress.	688	Workers exposed to dangerous working conditions caused by extreme weather conditions (e.g. heat)	Follow-up	Immediate
			876	Systems to manage risks associated with extreme weather is not adequate, creating an immediate or widespread risk of death or injury	Follow-up	Immediate
			877	Systems to manage risks associated with extreme weather is not adequate, creating a significant risk of death or injury	Follow-up	30 days
			878	Systems to manage risks associated with extreme weather is not adequate, creating some risk of death or injury	Desktop	60 days
			879	Isolated failures of systems to manage risks associated with extreme weather processes not causing an immediate or significant risk of injury	Desktop	90 days
	3.R	Provide clean and secure toilets, wash areas, and worker changing facilities, with adequate hygiene supplies separated by gender or with effective privacy. Ensure potable water is easily accessible by workers and, where appropriate, clean storage	326	Materials/rubbish/other waste stored in unacceptable areas e.g. stairwell	Desktop	30 days
			327	Storage of goods not in line with legal requirements (e.g. too high)	Desktop	60 days
			328	No secure facilities for workers to store personal effects while working	Desktop	60 days
			329	Sanitary facilities (e.g. toilets, hand basins) are unhygienic/not clean	Desktop	30 days
			330	Sanitary facilities are insufficient for the size of the site (e.g. the number of toilets or hand	Desktop	60 days

		facilities for food and personal belongings.		basins is insufficient for the number of workers)		
			331	Insufficient privacy afforded to workers in the toilets (e.g. no/missing toilet doors)	Desktop	30 days
			332	Sanitary facilities are inadequate to protect women's health, safety or privacy (e.g. lack menstrual hygiene facilities, or toilets not separated by gender)	Desktop	30 days
			333	Sanitary facilities (e.g. toilets) are inadequate/unavailable to people with disabilities	Desktop	60 days
			334	Sanitary facilities (e.g. toilets) do not meet a local legal requirement not classified elsewhere	Desktop	30 days
			335	No canteen facility provided as per local law	Desktop	60 days
			336	Canteen provided is insufficient to meet legal requirements and/or worker needs	Desktop	60 days
			339	No rest area/break area	Desktop	60 days
			340	Rest facilities in poor condition	Desktop	30 days
			341	Workstations and work areas are untidy, creating a risk of injury	Desktop	30 days
			342	Worker facilities (e.g. changing rooms, lockers) in a poor condition	Desktop	60 days
			880	Food storage facilities, where provided, are unhygienic or present a risk to worker health	Desktop	30 days
	3.S	Ensure that any accommodation which the	348	The living accommodation is unfit for human habitation (e.g. filthy and overcrowded)	Follow-up	Immediate

<p>site provides poses no risk to worker health and safety, and is assessed to ensure it meets local housing and safety requirements by someone suitably qualified. This includes accommodation provided by a contracted third party or any labour agencies engaged by the site.</p>	349	Conditions in living accommodation (i.e. sleeping quarters, toilets/wash areas, eating areas, etc.) are unhygienic	Desktop	30 days
	350	Production area and dormitory area not adequately separated, creating potential fire risk	Desktop	60 days
	351	Accommodation used to store hazardous, flammable, combustible materials	Desktop	30 days
	352	Accommodation is not equipped with basic amenities/services (i.e. electrical, water, etc.)	Desktop	30 days
	353	Overcrowding in dormitories	Desktop	30 days
	354	Accommodation does not provide adequate protection from external conditions	Desktop	30 days
	355	Conditions of the living accommodation presents a risk to worker health (e.g. presence of mould)	Desktop	30 days
	356	Accommodation is located in an unsafe area (e.g. exposed to environmental or physical hazards)	Follow-up	60 days
	357	Workers cannot travel safely between the living accommodation and the worksite	Desktop	30 days
	358	Accommodation is not equipped with proper lighting	Desktop	30 days
	359	No/inadequate temperature control in accommodation (e.g. air-conditioning, fans)	Desktop	30 days
	360	Unsafe electrical wiring and other electrical equipment	Desktop	30 days

			361	Accommodation has inadequate canteen facility/eating area or inadequate appliances for cooking	Desktop	60 days
			362	Workers have no/inadequate beds or mattresses	Desktop	30 days
			363	No appropriate gender segregation in sleeping facilities	Desktop	30 days
			364	No/inadequate accommodation for couples or families	Desktop	30 days
			365	Washing/showering facilities are inadequate	Desktop	60 days
			366	No/inadequate security in workers' accommodation	Desktop	30 days
			367	Workers are charged excessive rent for accommodation compared with local norms	Follow-up	60 days
			368	Accommodation is not properly maintained (i.e. minor issues with repair, such as broken windows, small cracks, peeling paint, etc.)	Desktop	60 days
			369	No/inadequate access to hot water	Desktop	60 days
			370	First aid kits not available in workers' accommodation	Desktop	60 days
			371	Each individual does not have adequate and secure storage for personal possessions	Desktop	60 days
			372	Recreational facilities in poor condition (e.g. unhygienic, in state of disrepair, etc.)	Desktop	60 days
	3.T	Ensure that transport provisions, including those provided by a contracted	294	Workplace vehicles appear to be unsafe	Desktop	30 days
			296	Company/employer-provided transport to and/or from work appears to be unsafe or otherwise present a danger	Desktop	30 days

	third party, are safe and meet legal requirements.	295	Workplace traffic management system/roads etc. is unsafe or inadequate	Desktop	30 days
3.U	Ensure any additional relevant legal requirements concerning health & safety are met.	153	Failure to submit health and safety audit to external party (e.g. government authority) as per legal requirements	Desktop	60 days
		881	A systemic, deliberate or severe breach of a local law which represents a danger to workers or others, or which denies a basic human right (relating to Code Area 3: Working Conditions are Safe and Hygienic but which cannot be captured under another Workplace Requirement)	Follow-up	30 days
		882	A systemic breach of a local law that could present a danger to workers or violate upon a human right (relating to Code Area 3: Working Conditions are Safe and Hygienic but which cannot be captured under another Workplace Requirement)	Follow-up	30 days
		883	An isolated breach of local law which represents low risk to workers (relating to Code Area 3: Working Conditions are Safe and Hygienic but which cannot be captured under another Workplace Requirement)	Desktop	90 days
		337	No/inadequate hygiene checks and/or catering licence in the canteen	Desktop	60 days
		338	No/inadequate health checks for kitchen personnel	Desktop	60 days

4: Child labour shall not be used	4.A	Ensure that no worker is under the age of 15 years' old or the local legal requirement if this is higher, except where ILO Convention No.138 developing country exceptions apply.	387	Evidence of individuals under 15 years old or the legal working age engaged in work	Follow-up	Immediate
	4.B	Review original photographic identification to validate that all workers (including non-directly hired workers) are at least 15 years old at the time of employment, or require any agency or labour broker to do the same, and assess these systems rigorously via sampling on a regular basis.	381	Age verification records are not maintained	Follow-up	Immediate
			382	Age verification records are not consistently maintained	Follow-up	60 days
			884	The mechanism used to verify workers' age is inappropriate	Follow-up	60 days
			390	No process in place requiring age verification and records maintenance	Desktop	30 days
	4.C	Ensure that workers under 18 (but above legal minimum age) only carry out age appropriate, non-hazardous work that is	383	No/inadequate risk assessment conducted regarding young workers	Desktop	30 days
			885	Workers over the legal age but under 18 working in conditions which are not permitted by law for their age	Follow-up	30 days

	properly supervised. Ensure these workers do not work night shifts, and comply with other relevant laws on young workers' employment (e.g. obtaining permits or permission from parents, ensuring apprenticeships are properly registered and supervised).	399	Instances of workers under 18 working in dangerous or unhealthy conditions, creating significant risk of death, injury or illness as a result of poor safety and health standards or working conditions	Follow-up	Immediate
		886	Instances of workers under 18 handling hazardous substances (e.g. chemicals and pesticides), creating some risk of injury or illness	Follow-up	60 days
		400	Instances of workers over the legal minimum age but under 18 working at night	Follow-up	60 days
		887	Contravention of applicable law concerning conditions of young workers' employment (e.g. failure to obtain permits or permission from parents) - isolated	Desktop	60 days
		888	Contravention of applicable law concerning conditions of young workers' employment (e.g. failure to obtain permits or permission from parents) - systemic	Follow-up	30 days
		889	Contravention of applicable law concerning the use of apprenticeships	Follow-up	60 days
		384	Contracts for young workers not sanctioned by the proper authorities (registered/approved by relevant authority; signed by parent/legal guardian as per legal requirements)	Desktop	30 days
		401	No health examination for young workers as per legal requirement	Desktop	30 days

4.D	Ensure no worker under 18 is employed on a full-time basis if still of compulsory school age. Part-time work must not interfere with their education.	890	Young workers of legal working age are employed on a schedule which interferes with compulsory full-time education	Follow-up	30 days
4.E	Ensure any school-age children of workers living in accommodation provided by the employer have access to schooling that is within a reasonable travelling distance, using safe transport.	398	Children of school-age living on site do not have adequate access to schools	Follow-up	120 days
4.F	Maintain a written policy and process outlining how child labour would be remediated (in line with ILO guidance and local legal requirements where in place)	393	There is no written policy which outlines how child labour would be remediated, or this policy does not align with ILO guidance	Desktop	60 days
4.G	Where applicable, provide remediation and safeguarding of underage workers (in line with ILO guidance).	392	Collaborative Action Required: Where child labour has been found it has not been remediated in line with ILO guidance and local legal requirements where applicable	Collaborative Action Required	Collaborative Action Required
4.H	Comply with all other applicable laws that	891	A systemic, deliberate or severe breach of a local law which represents a danger to workers or others, or which denies a basic	Follow-up	30 days

		impose conditions on Code Area 4.		human right (relating to Code Area 4: Child Labour Shall Not Be Used but which cannot be captured under another Workplace Requirement)		
			892	A systemic breach of a local law that could present a danger to workers or violate upon a human right (relating to Code Area 4: Child Labour Shall Not Be Used but which cannot be captured under another Workplace Requirement)	Follow-up	30 days
			893	An isolated breach of local law which represents low risk to workers (relating to Code Area 4: Child Labour Shall Not Be Used but which cannot be captured under another Workplace Requirement)	Desktop	90 days
5: Legal wages are paid	5.A	Ensure that all workers (including non-employee workers) are paid at least the legal minimum wage or legally recognised collective bargaining agreement (CBA) where one exists, whichever is higher.	435	Systemic instances of employees working without payment	Follow-up	Immediate
			436	Isolated instances of employees working without payment	Follow-up	30 days
			437	Systemic instances of workers paid less than the legal minimum wage	Follow-up	60 days
			438	Isolated instances of workers paid less than the legal minimum wage	Follow-up	60 days
			440	Systemic instances of pay below contracted rates, but above minimum wage	Follow-up	60 days
			441	Isolated instances of pay below contracted rates, but above minimum wage	Desktop	60 days
			445	Systemic occurrence of wages not paid on time	Follow-up	60 days

			446	Isolated occurrence of wages not paid on time	Follow-up	60 days
			447	Payment schedule is regular but not at frequency required by law	Follow-up	60 days
	5.B	Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.	405	No payroll records available on date of audit	Follow-up	30 days
			406	Unable to verify wages due to missing/incomplete/inconsistent/inaccurate records	Follow-up	60 days
			416	Failure to provide workers with legally required leave entitlement (e.g. annual, maternity, paternity, sick leave) - systemic	Follow-up	60 days
			417	Failure to provide workers with legally required leave entitlement (e.g. annual, maternity, paternity, sick leave) - isolated	Follow-up	60 days
			418	Failure to pay legally required leave entitlements or other benefits - systemic	Follow-up	60 days
			419	Failure to pay legally required leave entitlements or other benefits - isolated	Follow-up	60 days
			420	Failure to pay legally required leave entitlements (e.g. annual, maternity, paternity, sick leave) correctly - systemic	Follow-up	60 days
			421	Failure to pay legally required leave entitlements (e.g. annual, maternity, paternity, sick leave) correctly - isolated	Desktop	60 days
			422	Workers are unreasonably restricted from taking the leave which they are entitled to by contract - systemic	Follow-up	60 days
			423	Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic	Follow-up	30 days

			424	Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - isolated	Desktop	60 days
			425	Failure to retain records of all required social insurances	Desktop	60 days
			426	Regular practice of delayed payment of social insurance and other legally mandated contributions to relevant authorities	Desktop	60 days
	5.C	Ensure that any partial payments with in-kind benefits do not exceed the national legal limit or the ILO recommended maximum of 50% of wages, whichever is lower.	448	Payment in kind (e.g. payment of wages in goods or services instead of cash) as part of wages is in excess of legal limits or 50%, whichever is lower.	Follow-up	60 days
	5.D	Ensure no deduction from workers pay is for disciplinary sanctions. Ensure deductions not provided for by national laws are legal, and do not take workers below the legal minimum wage. Ensure workers are provided with information to understand any wage deductions and provide their authorisation.	411	Deductions are made from wages without workers' written permission, and these are not legally mandated - systemic	Follow-up	30 days
412			Deductions are made from wages without workers' written permission, and these are not legally mandated - isolated	Follow-up	60 days	
413			Pay deducted for disciplinary measures (e.g. lateness, absenteeism, disciplinary warnings, errors in production, etc.) - systemic	Follow-up	60 days	
414			Pay deducted for disciplinary measures (e.g. lateness, absenteeism, disciplinary warnings, errors in production, etc.) - isolated	Desktop	60 days	
415			Workers are charged (including via wage deductions) for Personal Protective Equipment (PPE) or other essential work-related items	Follow-up	60 days	

5.E	Ensure workers are remunerated for all time worked, including meetings and essential training. Meetings and essential training shall take place at no cost to the worker and during remunerated working hours.	894	Workers are required to pay for essential training - Isolated	Desktop	60 days	
		895	Workers are required to pay for essential training - Systemic	Desktop	60 days	
		896	Workers are not remunerated for all time worked - Isolated	Desktop	60 days	
		897	Workers are not remunerated for all time worked - Systemic	Desktop	60 days	
5.F	Provide all workers with clearly written information, in a language workers understand, outlining wage information (rates of and total pay, overtime, payment frequency, deductions, benefits and insurances, and paid leave) before employment begins, and with clearly written information relating to any changes of the same during the course of employment.	898	Wage information (rates of and total pay, overtime, payment frequency, deductions, benefits and insurances, and paid leave) is not adequately communicated to workforce	Desktop	60 days	
		899	Changes in wages (rates of and total pay, overtime, payment frequency, deductions, benefits and insurances, and paid leave) have not been not adequately communicated to workforce	Desktop	60 days	
		4500	No public display of wage rates as per law	Desktop	60 days	

5.G	Maintain records to demonstrate that workers receive a wage statement, or payslip each pay period with a clear and understandable breakdown of their wages, benefits and any deductions.	407	Systematic failure to provide payslips with complete, accurate and understandable information to workers	Follow-up	60 days	
		408	Isolated failure to provide payslips with complete, accurate and understandable information to workers	Desktop	60 days	
		409	Isolated incidents of payslips inconsistent with wages paid	Desktop	60 days	
5.H	Comply with all other applicable laws that impose conditions on Code Area 5.	442	Workers are not paid during stoppage of production in line with local law	Follow-up	60 days	
		900	A systemic, deliberate or severe breach of a local law which represents a danger to workers or others, or which denies a basic human right (relating to Code Area 5: Legal Wages are Paid but which cannot be captured under another Workplace Requirement)	Follow-up	30 days	
		901	A systemic breach of a local law that could present a danger to workers or violate upon a human right (relating to Code Area 5: Legal Wages are Paid but which cannot be captured under another Workplace Requirement)	Follow-up	30 days	
		902	An isolated breach of local law which represents low risk to workers (relating to Code Area 5: Legal Wages are Paid but which	Desktop	90 days	

				cannot be captured under another Workplace Requirement)		
5.A: Living wages are paid	5.A.A	Review workers' total pay including benefits and compare it with a credible 'living wage' to calculate a 'living wage gap', and understand what proportion of the workforce has a gap.	903	Collaborative Action Required: A living wage gap analysis has not been completed	Collaborative Action Required	Collaborative Action Required
			904	Collaborative Action Required: A living wage gap analysis has been completed but it is missing key elements	Collaborative Action Required	Collaborative Action Required
	5.A.B	Put in place a wage improvement plan that aims to pay workers a living wage within a stated timeframe.	905	Collaborative Action Required: A wage improvement plan (with Living Wage as the goal) has not been completed	Collaborative Action Required	Collaborative Action Required
			906	Collaborative Action Required: A wage improvement plan (with Living Wage as the goal) has been completed but it is missing key elements	Collaborative Action Required	Collaborative Action Required
6: Working hours are not excessive	6.A	Ensure working hours do not exceed legal limits or limits in collective bargaining agreements, whichever gives more protection for workers.	469	Working hours exceed what is allowed by law or collective bargaining agreement – systemic	Follow-up	60 days
			470	Working hours exceed what is allowed by law or collective bargaining agreement – isolated	Follow-up	60 days
			689	Working hours in extreme weather conditions (e.g. heat) exceed what is allowed by local law or collective bargaining agreement – systemic	Follow-up	Immediate
			690	Working hours in extreme weather conditions (e.g. heat) exceed what is allowed by local law or collective bargaining agreement – isolated	Desktop	30 days

		463	Unable to verify working hours due to missing/ incomplete/ inconsistent records	Follow-up	60 days
6.B	Ensure workers receive all legally required rest and meal breaks, including continuous rest hours between shifts.	491	Rest breaks during shifts are not taken as required - systemic	Follow-up	60 days
		492	Rest breaks during shifts are not taken as required - isolated	Desktop	60 days
		493	Rest breaks between shifts are not taken as required - systemic	Follow-up	30 days
		494	Rest breaks between shifts are not taken as required - isolated	Follow-up	60 days
6.C	Provide workers with at least 24 hours of consecutive rest in every 7-day period or, where allowed by national law, two 24 hour periods in every 14-days.	485	Workers do not take off 1 day in 7, and this is contrary to law or collective bargaining agreement (CBA) - systemic	Follow-up	60 days
		486	Workers do not take off 1 day in 7, and this is contrary to law or collective bargaining agreement (CBA) - isolated	Desktop	60 days
		487	Workers do not take off 2 days in 14, regardless of legality in the local context - systemic	Follow-up	30 days
		488	Workers do not take off 2 days in 14, regardless of legality in the local context - isolated	Follow-up	60 days
6.D	Ensure that working hours do not exceed 60 hours in a standard working week for any worker, except where all of the following are met: this is allowed by national law; this is allowed by a collective agreement freely	471	Total working hours exceed 72 hours per week on a regular basis and over an extended period (but are within the parameters of local law or collective bargaining agreement)	Follow-up	60 days
		472	Total working hours exceed 72 hours per week on an occasional basis (but are within the parameters of local law or collective bargaining agreement)	Follow-up	60 days

	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.	473	Total hours exceed 60 hours per week - ETI requirements are not met - systemic	Follow-up	60 days
		474	Total hours exceed 60 hours per week - ETI requirements are not met - isolated	Desktop	60 days
6.E	Ensure the standard working week excluding overtime is not more than 48 hours per week and is included in workers' contracts.	466	Contracted working hours (excluding overtime) exceed 48 per week, or lower legal limit	Follow-up	60 days
6.F	Ensure that where overtime is used, it is in order to manage changes in demand or in exceptional circumstances and not used to replace regular employment.	481	There are not enough workers engaged to complete business operations without requiring overtime	Follow-up	60 days
		480	Overtime is not used responsibly (i.e. extent, frequency and level of hours worked by individual workers and/or whole workforce are excessive)	Follow-up	60 days
6.G	Ensure that overtime is	105	Overtime is mandatory outside parameters permitted by local law or collective	Follow-up	Immediate

		voluntary and can be refused without penalty.		agreements, AND under threat of penalty (including fines or dismissal) OR is necessary for workers to earn at least the minimum wage		
			106	Overtime is mandatory, outside parameters permitted by local law or collective agreements (but with no threat of penalty, nor is it necessary for workers to earn at least the minimum wage)	Follow-up	30 days
			107	Overtime is mandatory, within the parameters permitted by local law or collective agreements - Systemic	Follow-up	60 days
			108	Overtime is mandatory, within the parameters permitted by local law or collective agreements - Isolated	Desktop	60 days
			482	Overtime policy includes provision for compulsory/mandatory overtime outside the limits of the law or collective bargaining agreement (but not enforced in practice)	Desktop	60 days
	6.H	Ensure that overtime is always compensated at a premium rate, which is not less than 125% of the regular rate of pay.	455	Overtime premium is not paid according to the law - systemic	Follow-up	60 days
			456	Overtime premium is not paid according to the law - isolated	Desktop	60 days
			457	Overtime hours are not paid according to SMETA guidance (at the premium rate of 125% basic hours) but this is not contrary to law - systemic	Follow-up	60 days
			458	Overtime premium is between +0% and 10% and this is not contrary to local law	Follow-up	60 days

			459	Overtime premium is between +10% and 25% and this is not contrary to local law	Desktop	60 days
			460	Overtime premium is below +25%, agrees with local law and collective bargaining agreements are in place	Desktop	60 days
			461	An enhanced basic rate is paid instead of overtime premium, but this does not meet SMETA guidance	Follow-up	60 days
			462	Workers moved to other facilities/departments/homeworking to avoid paying them for overtime	Follow-up	60 days
	6.I	Undertake a review of appropriate frequency of the working hours of individual workers and the workforce as a whole and use this review to responsibly manage overtime.	907	There is no review conducted of working hours with the intention of responsibly managing overtime	Desktop	60 days
			908	There is a review conducted of working hours with the intention of responsibly managing overtime, but it is not adequate or does not lead to demonstrable corrective action	Desktop	90 days
	6.J	Comply with all other applicable laws that impose conditions on Code Area 6.	909	A systemic, deliberate or severe breach of a local law which represents a danger to workers or others, or which denies a basic human right (relating to Code Area 6: Working Hours are not Excessive but which cannot be captured under another Workplace Requirement)	Follow-up	30 days
			910	A systemic breach of a local law that could present a danger to workers or violate upon a human right (relating to Code Area 6: Working	Follow-up	30 days

				Hours are not Excessive but which cannot be captured under another Workplace Requirement)		
			911	An isolated breach of local law which represents low risk to workers (relating to Code Area 6: Working Hours are not Excessive but which cannot be captured under another Workplace Requirement)	Desktop	90 days
7: No discrimination is practiced	7.A	Ensure no discrimination is practiced, taking particular consideration of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.	497	Evidence of harassment or unfair treatment towards an individual or group based on their race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation, or other similar characteristic protected by law	Follow-up	30 days
			498	Evidence of harassment or unfair treatment towards an individual based on their sex, gender, gender identity, marital status or other similar characteristic protected by law	Follow-up	30 days
			499	Evidence of discrimination in hiring, compensation, access to training, promotion, terminations, or retirement based on an individual's race, caste, colour, national origin, religion, age, disability, sexual orientation, union membership, political affiliation or other similar characteristic protected by law	Follow-up	30 days
	7.B	Ensure that employment policies and processes are sufficient to prevent	501	Insufficient evidence to demonstrate non-discrimination (e.g. lack of transparency in hiring, pay, etc.)	Desktop	30 days

		discrimination at all stages of employment. This includes 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.	502	No policy/system on wages and transparency in remuneration (e.g. to demonstrate non-discrimination) as required by law	Desktop	30 days
			503	Different wage rates based on age alone for the same work and skill set and it is not contrary to local law	Follow-up	60 days
			505	No facility or provision to allow for religious activity (e.g. daily prayers) as per local law requirement	Desktop	30 days
			959	Different wage rates based on gender/ race or other characteristic alone for the same work and skill set and it is not contrary to local law	Follow-up	60 days
			912	Policies, processes and training are not sufficient to prevent discrimination at all stages of employment	Desktop	60 days
			913	Insufficient evidence to demonstrate non-discrimination in key areas of employment, where this has been raised as a concern by interviewed employees	Follow-up	30 days
	7.C	Not require or allow health checks for workers to take place during the recruitment process or during employment where the results are used to unfairly avoid hiring or retaining workers with certain health issues or medical conditions. This	504	Site requires medical tests that may lead to discrimination against certain workers (e.g. against pregnant workers, workers with HIV/AIDs, etc.)	Follow-up	60 days

		includes pregnancy (unless explicitly required by law) or HIV/AIDS.				
	7.D	Ensure that grievance mechanisms are accessible to all workers, regardless of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership and political affiliation.	914	Certain groups or individuals do not have access to or are not made aware of the grievance mechanism (e.g. due to language/technology barriers, inclusion in training)	Desktop	30 days
	7.E	Have a dedicated equity approach in recruitment, training, development and promotion processes.	915	Collaborative Action Required: There is no dedicated equity approach regarding recruitment, training, development and promotion processes	Collaborative Action Required	Collaborative Action Required
			916	Collaborative Action Required: There is a dedicated equity approach but it is inadequate	Collaborative Action Required	Collaborative Action Required
	7.F	Comply with all other applicable laws that impose conditions on Code Area 7.	506	Site does not achieve the percentage or number of a particular group (e.g. workers with disabilities, apprentices etc.) as required by local law	Desktop	60 days
			917	A systemic, deliberate or severe breach of a local law which represents a danger to workers or others, or which denies a basic human right (relating to Code Area 7: No Discrimination is Practised but which cannot	Follow-up	30 days

				be captured under another Workplace Requirement)		
			918	A systemic breach of a local law that could present a danger to workers or violate upon a human right (relating to Code Area 7: No Discrimination is Practised but which cannot be captured under another Workplace Requirement)	Follow-up	30 days
			919	An isolated breach of local law which represents low risk to workers (relating to Code Area 7: No Discrimination is Practised but which cannot be captured under another Workplace Requirement)	Desktop	90 days
8: Regular employment is provided	8.A	Provide a written contract or other binding agreement that specifies the terms and conditions of employment, that meet all legal requirements, in a language workers can understand.	526	Systemic occurrence of contracts in place but not signed by the worker	Desktop	30 days
			527	Isolated occurrence of contracts in place but not signed by the worker	Desktop	60 days
			522	Systemic occurrence of no contracts/letters of appointment in place	Desktop	30 days
			523	Isolated instances of no contracts/letters of appointment in place	Desktop	30 days
			524	Systemic occurrence of workers not being given a copy of their contracts or letter of appointment (including digital copy)	Desktop	60 days
			920	Isolated occurrence of workers not being given a copy of their contracts or letter of appointment (including digital copy)	Desktop	30 days
			530	Contractual terms are not communicated in a language the worker can understand	Follow-up	30 days

			531	Contractual terms not clearly communicated prior to recruitment	Desktop	30 days
			528	Contracts changed during the course of employment without communication or facility imposing additional terms or requirements on worker without their knowledge and consent (contract substitution/supplemental agreements)	Desktop	30 days
			529	Workers are required to sign blank papers, resignation letters, etc.	Follow-up	30 days
			525	Inadequate contracts in place, i.e. missing critical elements such as job description, wages (regular and overtime), hours of work (including overtime), notice period etc.	Desktop	30 days
			921	Contracts or work agreements stipulate that spouses, children, or any other family members of workers are required to work.	Desktop	30 days
			922	Evidence of contracts or work agreements in place that apply to more than one individual worker.	Desktop	60 days
	8.B	Meet its contractual and legal obligations in cases of dismissal, termination or redundancy.	536	Site has not met its contractual obligations relating to dismissal, termination or redundancy (no evidence of discrimination) - Systemic	Follow-up	60 days
			537	Site has not met its contractual obligations relating to dismissal, termination or redundancy (no evidence of discrimination) - Isolated	Follow-up	90 days

	8.C	Use an employment or engagement model appropriate to and intended for the nature of work undertaken in the local context.	923	The contractual model used to engage workers is not appropriate for the nature of the work undertaken (e.g. contravenes legal guidance that such a model is to be used for specific kinds of work, duration of employment, degree of supervision etc. - systemic	Follow-up	60 days
			924	The contractual model used to engage workers is not appropriate for the nature of the work undertaken, e.g. contravenes legal guidance that such a model is to be used for specific kinds of work, duration of employment, degree of supervision etc. - isolated	Follow-up	90 days
			925	Freelancers or subcontracted workers are held to the same obligations as employees but do not receive the same benefits and protections - systemic	Follow-up	60 days
			926	Freelancers or subcontracted workers are held to the same obligations as employees but do not receive the same benefits and protections - isolated	Desktop	60 days
	8.D	Not utilise apprenticeships, temporary, irregular, sub-contracted or non-employment models of labour for the purpose of	927	Less protective forms of employment/labour engagement are used for the purpose of avoiding obligations relating to regular employment	Follow-up	90 days

		avoiding its obligations relating to regular employment, regardless of legality.	541	Excessive and repeated use of agency, subcontracted or temporary labour used to replace regular employment	Follow-up	60 days
			542	Form of using irregular employment, contracting or self-employment is comparable to employment and could provide legal risk to the company	Follow-up	60 days
			543	Temporary workers are systematically fired and rehired in order to avoid obligations related to continual employment	Follow-up	90 days
8.E		Meet legal conditions for the use of apprenticeships, temporary, irregular, sub-contracted or non-employment models of labour.	928	Legal conditions for the use of apprenticeships, temporary, irregular, sub-contracted or non-employment models of labour have not been met - systemic	Follow-up	60 days
			929	Legal conditions for the use of apprenticeships, temporary, irregular, sub-contracted or non-employment models of labour have not been met - isolated	Desktop	90 days
			538	Systemic occurrence of workers in precarious employment (e.g. seasonal contract, apprentices, trainees, probationary workers) not moved to permanent status in line with law	Follow-up	90 days
			539	Isolated occurrence of workers in precarious employment (e.g. seasonal contract, apprentices, trainees, probationary workers) not moved to permanent status in line with law	Desktop	60 days

			544	Legal restrictions on the use of temporary labour are contravened, for example the frequency, extent or duration of use	Follow-up	60 days
			545	Isolated incidents of temporary workers not being offered permanent contracts, contrary to law	Desktop	60 days
			547	Total number or percentage of the workforce that are apprentices/trainees exceed legal limits	Follow-up	60 days
			403	Apprentices/trainees/vocational workers are employed under terms and conditions contrary to law	Follow-up	30 days
	8.F	Not unfairly restrict those working under apprenticeships, temporary, irregular, sub-contracted or non-employment models of labour from seeking regular employment.	930	Those working under apprenticeships, temporary, irregular, sub-contracted or non-employment models of labour are not made aware of regular employment opportunities	Desktop	90 days
			931	Service agreements with labour providers proscribe the employment of workers by the site or impose excessive transfer fees for doing so	Desktop	60 days
	8.G	Demonstrate real intent to impart skills and/or provide regular employment once the apprenticeship term is completed, where apprenticeship schemes are used.	548	Apprentices used but without any real intent to impart skills or provide regular employment	Follow-up	60 days

8.H	Comply with all other applicable laws that impose conditions on Code Area 8.	532	Contracts in place with no minimum hours contrary to local law	Desktop	30 days
		533	Labour contracts not authenticated or registered by/with the local labour bureau where it is a legal requirement	Desktop	30 days
		534	Information about internal rules and regulations is not available (e.g. by providing handbooks or terms & conditions for workers and it is a legal requirement)	Desktop	30 days
		540	Occurrence of agency, subcontracted or temporary workers being requested then turned away at the beginning of the day without pay where this is contrary to law	Follow-up	60 days
		86	Probation period required from the worker is in excess of the legal maximum	Desktop	30 days
		932	A systemic, deliberate or severe breach of a local law which represents a danger to workers or others, or which denies a basic human right (relating to Code Area 8: Regular Employment is Provided but which cannot be captured under another Workplace Requirement)	Follow-up	30 days
		933	A systemic breach of a local law that could present a danger to workers or violate upon a human right (relating to Code Area 8: Regular Employment is Provided but which cannot be captured under another Workplace Requirement)	Follow-up	30 days

			934	An isolated breach of local law which represents low risk to workers (relating to Code Area 8: Regular Employment is Provided but which cannot be captured under another Workplace Requirement)	Desktop	90 days
8.A: Sub-contracting and homeworkers are used responsibly	8.A.A	Ensure all homeworking and sub-contracted work is authorised by the relevant clients receiving the products.	556	No policy on managing and selecting sub-contractors including policy on obtaining clients' approval	Desktop	60 days
			559	Production is being outsourced to sub-contractors in contravention of customer requirements (e.g. prior authorisation has not been sought where applicable)	Desktop	30 days
			561	Production is being outsourced to homeworkers in contravention of customer requirements (e.g. prior authorisation has not been sought where applicable)	Desktop	30 days
			560	No subcontracting declared but the site does not appear to have the production capacity to meet demand	Follow-up	60 days
	8.A.B	Maintain up-to-date records relating to sub-contracted work, and have systems in place to assess working conditions at sub-contracted sites.	935	No records exist relating to sub-contractors, but sub-contracting exists	Follow-up	60 days
			936	Incomplete or out-of-date records relating to sub-contracting	Desktop	60 days
			970	No/ inadequate systems in place to assess working conditions at sub-contracted sites	Follow-up	60 days
	8.A.C	Have systems in place to ensure working conditions	562	No system in place to monitor homeworkers' conditions in relation to social/ethical	Desktop	30 days

		of home workers meet ETI Base Code. Where directly employed, ensure no differentiation from other direct workers. Where indirectly employed, this must include sampling of documents relating to specific workers' contracts, pay and legal right to work. Records of these checks must be available to audit and conducted on an ongoing basis. It must also include visits to the place of work.		standards or system is missing crucial elements (e.g. wages and hours, child labour, safety, forced labour)		
			937	System in place to monitor homeworkers' conditions in relation to social/ethical standards but there are isolated gaps	Desktop	90 days
			563	No records for homeworkers (e.g. not on the payroll etc.) but homeworking occurring	Desktop	30 days
			564	Children/underage labour used by homeworkers and does not meet legal/ILO requirements	Follow-up	Immediate
	8.A.D	Comply with all other applicable laws that impose conditions on Code Area 8.A.	938	A systemic, deliberate or severe breach of a local law which represents a danger to workers or others, or which denies a basic human right (relating to Code Area 8A: Sub-contracting and Homeworkers but which cannot be captured under another Workplace Requirement)	Follow-up	30 days
			939	A systemic breach of a local law that could present a danger to workers or violate upon a human right (relating to Code Area 8A: Sub-contracting and Homeworkers but which cannot be captured under another Workplace Requirement)	Follow-up	30 days

			940	An isolated breach of local law which represents low risk to workers (relating to Code Area 8A: Sub-contracting and Homeworkers but which cannot be captured under another Workplace Requirement)	Desktop	90 days
9: No harsh or inhumane treatment is allowed	9.A	Not engage in or facilitate harsh or inhumane treatment of workers, including gender-based violence and harassment.	570	Evidence (including widespread worker testimony) of physical or psychological harassment, violence or abuse	Follow-up	Immediate
			571	Isolated reports from workers of instances of physical or psychological harassment, violence, abuse or bullying	Follow-up	30 days
			572	Workers report instances of low-level verbal abuse (e.g. shouting or swearing)	Follow-up	60 days
	9.B	Implement, adopt and communicate to all workers a workplace policy prohibiting harsh or inhumane treatment, including gender-based violence and harassment.	567	There is no or insufficient policy on harassment, violence and abuse that is aligned with applicable laws and communicated to workers	Desktop	30 days
	9.C	Implement, adopt and communicate to all workers a disciplinary policy, and procedures that are fair and appropriate.	579	Lack of a detailed disciplinary procedure that has been communicated to all workers	Desktop	30 days
			580	Disciplinary procedures and/or penalties are inappropriate or excessive (e.g. workers are threatened with removal of privileges, assignment of extra work, etc.)	Desktop	30 days
			581	Records of disciplinary cases are incomplete or missing	Desktop	90 days

9.D	Implement measures to prevent and control risks of harsh or inhumane treatment, including gender-based violence and harassment, based on an identification of hazards and risks, including in accommodation and worker transport where provided by the employer.	941	There are no or insufficient measures in place to prevent and control risks of harsh and inhumane treatment	Desktop	30 days
9.E	Ensure all workers (taking particular consideration of vulnerable worker groups) have accessible information and accessible training (where relevant) on the measures taken to prevent and control harsh or inhumane treatment, the identified risks and their rights and responsibilities.	942	There is no or insufficient training programme in place to prevent harsh or inhumane treatment in the workplace, or key members of staff have not received the training	Desktop	60 days
568		Not all relevant workers are trained on policies and procedures to prevent and report workplace harassment, violence and abuse	Desktop	30 days	
569		No/ineffective training for people managers/supervisors on policies and procedures to prevent and report workplace harassment, violence and abuse	Desktop	30 days	
943		There is no mechanism to monitor understanding and implementation of training to prevent harsh or inhumane treatment, or it is inadequate	Desktop	90 days	
9.F	Ensure all workers (taking particular consideration of vulnerable worker groups)	944	Certain groups or individuals do not have access to or are not made aware of the measures taken to prevent harsh and	Desktop	60 days

		have accessible information and training on the measures taken to prevent and control harsh or inhumane treatment, the identified risks and their rights and responsibilities.		inhumane treatment (e.g. due to language/technology barriers, inclusion in training)		
9.G		Not conduct bodily searches. Any non-bodily searches shall be conducted only where there is a legitimate business reason (e.g. theft). Where non-bodily searches are conducted the search must respect workers' privacy, be conducted by a member of the same sex and meet legal requirements.	573	Non-bodily searches conducted by member of the opposite gender, or in a way which does not respect workers privacy or meet legal requirements	Follow-up	Immediate
			574	Non-bodily searches conducted in a way which does respect workers privacy and meet legal requirements, but without a legitimate business reason.	Follow-up	60 days
			575	Bodily / strip-searches conducted	Follow-up	Immediate
9.H		Implement a formal process for workers to be able report grievances (concerns, complaints, or problems) without fear of retaliation. The grievance mechanism should be legitimate, accessible, predictable, equitable,	583	Lack of a detailed grievance procedure that has been communicated to all workers	Desktop	30 days
			584	Lapses exist in the recordkeeping of grievances reported, grievance proceedings and the outcomes	Desktop	60 days
			585	No grievance committee in place contrary to legal requirement	Desktop	90 days
			586	Grievance committee in place, but it is not effective	Desktop	60 days

		transparent, rights-compatible, continuously improving and based on engagement and dialogue.	578	Lack of a detailed grievance policy that has been communicated to all workers	Desktop	60 days
			588	Workers report that grievances are not satisfactorily addressed and resolution is not communicated	Follow-up	60 days
			589	Reprisals made against workers in retaliation for raising grievances	Follow-up	Immediate
	9.I	Comply with all other applicable laws that impose conditions on Code Area 9.	587	No sexual harassment committee where required by local law	Desktop	90 days
			945	A systemic, deliberate or severe breach of a local law which represents a danger to workers or others, or which denies a basic human right (relating to Code Area 9:Harsh or Inhumane Treatment but which cannot be captured under another Workplace Requirement)	Follow-up	30 days
			946	A systemic breach of a local law that could present a danger to workers or violate upon a human right (relating to Code Area 9:Harsh or Inhumane Treatment but which cannot be captured under another Workplace Requirement)	Follow-up	30 days
			947	An isolated breach of local law which represents low risk to workers (relating to Code Area 9:Harsh or Inhumane Treatment but which cannot be captured under another Workplace Requirement)	Desktop	90 days
	10.A.A	Remain aware of the local, regional and national	599	Site is not aware of the local and national laws or permits related to environment	Follow-up	60 days

10.A: Environment 2-Pillar		environmental laws relating to the site, and have clear processes around how these laws are updated and communicated.	971	Site has no or inadequate processes in place to manage updates to local, regional and national laws related to environment	Follow-up	60 days
	10.A.B	Comply with relevant local, regional and national laws or regulations, and have the correct documentation or permits, including for resource use (e.g. water, energy, material) and waste disposal.	606	Environmental certifications or environmental management systems documentation were not available to review	Desktop	30 days
			597	Presence of fines/prosecutions for non-compliance with environmental regulations that have not been remediated or appealed within the stipulated timeframes	Follow-up	60 days
			598	The site does not have all legally required permits for use and/or disposal of resources (e.g. energy, water, air emissions, waste etc.)	Desktop	30 days
			608	No public/external reporting on environmental performance and it is required by law	Desktop	60 days
			631	No water treatment in place contrary to law	Desktop	30 days
			618	No permits for waste disposal as per legal requirement	Desktop	30 days
			637	No monitoring of air emission limits as per legal requirements	Desktop	60 days
			636	No permits for emissions to air as per legal requirement	Desktop	30 days
			633	Waste water contains contaminants over legal limits	Follow-up	30 days
			634	No appropriate permits for water use/extraction as per legal requirements	Desktop	30 days

			635	No monitoring of water usage/extraction as per legal requirement	Desktop	60 days
			640	No required air emission treatment in place contrary to law	Desktop	60 days
			641	Air emissions contain contaminants over legal emission limits	Desktop	60 days
			642	Ozone depleting substances inventory not maintained as per legal requirement	Desktop	60 days
			643	GHG (Green House Gas) emissions not monitored as per legal requirements	Desktop	60 days
			646	No permits for use of energy as per legal requirements	Desktop	30 days
			647	No monitoring of energy usage as per legal requirements	Desktop	60 days
			648	Site does not have an energy conservation policy in place contrary to legal requirement	Desktop	60 days
			627	No permits for waste water disposal (effluent) as per legal requirement	Desktop	30 days
			650	Evidence of illegal activity resulting in long-term damage to the natural environment (e.g. deforestation of a protected area)	Follow-up	30 days
			972	Site is not in compliance with environmental regulations regarding the use of hazardous substances (e.g. chemicals and pesticides)	Follow-up	60 days
			973	A systemic, deliberate or severe breach of a local law causing damage to the environment (relating to Code Area 10.A: Environment 2-Pillar but which cannot be captured under another Workplace Requirement)	Follow-up	30 days

			974	A systemic breach of a local law that could cause damage to the environment (relating to Code Area 10.A: Environment 2-Pillar but which cannot be captured under another Workplace Requirement)	Follow-up	30 days
			975	An isolated breach of local law which represents a low risk of damage to the environment (relating to Code Area 10.A: Environment 2-Pillar but which cannot be captured under another Workplace Requirement)	Follow-up	30 days
	10.A.C	Have a system in place for identifying and remediating gaps between their clients' environmental standards and the environmental impact of their own operations.	600	Company is not aware of the customer's environmental requirements	Desktop	30 days
			948	Site does not have a system in place for remediating gaps between customers' environmental standards and the impact of their own operations	Desktop	60 days
			619	Site is not aware of customers' requirements in reference to hazardous substances (e.g. chemicals and pesticides)	Desktop	60 days
	10.A.D	Maintain a list of hazardous substances (e.g. chemicals and pesticides) used in manufacturing or in purchased components. Ensure they are compliant with their clients' requirements and relevant legislation in the	949	Site does not maintain a complete list of relevant hazardous substances (e.g. chemicals and pesticides) used	Desktop	60 days
			950	Site is not compliant with customer requirements and relevant legislation in destination countries	Follow-up	60 days

		destination countries for those substances.				
10.B: Environment 4-Pillar	10.B.E	Identify and monitor potential negative environment impacts of operations and supply chain and have in place systems that prevent, mitigate or remedy the impacts of their own operations.	951	Site does not identify its potential negative environment impacts or have in place systems to prevent, mitigate or remedy those impacts	Desktop	60 days
			952	Site has taken significant steps to identify and mitigate its environmental impacts, but there are significant gaps	Desktop	90 days
			605	No systems in place to continually improve environmental performance	Follow-up	60 days
			607	The site does not measure its environmental impacts	Desktop	60 days
			229	Evidence of unsafe disposal of hazardous chemicals	Follow-up	30 days
			622	No waste inventory or tracking system	Desktop	60 days
			623	Uncontrolled waste to landfill	Follow-up	30 days
			620	Hazardous waste improperly handled/stored/disposed of	Follow-up	30 days
			954	Non-hazardous waste improperly handled/stored/disposed of	Follow-up	60 days
			638	No/inadequate emission treatment system (e.g. no removal of contaminants)	Desktop	60 days
			639	No/inadequate training of personnel for monitoring air emissions	Desktop	30 days
			624	Employees not trained in waste management	Desktop	30 days
			625	No recycling policy in place	Desktop	60 days
626	No recycling scheme in place	Desktop	60 days			

			628	No/inadequate monitoring of waste water (effluent)	Desktop	30 days
			629	No/inadequate drainage system (e.g. no separation of clean and foul water)	Desktop	30 days
			630	No/inadequate training of personnel for monitoring effluent	Desktop	30 days
			632	No water treatment in place (where water is contaminated) and it is not a legal requirement	Desktop	60 days
			609	Site is not aware of the environmental performance of its suppliers	Desktop	60 days
			976	Site has inadequate systems in place to monitor environmental performance of its suppliers	Desktop	60 days
	10.B.F	Have and communicate policies and processes, endorsed at the highest level, that includes commitments to improve environmental performance and an approach to managing environmental impacts on relevant stakeholders	601	Lack of a detailed environment policy that covers relevant environmental impacts and has been communicated to necessary parties	Desktop	60 days
			602	Site has an environmental policy in place but does not communicate it to its suppliers	Desktop	60 days
			604	Management lack awareness of the significant environmental impact of their site and its processes	Desktop	30 days
			977	Site has an environmental policy in place but it is not endorsed at a senior level	Desktop	60 days
			603	No competent individual responsible for coordinating the site's efforts to improve environmental performance	Desktop	30 days

	10.B.G	Establish resource-use targets and a plan to reach them.	953	Site has not established resource targets and/or has not developed a plan to reach them	Desktop	90 days
	10.B.H	Record energy use, water use, solid waste, material use, hazardous substance use and waste, and effluent discharge.	244	No/inadequate systems or records for safe disposal of hazardous substances (e.g. chemicals and pesticides)	Desktop	30 days
			621	No/inadequate systems or records for hazardous substances (e.g. chemicals and pesticides) use	Desktop	30 days
			978	No/inadequate systems or records for energy use	Desktop	30 days
			979	No/inadequate systems or records for water use	Desktop	30 days
			980	No/inadequate systems or records for solid waste use	Desktop	30 days
			981	No/inadequate systems or records for material use	Desktop	30 days
			982	No/inadequate systems or records for chemical use	Desktop	30 days
			983	No/inadequate systems or records for effluent discharge	Desktop	30 days
			10.B.I	Monitor and mitigate the site's impacts on biodiversity.	651	Site is not aware of the local laws and regulations covering biodiversity
	652	Site does not have a biodiversity policy in place contrary to law			Desktop	60 days
10.C: Business ethics	10.C.A	Demonstrate understanding of current and relevant legislation relating to bribery,	656	Site is not aware of all local or national laws covering bribery, corruption or unethical business practice	Desktop	30 days

	corruption, unethical, or any type of fraudulent or unethical business practices.					
10.C.B	Assess risks of bribery, corruption or any fraudulent or unethical business practices and implement measures to mitigate these.	662	No system to investigate evidence of bribery, corruption and unethical business practice	Follow-up	60 days	
		660	Evidence of Business Ethics issues e.g. bribery, facilitation payments, fraud, transshipment, tax evasion, anti-competitive practices, extortion, money laundering, political contributions etc.	Follow-up		
10.C.C	Demonstrate awareness of, and compliance with, any fiscal legislative requirements, where required. This may include 3rd party financial audits.	955	Non-compliance with any fiscal legislative requirements	Follow-up	60 days	
10.C.D	Have and communicate a business ethics policy covering bribery, corruption, or any type of fraudulent or unethical business practice to all parties it deems as high risk, including the site's own suppliers.	658	Lack of detailed Business Ethics policy concerning bribery, corruption or unethical business practices (e.g. fraud, tax evasion, political interest, anti-competitive practices, extortion or money laundering, etc.)	Desktop	30 days	
		659	Policy and procedures to prevent or avoid bribery, corruption and other unethical business practices have not been communicated to employees in higher risk positions such as management, finance, purchasing and logistics	Desktop	30 days	
10.C.E	Provide appropriate business ethics training to	956	Lack of business ethics training to individuals in high risk roles	Desktop	90 days	

	workers at all levels in roles which have greater exposure to risks of bribery, corruption, fraudulent or unethical business practices, such as sales, purchasing, logistics.				
10.C.F	Develop and implement a transparent and accessible mechanism that effectively allows confidential and anonymous reporting, monitoring and investigation of any fraudulent or unethical business practices without fear of reprisals towards the reporter.	667	No confidential whistleblowing procedure in place	Desktop	30 days
		668	Whistleblowing procedure is not communicated to all workers	Desktop	60 days
		661	Lack of a transparent system in place for confidentially reporting and managing resolution of issues such as bribery, corruption, and unethical business practices	Desktop	30 days
		957	No grievance mechanism communicated to relevant external parties (e.g. the local community)	Desktop	30 days
10.C.G	Obtain and store personal data with the appropriate consents and controls, complying with any legislative requirements.	663	Evidence that the company misuses private and/or confidential data	Follow-up	30 days
10.C.H	Implement appropriate and effective corrective actions where they have	958	Historical fines/prosecutions with no evidence of corrective action	Desktop	90 days

		been subject to any fines/prosecutions for non-compliance to business ethics, regulations or equivalent.				
	10.C.I	Can demonstrate, where appropriate, that licences and permissions are held relating to ownership and/or leasing of the land where the site operates.	33	Business premises are informal and not registered (law enforcement or other agencies would find it difficult to locate the business)	Desktop	30 days
			34	Site is operating without all required in-date licences and permits (e.g. business/factory licence has expired)	Desktop	30 days