



SMETA Corrective Action Plan Report (CAPR)

Version 6.1

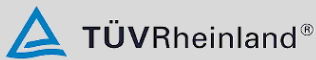


Audit Details

Sedex Company Reference:	ZC: 3726108	Sedex Site Reference:	ZS: 3780198
Business name (Company name):	PF Logo Express Sp. z o.o.		
Site name:	PF Logo Express Sp. z o.o.		
Site address:	Ul. Żernicka 22, 62-023 Robakowo	Country:	Poland
Site contact and job title:	Agnieszka Wiśniewska / Health Safety, Fire Safety and Environment Specialist		
Site phone:	00. 48.616593431	Site e-mail:	A.Wisniewska@pfconcept.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar
			<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	27-28 July 2021		

Audit Company Name & Logo:

TÜV Rheinland Polska Sp. z o.o.



Report Owner (payer):

PF Logo Express Sp. z o.o.

Audit Conducted By

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size): The sample for wages were reduces to 36 as 3 out of 42 sample selected works were hired in current month and no wages evidence available and 3 out of 42 workers refuse access to persona files.

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

Lead auditor: Robert Suder

Team auditor: Janina Huczyńska

Interviewers: Robert Suder & Janina Huczyńska

Report writer: Robert Suder & Janina Huczyńska

Report reviewer: Danuta Kędzierska

Date of declaration: July 28, 2021

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

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

Audit Parameters

Audit Parameters			
A: Time in and time out	Day 1 Time in: 8:00 Day 1 Time out: 16:00	Day 2 Time in: 8:00 Day 2 Time out: 16:00	Day 3 Time in: NA Day 3 Time out: NA
B: Number of auditor days used:	3,5MD (2DM Lead auditor & 1,5MD Team auditor).		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define: NA		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not: NA		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
G: Who signed and agreed CAPR	Marek Flaszak / Plant Manager		
H: Is further information available	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	04-05 July 2019		
J: Previous audit type:	Periodic		
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why:	NA		
E: If Union Representatives were not present please explain reasons why:	NA – No union appointed in the company		

Guidance

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

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

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

Root cause (see column 4)

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

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

Next Steps:

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

Corrective Action Plan

Corrective Action Plan – non-compliances									
Non-Compliance Number	New or Carried Over	Details of Non-Compliance	Root cause	Preventative and Corrective Actions	Timescale	Verification Method	Agreed by Management and Name of Responsible Person:	Verification Evidence and Comments	Status
NC 1 Safety and Hygienic Conditions No. 3	New	<p>6 out of 18 fire extinguishers located in storage racks of the high storage warehouse were blocked by palletised goods.</p> <p>6 z 18 gaśnic znajdujących się w regałach magazynowych magazynu wysokiego składowania były zablokowane przez towar na paletach.</p>	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	<p>Access to the firefighting equipment must be assured permanently and workers shall be trained from the fire safety organization rules in warehouse area.</p> <p>Dostęp do sprzętu przeciwpożarowego musi być zapewniony w sposób ciągły, a pracownicy muszą być przeszkoleni z zasad organizacji przeciwpożarowej na terenie magazynu.</p>	30 days	Desktop	Yes - Agnieszka Wiśniewska / Health Safety, Fire Safety and Environment Specialist	<p>Desktop review on September 1st, 2021</p> <p>The extinguisher system in the area of the Inbound department in the warehouse has been reorganized. The places where the fire extinguishers are located are marked with the red X sign in front of each fire extinguisher on the floor, which means that it is forbidden to store the goods next to the fire-fighting equipment. Employees responsible for supervising fire matters in the discussed area have been trained and obliged to communicate the rules to their subordinate employees on 18.08.2021 wat was confirmed by signature on attendance list.</p> <p>The corrective actions were confirmed by photo evidence and report sent by Mrs. Agnieszka Wiśniewska / Health Safety, Fire Safety and Environment Specialist on August 28th, 2021. The corrective actions were taken – Robert Suder / TÜV Rheinland</p>	Closed

								Polska Sp. z o.o.	
NC 2 Safety and Hygienic Conditions No. 3	New	Lack of eye wash liquid while the stand with safety marking remain on the wall was observed in pad tamping lines. Zaobserwowano brak płynu do płukania oczu, podczas gdy wieszak wraz z oznakowaniem pozostał na ścianie w obszarze linii tampingu.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	The verification method shall be improved to assure eye wash liquids available all the time for related employees. Należy udoskonalić metodę weryfikacji, aby zapewnić stały dostęp do płynów do płukania oczu dla pracowników obszaru.	30 days	Desktop	Yes - Agnieszka Wiśniewska / Health Safety, Fire Safety and Environment Specialist	Desktop review on September 1st, 2021 Each place equipped with eye wash has been checked and added where missed. The employees responsible for first aid measures have been sent a reminder to report shortage of equipment on 18.08.2021. Additional point concerning first aid measures has been added to the checklist used during periodic audits performed by the OHS service. The corrective actions were confirmed by photo evidence and OHS checklist sent by Mrs. Agnieszka Wiśniewska / Health Safety, Fire Safety and Environment Specialist on August 28th, 2021. The corrective actions were taken – Robert Suder / TÜV Rheinland Polska Sp. z o.o.	Closed

Corrective Action Plan – Observations

Observation Number	New or Carried Over	Details of Observation	Root cause	Any improvement actions discussed
Obs1 Living Wages are Paid No. 5	New	Is recommended to clarified monthly bonus construction policy and improve the communication as interviewed workers were not sure how the bonus is calculated, which part can be obtained/reduce due to absence, quality or performance (general monthly bonus calculation rules are not clear). In addition is recommended to improve communication and clarification of overtime settlement system (how it work) – when the overtime is refund as day off and when paid extra rate. Zaleca się doprecyzowanie zasad konstruowania nagrody miesięcznych i poprawę		To improve monthly bonus calculation method communication.

		komunikacji, ponieważ ankietowani pracownicy nie byli pewni, jak obliczana jest nagroda, jaką część można uzyskać/zmniejszyć z powodu nieobecności, jakości lub wydajności (ogólne zasady obliczania premii miesięcznych nie są jasne). Dodatkowo rekomendowane jest usprawnienie komunikacji i wyjaśnienie systemu rozliczania nadgodzin (jak to działa) – kiedy nadgodziny są refundowane jako dzień wolny a kiedy płatne w sposób premiowany.		
Obs 2 Discrimination No. 7	New	<p>Is recommended to prepare documents in native language for migrant workers even they spoken Polish well to be sure that terms and condition with safety training records are transparent for the recruited employees (kept in personal files).</p> <p>Zaleca się przygotowanie dokumentów w języku ojczystym dla pracowników zagranicznych, nawet tych, którzy dobrze mówili po polsku, aby mieć pewność, że warunki pracy wraz z zapisami szkoleń BHP są przejrzyste dla zatrudnianych pracowników .</p>		Provide native language basic HR documentation.

Good examples		
Good example Number	Details of good example noted	Any relevant Evidence and Comments
GE 1 Management system and Code Implementation No. 0B	<p>Implemented management systems based on norms ISO14001:2015.</p> <p>Wdrożony system zarządzania w oparciu o normę ISO14001:2015.</p>	Interviews and documents review
GE 2 Management system and Code Implementation No. 0B	<p>The company implemented integrated audits system based on the plan where quarterly each key divisions must past internal assessment. The audit contained fire safety, health and safety, hazardous materials, wastes, environment aspects. Last audit report dated 07.07.2021 was conducted M&R (screen printing).</p> <p>W przedsiębiorstwie wdrożono zintegrowany system audytów oparty o plan gdzie kwartalnie każdy kluczowy dział musi przejść ocenę wewnętrzną. Audyt obejmuje bezpieczeństwo przeciwpożarowe, BHP, materiały niebezpieczne, odpady oraz aspekty środowiskowe. Ostatni raport z audytu z dnia 07.07.2021 został przeprowadzony w dziale M&R (sitodruk).</p>	Interviews and documents review

<p>GE 3 Safety and Conditions No. 3</p> <p>Hygienic</p>	<p>Implemented near misses system for reporting potentially dangerous situations to the OHS department – pfle_bhp@pflogoexpress.com. Full register is manager by 4 safety officers.</p> <p>Wdrożono system zgłaszania potencjalnie niebezpiecznych sytuacji do działu BHP – pfle_bhp@pflogoexpress.com. Pełny rejestr jest zarządzany przez 4 specjalistów bezpieczeństwa.</p>	<p>Interviews and documents review</p>
<p>GE 4 Safety and Conditions No. 3</p> <p>Hygienic</p>	<p>High awareness along with the preparation and implementation of measures taken to combat the Covid-19 pandemic situation. Employees confirmed the implemented rules, countermeasures and the availability of all remedial measures together with isolation / distance. The company organized the possibility of free vaccinations on the premises of economic zone.</p> <p>Duża świadomość wraz z przygotowaniem i wdrożeniem działań podjętych w zakresie zwalczania sytuacji pandemicznej Covid-19. Pracownicy potwierdzili wdrożone zasad i przeciwdziałania oraz dostępność wszelakich środków zaradczych wraz izolacją/dystansem. Przedsiębiorstwo zorganizowało możliwość darmowych szczepień na terenie strefy ekonomicznej.</p>	<p>Interviews and documents review</p>
<p>GE5 Living Wages are Paid No. 5</p>	<p>The company organizes free travel to / from work from several locations. For employees who travel on their own, they reimburse partial travel costs 50% of ticket for related travel distance and after 10 years of work, the employee can go to holiday and the amount of 2000PLN is covered by the employer.</p> <p>Przedsiębiorstwo organizuje darmowy dojazd do/z pracy z kilku lokalizacji. Dla pracowników dojeżdżających we własnym zakresie refunduje częściowe koszty dojazdu – 50% ceny biletu dla danej odległości dojazdu, po 10 latach pracy pracownik może jechać na wypoczynek i kwotę 2000PLN pokrywa pracodawca.</p>	<p>Interviews and documents review</p>

Confirmation

<p>Please sign this document confirming that the above findings have been discussed with and understood by you: (site management) <i>If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.</i></p>		
A: Site Representative Signature:	Marek Flaszak	Title Plant Manager Date July 28, 2021
B: Auditor Signature:	Robert Suder	Title Lead auditor Date July 28, 2021
C: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes.		
D: I dispute the following numbered non-compliances: NA		
E: Signed: <i>(If any entry in box D, please complete a signature on this line)</i>		Title Date
F: Any other site Comments:		

Guidance on Root Cause

Explanation of the Root Cause Column

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

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

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

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

Some examples of finding a "root cause"

Example 1

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

Example 2

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

Example 3

A site uses fines to control unacceptable behaviour of workers.

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

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

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

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

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



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

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

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

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5Iw_3d_3d)

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5Iw_3d_3d

[Click here for Supplier \(B\) members:](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d

[Click here for Auditors:](https://www.surveymonkey.co.uk/r/BRTVCKP)

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