




# 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,<br>62-023 Robakowo  | Country:  | Poland   |
| Site contact and job title:   | Agnieszka Wiśniewska / Health Safety, Fire Safety and Environment Specialist |   |  |
| Site phone:                   | +48 61 6593431   | Site e-mail:  | <a href="mailto:A.Wisniewska@pfconcept.com">A.Wisniewska@pfconcept.com</a>                                   |
| 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:                | 25-26.07.2023  |   |  |

|   |  |
|---|--|
| <b>Audit Company Name &amp; Logo:</b><br>TÜV Rheinland Polska Sp. z o.o.<br> | <b>Report Owner (payer):</b><br>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 number of workers reported on the audit day slightly exceeded 1000 persons although the audit was planned for less than 1000 persons site (1027 including temporary workers). Therefore the audit duration was 3,5 instead of 4,5 as it was not possible to extend the audit. It was summer season and the team was supported by temporary workers that is why the number of workers was bigger but not all of them were working on site due to various absence (sick leave, maternity leave, annual leave etc.) The distribution of workers in group interviews was adjusted to the working hours and availability of selected workers.

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

Lead auditor: Danuta Kędzierska

Team auditor: Janina Huczyńska

Interviewers: Danuta Kedzierska, Janina Huczyńska

Report writer: Danuta Kędzierska

Report reviewer:

Date of declaration: 26.07.2023

*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: 09:00<br>Day 1 Time out: 16:00   | Day 2 Time in: 09:00<br>Day 2 Time out: 16:00 | Day 3 Time in: NA<br>Day 3 Time out: NA |
| B: Number of auditor days used:                                      | 3,5MD (1,75 Lead auditor & 1, 75 MD Team auditor).  |   |   |
| C: Audit type:   | <input type="checkbox"/> Full Initial<br><input checked="" type="checkbox"/> Periodic<br><input type="checkbox"/> Full Follow-up<br><input type="checkbox"/> Partial Follow-Up<br><input type="checkbox"/> Partial Other<br>If other, please define: NA |   |   |
| D: Was the audit announced?  | <input checked="" type="checkbox"/> Announced<br><input type="checkbox"/> Semi – announced: Window detail:    weeks<br><input type="checkbox"/> Unannounced   |   |   |
| E: Was the Sedex SAQ available for review?                           | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No<br>If No, why not: NA  |   |   |
| F: Any conflicting information SAQ/Pre-Audit Info to Audit findings? | <input type="checkbox"/> Yes<br><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:  | 27-28 July 2021   |   |   |
| 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| B: Present at the audit?  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| C: Present at the closing meeting?  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No   | <input 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: | No worker representative was available during opening meeting due to their working hours and other assignments. |   |   |

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](http://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](http://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<br><i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i> | New or Carried Over<br><i>Is this a new non-compliance identified at the follow-up or one carried over (C) that is still outstanding</i> | Details of Non-Compliance<br><i>Details of Non-Compliance</i> | Root cause<br><i>(completed by the site)</i>   | Preventative and Corrective Actions<br><i>Details of actions to be taken to clear non-compliance, and the system change to prevent re-occurrence (agreed between site and auditor)</i> | Timescale<br><i>(Immediate, 30, 60, 90, 180, 365)</i> | Verification Method<br><i>Desktop / Follow-Up [D/F]</i> | Agreed by Management and Name of Responsible Person:<br><i>Note if management agree to the non-compliance, and document name of responsible person</i> | Verification Evidence and Comments<br><i>Details on corrective action evidence</i> | Status<br><i>Open/Closed or comment</i> |
|  |  | Nothing to report   | <input type="checkbox"/> Training<br><input type="checkbox"/> Systems<br><input type="checkbox"/> Costs<br><input type="checkbox"/> lack of workers<br><input type="checkbox"/> Other – please give details: |  |   |   |  |  |   |

| Corrective Action Plan – Observations  |   |   |  |   |
|--|---|---|--|---|
| Observation Number<br><i>The reference number of the observation from the Audit Report, for example, Discrimination No.7</i> | New or Carried Over<br><i>Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding</i> | Details of Observation<br><i>Details of Observation</i>                           | Root cause<br><i>(completed by the site)</i> | Any improvement actions discussed<br><i>(Not uploaded on to SEDEX)</i>                  |
| Universal Rights   | New   | ENG Businesses shall identify their stakeholders and human rights salient issues. | Systems                                      | ENG It is recommended performing human rights due diligence in line with the UN Guiding |

|                        |     |  |          |   |
|------------------------|-----|--|----------|---|
| Covering UNGP          |     | <p>Potential risks: no language skills test during recruitment and not all documents are available in language used by workers what can lead to miscommunication and discrimination.</p> <p>PL Biznes powinien zidentyfikować interesariuszy oraz istotne kwestie dla praw człowieka. Potencjalne ryzyko: w trakcie rekrutacji nie prowadzi się testów językowych i nie wszystkie dokumenty są dostępne w językach używanych przez pracowników co może prowadzić do zakłóceń w komunikacji i dyskryminacji.</p>  |          | <p>Principles and based on identification of stakeholders and salient issues.</p> <p>PL Zaleca się przeprowadzić ocenę zgodności z prawami człowieka zgodnie z wytycznymi ONZ oraz w oparciu o identyfikację interesariuszy i istotnych kwestii.</p>  |
| Management System OB   | New | <p>ENG Preventive actions and lessons learned process is implemented but in isolated cases (e.g. investigation in harassment in the workplace) no follow up activity leading to changes in training process, organisation of work etc. was taken.</p> <p>PL Wdrożono proces działań prewencyjnych oraz uczenia się, ale w odizolowanych przypadkach (np. postępowanie wyjaśniające dot. mobbingu) nie wprowadzono działań następczych, które doprowadziłyby do zmian np. w procesie szkolenia czy organizacji pracy.</p>   | Systemic | <p>ENG It is recommended introducing a follow up process: preventive and improvement actions, for all nonconformities and near misses.</p> <p>PL Zaleca się wprowadzić proces działań następczych: prewencyjnych i doskonalących, dla wszystkich niezgodności i potencjalnych niezgodności.</p> |
| Management System OB   | New | <p>ENG Isolated gaps in record management: Isolated case of not reporting NC from internal audit in NC register</p> <p>PL Odizolowany przypadek luki w zarządzaniu zapisami: odizolowany przypadek niezarejestrowania niezgodności z audytu wewnętrznego w rejestrze niezgodności</p>  | Systemic | <p>ENG It is recommended assuring a double-check process to assure that all NC are registered and monitored.</p> <p>PL Zaleca się zapewnić, że wszystkie niezgodności są rejestrowane i monitorowane.</p>   |
| Health and Safety No 1 | New | <p>ENG Isolated case of missing emergency sign in female locker room – sign was provided during the audit.</p> <p>PL Odizolowany przypadek brakującego oznakowania wyjścia ewakuacyjnego w szatni damskiej – znak uzupełniono w trakcie audytu.</p>  | Systemic | <p>ENG It is recommended assuring a system to monitor availability of the emergency signs.</p> <p>PL Zaleca się wprowadzić system monitorowania dostępności znaków awaryjnych.</p>  |
| Health and Safety No 2 | New | <p>ENG Isolated case of hazardous chemicals stored in the room which was not meant to store chemicals. It was explained that those chemicals were stored in the room for the time of changes in the workshop and they were removed to the secure place during the audit.</p> <p>PL Odizolowany przypadek przechowywania substancji niebezpiecznych w pomieszczeniu, które nie było przeznaczone do tego celu. Wyjaśniono, że substancje te były przechowywane w tym pomieszczeniu na czas remontu warsztatu oraz zostały przeniesione w bezpieczne miejsce w trakcie trwania audytu.</p> | Systemic | <p>ENG It is recommended assuring safety procedures for extraordinary situations .</p> <p>PL Zaleca się opracować procedury bezpiecznej pracy na niecodzienne sytuacje.</p>   |



|                        |     |   |          |   |
|------------------------|-----|---|----------|---|
| Health and Safety No 3 | New | <p>ENG During the test of eyewash and shower stations it was noticed the water is dirty what might indicate that the equipment is not tested with sufficient frequency.</p> <p>PL W trakcie testów myjki do oczu oraz prysznicza zauważono, że woda z nich wypływająca jest brudna co może wskazywać, że sprzęt ten jest testowany niewystarczająco często.</p> | Systemic | <p>ENG It is recommended reviewing the emergency equipment safety test instruction.</p> <p>PL Zaleca się dokonać przeglądu instrukcji przeglądu bezpieczeństwa urządzeń awaryjnych.</p> |
| Health and Safety No 4 | New | <p>ENG Psychosocial risks are assessed for senior operator but not for operator. It is not clear why.</p> <p>PL Ryzyka psychospołeczne są ocenione dla starszego operatora, ale nie dla operatora. Nie jest jasne dlaczego.</p>   | Systemic | <p>ENG It is recommended assessing psychosocial risks for all work stations.</p> <p>PL Zaleca się ocenić ryzyka psychospołeczne dla wszystkich stanowisk.</p>                           |



### Good examples

| Good example Number<br><i>The reference number of the good example from the Audit Report, for example, Discrimination No.7</i> | Details of good example noted   | Any relevant Evidence and Comments   |
|--|---|--|
| Management System 0B No 1  | <p>ENG Presence of relevant certifications</p> <p>PL Dostępność mających znaczenie certyfikatów</p>                               | ISO 14001  |
| Management System 0B No 2  | <p>ENG Site supports community and charitable projects</p> <p>PL Wsparcie społeczności i prowadzenie projektów charytatywnych</p> | <p>ENG Support for Ukrainian workers and Ukraine people during the war</p> <p>PL Wsparcie dla pracowników z Ukrainy oraz Ukraińców w trakcie wojny</p> |

|                            |  |  |
|----------------------------|--|--|
| Management System 0B No 3  | <p>ENG Excellent Human Resource (HR) practices in place – well maintained personal files</p> <p>PL Doskonałe praktyki HR – dobrze utrzymane akta pracowników</p>   | <p>ENG Document review</p> <p>PL Przegląd dokumentacji</p>     |
| Management System 0B No 4  | <p>ENG Comprehensive health and safety audit / risk assessment conducted for internal analysis &amp; root cause corrective actions</p> <p>PL Wyczerpujące audyty BHP oraz ocena ryzyka na podstawie których prowadzi się analizy przyczyn źródłowych i prowadzi działania korygujące</p> | <p>ENG Document review</p> <p>PL Przegląd dokumentacji</p>     |
| Living wages are paid No 1 | <p>ENG Company provides a range of additional benefits, including: free medical care</p> <p>PL Firma oferuje szeroki zakres dodatkowych benefitów, włączając bezpłatną opiekę medyczną</p>   | <p>ENG Remuneration records</p> <p>PL Dokumentacja płacowa</p> |
| Discipline Procedure No 01 | <p>ENG Sick leave monitoring procedure in place, preventing from unjustified disciplinary termination of contract due to absence</p> <p>PL Procedura monitorowania zwolnień lekarskich, zapobiegająca nieuzasadnionym zwolnieniom dyscyplinarnym z powodu nieobecności</p>               | <p>ENG Document review</p> <p>PL Przegląd dokumentacji</p>     |

## Confirmation

Please sign this document confirming that the above findings have been discussed with and understood by you: (site management) If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.

|  |   |   |
|--|---|---|
| A: Site Representative Signature:  |  | Title <i>Kier. BHP, Prod. OUFIR. Spoz</i><br>Date <i>26.07.2023</i> |
| B: Auditor Signature:  |  | Title <i>lead auditor</i><br>Date <i>26.07.2023</i>                 |
| 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:   |   |   |
| E: Signed:<br>(If any entry in box D, please complete a signature on this line)  |   | Title<br>Date   |
| F: Any other site Comments:  |   |   |