

Sedex Members Ethical Trade Audit Report

Version 7



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Audit content

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Minimum Requirements were applied and the SMETA Auditor Manual was followed. 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.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the following Code Areas:

Included in a 2-Pillar audit:

1. Labour Standards Code Areas:
 - 0: Enabling accurate Assessment
 - 1: Employment is Freely Chosen
 - 1.A: Responsible Recruitment & Entitlement to Work
 - 2: Freedom of Association and Right to Collective Bargaining are Respected
 - 4: Child Labour Shall Not be Used
 - 5: Legal Wages are Paid
 - 5.A: Living Wages are Paid
 - 6: Working Hours are Not Excessive
 - 7: No Discrimination is Practiced
 - 8: Regular Employment is Provided
 - 8.A: Sub-contracting and Homeworkers are Used Responsibly
 - 9: No Harsh or Inhumane Treatment is Allowed
2. Health & Safety Code Area:
 - 3: Working Conditions are Safe and Hygienic
3. Environment Code Area:
 - 10.A: Environment 2-Pillar

Included in a 4-Pillar audit:

1. Labour Standards Code Areas
 - As 2-pillar
2. Health & Safety Code Area
 - As 2-pillar
3. Environment Code Area:
 - 10.A: Environment 2-Pillar
 - 10.B: Environment 4-Pillar
4. Business Ethics Code Area:
 - 10.C: Business Ethics

- (2) Where appropriate, non-compliances or non-conformances were raised where either local law or the Base Code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.
- (3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit and site details

Audit details

Sedex company reference	ZC5000034952	Auditor company name	DQS CFS GmbH
Date of audit	2024-11-28	Audit conducted by	Sedex member
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		

Site details

Sedex site reference	ZS1000040900	Site name	PT Langgeng Jaya Plastindo
Business name	PT. Langgeng Jaya Plastindo	Site address	61175 Jl. Raya Kedamean No. 16, Kedamean, Kab. Gresik, Gresik, ID
Site phone	03179970535	Site email	diviso.ljp@gmail.com

Audit parameters

Time in and out	Day 1		Day 2	
	In	08:00	In	08:00
	Out	17:00	Out	13:00
Audit type	Full initial			
Was the audit announced?	Announced			
Was the Sedex SAQ available for review?	Yes			
Who signed and agreed CAPR?	Mr. Syamsul Amin / HRGA Manager			
Any conflicting information SAQ/Pre-Audit Info	No			
Is further information available?	No			

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	There is no trade union established at the facility, and it is not mandatory to have one based on national laws.		
Reason for absence during the audit	There is no trade union established at the facility, and it is not mandatory to have one based on national laws.		
Reason for absence at the closing meeting	There is no trade union established at the facility, and it is not mandatory to have one based on national laws.		

SMETA declaration

Auditor team

SMETA declaration	<p>I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.</p> <ol style="list-style-type: none"> Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. <p>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.</p>
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Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)

Lead auditor	Faisal Rahmat	APSCA Number	21703238
Additional auditor			
Date of declaration	2024-11-29		

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Mr. Syamsul Amin
Title	HRGA Manager
Date of declaration	2024-11-29





































Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.K Ensure that all premises are safe and hav...	§1	NC ZAF600783192
	3.L Implement effective processes to manage f...	§2	NC ZAF600783193
	3.L Implement effective processes to manage f...	§3	NC ZAF600783194
	3.L Implement effective processes to manage f...	§4	NC ZAF600783195
	3.L Implement effective processes to manage f...	§5	NC ZAF600783196

Local law issues

§1	<p>Law No 28 year 2002 : Article 7 (1) Each building must meet the requirements of the administrative and technical requirements in accordance with the function of the building. (3) The technical requirements of the building referred in paragraph (1) shall include the requirements of the building layout and requirements of buildings reliability.</p> <p>Article 16 (1) Requirements for reliability of buildings referred in Article 7 paragraph (3) , includes requirements for safety, health, comfort , and convenience.</p> <p>Article 37 : (2) Buildings stated to comply with the feasibility functions requirements when met the technical requirements , as referred in Chapter IV of this legislation. Explanatory notes of Article 37 : (2) A building is declared acceptance if the technical assessment had fully conducted for all the technical requirements of the building , and Local Government issued building operational acceptance certificate of building functions.</p> <p>Article 48 (3) The building of buildings that have been standing , but does not have permission building at the time this law was enacted, to obtaining building permits must obtain building operational acceptance certificate under the provisions of this law.</p>
§2	<p>In compliance with the Ministry of Public Works Regulation number 26/PRT/M/2008 outlining the Technical Requirements for Fire Protection Systems in Buildings and Surrounding Areas, as per article 9.4.1, supervision and oversight during this stage are conducted not solely by the building owner but also by accredited technical agencies and consultants specializing in building and environmental maintenance. This collective oversight aims to guarantee the building's continuous functionality and adherence to regulations.</p>
§3	<p>Labor Minister Regulation No.7 of 1964 regarding Condition of Health, Cleanness and lighting in workplace: article 13(1): a workplace in use at night-time must be provided with emergency lighting equipment. Article 13.4: Exits, such as doors, corridors, etcetera, must be provided with emergency lighting equipment and with signs, painted with luminous, reflecting or fluorescence material.</p>
§4	<p>Labor Minister Decree No. 186 year 1999, regarding Fire Management Unit in Work Location article 2(2b): Obligation to prevent, alleviate and extinguish fire in work location as referred to in paragraph (1) shall cover to prepare detector, alarm, fire extinguisher and evacuation facilities.</p>
§5	<p>Labor Minister Regulation No.7 of 1964 regarding Condition of Health, Cleanness and lighting in workplace, article 13(1): a workplace in use at night-time must be provided with emergency lighting equipment. Article 13.4: Exits, such as doors, corridors, etcetera, must be provided with emergency lighting equipment and with signs, painted with luminous, reflecting or fluorescence material.</p>

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen				
1.A. Responsible recruitment and entitlement to work				
2. Freedom of association and right to collective bargaining are respected				
3. Working conditions are safe and hygienic				
4. Child labour shall not be used				
5. Legal wages are paid				
6. Working hours are not excessive				
7. No discrimination is practiced				
8. Regular employment is provided				



Not addressed



Fundamental improvements required







Some improvements recommended



Robust management systems

	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	✔	✔	✔	✔
9. No harsh or inhumane treatment is allowed	✔	✔	✔	✔
10.A. Environment 2-Pillar	✔	✔	✔	✔
10.C. Business ethics	✔	✔	✔	✔

-  Not addressed
-  Fundamental improvements required
-  Some improvements recommended
-  Robust management systems

Site details

Company and site details

Sedex company reference	ZC5000034952	
Sedex site reference	ZS1000040900	
Company name	PT. Langgeng Jaya Plastindo	
Business ownership type	GOODS	
Site name	PT Langgeng Jaya Plastindo	
Site name in local language		
GPS location	GPS address	JL. RAYA KEDAMEAN NOMOR : 16, Desa/Kelurahan Kedamean, Kec. Kedamean, Kab. Gresik, Provinsi Jawa Timur
	Coordinates	Latitude :-7.318411229738657, Longitude: 112.5661304143313
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Mr. Samsul Amin
	Job title	HRGA Manager
	Phone number	03179970535
	Email	diviso.ljp@gmail.com
Applicable business and other legally required business license numbers and documents	Business license No. 9120208930454 issued on October 10, 2024 without expiration date	

Site activities

Site function	Factory Processing/Manufacturer
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Site activities

Site activities	Primary	Manufacture of plastics products
	Secondary	
	Other	
Product type	<p>The main products of the facility are manufacturing flexible intermediate bulk containers (FIBCs), woven bags, polyester staple fiber padding, plastic pellets from recycled materials, and PET flakes from recycled materials.</p> <p>The main production processes are listed as follows: FIBC and Woven Bag: Raw material - extruder - circular room - assembling - finishing - packing Polyester Staple Fiber Padding: Raw Material - Heating - Finishing Pellet: Raw material - washing - shredding - extrude - finishing - packing PET Flakes: Raw material - washing - shredding - finishing - packing</p>	
Process overview	<p>The facility primarily manufactures flexible intermediate bulk containers (FIBCs), woven bags, polyester staple fiber padding, plastic pellets from recycled materials, and PET flakes from recycled materials, operating with 5 production lines. The main production processes include cutting, printing, sewing, assembling, inspection, and packing. Key machines used in the facility include washing, extrusion, weaving, sewing, and padding equipment.</p>	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes	
What is the area of audited site to its boundary?	30600m ²	
Building 1	Last construction works on site	2008
	If building is shared, provide details	No
	Number of floors	2
	Description of floor activities	The building 1 has two floors: the first floor is utilized for office space, warehouse, and production, while the second floor is entirely dedicated to production.

Site scope

Building 2	Last construction works on site	2008
	If building is shared, provide details	No
	Number of floors	2
	Description of floor activities	Building 2 has two floors, with both floors used exclusively for the spare parts warehouse.
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	
Is any activity conducted onsite not included within the scope of the audit?	No	

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No
Does the site organise worker transport to the worksite?	Not applicable Not applicable, as there are no legal requirements for providing transportation to workers.

Work patterns

Approximate workers on site per month (% of peak)	January	95-100%	February	95-100%
	March	95-100%	April	95-100%
	May	95-100%	June	95-100%
	July	95-100%	August	95-100%
	September	95-100%	October	95-100%
	November	95-100%	December	95-100%

Work patterns

Is there any night or back shift work at the site?	Yes Employees work six days a week in three shifts, with one day off per week for each shift. Work hours are as follows: 1st Shift: •Mondays – Fridays: 7:00 to 15:00 with a 1-hour break from 11:00 to 12:00. •Saturdays: 7:00 to 12:00 with a short break from 9:00 to 9:15. 2nd Shift: •Mondays – Fridays: 15:00 to 23:00 with a 1-hour break from 19:00 to 20:00. •Saturdays: 12:00 to 17:00 with a short break from 14:00 to 14:15. 3rd Shift: •Mondays – Fridays: 23:00 to 7:00 with a 1-hour break from 3:00 to 4:00. •Saturdays: 17:00 to 22:00 with a short break from 19:00 to 19:15.
What percentage of the workforce, including temporary and agency workers, work during the night/ back shift?	50%
Was the audit conducted across all shift times, and did it include a representative sample of workers from each shift time in interviews and sampling?	Yes The audit was conducted across all shift times and included a representative sample of workers from each shift for interviews and sampling.

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	Other certification The facility have Global recycle certificate from Control Union as audit firm, this certificate is issued on Mar 31, 2024 and expired on Mar 30, 2025
Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	No The facility has not assessed its direct, indirect, or potential impacts on the human rights, lands, resources, territories, livelihoods, or food security of indigenous peoples or the local community.
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	No The facility has not established a Human Rights Impact Assessment (HRIA) but has incorporated the prohibition of forced or trafficked labor, bonded labor, prison labor, and child labor in its company regulations.

Worker analysis

Gender disaggregated data available

Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	68 (81.9%)	15 (18.1%)	- -	83 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	0 (0%)	0 (0%)	- -	0 (0%)
Temporary or fixed term employees	68 (81.9%)	15 (18.1%)	- -	83 (100%)
Agency or subcontracted workers	0 (0%)	0 (0%)	- -	0 (0%)
Seasonal workers	0 (0%)	0 (0%)	- -	0 (0%)
Self-employed workers	0 (0%)	0 (0%)	- -	0 (0%)
Informal workers including home workers	0 (0%)	0 (0%)	- -	0 (0%)
Apprentices, trainees or interns	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
International migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
Total migrant workers	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from

None

Workers by age

	Men	Women	Other	Total
18 - 24 years old	12 (14.5%)	0 (0%)	- -	12 (14.5%)
15 - 17 years old	0 (0%)	0 (0%)	- -	0 (0%)
Under 15 years old	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit?

Yes

Please list the nationalities of all workers, with the three most common nationalities listed first

Indonesian

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Indonesian	82%	18%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid hourly / daily rate	0 (0%)	0 (0%)	- -	0 (0%)
Salaried workers	65 (78.3%)	18 (21.7%)	- -	83 (100%)

* % of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	- -	- -	- -	0 (0%)
Paid weekly	- -	- -	- -	0 (0%)
Paid monthly	68 (81.9%)	15 (18.1%)	- -	83 (100%)
Other	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details None

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	4 (4.8%)	1 (1.2%)	- -	5
Supervisors or team leaders	8 (9.6%)	2 (2.4%)	- -	10
Administrative staff	0 (0%)	2 (2.4%)	- -	2

Worker interview summary

Gender disaggregated data available	Men and women
Which methods of worker engagement were used?	Individual interviews Group interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?	
Was the interview sample representative of all types of nationality and employment types of workers?	Yes
Was the interview sample representative of the gender composition of the workforce?	Yes
Number and size of group interviews	1 group of 5
Did workers understand the purpose of the audit?	Yes
Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?	Yes
Was there any indication that workers had been 'coached' in how they should respond to questions?	No
What was the general attitude of the workers towards their workplace?	Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Facilities (e.g. rest area, recreation, canteen)
What did the workers like the most about working at this site?	Hours worked, rest days or breaks Freedom of movement Social benefits & insurance (e.g. ability to book annual leave, maternity leave, pensions etc.) Overtime Work atmosphere (e.g. treatment by supervisors) Communication (e.g. from management) Equal opportunities Job security Contracts
Additional comments	No additional comments were noted during employees' interview.
Attitude of workers' committee/union representatives	During the audit, one (1) employee committee representative confirmed that he/she enjoys working for the facility and satisfied with the working condition, benefits and management system and no complaints nor negative information were raised by him / her.
Attitude of managers	During the opening meeting in this periodic audit, the management representative confirmed that they would fully cooperate with the audit such as gave the full access for the auditor to conduct the facility tour, took a photo during facility tour for the health and safety and also the production process, provided the documents requested by the auditor such as employees' documents and legal permits. The management also confirmed that the auditors could conduct employees' interviews separated from the management. On the closing meeting, the facility representative, Mr. Abdul Hamid Rais agreed and approved with the result of the audit.

Workers interviewed by type

	Total
Permanent workers	0
Temporary or fixed-term employees	10
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	10

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	3	2	-	5
Workers interviewed individually	2	3	-	5

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	0	0	-	0

Measuring workplace impact

Gender disaggregated data available

Totals only

The facility provided totals only

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	-	-	-	2.0%
Last full calendar year (2023)	-	-	-	2.0%
Previous full calendar year (2022)	-	-	-	2.0%

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	-	-	-	3.0%
Last full calendar year (2023)	-	-	-	4.0%
Previous full calendar year (2022)	-	-	-	5.0%

* Number of days lost through job absence in the year, calculated as (the number of employees on 1st day of the year + number employees on the last day of the year) / 2)* number available workdays in the year*100

Are accidents recorded?

Yes

The accident was recorded by the Health and Safety Committee Representative. The accident records book is maintained daily by the HR Officers. During the audit on October 22, 2024, one accident was recorded, and the record is available for review.

Annual number of work related accidents and injuries (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	-	-	-	1.0%
Last full calendar year (2023)	-	-	-	2.0%
Previous full calendar year (2022)	-	-	-	2.0%

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	-	-	-	9.0%
Last full calendar year (2023)	-	-	-	0.0%
Previous full calendar year (2022)	-	-	-	0.0%

* Calculated as (number of lost days due to work accidents and work related injuries * 100) / number of total workers.

Percentage of workers that work on average more than 48 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	-	-	-	0.0%
Last full calendar year (2023)	-	-	-	0.0%
Previous full calendar year (2022)	-	-	-	0.0%

Percentage of workers that work on average more than 60 standard hours in a given week

	Men	Women	Other	Total
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Percentage of workers that work on average more than 60 standard hours in a given week

Last full quarter (90 days)	-	-	-	0.0%
Last full calendar year (2023)	-	-	-	0.0%
Previous full calendar year (2022)	-	-	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current System:</p> <ol style="list-style-type: none">The facility allowed the auditor to conduct the audit by:<ul style="list-style-type: none">- Providing requested documents in a timely manner- Granting access to selected employees for record reviews, and- Facilitating a facility tour.The facility does not provide or offer any benefits, money, accommodation, meals, transportation, or other hospitality to auditors, adhering to the signed Eurofins Integrity Declaration. This ensures no undue influence or threat to the auditor's independence.The facility provided a site description and Sedex profile both prior to and during the audit. The facility's human rights policy, though without a document number and date, prohibits the use of forced or trafficked labor, bonded labor, prison labor, and child labor. This policy has been communicated to all employees through a notice board. <p>Evidence Examined:</p> <ol style="list-style-type: none">Company policy regarding social complianceInterviews with 10 selected employeesSedex site profileHuman rights policyTraining records		

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Yes This is not applicable because there are no agency or subcontracted workers at the site.

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

Management systems

Explanation for management systems grades

Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met
Grade: Robust Management System
The company has a clear policy ensuring that employment is freely chosen, with no tolerance for forced, bonded, or involuntary labor. Workers are employed based on their free will, and no deposits or identity documents are retained by the company as a condition of employment. Written employment contracts are provided to all workers in a language they understand, clearly outlining their rights and responsibilities, including the freedom to terminate employment with reasonable notice.

Appoint a manager with sufficient seniority who is responsible for implementing procedures
Grade: Robust Management System
The HR team is responsible for implementing and resourcing this policy. They are allocated the necessary tools and personnel to monitor hiring processes and ensure no coercive practices occur. Resources are also dedicated to maintaining detailed employment records and ensuring compliance with labor laws.

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures
Grade: Robust Management System
Mandatory training is conducted for HR staff and managers to ensure awareness of the principles of freely chosen employment. Training includes recognizing and preventing coercive recruitment practices and ensuring adherence to ethical employment standards.
The factory had established an annual training schedule, conducted training sessions for employees as planned, and maintained training records for review.

Monitor the effectiveness of procedures to meet policy and Workplace Requirements
Grade: Robust Management System
The company monitors compliance with this policy through regular internal audits and reviews of employment practices. Employee feedback mechanisms are in place to report any concerns anonymously, and any identified issues are escalated to management for immediate resolution. Monitoring records are maintained to track compliance and improvements over time.

The inherent risk of employment not being freely chosen is considered low in this context due to the presence of stringent local regulations and well-established systems designed to prevent such issues. These measures include robust policies that explicitly prohibit forced labor, comprehensive employment contracts that outline the rights and responsibilities of both parties, and diligent oversight by the HR department. Regular audits, employee awareness initiatives, and adherence to legal frameworks ensure compliance and create an environment where ethical employment practices are upheld.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current System:

1. The facility has established a human rights policy, without document number, revision 0, effective date August 27, 2024, that prohibits any form of forced or trafficked labor, bonded labor, prison labor, and child labor. This policy has been communicated to all employees through a notice board.
2. A review of personnel files for all 10 selected employees confirmed that no prison labor is employed by the facility. As part of the hiring process, employees are required to submit clearance letters from the police department along with their application letters.
3. Based on interviews with 10 selected employees and visual observation of employee movement, employees are free to move around their workplace area for personal matters. This includes taking drinking water, going to the first aid room, visiting the toilet, and accessing other desks for both job-related and non-job-related purposes without threats, penalties, coercion, physical force, violence, or any harsh or inhumane treatment.
4. Interviews with 10 selected employees confirmed that employees are free to leave the workplace area once their shift ends. Early departures are permitted for urgent matters, and employees wishing to leave early receive a written permit from their supervisor, which they submit to security at the main entrance gate.
5. The facility does not retain workers' original passports, travel or identity documents, or any other valuable items. The facility only keeps copies of employees' documents for record-keeping purposes. All applicants are required to show original documents to the HRD department only during the recruitment process.
6. Based on interviews with management and 10 selected employees, employees are free to resign or take leave without being penalized. Employees intending to resign are required to submit a resignation letter with one (1) month's notice.

Evidence Examined:

1. Company policy regarding social compliance
2. Interviews with 10 selected employees
3. Personnel files of 10 selected employees
4. Overtime forms for 10 selected employees

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

Management systems

Explanation for management systems grades

Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met
Grade: Robust Management System
The company has a clear Responsible Recruitment Policy that prohibits the use of forced, bonded, or child labor. All recruitment is managed directly by the company to ensure fairness and transparency, without reliance on third-party agencies. The policy includes specific mechanisms for verifying the legal right to work, preventing underage employment, and ensuring ethical hiring practices. Workers are provided with written contracts that clearly outline wages, working hours, and job conditions in a language they understand.

Appoint a manager with sufficient seniority who is responsible for implementing procedures
Grade: Robust Management System
The HR Manager is responsible for overseeing all recruitment and hiring processes to ensure compliance with the policy. Dedicated HR personnel are assigned to conduct document verification and ensure that all workers meet legal work requirements. Adequate resources are allocated to maintain up-to-date records of employees' work eligibility, and regular audits are conducted to ensure adherence to policies.

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures
Grade: Robust Management System
All HR staff undergo mandatory training on the company's recruitment procedures, legal requirements for work entitlement, and ethical hiring practices. Supervisors and line managers are also trained to recognize signs of illegal employment practices or potential exploitation. The factory had established an annual training schedule, conducted training sessions for employees as planned, and maintained training records for review.

Monitor the effectiveness of procedures to meet policy and Workplace Requirements
Grade: Robust Management System
To monitor compliance, the company conducts regular internal audits through the HR team to verify adherence to recruitment policies and confirm the authenticity of workers' documents. Recruitment records and work eligibility are reviewed quarterly. Any discrepancies or concerns identified during these audits are escalated to senior management for immediate corrective action. Additionally, feedback mechanisms, such as anonymous reporting channels, are in place to allow workers to report unethical recruitment practices or other concerns confidentially.

The inherent risk associated with responsible recruitment and entitlement to work is considered low due to the implementation of stringent policies and oversight mechanisms. These include rigorous recruitment practices that ensure fair treatment of candidates, verification processes to confirm legal entitlement to work, and compliance with local labor laws and ethical standards. Detailed employment contracts and transparent hiring procedures further strengthen the framework, while regular audits and HR monitoring help identify and address any potential issues. Together, these measures create a robust system that minimizes the risk of unethical recruitment practices or violations of work entitlement regulations.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current System:

1. The facility has established a hiring procedure with document number LJP-SOP-HRD-001, rev 0, effective date December 27, 2018, stating that recruitment decisions are based on the employee's abilities and the facility's needs.
2. During the recruitment process, the facility accurately communicates essential information to prospective employees, including the nature of work, working conditions, living conditions, job requirements, cost of living, wages, and benefits, reflecting what was presented at the time of recruitment.
3. The facility commits to not employing children or young workers. To ensure this, age documentation is verified during the recruitment process.
4. Based on interviews with 10 selected employees, neither the facility nor any labor agency collects monetary deposits or charges fees for any aspect of the hiring process, including medical check-ups. All hiring processes are free of charge.

Evidence Examined:

1. Company policy regarding social compliance
2. Interviews with 10 selected employees
3. Personnel files of 10 selected employees
4. Hiring process records

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company Workers are hired through formal temporary, seasonal, or guest worker programmes The site conducts hiring for temporary workers by itself.
Provide business names for all labour providers and programmes used	None
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (including dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	No The site does not use any agency or subcontracted workers.

Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	0%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	No

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?	Not Applicable
Were recruitment fees or costs identified during worker interviews?	<div>No</div> <div>The facility does not use any labor agencies and does not employ migrant workers. During employees' interviews, it was confirmed that there are no recruitment fees or costs associated with the hiring process.</div>

2. Freedom of association and right to collective bargaining are respected

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

Management systems

Explanation for management systems grades

Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met
Grade: Robust Management System
The company has a clear policy that respects workers' rights to freedom of association and collective bargaining, in compliance with local laws and international standards. Workers are free to join or form trade unions of their choice and to engage in collective bargaining without fear of discrimination, intimidation, or retaliation. The policy emphasizes open and respectful communication between management and workers or their representatives.

Appoint a manager with sufficient seniority who is responsible for implementing procedures
Grade: Robust Management System
The HR department is responsible for ensuring the necessary resources are in place to support this policy. This includes maintaining open communication channels with worker representatives and ensuring that worker rights are upheld in all employment practices. Adequate resources are allocated to facilitate meetings between management and worker representatives, where applicable.

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures
Grade: Robust Management System
All HR staff and line managers are trained to understand and uphold the principles of freedom of association and collective bargaining. Training includes recognizing and addressing any barriers to workers exercising these rights and fostering a culture of respect and cooperation within the workplace. The factory also established an annual training schedule, conducted training sessions for employees as planned, and maintained training records for review.

Monitor the effectiveness of procedures to meet policy and Workplace Requirements
Grade: Robust Management System
Compliance is monitored through regular internal reviews and audits of employment practices. Feedback from workers is actively sought through anonymous reporting mechanisms to ensure any issues are promptly identified. Any barriers to freedom of association or collective bargaining are escalated to senior management for immediate resolution, and records of these monitoring activities are maintained to ensure continuous improvement.

The inherent risk related to the freedom of association and the right to collective bargaining is considered low due to strong adherence to legal frameworks and organizational commitments to uphold these fundamental rights. Policies explicitly supporting employees' rights to form or join unions and engage in collective bargaining are in place, in alignment with local and international labor standards. Management fosters open communication, ensuring that employees feel empowered to voice concerns and negotiate terms collectively. Regular training for leadership and workers, as well as oversight by HR and compliance teams, further ensures that these rights are consistently respected and upheld.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current System:

1. Employees have the freedom to express opinions and raise concerns directly with management representatives, such as their supervisors.
2. The facility has a bipartite cooperation institution registered under letter No. 560.4/07/LKS B/437.58/2022, issued on 16 November 2021, and valid until 15 November 2024. This institution, chaired by the Director, includes 10 members (5 management representatives and 5 employee representatives) and serves as a communication forum between employees and facility representatives.
3. The latest bipartite report, covering January to June 2024, was submitted to the local labor bureau on 26 June 2024.
4. A suggestion box is located in front of the office and monitored monthly by HRDGA.

Evidence Examined:

1. Registration of the bipartite cooperation institution
2. Latest bipartite activity report submitted to the local labor bureau
3. Grievance procedure

2. Freedom of association and right to collective bargaining are respected

Data points

Are trade unions allowed by law in the national context?	No
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Yes
Does the membership reflect the nationality composition of the workforce?	Not Applicable
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

Management systems

Explanation for management systems grades

Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met
Grade: Robust Management System
The company has a comprehensive policy ensuring that all working conditions are safe and hygienic, in full compliance with local health and safety regulations and industry best practices. The policy outlines specific measures to identify, assess, and mitigate workplace hazards, including regular risk assessments and the provision of appropriate personal protective equipment (PPE) for all employees. The policy also includes clear procedures for reporting and addressing health and safety concerns raised by workers.

Appoint a manager with sufficient seniority who is responsible for implementing procedures
Grade: Robust Management System
Dedicated resources are allocated to ensure the implementation of this policy. A qualified Health and Safety Officer is responsible for overseeing workplace safety, conducting regular inspections, and maintaining compliance with all regulatory requirements. Adequate funding is provided to maintain safety equipment, conduct repairs, and facilitate ongoing safety improvements.

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures
Grade: Robust Management System
Mandatory health and safety training is provided to all employees and management staff, ensuring they are aware of potential workplace hazards and how to prevent accidents. This training is regularly updated and includes the proper use of equipment, emergency response procedures, and first aid. Supervisors and line managers also receive additional training to enforce safety protocols effectively.

Monitor the effectiveness of procedures to meet policy and Workplace Requirements
Grade: Robust Management System
The company monitors compliance with health and safety standards through regular internal audits and inspections of all work areas. Incident reports and near-miss records are reviewed to identify trends and implement preventive measures. Worker feedback is actively encouraged through open communication channels and anonymous reporting mechanisms. Any identified issues are escalated for immediate resolution, and all monitoring activities are thoroughly documented to track continuous improvement in workplace safety and hygiene. However, some improvements are required in the internal monitoring effectiveness since some non-compliances were identified.

The inherent risk regarding safe and hygienic working conditions is considered low due to stringent health and safety regulations, comprehensive workplace policies, and robust monitoring systems. Measures such as regular risk assessments, provision of appropriate safety equipment, and adherence to hygiene protocols ensure compliance with legal and industry standards. Employee training programs on safety practices and emergency procedures further reinforce awareness and preparedness. Additionally, ongoing inspections and prompt resolution of identified hazards demonstrate a proactive approach to maintaining a safe and healthy work environment for all employees.

Summary of findings

Code area	Workplace requirement	Local law	Finding
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3. Working conditions are safe and hygienic	3.K Ensure that all premises are safe and hav...	§1	NC	ZAF600783192
	3.L Implement effective processes to manage f...	§2	NC	ZAF600783193
	3.L Implement effective processes to manage f...	§3	NC	ZAF600783194
	3.L Implement effective processes to manage f...	§4	NC	ZAF600783195
	3.L Implement effective processes to manage f...	§5	NC	ZAF600783196

Systems and evidence examined to validate this code section

General Safety

- 1.The facility's structure is made of brick and light steel, surrounded by a five-meter permanent brick perimeter wall.
- 2.The work environment is clean, with well-maintained floors.
- 3.The facility provides six lavatories (three for females and three for males), meeting legal requirements for a workforce of 100 employees. These are gender-marked, cleaned twice daily, equipped with running water, and no queuing was observed during the facility tour.
- 4.Health and safety training programs conducted include:
 - o1st Evacuation Drill: Held on February 21, 2024, by OHS staff, with all employees participating. Evacuation time was 2 minutes and 30 seconds.
 - o2nd Evacuation Drill: Held on August 23, 2024, by OHS staff, with all employees participating. Evacuation time was 2 minutes and 48 seconds.
 - oFire Drill: Conducted on August 23, 2024, with all employees demonstrating fire equipment usage.
 - oFirst Aid Training: Conducted on August 23, 2024, for 10 employees, focusing on first aid supplies and procedures.
 - oChemical Handling and Emergency Response Training: Conducted on October 14, 2024, for 10 employees on safe chemical handling and emergency measures.
 - oPPE Usage Training: Conducted on May 24, 2024, for all employees on proper PPE use.
- 5.Drinking water test report number L22001894/202/AM/IX/2024 was conducted by BALAI BESAR LABORATORIUM KESEHATAN SURABAYA on September 21, 2024.
- 6.A hazard identification and risk analysis was updated for each production department (LJP-FRM-HSE-023, issue date December 15, 2023).
- 7.The facility provides a lactation room with a sofa and refrigerator.
- 8.Air quality, temperature, and noise level tests were conducted on January 17, 2024, by an accredited lab, meeting legal standards.
- 9.An OHS officer with license 5/1054021024/AS.01.03/X/2024, valid until October 2, 2027, has been appointed.

Fire Safety

- 1.A total of 40 fire extinguishers are distributed across production areas, with inspection dates and usage instructions provided in the local language.
- 2.The facility is equipped with zero hydrants and eight smoke detectors, last inspected by the emergency response team on June 24, 2024.
- 3.Eleven alarms are installed in security and production areas, with unique sounds distinct from other alarms.
- 4.Five emergency exits are located in production areas, equipped with emergency lighting and illuminated signs. Exit dimensions range from 3 to 5 meters in width and 3 to 4 meters in height.
- 5.Fifteen emergency lights are installed along evacuation routes and production areas, maintained monthly by the emergency response team.
- 6.The emergency plan for fire, natural, and social disasters (LJP-WI-HSE-002, revision: 01, October 2, 2023).
- 7.A fire recommendation letter was issued on June 25, 2024 (No. 566/61/KBKR/W8.5-SBY/III/2021), valid until June 25, 2025.

Electrical Safety

- The site holds a valid fire safety inspection report, valid until October 2025.

Chemical Safety

- 1.All chemicals are stored with secondary containment and proper labeling.
- 2.Material Safety Data Sheets (MSDS) are available in the local language in chemical storage areas.
- 3.Chemicals used include lubricant oil and soap.
- 4.Eyewash stations are provided in the chemical storage area.

Medical Services

- 1.Twelve first aid boxes, each containing 21 items, are located in production areas and are accessible to employees.
- 2.The last annual medical examination for all employees was conducted on August 26, 2024, by Klinik Sejahtera.
- 3.Accident records show no injuries for 2023 up to the audit date.
- 4.A first aid room equipped with a bed and first aid kit is available.
- 5.Certified first aid responders include:

oEmployee 1 (License No. 566/0327-P3K/108.5/V/2021).

6.The nearest hospital, RS Randegansari Husada, is 10 minutes away by car.

Machine Safety

- 1.Machinery permits include one forklift, each with valid inspection dates.
- 2.Three forklift operators hold valid licenses.
- 3.One compressor permit is current.
- 4.One boiler is in use.

Evidence Examined

- 1.Machinery and operator permits.
 - 2.Health and safety training records.
 - 3.Emergency preparedness and response procedures.
 - 4.Risk assessment documents.
 - 5.Accident records.
 - 6.Electrical and lightning permits.
 - 7.Fire equipment internal inspection records.
 - 8.Air quality, noise, and temperature test results.
 - 9.Annual medical examination records.
 - 10.Building construction permits and acceptance certificates.
 - 11.Fire recommendation letter.
 - 12.First aid officer licenses.
 - 13.Fire prevention unit licenses.
-

Findings: non-compliances

ZAF600783192

Non-compliance

Due 2025-03-23

Code area

3 Working conditions are safe and hygienic

Status

Closed (2025-02-14)*

Workplace requirement

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.

Time given to resolve

60 days

Issue title

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)

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

Description

During the document review and management interview, it was observed that the site is still in the process of obtaining the Building Acceptance Certificate (SLF). Based on documentation number 004/LBKLP/XI/2024, the facility is working with CV. Lautan Berkas Konstruksi as the consultant for obtaining this certificate.

Corrective and preventative actions

The facility should ensure that the Building Acceptance Certificate is obtained on time.

Local law reference

Law No 28 year 2002 :

Article 7

(1) Each building must meet the requirements of the administrative and technical requirements in accordance with the function of the building.

(3) The technical requirements of the building referred in paragraph (1) shall include the requirements of the building layout and requirements of buildings reliability.

Article 16

(1) Requirements for reliability of buildings referred in Article 7 paragraph (3) , includes requirements for safety, health, comfort , and convenience.

Article 37 :

(2) Buildings stated to comply with the feasibility functions requirements when met the technical requirements , as referred in Chapter IV of this legislation.

Explanatory notes of Article 37 :

(2) A building is declared acceptance if the technical assessment had fully conducted for all the technical requirements of the building , and Local Government issued building operational acceptance certificate of building functions.

Article 48

(3) The building of buildings that have been standing , but does not have permission building at the time this law was enacted, to obtaining building permits must obtain building operational acceptance certificate under the provisions of this law.

Evidence



[SLF-Notification-Letter.pdf](#)

* PDF generated at 01:36 (UTC) on 14 Feb 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600783193	Non-compliance	Due 2025-02-21
Code area 3 Working conditions are safe and hygienic	Status Closed (2025-02-14)*	
Workplace requirement 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.	Time given to resolve 30 days	
Issue title 172 - Fire licence, inspection or certificates not in place as required by law	Verification method Desktop audit	
Description During the document review, and as agreed by management, it was noted that the facility is still in the process of obtaining the Fire Protection Installation Permit.	Area of non-compliance/non-conformance Local law Base code	
Corrective and preventative actions The facility should ensure that the Fire Protection Installation Permit is obtained.		
Local law reference In compliance with the Ministry of Public Works Regulation number 26/PRT/M/2008 outlining the Technical Requirements for Fire Protection Systems in Buildings and Surrounding Areas, as per article 9.4.1, supervision and oversight during this stage are conducted not solely by the building owner but also by accredited technical agencies and consultants specializing in building and environmental maintenance. This collective oversight aims to guarantee the building's continuous functionality and adherence to regulations.		

* PDF generated at 01:36 (UTC) on 14 Feb 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600783194	Non-compliance	Due 2025-03-23
Code area 3 Working conditions are safe and hygienic	Status Closed (2025-02-14)*	

Workplace requirement

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.

Issue title

210 - Inadequate/poorly functioning emergency lighting

Description

During the facility walkthrough, it was observed that one of the two emergency exit doors in Warehouse C was not equipped with an emergency light.

Corrective and preventative actions

The facility is recommended to conduct an inspection to ensure emergency lights are installed in accordance with the law.

Local law reference

Labor Minister Regulation No.7 of 1964 regarding Condition of Health, Cleanness and lighting in workplace:
article 13(1): a workplace in use at night-time must be provided with emergency lighting equipment.
Article 13.4: Exits, such as doors, corridors, etcetera, must be provided with emergency lighting equipment and with signs, painted with luminous, reflecting or fluorescence material.

* PDF generated at 01:36 (UTC) on 14 Feb 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600783195

Non-compliance

Due 2025-02-21

Code area

3 Working conditions are safe and hygienic

Workplace requirement

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.

Issue title

215 - Evacuation plan not adequately communicated to workers

Description

During the facility walkthrough, it was observed that the evacuation map in Warehouse C did not reflect the actual conditions. The map also did not include a 'You Are Here' sign.

Corrective and preventative actions

The site should ensure that all evacuation maps reflect the actual conditions.

Local law reference

Labor Minister Decree No. 186 year 1999, regarding Fire Management Unit in Work Location
article 2(2b): Obligation to prevent, alleviate and extinguish fire in work location as referred to in paragraph (1) shall cover to prepare detector, alarm, fire extinguisher and evacuation facilities.

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law
Base code

Status

Closed (2025-02-14)*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law
Base code

* PDF generated at 01:36 (UTC) on 14 Feb 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600783196

Non-compliance

Due 2025-02-21

Code area

3 Working conditions are safe and hygienic

Status

Closed (2025-02-14)*

Workplace requirement

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.

Time given to resolve

30 days

Issue title

209 - Not all emergency exits are properly marked and lighted

Verification method

Desktop audit

Description

During the facility walkthrough, it was observed that one of the two emergency exit doors in Warehouse C was not equipped with an exit sign.

Area of non-compliance/non-conformance

Local law

Base code

Corrective and preventative actions

The facility is recommended to conduct an inspection to ensure exit sign are installed in accordance with the law.

Local law reference

Labor Minister Regulation No.7 of 1964 regarding Condition of Health, Cleanness and lighting in workplace,
article 13(1): a workplace in use at night-time must be provided with emergency lighting equipment.
Article 13.4: Exits, such as doors, corridors, etcetera, must be provided with emergency lighting equipment and with signs, painted with luminous, reflecting or fluorescence material.

* PDF generated at 01:36 (UTC) on 14 Feb 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes The facility utilizes chemicals, such as soap, for the washing process.
Who organises accommodation for workers?	Not applicable
Who organises worker transportation between accommodation and worksite?	Not applicable
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable There are no added structures for the existing building.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

Management systems

Explanation for management systems grades

Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met
Grade: Robust Management System
The company has a strict policy prohibiting the use of child labor in any part of its operations, in alignment with local labor laws and international standards such as the ILO conventions. The policy includes robust age-verification procedures to ensure that no workers below the legal minimum working age are employed. This policy also outlines measures to provide remediation and support if any cases of child labor are identified, ensuring the well-being of the affected individual.

Appoint a manager with sufficient seniority who is responsible for implementing procedures
Grade: Robust Management System
Resources are allocated to ensure the implementation of this policy, including dedicated HR personnel responsible for verifying the age and work eligibility of all employees. The company maintains a secure and comprehensive record-keeping system to track employee age verification and compliance with legal requirements.

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures
Grade: Robust Management System
All HR staff and line managers receive mandatory training on child labor prevention, including how to conduct thorough age-verification checks and recognize signs of potential non-compliance. Training also covers remediation procedures and the company's commitment to ethical employment practices. The factory also established an annual training schedule, conducted training sessions for employees as planned, and maintained training records for review.

Monitor the effectiveness of procedures to meet policy and Workplace Requirements
Grade: Robust Management System
Compliance is monitored through regular internal audits of recruitment records and periodic checks of employee documentation. Any concerns or irregularities are escalated immediately to senior management for investigation and corrective action. The company maintains detailed monitoring records and engages workers in providing feedback through confidential reporting mechanisms to ensure continuous improvement in child labor prevention.

The inherent risk of child labor being used is considered low due to strict adherence to local and international labor laws that prohibit such practices. Clear policies are in place to ensure that only individuals of legal working age are employed, with thorough age verification processes during recruitment. Additionally, regular audits, inspections, and employee training programs help ensure compliance with child labor laws. These measures, coupled with oversight by HR and external bodies, provide strong safeguards against the use of child labor and promote ethical employment practices.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current System

Based on interviews with all selected employees and a review of personnel files, the youngest employee is 18 years old, born on March 22, 2006, and employed on September 12, 2024.

- Supporting documentation in personnel files includes identity documents required during the hiring process:
- National identity card (Kartu Tanda Penduduk).
- School certificate.
- Clearance letter from the police department.
- Medical record.
- Curriculum vitae.
- Clearance letter from previous employment (if any).

Evidence Examined

- Employee interviews with 10 selected employees.
- Personnel files of 10 selected employees.
- Hiring procedure.

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	14%
Enter the legal age of employment	18
Enter the age of the youngest worker identified	18
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

Management systems

Explanation for management systems grades

Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met
Grade:Robust Management System
The facility ensures that all employees are paid wages that comply with or exceed the legal minimum requirements, in strict alignment with local labor laws and international standards such as ILO conventions. This includes fair compensation for overtime work and a prohibition on unauthorized deductions, guaranteeing that employees receive their full earnings in a timely manner. To promote transparency, detailed wage slips are provided to all employees, clearly itemizing hours worked, wages earned, overtime payments, and any applicable deductions.

Appoint a manager with sufficient seniority who is responsible for implementing procedures
Grade:Robust Management System
The facility has dedicated HR and payroll personnel responsible for overseeing wage compliance. Their duties include ensuring accurate wage calculations, proper documentation, and the timely disbursement of wages. An automated payroll system, integrated with time-tracking software, is used to minimize errors and discrepancies by ensuring that wage calculations are based on verified data.

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures
Grade:Robust Management System
All relevant staff, including HR and payroll teams, receive regular training on local wage laws, overtime regulations, and compliance requirements. Employees are also educated about their wage rights through training sessions, handbooks, and prominently displayed notices in common areas. This training ensures employees understand their pay structures and know how to report concerns if needed.

Monitor the effectiveness of procedures to meet policy and Workplace Requirements
Grade:Robust Management System
The facility conducts regular internal audits of wage records to verify compliance with both legal requirements and internal policies. Any irregularities identified during these audits are promptly escalated to senior management for corrective action. A confidential grievance mechanism is also in place, enabling employees to report wage-related concerns without fear of retaliation. Periodic reviews of wage policies ensure alignment with changes in labor laws and industry standards. Feedback from employees is also collected to drive continuous improvement in wage management practices.

The inherent risk of legal wages not being paid is considered low due to strict adherence to local labor laws and transparent payroll systems. The organization ensures that all employees receive wages that meet or exceed the legal minimum wage requirements, with clear, documented pay structures and regular payroll audits. Employees are provided with detailed pay slips, and any discrepancies are promptly addressed through an established grievance mechanism. Furthermore, HR oversight and compliance checks ensure that wage-related policies are consistently followed, reducing the risk of non-compliance with legal wage standards.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current System

- The facility provided 12 months of payroll and time attendance records from December 2023 to November 2024 for review. Records of 10 selected employees for November 2024 (current month), May 2024 (random month), and December 2023 (random month) were analyzed.
- Based on interviews with 10 selected employees, the facility has never delayed salary payments.
- Wages are calculated on a monthly basis.
- All employees are entitled to 12 days of annual leave and other legal leaves, while pregnant employees are entitled to three months of maternity leave. Leave record reviews confirmed that one production employee took annual leave on July 18, 2024, and received compensation as per the law.
- The last state social security (BPJS Ketenagakerjaan) payment, covering all employees, was made in November 2024 for the period of October 2024.
- The last state health care (BPJS Kesehatan) payment, covering all employees, was made on November 9, 2024, for the period of September 2024.
- The legal minimum wage of Kabupaten Gresik:
o2024: IDR 4,642,031 per month
- Based on payroll records and employee interviews:
o2024: The highest wage paid was IDR 5,700,000, and the lowest wage paid was IDR 4,642,031.
- The facility provided a festive allowance (THR) for May 2024. Employees with 12 months or more of service received one month's wage; those with service periods of 1–12 months received proportional allowances.

Evidence Examined

- Employee and management interviews.
- Time attendance and payroll records of all selected employees for November 2024 (current month), May 2024 (random month), and December 2023 (random month).
- Overtime forms.
- Social security (BPJS Ketenagakerjaan) payment receipts.
- Health care security (BPJS Kesehatan) payment receipts.
- Legal leave forms.
- Festive bonus records.
- Decree of the Governor of East Java on the legal minimum wage for 2024.

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage Wages meet a living wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Only digital payments
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	I don't know

Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Not applicable
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Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	7.0
	Max hours per week	40.0
	Max hours per month	Non applicable
Actual required working hours	Required hours per day	7.0
	Required hours per week	40.0
	Required hours per month	Non applicable
Maximum legal overtime hours	Max hours per day	4.0
	Max hours per week	18.0
	Max hours per month	Non applicable

Actual overtime hours	Max hours per day	2.0
	Max hours per week	4.0
	Max hours per month	12.0
Minimum legal wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	4642031.0
Actual minimum wage	Actual per hour	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	4642031.0
Minimum legal overtime wage	Min per hour	26833.0
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	Non applicable
	Actual per day	26833.0
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	10
Provide the date and details of the records	10 selected employees for period of November 2024 (current month). 10 selected employees for period of May 2024 (random month). 10 selected employees for period of December 2023 (random month).
Are there different legal minimum/ legally recognised CBAs wage grades?	No

For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Not applicable
Indicate the breakdown of workforce per earnings	The site is paying at least minimum wages. The lowest wage paid of 10 selected employees in 2024 is IDR 4,642,500 per month.
Are there any bonus schemes used?	No
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current Systems:</p> <ol style="list-style-type: none"> Based on the workers' interview, the facility provides workers covered with Social Security Scheme with the base of calculation from the basic wage of workers. During document review, the facility paid workers on a monthly basis. All wages were paid through a bank transfer method. The Minimum Wages 2024 for Kab. Gresik is IDR =4,642,031, and the facility applied IDR 4,642,031 per month as per regulation. The facility has established wages and benefits policy as mentioned on company regulation. The facility has provided 12 months of data for audit with sample records taken for December 2024 (current month), May 2024 (random month), and January 2024 (random month). The pay slips were provided, and they are understood by workers. There is no fine or monetary deduction for disciplinary action. Legal overtime wages rate premiums per hour: In accordance with Government Regulation (PP No. 35/2021) on Working Hours and Rest Time, Art. 31 (1), companies that employ workers/laborers beyond their working hours, as referred to in Article 21 paragraph (2), are required to pay overtime wages. (Legal minimum wage + Fixed allowance) / 173. Normal Working Days: Multiply by 150% for the 1st hour of overtime and 200% for the 2nd hour onward. Rest day and holiday: Multiply by 200% for the first 7 hours, 300% for the 8th hour, and 400% for up to 10 hours. Minimum legal overtime wage per hour: IDR 26,832. Actual legal overtime wage per hour: IDR 26,832. Based on the legal leave form, all employees are entitled to claim their 12 days of annual leave and other legal leaves. Female pregnant employees are entitled to claim their three (3) months of maternity leave. This facility provides wage scales for 2024 where employees are paid at least meet the legal minimum wage. The facility calculates the living wage every December to use it in January of the following year. The facility calculates the living wage by considering a family structure consisting of a spouse and two children. The facility calculates the living wage using KHL (Komponen Kebutuhan Hidup Layak / Decent Living Needs Component), referring to UU Nomor 13 Tahun 2003 on Manpower, Anker reference value methodology and ILO living wage estimation principles. Due to the living wage for Kab. Gresik not being available on the WageIndicator website, the auditor calculates the living wage using the Anker Method and data from Numbeo. The living wage is approximately IDR 4,390,000, while the facility pays the workers above the living wage. <p>Evidence examined:</p> <ol style="list-style-type: none"> Payroll, payslip, employment contract, social and health security contribution record, overtime record, festivity bonus (Tunjangan Hari Raya). Sample records of December 2024 (current month), May 2024 (Random month), and January 2024 (random month). Facility tour, document review, workers, and management interview. Decree of the governor of East Java on the legal minimum wage for 2024. Wage scales for 2024. Leave records. living wage calculation records 		

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

Management systems

Explanation for management systems grades

Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met
Grade: Robust Management System
The facility strictly adheres to local labor laws and international standards, including ILO conventions, to ensure that working hours are not excessive. Employees work within the legally mandated limits for daily and weekly working hours, and overtime is strictly voluntary and capped as per legal and contractual requirements. The policy guarantees that all employees are provided with sufficient rest periods, including breaks during shifts, a minimum of one rest day per week, and proper intervals between shifts. Detailed schedules are maintained to avoid practices that could lead to excessive working hours or fatigue.

Appoint a manager with sufficient seniority who is responsible for implementing procedures
Grade: Robust Management System
The facility has a dedicated scheduling team responsible for managing employee work hours and ensuring compliance with legal and policy standards. An automated time-tracking system is in place to monitor working hours, track overtime, and calculate rest periods accurately. This system integrates with payroll to ensure correct compensation for overtime work and provides real-time visibility of working hours to managers.

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures
Grade: Robust Management System
Supervisors, managers, and HR staff receive regular training on local labor laws and international standards governing working hours and overtime. Training covers best practices for scheduling, managing workloads, and avoiding excessive hours. Employees are also informed about their rights related to working hours, overtime limits, and rest periods through handbooks, posters, and awareness sessions. This empowers workers to recognize and report any instances of non-compliance.

Monitor the effectiveness of procedures to meet policy and Workplace Requirements
Grade: Robust Management System
The facility conducts regular internal audits of employee time records and schedules to ensure compliance with legal limits on working hours and overtime. These audits are reviewed by senior management, and any discrepancies are addressed through corrective actions. Employees are encouraged to use the confidential grievance mechanism to report concerns related to excessive working hours without fear of retaliation. Additionally, the facility seeks regular feedback from employees to ensure that workloads are manageable and that sufficient rest periods are consistently provided.

The inherent risk of excessive working hours is considered low due to strict compliance with local labor laws and company policies that regulate work hours. The organization ensures that employees' working hours align with legal limits, with clear guidelines on maximum daily and weekly hours. Overtime is voluntary, fairly compensated, and carefully monitored to prevent overworking. Regular audits and employee feedback mechanisms are in place to ensure that working hours remain within acceptable limits and that employees' well-being is prioritized. These systems collectively reduce the risk of employees being subjected to excessive working hours.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current System:

1. The facility provided 12 months of payroll and time attendance records from December 2023 to November 2024 for review. Records of 10 selected employees for November 2024 (current month), May 2024 (random month), and December 2023 (random month) were analyzed.
2. The facility uses a biometric system to record the time attendance of all employees.
3. Employees work six days a week in three shifts, with one day off per week for each shift. Work hours are as follows:
1st Shift:
• Mondays – Fridays: 7:00 to 15:00 with a 1-hour break from 11:00 to 12:00.
• Saturdays: 7:00 to 12:00 with a short break from 9:00 to 9:15.
2nd Shift:
• Mondays – Fridays: 15:00 to 23:00 with a 1-hour break from 19:00 to 20:00.
• Saturdays: 12:00 to 17:00 with a short break from 14:00 to 14:15.
3rd Shift:
• Mondays – Fridays: 23:00 to 7:00 with a 1-hour break from 3:00 to 4:00.
• Saturdays: 17:00 to 22:00 with a short break from 19:00 to 19:15.
4. Based on interviews with 10 selected employees and a review of payroll and time attendance records, the highest overtime observed for 10 selected employees was:
o November 2024 (current month): 2 hours per day and 4 hours per week.
o May 2024 (random month): 2 hours per day and 4 hours per week.
o December 2023 (random month): 2 hours per day and 4 hours per week.
5. The facility calculates overtime wages according to company regulations, which comply with legal requirements:
o Regular days:
1st hour = $[(\text{monthly wage}) / 173] \times 1.5$ per hour.
2nd and succeeding hours = $[(\text{monthly wage}) / 173] \times 2$ per hour.
o Public holidays and weekly rest days:
1st to 7th hour = $[(\text{monthly wage}) / 173] \times 2$ per hour.
8th hour = $[(\text{monthly wage}) / 173] \times 3$ per hour.
9th hour onward = $[(\text{monthly wage}) / 173] \times 4$ per hour.
6. Based on interviews with 10 selected employees and a review of payroll and time attendance records, no employees worked seven consecutive days without one day off.

Evidence Examined:

1. Working hour policy.
2. Time attendance records of 10 selected employees for November 2024 (current month), May 2024 (random month), and December 2023 (random month).
3. Overtime forms.
4. Company regulations.
5. Interviews with 10 selected employees.

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	150%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	Not applicable because the site pays premium rate above 125
Excluding overtime, what are the regular working hours per week for workers at this site?	40.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	40.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	44.0
Maximum number of days worked without a day off in sample	6

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

Management systems

Explanation for management systems grades

Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met
Grade:Robust Management System
The facility upholds a strict non-discrimination policy, ensuring equal opportunities for all employees regardless of race, color, gender, age, religion, ethnicity, disability, sexual orientation, or any other protected characteristic. This policy aligns with local labor laws and international standards, including ILO conventions and UN guidelines. Recruitment, promotion, remuneration, training, and other employment practices are based solely on merit, qualifications, and business needs. The policy explicitly prohibits any form of discrimination, harassment, or retaliation in the workplace and provides clear guidelines for addressing grievances related to discrimination.

Appoint a manager with sufficient seniority who is responsible for implementing procedures
Grade:Robust Management System
The facility has a dedicated HR team responsible for implementing and monitoring the non-discrimination policy. This team oversees recruitment processes, performance evaluations, and employee relations to ensure compliance with non-discrimination principles. Resources are allocated to maintain a safe and inclusive work environment, including access to legal advice and external support services when necessary.

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures
Grade:Robust Management System
Regular training sessions are conducted for all employees, supervisors, and managers to promote awareness of the non-discrimination policy and foster an inclusive workplace culture. These sessions cover topics such as unconscious bias, respectful communication, and recognizing and preventing discrimination and harassment. Training materials are tailored to address specific workplace scenarios and are accessible to all employees, ensuring consistent understanding and application of the policy.

Monitor the effectiveness of procedures to meet policy and Workplace Requirements
Grade:Robust Management System
The facility monitors compliance with its non-discrimination policy through regular employee surveys, anonymous feedback channels, and audits of recruitment and employment practices. Any reported incidents of discrimination are thoroughly investigated by the HR team and escalated to senior management when necessary. A confidential grievance mechanism is in place to allow employees to report discrimination or harassment without fear of retaliation. Findings from investigations and monitoring efforts are used to improve policies and procedures, ensuring continuous progress toward a fair and inclusive workplace.

The inherent risk of discrimination is considered low due to the implementation of comprehensive policies promoting equal opportunity and inclusivity in the workplace. These policies explicitly prohibit any form of discrimination based on race, gender, age, religion, disability, or other protected characteristics. Regular training programs raise awareness about diversity, equity, and inclusion, ensuring that all employees are treated fairly and with respect. Additionally, the organization maintains robust grievance mechanisms that allow employees to report discriminatory practices, while HR oversight and regular audits further reinforce a commitment to a discrimination-free work environment.

Summary of findings

Code area	Workplace requirement	Local law	Finding
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No findings

Systems and evidence examined to validate this code section

Current system:

1. Based on the management interview with the management representative, the facility does not discriminate against employees in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, or political affiliation.
2. Based on interviews with all 10 selected employees, they are given reasonable time off to pray. The facility provides one praying room.
3. Based on discussions with management representatives, there is no discrimination in hiring practices.
4. The presented overtime form shows that all employees from all departments have equal opportunities to perform overtime work.
5. The presented legal leave form shows that all employees are entitled to claim their legal leaves.
6. There is a dedicated equity approach plan in recruitment, training, development and promotion processes.

Evidence examined:

1. Payroll and time attendance records of 10 selected employees.
2. Overtime form.
3. Legal leave form.
4. Anti-discrimination procedure.

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	0%
Representation of women in managerial roles (ratio of women workers to women managers)	6%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	13%
Three most common nationalities in managerial and supervisory roles	Indonesian

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

Management systems

Explanation for management systems grades

Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met
Grade:Robust Management System
The facility is committed to providing regular and stable employment in compliance with local labor laws and international standards, including ILO conventions. Employment contracts are clear, written, and provided to all employees, detailing terms and conditions such as job roles, wages, working hours, benefits, and termination procedures. The facility strictly avoids the use of casual arrangements that undermine workers' rights. Policies are in place to ensure no unfair dismissal or unjustified termination of employment.

Appoint a manager with sufficient seniority who is responsible for implementing procedures
Grade:Robust Management System
The facility allocates resources to ensure employment practices are fair and transparent. A dedicated HR team manages employment contracts, employee records, and compliance with labor laws. The facility uses an automated record-keeping system to track employment terms, contract renewals, and any probationary periods, ensuring workers' rights are upheld.

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures
Grade:Robust Management System
HR staff and managers receive regular training on labor laws, ethical employment practices, and the facility's policies related to providing regular employment. Employees are educated on their rights and the terms of their contracts during onboarding sessions and through regular communication. Accessible materials, such as employee handbooks, are provided to ensure workers clearly understand their employment status and entitlements.

Monitor the effectiveness of procedures to meet policy and Workplace Requirements
Grade:Robust Management System
The facility regularly reviews employment records and contracts to ensure compliance with labor laws and company policies. Internal audits are conducted to verify that all employees are working under valid and legal contracts. A confidential grievance mechanism is available for employees to report concerns about employment practices, contract terms, or potential violations. Feedback from employees is reviewed and used to refine policies and procedures to ensure that regular and stable employment is consistently provided.

The inherent risk of irregular employment practices is considered low due to the organization's commitment to offering stable, regular employment in accordance with local labor laws. Employees are provided with clear, written contracts that outline the terms of their employment, including job security, benefits, and other rights. The company follows legal requirements regarding probationary periods, termination procedures, and access to permanent employment. Additionally, regular monitoring by HR ensures that workers are not employed on an ad-hoc or temporary basis unless legally justified, reducing the risk of exploitative or unstable employment arrangements.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current System:

1. A total of 83 workers are currently employed at the facility, including 68 male employees and 15 female employees.
2. The workforce includes 17 non-management employees (staff, production employees, and indirect employees).
3. The facility employs no direct permanent employees; all 83 workers are direct temporary employees.
4. All employees are local, with no expatriates working at the facility.
5. The 10 selected employees consist of 5 male and 5 female employees, all of whom are temporary workers.
6. All selected contract employees have received signed copies of their contract agreements, and all permanent employees have received appointment letters.
7. The facility does not use any manpower agencies for recruitment.

Evidence Examined:

1. Hiring and termination practices.
2. Personnel files of 10 selected employees.
3. Employee list.
4. Appointment letters and working agreements of 10 selected employees.
5. Interviews with 10 selected employees.

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

8.A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

Management systems

Explanation for management systems grades

This management system is not applicable because the facility does not use any subcontracting. The facility has established the following management system:

Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met

Grade: Robust Management System

The facility has a strict policy against the use of subcontractors and homeworkers, ensuring that all production processes are conducted in-house and under direct supervision. This policy is in line with local labor laws and international standards, including ILO conventions, to maintain full control over working conditions and labor standards. The facility ensures transparency in its operations and clearly communicates this policy to clients, suppliers, and stakeholders.

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Grade: Robust Management System

The facility allocates resources to maintain its in-house production processes, ensuring that all operations are carried out within the facility. Dedicated personnel oversee compliance with this policy, and a secure record-keeping system is in place to document all production activities and supplier interactions, providing traceability and assurance that no subcontracting occurs.

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Grade: Robust Management System

Relevant employees, supervisors and manager, including procurement and production teams, receive regular training on the facility's subcontracting and homeworkers policy and the importance of maintaining ethical and transparent operations. This training ensures that all employees understand their responsibilities and the implications of unauthorized subcontracting. Clients and suppliers are also informed about this policy during engagement and contract negotiations to avoid any misunderstandings.

Monitor the effectiveness of procedures to meet policy and Workplace Requirements

Grade: Robust Management System

The facility conducts regular internal audits and reviews production processes to confirm that all activities are performed in-house. Documentation and records are checked to ensure compliance with the no-subcontracting policy. A grievance mechanism is available for employees to report any concerns about potential policy violations. Feedback from stakeholders is actively sought to continuously improve transparency and maintain responsible practices.

The inherent risk associated with sub-contracting and homeworkers is considered low due to the company's strict oversight and responsible practices in managing these arrangements. All subcontractors and homeworkers are vetted to ensure compliance with labor laws, ethical standards, and the company's policies. Clear contracts are established with sub-contractors to guarantee fair wages, safe working conditions, and adherence to the same standards upheld by the organization. Regular audits and inspections are conducted to monitor compliance and address any issues related to working conditions or exploitation. This proactive approach ensures that subcontracting and homemaker arrangements remain ethical and responsible.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

**Systems and evidence examined to
validate this code section**

Current system:

- The facility does not use subcontractors or home workers.
- All production processes are conducted on-site at the facility.

Evidence examined:

- Daily production records.
 - Shipping records.
 - Employees' and management interview.
 - Facility tour.
-

8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent?

Not applicable

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homeworker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers?

No

Not applicable, as the site does not buy products or services from suppliers that use homeworkers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?

No

The site does not use any subcontractors.

Are any sub-contractors used?

No

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

Management systems

Explanation for management systems grades

Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met
Grade: Robust Management System
The facility has a zero-tolerance policy for any form of harsh or inhumane treatment, including physical punishment, verbal abuse, harassment, or intimidation. This policy aligns with local labor laws and international standards, such as ILO conventions, ensuring that all employees are treated with dignity and respect. The policy outlines clear procedures for reporting and addressing incidents of misconduct, ensuring swift and appropriate action is taken to prevent recurrence.

Appoint a manager with sufficient seniority who is responsible for implementing procedures
Grade: Robust Management System
A dedicated HR team is in place to enforce this policy and manage complaints related to employee treatment. The facility has established a grievance mechanism that allows employees to report concerns confidentially and without fear of retaliation. Additionally, resources such as counseling services or external support networks are made available to employees affected by harassment or abuse.

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures
Grade: Robust Management System
All employees, including supervisors and managers, receive mandatory training on the facility's zero-tolerance policy for harsh or inhumane treatment. This training covers acceptable workplace behavior, conflict resolution, and the importance of treating all individuals with respect. Employees are also educated on how to report incidents of misconduct and the protections afforded to them during the process.

Monitor the effectiveness of procedures to meet policy and Workplace Requirements
Grade: Robust Management System
The facility monitors compliance with this policy through regular employee feedback, workplace surveys, and anonymous reporting mechanisms. Incidents are thoroughly investigated by HR, with findings reviewed by senior management to ensure proper resolution and corrective actions. Regular audits of workplace culture and practices are conducted to identify and mitigate any potential risks. The facility also encourages open communication to foster a supportive and respectful work environment.

The inherent risk of harsh or inhumane treatment is considered low due to the organization's firm policies against such practices, which are in full compliance with local and international human rights standards. Clear codes of conduct prohibit any form of physical, verbal, or psychological abuse in the workplace. Employees are regularly trained on respect, dignity, and appropriate behavior, and any incidents of mistreatment are addressed through well-defined grievance mechanisms. Additionally, HR and management teams actively monitor the work environment to ensure that all employees are treated with fairness and respect, ensuring that harsh or inhumane treatment is not tolerated.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current system:

-Based on employee interviews with 10 selected employees, the facility treats all employees with respect and dignity. No harassment and abuse of any kind, including physical, verbal, psychological and sexual on employment practices.
-No physical abuse or discipline ever happened in the facility and the disciplinary procedure of the facility is education, verbal warning, and warning letter 1, 2, 3 and termination.

Evidence examined:

-Procedures of disciplinary practices. -Disciplinary records.
-Employee and management interview. -Facility tour

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process The grievance process is available to all workers
What type of grievance mechanism(s) are available?	Sugeestion box, talk directly to Supervisor and HRD
Number of grievances raised in the last 12 months	1
Number of grievances resolved in the last 12 months	1

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

Management systems

Explanation for management systems grades

Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met
Grade:Robust Management System
The facility is committed to managing its environmental impact responsibly and complies with all applicable local environmental laws and regulations. Policies are in place to ensure the efficient use of natural resources, proper waste management, and the minimization of emissions and pollution. The facility actively seeks opportunities to reduce its environmental footprint through measures such as energy conservation, water-saving initiatives, and waste reduction programs. These policies are integrated into daily operations and communicated to all stakeholders.

Appoint a manager with sufficient seniority who is responsible for implementing procedures
Grade:Robust Management System
The facility has allocated dedicated personnel to oversee environmental compliance and sustainability efforts. This includes an environmental officer responsible for monitoring resource usage, waste management, and adherence to environmental policies. Resources are invested in eco-friendly technologies, such as energy-efficient equipment and water treatment systems, to enhance the facility's sustainability performance. Comprehensive documentation is maintained to track environmental practices and ensure compliance with legal requirements.

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures
Grade:Robust Management System
Regular training sessions are conducted for employees and management to raise awareness about the facility's environmental policies and best practices. Topics covered include resource conservation, waste segregation, and proper handling of hazardous materials. Training programs are designed to encourage employee participation in environmental initiatives and to promote a culture of sustainability within the facility.

Monitor the effectiveness of procedures to meet policy and Workplace Requirements
Grade:Robust Management System
The facility conducts regular internal audits to evaluate its environmental performance and compliance with regulations. Key performance indicators (KPIs) are tracked, such as energy consumption, water usage, and waste generation, to identify areas for improvement. Any non-compliance issues are promptly addressed through corrective actions. Employees are encouraged to report environmental concerns through a confidential grievance mechanism. The facility also engages with external stakeholders, such as local communities and regulatory bodies, to ensure transparency and continuous improvement in environmental management practices.

The inherent risk related to environmental impact is considered low due to the organization's strong commitment to sustainability and environmental compliance. Policies are in place to ensure the responsible use of resources, waste management, and adherence to local and international environmental regulations. The company actively monitors its environmental footprint through regular audits and assessments, ensuring that its practices align with established standards. Additionally, measures to reduce carbon emissions, conserve water, and minimize waste are rigorously enforced, reducing the likelihood of significant environmental harm. These proactive systems and compliance mechanisms collectively minimize the inherent environmental risk, supporting both sustainability and regulatory adherence.

Summary of findings

Code area	Workplace requirement	Local law	Finding
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No findings

Systems and evidence examined to validate this code section

- Current System:
- 1.The facility established and endorsed the Environmental Impact Assessment (UKL/UPL) document 660/203/UKL-UPL/437.75/2019, issued by the Environment Department on July 30, 2024. The last report, covering the period from January 2024 to June 2024, was submitted to the local environmental authority on October 28, 2024.
 - 2.The facility uses licensed hazardous waste transporters, specifically PT Lewind, under agreement 210/AL-LJP/X/2024, dated September 1, 2024. The last hazardous waste disposal was manifested on September 11, 2024.
 - 3.Based on testing record reviews, the last wastewater testing was conducted by a local laboratory on June 30, 2024, and the results met the legal parameters for clean wastewater.
 - 4.The last air emission testing was conducted by a local laboratory on January 17, 2024, and the results met the legal parameters.
 - 5.The facility established an environmental policy on August 6, 2020.
- Evidence Examined:
- 1.Endorsement letter of the environmental management and monitoring system (UKL/UPL).
 - 2.Periodic report of the environmental management and monitoring system (UKL/UPL).
 - 3.Hazardous waste temporary storage permit.
 - 4.Manifest records of hazardous waste transportation.
 - 5.Wastewater discharge permit.
 - 6.Wastewater testing records.
 - 7.Air emission testing records.
 - 8.Environmental policy.
 - 9.Facility tour.

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	No environmental or energy management certificates are obtained by the facility.
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC))?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	No

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	<p>Current system:</p> <ul style="list-style-type: none">1. The facility has established environmental procedures related to environmental management.2. The facility records all energy use, water use, solid waste, material use, hazardous substance use and waste, and effluent discharge.3. The facility appoints one employee in charge of managing environmental impact. <p>Evidence examined:</p> <ul style="list-style-type: none">1. Environmental procedures.2. Appointment letter of the person responsible for environmental impact.3. Energy usage record.		

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Responsible use and management of water Circular economy and resource efficiency
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes The site has a policy and procedure in place to ensure compliance with the destination country's regulations, including environmental and chemical issues.
Does the site have reduction targets in place to manage climate related risks?	Yes, to reduce scope 1 greenhouse gases (GHGs) Yes, to reduce scope 2 greenhouse gases (GHGs)
Are any of these science-based targets?	No, but we anticipate setting one in the next two years
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	Yes The site have a target to reduce GHG at 2030 with reducing 42% for electricity
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Yes The site conducts monitoring for the selection and evaluation of suppliers, including verification of mandatory permits and licenses.

Usage/discharge analysis

	Last full calendar year (2023)	Previous full calendar year (2022)
Total electricity consumption from non-renewable sources (kWh)	8,877,223	9,757,902
Total electricity consumption from renewable sources (kWh)	Data not available	Data not available
Sources of renewable energy used	Data not available	Data not available
Types of renewable energy used	Data not available	Data not available

Total natural gas consumption (kWh)	Data not available	Data not available
Usage of other purchased fuels	Data not available	Data not available
Has the site completed any carbon footprint analysis?	No	No
Water sources	Data not available	Data not available
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	Data not available	Data not available
Water discharged	Data not available	Data not available
Water volume discharged (m3)	Data not available	Data not available
Water volume recycled (m3)	Data not available	Data not available
Total waste produced (mt)	Data not available	Data not available
Total hazardous waste produced (mt)	Data not available	Data not available
Waste to recycling (mt)	Data not available	Data not available
Waste to landfill (mt)	Data not available	Data not available
Waste to other (mt)	Data not available	Data not available
Total product produced (mt)	Data not available	Data not available

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

Management systems

Explanation for management systems grades

Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met
Grade: Robust Management System
The facility is committed to conducting its business operations with integrity, transparency, and accountability. A robust Code of Ethics is in place, outlining principles related to anti-corruption, fair competition, confidentiality, and responsible sourcing. The policy strictly prohibits bribery, fraud, and any form of unethical behavior, in alignment with local laws and international standards such as the UN Global Compact. Clear procedures are established to identify, report, and address unethical practices, ensuring the highest standards of ethical conduct throughout the organization.

Appoint a manager with sufficient seniority who is responsible for implementing procedures
Grade: Robust Management System
The facility has a dedicated compliance team responsible for overseeing business ethics practices and ensuring adherence to the Code of Ethics. Resources are allocated to support ethical business operations, including the implementation of robust internal controls, secure reporting mechanisms, and risk assessment tools. Partnerships with external experts and legal advisors are also maintained to stay updated on best practices and regulatory changes.

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures
Grade: Robust Management System
All employees, including senior management and procurement staff, receive mandatory training on the facility's Code of Ethics. This training includes topics such as anti-bribery and anti-corruption laws, ethical decision-making, and recognizing and reporting conflicts of interest. Training sessions are designed to be practical and scenario-based, ensuring that employees can apply ethical principles in their daily work. Suppliers and business partners are also informed about the facility's commitment to ethical practices and are required to adhere to similar standards.

Monitor the effectiveness of procedures to meet policy and Workplace Requirements
Grade: Robust Management System
The facility monitors compliance with its business ethics policy through regular audits, risk assessments, and employee feedback. Any reported concerns or violations are investigated thoroughly by the compliance team, with findings reviewed by senior management for corrective action. A confidential whistleblowing mechanism is in place, allowing employees and stakeholders to report unethical behavior anonymously and without fear of retaliation. Periodic reviews of the facility's ethical policies and practices ensure alignment with evolving regulations and industry standards.

The inherent risk related to business ethics is considered low due to the organization's strong commitment to maintaining high ethical standards in all aspects of its operations. Clear codes of conduct, policies, and guidelines are in place to ensure transparency, fairness, and integrity in business practices. Regular training is provided to employees at all levels to reinforce ethical decision-making, including topics such as anti-corruption, conflicts of interest, and honest marketing. Additionally, a robust system of reporting mechanisms, such as whistleblower protections and regular audits, helps identify and address any ethical violations. These systems, alongside strong leadership and oversight, significantly reduce the risk of unethical behavior within the business.

Summary of findings

Code area	Workplace requirement	Local law	Finding
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No findings

Systems and evidence examined to validate this code section

Current system:
1. The facility has a policy that meets the requirements of local and national laws related to bribery, corruption, and any type of fraudulent business practices.
2. The facility management has a transparent system in place for confidentially reporting and addressing unethical business practices, ensuring reporters are protected from reprisals.
3. The facility has designated a person responsible for implementing standards concerning business ethics.
4. Training is provided, and performance is evaluated through audits.

Evidence examined:
1. Whistleblower procedure.
2. Whistleblower socialization.
3. Incident records.

10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?	No
Provide any certified anti-bribery management systems for the site	The site does not have a certified Anti-Bribery Management System.

Attachments



[20. Attendance record system.jpeg](#)



[2. Site Name Sign.jpeg](#)



[25. Business License.pdf](#)



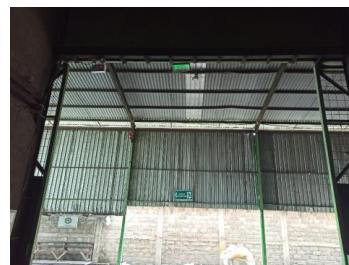
[19. WWTP.jpeg](#)



[18. Boiler.jpeg](#)



[16. Finished Goods Warehouse.jpeg](#)



[14. Emergency exit equipped with exit sign and emergency light.jpeg](#)



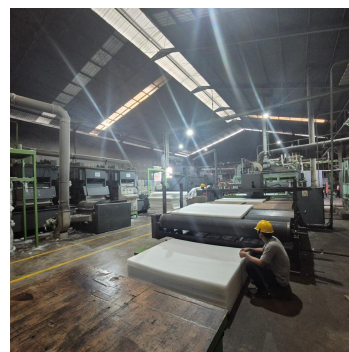
[3. Eating area.jpg](#)



[15. Assembly point.jpg](#)



[1. Site Main Gate.jpg](#)

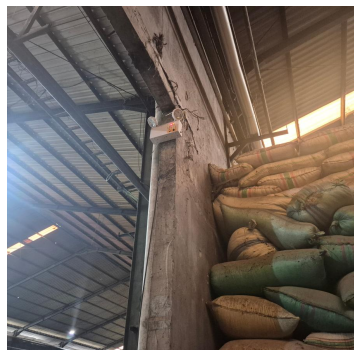


[23. Padding Section.jpg](#)

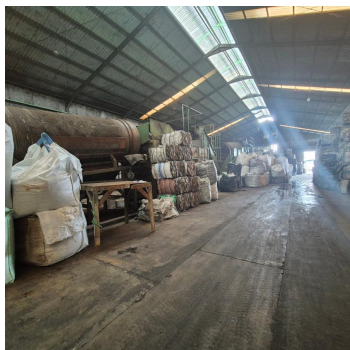


[9. First aid kit.jpg](#)





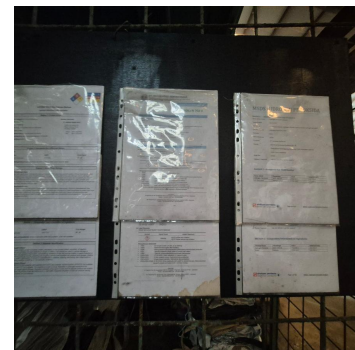
[11. Emergency light.jpg](#)



[22. Washing Section.jpg](#)



[4. Chemical Storage.jpg](#)



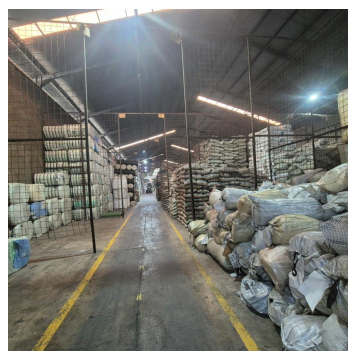
[6. MSDS.jpg](#)



[5. Emergency Eyewash.jpg](#)



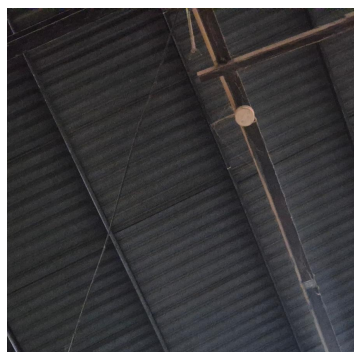
[21. Extrusion section.jpg](#)



[17. Raw Material Warehouse.jpg](#)



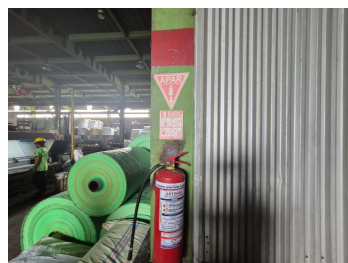
[7. Hazardous waste storage.jpg](#)



[12. Smoke Detector.jpg](#)



[10. Fire alarm.jpg](#)

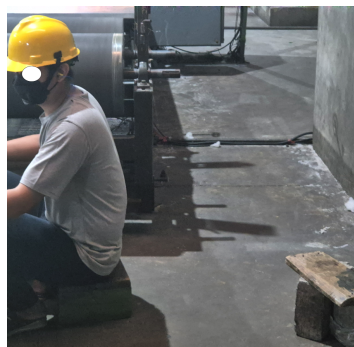


[13. Fire extinguisher.jpg](#)



[24. Weaving Section.jpg](#)





[8. Workers wearing PPE.jpg](#)



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