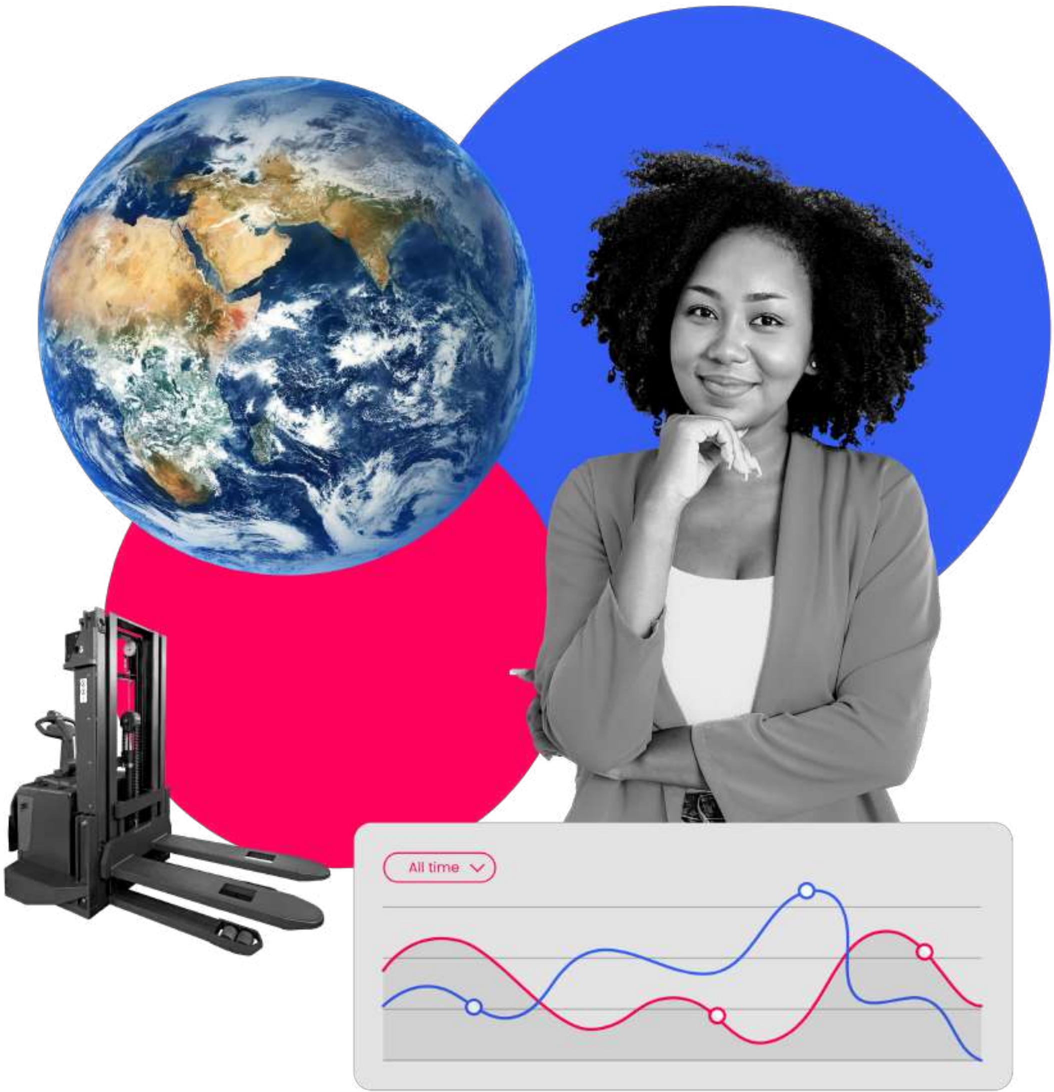
SMETA

Sedex Members Ethical Trade Audit

Sedex Members Ethical Trade Audit Report

Version 7



Contents

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	ZC5000054071	**Auditor company name**	BSI Group
Date of audit	2025-03-18	**Audit conducted by**	Sedex member
Audit pillars	Labour Standards | Health and safety | Environment 4-Pillar | Business ethics		

Site details

Sedex site reference	ZS1000064417	**Site name**	Hoang Long Seafood Processing Company Limited
Business name	Hoang Long Seafood Processing Company Limited	**Site address**	870000 Tan Cuong hamlet, Phu Cuong commune, Tam Nong District, Dong Thap province, Vietnam, Tam Nong District, VN
Site phone	+842773827178	**Site email**	qlcl.hoanglong@gmail.com

Audit parameters

Time in and out	Day 1		Day 2		
	In	13:00	In	08:00	
	Out	17:00	Out	17:00	
Audit type	Full initial				
Was the audit announced?	Unannounced				
Was the Sedex SAQ available for review?	Yes				
Who signed and agreed CAPR?	Mr. Le Phuoc Loi / HR Deputy 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	No	Yes
B: Present at the audit?	Yes	No	Yes
C: Present at the closing meeting?	Yes	No	Yes
Reason for absence at the opening meeting	There is no worker representative in the facility.		
Reason for absence during the audit	There is no worker representative in the facility.		
Reason for absence at the closing meeting	There is no worker representative in the facility.		

SMETA declaration

Auditor team

SMETA declaration	I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual. 1. 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. 2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. 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.
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	N/A

Lead auditor	Tran Hong Ngoc	**APSCA Number**	32200189
Additional auditor	DuyHung Tran	**APSCA Number**	21704497
	thithanhthao Le	**APSCA Number**	21703668
Date of declaration	2025-03-19		

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. Le Phuoc Loi
Title	HR Deputy Manager
Date of declaration	2025-03-19

Summary of findings

Code area	Workplace requirement	Local law	Finding
10.B. Environment 4-Pillar	10.B.G Establish resource-use targets and a p...		NC ZAF600865108
3. Working conditions are safe and hygienic	3.E Provide and record health and safety trai...	§1	NC ZAF600865109
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	§2	NC ZAF600865110
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§3	NC ZAF600865111
4. Child labour shall not be used	4.B Review original photographic identificati...		NC ZAF600865112

Local law issues

§1	According to the provisions of Article 17 of Decree 44/2016/ND-CP amended by Clause 5, Article 1 of Decree 140/2018/ND-CP regulating the subjects attending occupational safety and hygiene training courses
§2	In accordance with Article 92, Clause 2 of Law on Compulsory Social Insurance(58/2014/QH13): Monthly, employers should make payments calculated on the funds of social insurance salaries and remuneration of laborers.
§3	Pursuant to Article 108 of Decree 08/2022/ND-CP regulating environmental incident response plans

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	ZC5000054071	
Sedex site reference	ZS1000064417	
Company name	Hoang Long Seafood Processing Company Limited	
Business ownership type	GOODS	
Site name	Hoang Long Seafood Processing Company Limited	
Site name in local language	www.hoanglongseafood.com	
GPS location	**GPS address**	Tan Cuong hamlet, Phu Cuong commune, Tam Nong District, Dong Thap province, Vietnam
	Coordinates	Latitude: 10.6701906; Longitude: 105.5826753
Is the worksite in a remote location, far from habitation?	No	
Site contact	**Contact name**	Ms. Nguyen Thi Tho
	Job title	QA Manager
	Phone number	+842773827178
	Email	qlcl.hoanglong@gmail.com
Applicable business and other legally required business license numbers and documents	Business License: 1400656366 First issue date: July 9, 2008 Last (20th) issue date: Feb 22, 2024 (with no expiration date).	

Site activities

Site function	Factory Processing/Manufacturer

Site activities

Site activities	**Primary**	Other processing and preserving of fish, crustaceans and molluscs
	Secondary	
	Other	
Product type	Frozen raw pangasius	
Process overview	Receiving fish, Killing, Washing, Filleting, Skinning, Trimming, Treatment, Sizing, Grading, Weighting, IQF, Glazing, Packing, Storing.	
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?	74014m²	
Building 1	**Last construction works on site**	2009
	If building is shared, provide details	N/A. There was no shared building.
	Number of floors	3
	Description of floor activities	Building #1 (3,026.4m2) Main office including Management Board, HR, Quality Control and Business Department.
Building 2	**Last construction works on site**	2009
	If building is shared, provide details	N/A. There was no shared building.
	Number of floors	1
	Description of floor activities	Building #2 (17,010 m2) Workshop with main processing of frozen raw Pangasius through the main process Receiving fish, Killing, Washing, Filleting, Skinning, Trimming, Treatment, Sizing, Grading, Weighting, IQF, Glazing, Packing, Storing.

Site scope

Building 3	**Last construction works on site**	2009
	If building is shared, provide details	N/A. There was no shared building.
	Number of floors	2
	Description of floor activities	Building #3 (3,600 m2)Canteen provided free meal for all employees.
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 provided The facility did not provide worker transport.

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 Shift 1: 3:30 am to 12:30 pm. Shift 2: 4:00 am to 1:00 pm. Shift 3: 5:00 am to 2:00 pm. Shift 5: 3:00 pm to 00:00 am.
What percentage of the workforce, including temporary and agency workers, work during the night/ back shift?	21%
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 worker worked on dayshift every week. The workers worked in night shift had been interviewed during the audit.

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	SA 8000 (Social performance management), Other management system certification Other management system certification such as IFS; BRC and ISO 22000. They are still valid until Jul 2025 and Jan 2026; Apr 2025 (SA8000).
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?	Yes The negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community were assessed and reviewed annually by HR Department.
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	Yes Human Rights Impact Assessment which including in Social Compliance Risk Assessment was conducted annually by HR Department during the internal audit. Latest review was on Feb 19, 2025.

Worker analysis

Gender disaggregated data available	Men and women

Worker totals

	Men		Women		Other		Total	
Number of workers	38	(38%)	62	(62%)	-	-	100	(100%)

Workers by type

	Men		Women		Other		Total	
Permanent workers (employees)	38	(38%)	62	(62%)	-	-	100	(100%)
Temporary or fixed term employees	0	-	0	-	-	-	0	(0%)
Agency or subcontracted workers	0	-	0	-	-	-	0	(0%)
Seasonal workers	0	-	0	-	-	-	0	(0%)
Self-employed workers	38	(38%)	62	(62%)	-	-	100	(100%)
Informal workers including home workers	0	-	0	-	-	-	0	(0%)
Apprentices, trainees or interns	0	-	0	-	-	-	0	(0%)

* % of total workforce

Migrant workers

	Men		Women		Other		Total	
Domestic migrant workers	3	*(50%)*	3	*(50%)*	-	-	6	*(6%)*
International migrant workers	0	-	0	-	-	-	0	*(0%)*
Total migrant workers	3	*(50%)*	3	*(50%)*	-	-	6	*(6%)*

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from	The provinces of An Giang, Tien Giang, Vinh Long, Hau Giang, Tra Vinh, Ben Tre, Kien Giang, Can Tho

Workers by age

	Men		Women		Other		Total	
18 - 24 years old	7	*(46.7%)*	8	*(53.3%)*	-	-	15	*(15%)*
15 - 17 years old	0	-	0	-	-	-	0	*(0%)*
Under 15 years old	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit?	No
Describe how this may vary during peak periods	There are no peak seasons in the past 12 months.
Please list the nationalities of all workers, with the three most common nationalities listed first	Vietnamese

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Vietnamese	38%	62%	-	100%

Workers by remuneration type

	Men		Women		Other		Total	
Workers paid per unit (piece rate)	0	-	0	-	-	-	0	(0%)
Workers paid based on a mix of 'piece work' and hourly rate	0	-	0	-	-	-	0	(0%)
Workers paid hourly / daily rate	0	-	0	-	-	-	0	(0%)
Salaried workers	38	(38%)	62	(62%)	-	-	100	(100%)

* % of total workforce

Workers by payment cycle

	Men		Women		Other		Total	
Paid daily	0	-	0	-	-	-	0	(0%)
Paid weekly	0	-	0	-	-	-	0	(0%)
Paid monthly	-	-	-	-	-	-	0	(0%)
Other	38	(38%)	62	(62%)	-	-	100	(100%)

* % of total workforce

If other payment cycle entered, please provide details	The payment was conducted on day 15th of the following month.

People in managerial, supervisorial and administrative roles

	Men		Women		Other		Total
Employees in management positions	1	*(50%)*	1	*(50%)*	-	-	2
Supervisors or team leaders	1	*(50%)*	1	*(50%)*	-	-	2
Administrative staff	13	*(68.4%)*	6	*(31.6%)*	-	-	19

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	8 groups of 4, 22 individual
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?	Other (provide details) No significant concerns or complaints were raised by workers.
What did the workers like the most about working at this site?	Work environment – comfort (e.g. temperature, noise or dust levels) Equal opportunities Work atmosphere (e.g. treatment by supervisors) Grievance mechanisms Freedom of movement Facilities (e.g. rest area, recreation, canteen) Social dialogue (e.g. freedom to associate) Communication (e.g. from management) Workplace benefits (e.g. child care provisions)
Additional comments	Throughout the worker interview, we learn that all workers were satisfied as working in this facility and they were comfortable in communication with the facility management. They were free to share their information during the interview. There was no negative information from the interviewed workers.
Attitude of workers' committee/union representatives	The Trade Union was cooperative and supportive during the audit. Based on the interview with representatives, we noted that association activities were supported by the facility management.
Attitude of managers	The facility management showed a cooperative and supportive attitude during the audit. The auditor was allowed to visit all places in the facility. All documents requested were provided on time. At the closing meeting, all findings were accepted by the facility management.

Workers interviewed by type

	Total
Permanent workers	53
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	53

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	12	20	-	32
Workers interviewed individually	7	14	-	21

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	4	6	-	10
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	4	6	-	10

Measuring workplace impact

Gender disaggregated data available	Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	-	-	-	-
Last full calendar year (2024)	-	-	-	-
Previous full calendar year (2023)	-	-	-	-

* 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)	-	-	-	-
Last full calendar year (2024)	-	-	-	-
Previous full calendar year (2023)	-	-	-	-

* 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 facility has accidents records and there is no case of accidents happening in 2024 up to the audit date.

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

	Men	Women	Other	Total

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

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* 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)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	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%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

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

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%

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

Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	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	Current systems: - The facility management agreed auditors to conduct audit, and the management accompanied with auditors when auditors conducted facility tour. All required documents and records are provided to review on time. - The facility had a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers. - Mr. Ly Trong Khang – HR Manager was appointed to be responsible for implementing standards concerning human rights. - The facility had measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights. - The facility had a procedure showing that the factory will address these issues and enable effective remediation if it had an adverse impact on human rights within any of their stakeholders. - The facility had a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Evidence examined: - Human rights policy/ Written social compliance policies and procedures. - Training record. - Employee interview. - Workers' manuals. - Suggestion boxes logbook, grievance procedure.

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?	No

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	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policies and Procedures: The factory established the relevant policies and regulations that are appropriate for the site context and are very likely to lead to sustainable compliance with this section. The site has a detailed Freely employment policy which includes commitment to all the SMETA requirements, as well as key responsibilities and regulations by which it will be implemented. Regulation was in general and detailed in the implementation guidelines to prevent forced, bonded or involuntary prison labor in the facility. Resources: Mr. Nguyen Quoc Dao – General Director and Human Resources Officers have been clearly appointed as responsible persons to implement and maintain systems for compliance issues. Human Resources staff are allocated responsibility to implement the procedure at the facility, which includes all areas of the business. In general, the role(s) responsible understand their role and responsibilities. The management structure was active to changing circumstances ((In case person in charge leave the company) Communication and Training: The policy was posted in the public area of the workshop to communicate with workers. Training is also provided for new workers and current workers during orientation training and signature confirmation. However, no regular training was not provided for worker, this policy has been not high awarded by workers. Monitoring: Monitoring of the implementation of the free employment policy is carried out by human resources staff. Monitoring includes random checks of employee records, monitoring complaints and grievances, and attending meetings with employees. Th monitoring is applied in practice and this can be verified by interview person in charge, review document and maintained record fully.

Summary of findings

Code area	Workplace requirement	Local law	Finding

No findings

Systems and evidence examined to validate this code section	Current systems: - The facility had a policy which prohibits forced labor and this was available for review. - There was recruitment procedure that workers must present their ID cards for age verification during the job interview. Only copy of ID’ s for proof of worker’ s age is kept in the personnel files and the original ID shall not be kept by the facility. Original documents were kept by employees. - No employment fee was required as a condition of employment. - No prison labor or forced labor was noted during the audit. - The terms and conditions of employment in the handbook stated that workers were free to leave the workplace outside of their working hours. - All selected workers confirmed that they worked at the facility voluntarily and no enforcement to work overtime and the overtime forms were signed by workers before overtime performance. Evidence examined: - Personnel files including labor contracts. - Resignation records. - Factory internal regulation. - Collective Bargaining Agreement. - Management and workers interview. - Trade union representative interview.

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	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policies and Procedures: The factory established the relevant policy and procedure that are appropriate for the site context and are very likely to lead to sustainable compliance with this section. The site has a detailed Recruitment policy which includes commitment to all the SMETA requirements, as well as key responsibilities and procedures by which it will be implemented. The policy outlined a detailed statement and clear requirement on responsible hiring which outlines prevent step by step to due diligence during hiring process by HR staff; retain record to demonstrate that all workers have the legal right to work; control worker from sub-contractors / labor agency; no recruitment fee cost; etc. Resources: Mr. Ly Trong Khang- HR Manager, Human Resources Department have been clearly appointed as responsible persons to implement and maintain systems for compliance issues. Human Resources staff are allocated responsibility to implement the procedure at the facility, which includes all areas of the business. Procedures are in place for assign interim responsibility in the case of person in charge change or absence. Communication and Training: The policy was posted in the public area of the workshop to communicate with workers. Training is also provided for new workers during orientation training. Training on recruitment policy was mandatory for HR staff in charge of hiring. However, there is low awareness of the policy among employees interviewed. Monitoring: Monitoring of the implementation of the recruitment policy is carried out by human resources staff. Monitoring includes random checks of employee records, sub-contractor document, monitoring complaints and grievances, and attending meetings with employees. The monitoring (internal audit) was conducted to cover this code and overall performance is reported to the relevant senior management in management review. Record was available to review.

Summary of findings

Code area	Workplace requirement	Local law	Finding

No findings

Systems and evidence examined to validate this code section	Current systems: - Based on documentary review, management and workers interview, we ascertained that no employment agency was used by the facility. - The facility recruited the new workers directly by recruitment banners. - The facility had policy of recruitment with recruitment fees and related cost is charged for facility. All employees in the facility were Vietnamese. - Based on document review and worker interviews, the recruitment fees and related costs were not identified. - All workers had the proper legal rights to work in this region. - No agency worker was found during this audit. - The youngest age was 18 years old. Evidence examined: - Employment procedure. - Facility internal regulation. - Personal files with contracts. - Interview with management, workers and trade union representatives.

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
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?	Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	6%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	Yes
List the sending states/provinces/regions	The provinces of An Giang, Tien Giang, Vinh Long, Hau Giang, Tra Vinh, Ben Tre, Kien Giang, Can Tho

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?	No Recruitment fees or costs were not identified during worker interviews.

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	Policies and procedures: The position of the company is clearly stated in the policy and procedure of Freedom of association and right which meets all Workplace Requirements in this code area. The Policy makes reference to the policy and procedure of Freedom of association and right, which outlines the key mechanisms in place for preventing of Freedom of association and right to collective bargaining are respected. This procedure includes provision for nonemployee (agency) workers (if any). The Remediation Procedure outlines processes and responsibilities for undertaking remediation. Resources: Mr. Nguyen Quoc Dao – General Director is named within the policy and procedure of Freedom of association and right as ultimately responsible for ensuring its resourcing, approval and regular review. Specific Compliance Department are allocated responsibility to implement the policy and procedure of Freedom of association and right in named areas, which includes all areas of the business. Procedures are in place for interim responsibility in the case of position change or absence. Communication and Training: Training at site is governed by a training procedure which is the specific responsibility of the Training Team under the supervision of Top Management. the policy and procedure of Freedom of association and right is available and communicated to all employees, and there is general awareness of it amongst staffs/workers interviewed. Training on the policy and procedure of Freedom of association and right is mandatory for Training Team (Compliance staffs) processing applications or onboarding. A training matrix/ profiles utilized by Top Management ensures that there is a very low chance of gaps in regard to this training. The new workers had trained all policy and procedure of social system before working. Beside that all employees had communicated with the training annual. Monitoring: Responsibilities for monitoring implementation of policy and procedure of Freedom of association and right are defined by Compliance Department and Trade Union. The procedure requires that audit of the records kept of this verification is conducted by the Compliance Department and Trade Union. Records are kept of monitoring activities. Any identification of misapplication of procedures, or concerns about application are escalated for action in the monthly. The workers can contact their representatives (trade union) for any grievance if any. If there was a request, the trade union and facility management representatives conducted meetings with management to solve the issue(s) accordingly. The meeting records were provided for review and the meeting minutes were posted on the notice board that employees can read.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section	Current systems: - The Trade Union of Hoang Long Seafood Processing Company Limited was established with 13 members and Mr. Dinh Ha Nguyen Duc - Chairman of Trade Union. - Based on the employee interview, all selected interviewed employees said they were given the full rights to join any legal and external associations, and all of them were union members as they had all rights on wages and benefits and working conditions as others. - Interviewed workers confirmed that the members of the Trade Union had been elected by fellow workers. Evidence examined: - Site policy on freedom of association. - Interview with workers and representative of Trade Union. - Meeting records review.

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

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	Yes
Are they active?	The Trade Union of Hoang Long Seafood Processing Company Limited is active. The chairman is Mr. Dinh Ha Nguyen Duc
Does the employer recognise the trade union?	Yes
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
Explanation for management systems grades	Policies and procedures: Comprehensive health and safety policies are documented, up-to-date, and effectively communicated, covering all aspects of workplace safety, as confirmed by interviews, manuals, and committee minutes. Resources: Sufficient resources are fully available and effectively utilized, ensuring all safety equipment is maintained, training is up-to-date, and health and safety resources are properly managed, as evidenced by maintenance records, certificates, and interviews. Training and communication: Training is provided and ongoing, ensuring all employees are informed about health and safety procedures, with regular updates and refreshers, as confirmed by training records, certificates, and interviews with workers and the H&S committee. Monitoring: Monitoring systems are operational but require improvement, such as more frequent checks on fire safety, better documentation of injuries records, or more details on PPE risk assessment.

Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.E Provide and record health and safety trai...	§1	NC ZAF600865109

Systems and evidence examined to validate this code section	Current systems: 1.The facility established a health and safety policy, and a health and safety committee was established. 2.Mr. Le Phuoc Loi – HR Vice Manager & Mr. Nguyen Vu Linh – HSE Supervisor were the representative of health and safety system. 3.Check records of firefighting equipment was available on site, it was identified that all firefighting equipment was checked by safety officers on monthly basis. 4.Fire drill plan with approval from local fire police department dated on 25 Sep 2024. 5.There were 33 electricians in the facility. The certificates were provided by the factory for review during the audit. 6.Accident records as well as investigations were kept and provided for review. There was 0 cases of injury or accident happened since Jan 2025 until audit date. 7.The facility had provided the fire safety certificate and structure safety certificate of factory building for review. 9.Adequate toilets running water, and toilet papers and soaps were provided for employees. 10.Firefighting facilities were equipped at workshop. 11.PPE was provided to workers free of charge, and PPE warning sign was posted in place. PPEs were used by employees sufficiently. 12.The facility provided sufficient first aid supplies for first aid kits at production areas. 13.Based on observation on site, the lighting was acceptable at each workshop. 14.Based on site observation, potable water was provided for workers at each workshop. Based on workers' interview, they could access the potable water freely during working time. 15.Based on observation on site, the facility buildings were secure. Evidence examined: 1.Health and safety policy 2.Training records and certificates 3.Drinking water test records 4.Accident records, medical check-up records 5.Maintenance plan and records for machines, firefighting equipment, electricity 6.Fire drill plan 7.Machine inspection certificates 8.Building structure safety certificates 9.Accident records 10.Chemical list and SDS for each chemical, chemical handling, storage procedures 11.Management and worker interview 12.Facility tour

Findings: non-compliances

ZAF600865109

Non-compliance

Due 2025-04-29

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.E Provide and record health and safety training to all new workers, prior to exposure to risks. Provide continued training to existing workers, as appropriate for the hazards and levels of risk identified.

Issue title

162 - No/inadequate health and safety training provided to workers in relation to processes (including handling hazardous substances e.g. chemicals and pesticides) which may cause serious injury or death - isolated

Description

During site observation, document review, and interview, it was noted that the training certificate of Group 3, 5 expired on Mar 13, 2025, and Group 2 did not have certificate of Nguyen Vu Linh – the PIC of HSE system.
Note: The facility signed the training contract on Mar 10, 2025. However, the training was not conducted until the audit days.

Corrective and preventative actions

It is recommended that the facility shall ensure providing adequate training for employees.

Local law reference

According to the provisions of Article 17 of Decree 44/2016/ND-CP amended by Clause 5, Article 1 of Decree 140/2018/ND-CP regulating the subjects attending occupational safety and hygiene training courses

Status

Open*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

* PDF generated at 08:59 (UTC) on 30 Mar 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, senior manager or business owner Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	Yes
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
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 Not applicable
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?	No

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	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
Explanation for management systems grades	Policies and procedures: A comprehensive anti-child labor policy and hiring procedure is documented, clearly communicated, and consistently applied, including strict procedures for age verification during recruitment, as confirmed by personnel files and the latest employee list. Resources: Mr. Ly Trong Khang -HR Manager and Human Resources Department have been clearly appointed as responsible persons to implement and maintain systems for compliance issues. Human Resources staff are allocated the responsibility to implement conduct the verification process and maintained documented information. In addition, as per interview, the person in charge who is aware of how is the verification, action taken in case of child labor found Communication and Training: Training on No child labor policy was provided to relevant workers. The policy was posted in the public area of the workshop to communicate with workers. Person in charge of hiring had to trained on No child labor policy which include how to review the personal document, kind of child labor, etc. There is low awareness among staff interviewed. Monitoring by Human resources staff includes checks of worker personal document, interview with worker. Monitoring of implementation of the verification of age process was not effectively.

Summary of findings

Code area	Workplace requirement	Local law	Finding
4. Child labour shall not be used	4.B Review original photographic identificati...		NC ZAF600865112

Systems and evidence examined to validate this code section	Current systems: The facility management committed not to use labor under 18 years old. It was noted through audit process. The facility had established the procedure/policy requiring age verification and records maintenance. The facility had verified the age of the workers at the time of employment and collected age proof documents such as ID card, education certificate with photo, etc. but no evidence to maintain record fully on employee personnel file based on Internal procedure. No child labor was found during audit at the facility. Besides, no evidence of historic employment of child labor was found at the facility. There is also written policy that outlines how child labor would be remediated available to review. Interviewed employees confirmed that factory does not hire child labor, the minimum age employed by the facility is 18 years old. Evidence examined: - No child Labor policy and Remediation child labor handling procedure, dated 31/12/2022 - Personnel files verification of 52 sampled employees. - Site observation

Findings: non-compliances

ZAF600865112

Non-compliance

Due 2025-04-29

Code area

4 Child labour shall not be used

Workplace requirement

4.B Review original photographic identification to validate that all workers (including non-directly hired workers) are at least 15 years old at the time of employment, or require any agency or labour broker to do the same, and assess these systems rigorously via sampling on a regular basis.

Issue title

390 - No process in place requiring age verification and records maintenance

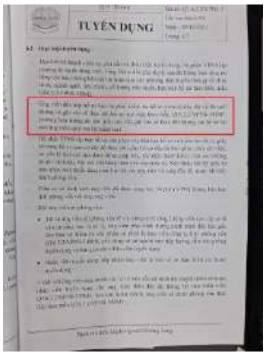
Description

During document review and management confirmation, it was noted that procedure/policy requiring age verification was set up (such as ID card, education certificate with photo, etc) but no evidence to maintain record fully on employee personnel file based on the hiring procedure (form QT6.2.2/VPNS-3/BM7).

Corrective and preventative actions

It is recommended the facility should ensure to follow the procedure to ensure sufficient record maintain.

Evidence


TUYỂN DỤNG

TimePhoto_20250319_151014.jpg

Status

Open*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Base code

* PDF generated at 08:59 (UTC) on 30 Mar 2025. View this finding on the Sedex platform for live updates and closure details.

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	15%
Enter the legal age of employment	15
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	0.0%
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	Some Improvements Recommended
Explanation for management systems grades	Policies and procedures:: The position of the company is clearly stated in the policy and procedure of wage and benefit which meets all Workplace Requirements in this code area. The Policy makes reference to the policy and procedure of wage and benefit, which outlines the key mechanisms in place for reviewing of wage and benefit under the local law and Living wages under ILO's 10 Principles. This procedure includes provision for nonemployee (agency) workers (if any). The Remediation Procedure outlines processes and responsibilities for undertaking remediation. Resources: The Mr. Nguyen Quoc Dao – General Director is named within the policy and procedure of wage and benefit as ultimately responsible for ensuring its resourcing, approval and regular review. Specific HR department are allocated responsibility to implement the policy and procedure of wage and benefit in named areas, which includes all areas of the business. Procedures are in place for interim responsibility in the case of position change or absence. Communication and Training: Training at site is governed by a training procedure which is the specific responsibility of the Training Team under the supervision of Top Management. The policy and procedure of wage and benefit is available and communicated to all employees, and there is general awareness of it amongst staffs/workers interviewed. Training on the policy and procedure of wage and benefit is mandatory for Training Team (HR staffs) processing applications or onboarding. A training matrix/ profiles utilized by Top Management ensures that there is a very low chance of gaps in regards to this training. The new workers had trained all policy and procedure of social system before working. Beside that all employees had communicated with the training annual. Monitoring: Responsibilities for monitoring implementation of the policy and procedure of wage and benefit are defined by HR Department. The procedure requires that audit of the records kept of this verification is conducted by the HR Department. Records are kept of monitoring activities. Any identification of misapplication of procedures, or concerns about application are escalated for action in the monthly. However, social insurance contribution was not forwarded to the Government on timely manner as detail on the report.

Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§1	NC ZAF600865111

Systems and evidence examined to validate this code section	Current systems: - The factory had established policy and procedure on wages and benefits, and it was legal and acceptable. - Employees' wages are calculated based on the hourly rate for all employees. Employees are paid via bank transfer on 15th of the following month. Through documentary review and management interviews, we ascertained that all workers always receive their pay slips on monthly. - Employees are paid at 150% of normal wage for overtime on weekdays, 200% of the normal wage for overtime time on rest days, and 300% of normal wage for overtime on holidays (if any). - Annual leave (14 days in a year for production employees whose jobs were classified as harmful & toxic conditions and 12 days for non-production employees). - Total 11 holidays are provided and paid to all employees in the year. - The legal minimum wages (minimum wage region 4) applied for the facility in the year of 2023 and before July 1, 2024 was 3,250,000 VND per month and from July 1, 2024 was 3,450,000 VND per month. Meanwhile, the facility paid at least 3,622,500 VND per month for all production employees after passing probation period. - The sick and maternity leave allowance is paid correctly to all employees on a timely basis. - The severance allowance, wages and entitled benefits are paid correctly to the resigned employees in compliance with local law. - The maternity leave of 6 months was provided to all female pregnant employees with full pay. - However, social insurance contribution was not forwarded to the Government on timely manner as detail on the report. - Records of attendance and payrolls of the past 12 months from March 2024 to February 2025 were available for review. The auditors randomly selected total 156 sampled time record and payroll of workers in 3 sampled months: February 2025 (recent month); October 2024 (random month) and May 2024 (random month). Evidence examined: - Internal regulation. - Policies on compensations and benefits, working Hours. - Records of time attendance and payrolls in the past 12 months. - Employment contracts. - Records of annual leave monitor. - Records of resignation, disciplinary, allowance payments. - Allowance payment records. - Wage Scales. - Social insurance contribution record.

Findings: non-compliances

ZAF600865111 Non-compliance Due 2025-05-29

Code area
5 Legal wages are paid

Workplace requirement
5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.

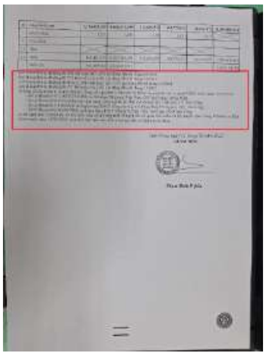
Issue title
426 - Regular practice of delayed payment of social insurance and other legally mandated contributions to relevant authorities

Description
It was noted from the record review of insurance payment in Feb. 2025 as well as management interview that the facility was still owing the Social and Health Insurance for Feb. 2025 with total amount of VND 10,495,885,66. As observed from the payroll, workers already contributed the monthly insurance of their salary (10.5% basic wage) in Feb. 2025. On Mar 14, 2025 the facility had contributed the total amount VND 619,761,732.

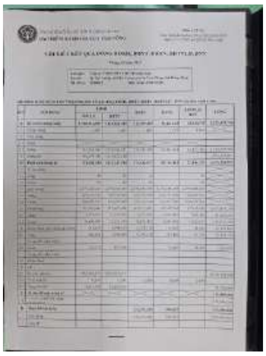
Corrective and preventative actions
It is recommended that the facility should forward social insurance to government to ensure employees were provided their benefit promptly.

Local law reference
In accordance with Article 92, Clause 2 of Law on Compulsory Social Insurance(58/2014/QH13): Monthly, employers should make payments calculated on the funds of social insurance salaries and remuneration of laborers.

Evidence



TimePhoto_20250319_111756.jpg



TimePhoto_20250319_111749.jpg

Status
Open*

Time given to resolve
60 days

Verification method
Desktop audit

Area of non-compliance/non-conformance
Local law
Base code

* PDF generated at 08:59 (UTC) on 30 Mar 2025. View this finding on the Sedex platform for live updates and closure details.

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage Wages meet a living wage Wages are based on job skills and experience
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?	None

Worker renumeration

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

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**	8.0
	Max hours per week	48.0
	Max hours per month	216.0
Actual required working hours	**Required hours per day**	8.0
	Required hours per week	48.0
	Required hours per month	216.0

Maximum legal overtime hours	**Max hours per day**	4.0
	Max hours per week	Non applicable
	Max hours per month	40.0
Actual overtime hours	**Max hours per day**	2.0
	Max hours per week	6.0
	Max hours per month	13.0
Minimum legal wage	**Min per hour**	16587.0
	Min per day	132692.0
	Min per week	Non applicable
	Min per month	3450000.0
Actual minimum wage	**Actual per hour**	17416.0
	Actual per day	139327.0
	Actual per week	Non applicable
	Actual per month	3622500.0
Minimum legal overtime wage	**Min per hour**	24880.0
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	**Actual per hour**	26124.0
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	52
Provide the date and details of the records	- Working hour data and wage records of 52 sampled workers each month of 3 sampled months in Feb. 2025 (most recent month), Oct. 2024 (random month) and May. 2024 (random month) - 52 personnel files and labor contracts.

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?	Above legal minimum
Indicate the breakdown of workforce per earnings	100% of workforce earning above legal minimum wage.
Are there any bonus schemes used?	Yes The facility management provides to all employees some benefits and working conditions which are not required by local law. Details as below: + Free meal with equal price 17,000 VND per pax per working day. + Attendance allowance: 300,000 VND per month + Childcare allowance: 50,000 VND per child per month + Transportation allowance: 300,000 VND – 500,000 VND per month. + Housing allowance: 300,000 VND per month. + The 13th bonus salary to employees, paid at the end of each year.
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	Current systems: - The facility had conducted the assessment on the living wage for all employees through surveys from all employees based on the questions under local law (regional minimum wage) and ILO's 10 principles of Living Wage Estimation through the IDH living wage recognized benchmark such as: Fair Wage Network Typical Family Methodology. - All working hours were recorded adequately and compensated properly. - The facility reviewed employee wages in accordance with local laws and updated the living wage through periodic communication with employees and Trade Union Representative. Evidence examined: - Fair Wage Network Typical Family Methodology. - The living wage assessment. - Wage Scale. - Workers interview. - Employment contracts. - Pay slips of workers. - Wage records in the past 12 months. - Allowance payment 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
Explanation for management systems grades	Policies and procedures: The position of the company is clearly stated in the policy and procedure of working hours which meets all Workplace Requirements in this code area. The Policy makes reference to the policy and procedure of working hours, which outlines the key mechanisms in place for reviewing of working hours under the local law, ILO and bas code under SEDEX requirement. This procedure includes provision for nonemployee (agency) workers (if any). The Remediation Procedure outlines processes and responsibilities for undertaking remediation. Resources: Mr. Nguyen Quoc Dao – General Director is named within the policy and procedure of working hours as ultimately responsible for ensuring its resourcing, approval and regular review. Specific HR department are allocated responsibility to implement the policy and procedure of working hours in named areas, which includes all areas of the business. Procedures are in place for interim responsibility in the case of position change or absence. Communication and Training: Training at site is governed by a training procedure which is the specific responsibility of the Training Team under the supervision of Top Management. The policy and procedure of working hours is available and communicated to all employees, and there is general awareness of it amongst staffs/workers interviewed. Training on the policy and procedure of working hours is mandatory for Training Team (HR staffs) processing applications or onboarding. A training matrix/ profiles utilized by Top Management ensures that there is a very low chance of gaps in regards to this training. The new workers had trained all policy and procedure of social system before working. Beside that all employees had communicated with the training annual. Monitoring: Responsibilities for monitoring implementation of the policy and procedure of working hours are defined by HR Department. The procedure requires that audit of the records kept of this verification is conducted by the HR Department. Records are kept of monitoring activities. Any identification of misapplication of procedures, or concerns about application are escalated for action in the monthly.

Summary of findings

Code area	Workplace requirement	Local law	Finding

No findings

Systems and evidence examined to validate this code section	Current systems: - Face-scan machines were used for tracking the number of hours worked. Employees had to record their time in/out according to their shifts (time-in at 3:30am; 4:00 am; 5:00 am; 6:00 am; 7:30 am; 3:00 pm and time-out at 12:30 pm; 1:00 pm; 2:00 pm; 3:00 pm; 5:00 pm and 00:00 am). The day and number of working hours employees worked were indicated on the time record. - The site's regular working hours are 8 hours per day 48 hours per week, from Monday to Saturday. The rest day is Sunday for office and one day off after 6 consecutive working days for production. There are 5 shifts for workers, Shift 1: 3:30 am to 12:30 pm with 1 hour break from 9:30 am to 10:30 am , shift 2: 4:00 am to 1:00 pm with 1 hour break from 10:00 am to 11:00 am, shift 3: 5:00 am to 2:00 pm with 1 hour break from 11:00 am to 12:00 pm, shift 4: 6:00 am to 3:00 pm with 1 hour break from 11:00 am to 12:00 pm; shift 5: 3:00 pm to 00:00 am with 1 hour break from 8:00 pm to 9:00 pm. Office staffs: 7:30 am to 5:00 pm with 1.5 hour lunch break from 11:30 am to 1:00 pm The rest break are 2 times per shift as 15 minutes each time. - Based on the working time records from March 2024 to February 2025 and workers interview, workers had at least one day off after 6 consecutive working days. - Other paid leave is provided in accordance with Collective Bargaining Agreements. -The facility has designated HR department to monitoring and tracking time record of all workers. - Through employees' interview, overtime is voluntary. - Based on the provided payrolls and time records, the working hours were noted as follows: + February 2025 (recent month): The normal working hours per week were 48 hours. Maximum weekly working hours were 52 hours (48 normal hours + 4 overtime hours). + October 2024 (random month): The normal working hours per week were 48 hours. Maximum weekly working hours were 54 hours (48 normal hours + 6 overtime hours). + May 2024 (random month): The normal working hours per week were 48 hours. Maximum weekly working hours were 48 hours. Evidence examined: - Payrolls and time records in the most recent 12 months. - CBA and Internal regulation. - Security logbook, production records. - Workers interview. - Management interview.

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.
Excluding overtime, what are the regular working hours per week for workers at this site?	48.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	52.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	54.0
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	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policies and Procedures: The factory had established the relevant policy is appropriate for the site context. The site has a detailed No discrimination policy. Policies are comprehensive, well-developed, and consistently enforced to ensure that no discrimination is practiced, with clear documentation and alignment with international standards. Resources: Mr. Nguyen Quoc Dao- General Director and Human Resources Department have been appointed as responsible persons to implement and maintain systems for compliance issues. Human Resources staff are allocated the responsibility to in charge of control the non-discrimination process based on documented in writing. In addition, as per interview, the person in charge aware of his role and responsibilities. Communication and Training: Training on non-discrimination policy was provided to relevant workers. The policy was posted in the public area of the workshop to communicate with workers. HR staffs had to trained on this policy to employee annually. However, low awareness this policy among workers interviewed. Monitoring systems are robust, regularly conducted, and thoroughly documented, ensuring that all policies related to non-discrimination are consistently and effectively implemented.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section	Current systems: - Based on employees interviews and management interview, there is no evidence of any discriminatory practices based on race, religion, age, nationality, social association, sexual orientation, gender or disability. - During the audit, all selected employees confirmed that they were treated with respect and dignity. - No worker was required to do the examination of the hepatitis B virus and HIV. - Policy on non-discrimination was available for review. - Gender divisions did not exist in the facility; both female and male workers were distributed in all types of work. - There was an internal grievance process, and all interviewed workers were aware of the grievance channels in case they encountered any discrimination cases. - There was no evidence of sexual harassment. Evidence examined: - Attendance records. - Termination records. - Personnel files. - Worker's interview. - Management interview. - Trade union interview. - Payroll records.

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)?	17%
Representation of women in managerial roles (ratio of women workers to women managers)	1%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	1%
Three most common nationalities in managerial and supervisory roles	Vietnamese

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
Explanation for management systems grades	Policies and procedures: The position of the company is clearly stated in the policy and procedure of recruitment and entitlement to work which meets all Workplace Requirements in this code area. The Policy makes reference to the policy and procedure of recruitment and entitlement to work, which outlines the key mechanisms in place for reviewing of original photographic identification; the costs of recruitment; … under the local law and ILO. This procedure includes provision for non-employee (agency) workers (if any). The Remediation Procedure outlines processes and responsibilities for undertaking remediation. Resources: Mr. Nguyen Quoc Dao - General is named within the policy and procedure of recruitment and entitlement to work as ultimately responsible for ensuring its resourcing, approval and regular review. Specific HR department are allocated responsibility to implement the policy and procedure of recruitment and entitlement to work in named areas, which includes all areas of the business. Procedures are in place for interim responsibility in the case of position change or absence. All employees were contracted when recruited (probation contract, definite-term labor contract and indefinite term labor contract) under the local law. Every employee has provided a copy of their contract and understands the terms and conditions of their employment. Communication and Training: Training at site is governed by a training procedure which is the specific responsibility of the Training Team under the supervision of Top Management. the policy and procedure of recruitment and entitlement to work is available and communicated to all employees, and there is general awareness of it amongst staffs/workers interviewed. Training on the policy and procedure of recruitment and entitlement to work is mandatory for Training Team (HR staffs) processing applications or onboarding. A training matrix/ profiles utilized by Top Management ensures that there is a very low chance of gaps in regards to this training. The new workers had trained all policy and procedure of social system before working. Beside that all employees had communicated with the training annual. Monitoring: Responsibilities for monitoring implementation of the policy and procedure of recruitment and entitlement to work are defined by HR Department. The procedure requires that audit of the records kept of this verification is conducted by the HR Department. Records are kept of monitoring activities. Any identification of misapplication of procedures, or concerns about application are escalated for action in the monthly.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section	Current systems: - All employees were recruited by the facility directly. No labor agency was used to hire workers. - Employees were provided with an orientation training on the facility rules and regulations including labor issues, wages and benefits, working time, and health and safety, Client’s standards. Labor contract was signed by both employee and employer after employee’s probation period was passed. - The factory applies 6 days or 30 days probation contracts for new worker. - No temporary worker, or home worker was identified by auditors. - No subcontractor was used. - All of workers had received the labor contract. Evidence examined: - Policy and procedure on recruitment. - The hiring and termination policies. - Personnel files. - Labor contracts. - Time and Payroll records.

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	100.0%
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	Policies and procedures: The position of the company is clearly stated in the policy and procedure of management of Sub-contracting and homeworkers which meets all Workplace Requirements in this code area. The Policy makes reference to the policy and procedure of management of Sub-contracting and homeworkers, which outlines the key mechanisms in place for reviewing of Sub-contracting and homeworkers. This procedure includes provision for employees (agency) workers (if any). The Remediation Procedure outlines processes and responsibilities for undertaking remediation. Resources: Mr. Nguyen Quoc Dao – General Director is named within the policy and procedure of management of Sub-contracting and homeworkers as ultimately responsible for ensuring its resourcing, approval and regular review. Specific Compliance Department are allocated responsibility to implement the policy and procedure of management of Sub-contracting and homeworkers in named areas, which includes all areas of the business. Procedures are in place for interim responsibility in the case of position change or absence. All employees were contracted when recruited (probation contract, definite-term labor contract and indefinite term labor contract) under the local law. Communication and Training: Training at site is governed by a training procedure which is the specific responsibility of the Training Team under the supervision of Top Management. The policy and procedure of management of Sub-contracting and homeworkers is available and communicated to all employees, and there is general awareness of it amongst staffs/workers interviewed. Training on the policy and procedure of management of Sub-contracting and homeworkers is mandatory for Training Team (Compliance staffs) processing applications or onboarding. A training matrix/ profiles utilised by Top Management ensures that there is a very low chance of gaps in regard to this training. The new workers had trained based on the procedure of supplier selection and evaluation before working. Beside that all employees had communicated with the training annual. Monitoring: Responsibilities for monitoring implementation of the policy and procedure of management of Sub-contracting and homeworkers are defined by Compliance Department. The facility had conducted internal audit depend on the procedure of supplier selection and evaluation and keeping related records (if any) by the Compliance Department. Any identification of misapplication of procedures, or concerns about application are escalated for action. - All production processes were presented in the facility. - No temporary worker, or home worker was identified. - No Sub-contracting was identified. - The facility had conducted internal audit depend on the procedure of supplier selection and evaluation. Beside that had conducted the training for service supplier (such as security, canteen, transportation).

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section	Current systems: - During the site tour, we confirmed that all production processes were present in the unit. - No home worker was identified in the facility. - No sub-contractor was identified in the facility. Evidence examined: - Facility tour. - Production records. - Management interview. - Workers interview.

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 No home workers were identified in assessment period.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?	No No sub-contracting was identified in assessment period.
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	Policies and procedures: The position of the company is clearly stated in the policy and procedure of harsh or inhumane treatment which meets all Workplace Requirements in this code area. The Policy makes reference to the policy and procedure of harsh or inhumane treatment, which outlines the key mechanisms in place for preventing of harsh or inhumane in place under the local law and ILO. This procedure includes provision for non-employee (agency) workers. The Remediation Procedure outlines processes and responsibilities for undertaking remediation. Resources: Mr. Nguyen Quoc Dao – General Director is named within the the policy and procedure of harsh or inhumane treatment as ultimately responsible for ensuring its resourcing, approval and regular review. Specific HR department are allocated responsibility to implement the policy and procedure of harsh or inhumane treatment in named areas, which includes all areas of the business. Procedures are in place for interim responsibility in the case of position change or absence. All employees were contracted when recruited (probation contract, definite-term labor contract and indefinite term labor contract) under the local law. There is an internal process for grievance, grievance boxes were installed in the facility, where workers can report any grievances anonymously (harassment, bullying, discrimination etc.), any received complaint will be handled by the Trade Union, without any reprisal for the workers in question. This system was installed, and all of workers knew about this. Communication and Training: Training at site is governed by a training procedure which is the specific responsibility of the Training Team under the supervision of Top Management. The policy and procedure of harsh or inhumane treatment is available and communicated to all employees, and there is general awareness of it amongst staffs/workers interviewed. Training on the policy and procedure of harsh or inhumane treatment is mandatory for Training Team (HR staffs) processing applications or onboarding. A training matrix/ profiles utilized by Top Management ensures that there is a very low chance of gaps in regards to this training. The new workers had trained all policy and procedure of social system before working. Beside that all employees had communicated with the training annual. Monitoring: Responsibilities for monitoring implementation of the policy and procedure of harsh or inhumane treatment are defined by HR Department. The procedure requires that audit of the records kept of this verification is conducted by the HR Department. Records are kept of monitoring activities. Any identification of misapplication of procedures, or concerns about application are escalated for action in the monthly.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section	Current systems: - The facility established the policies and procedures on no Harsh or Inhumane Treatment. - During the audit, we noted that there was no indicator to show that the facility engaged or supported physical harassment, mental harassment, abuse & threat, and any types of sexual harassment in the facility. - Interviewed employees reported that they were equally treated by their supervisors. No evidence of corporal punishment, threats of violence or other forms of physical, mental, sexual, verbal harassment and abuse has identified during audit process. - The facility management encouraged employees to report non-conformities, including instances of harassment or abuse, without fear of retribution. The facility management equipped suggestion boxes throughout the facility so that employees can freely share the harassment or abuse issues to the management. - Employees could share their concerns with their team leader or trade union representatives or meet directly with the management to send their complain or through hot-line phone numbers posted throughout the facility. - No agency staffs were found during this audit. Evidence examined: - The policy on non-harassment & abuse and related procedures. - Training records. - Procedure on grievance handling and related records. - Interview workers. - Interview management. - Interview trade union representative.

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?	1. Telephone hot lines. 2. Suggestion box. 3. Verbal exchange. 4. Trade Union discussion.
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

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	Some Improvements Recommended
Explanation for management systems grades	Policies and procedures: Comprehensive policies are well-developed and consistently enforced, ensuring full compliance with local, regional, national environmental laws and client standards, with all necessary permits in place. Resources: A dedicated manager with sufficient seniority and resources is responsible for overseeing the implementation of environmental policies, ensuring full compliance with local and client environmental standards, with permits regularly reviewed and updated. Training and communication: Training and communication are comprehensive, regular, and effective, ensuring that all employees, including management and supervisors, are fully aware of and understand the environmental policies and compliance requirements, with evidence of clear communication with clients and regulatory authorities. Monitoring: Monitoring systems are good, regularly conducted, and thoroughly documented, ensuring full compliance with environmental laws and client requirements, with regular audits conducted and permits consistently reviewed and maintained. However, there was 1 minor NC raised due to the lack of legal monitoring.

Summary of findings

Code area	Workplace requirement	Local law	Finding
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	§1	NC ZAF600865110

Systems and evidence examined to validate this code section	Current systems: 1. The legally required certificates including the registration form of environmental protection plan of the construction, and approval of environmental license were available and valid during this audit. 2. Wastewater, waste gas and noise were tested, and relevant monitoring report was available. 3. Environment emergency action procedures, such as action procedure for chemicals spill was available. 4. The factory established environment policy, relevant procedure and carried out environment management system. 5. Waste was collected and segregated in place. The factory transferred all wastes to licensed vendor with relevant qualification. Evidence examined: 1. Approval of environmental license (No. 393/GPMT-UBND, dated Apr 04, 2023). 2. Environment protection monitoring report date Jan 13, 2025. 3. Environmental policy and procedure dated 21/12/2023. 4. Emergency action procedures. 5. Wastes records (Oct 2024) 6. Management and worker interview 7. Factory tour 8. Chemicals spill drill was conducted on Dec 20, 2024.

Findings: non-compliances

ZAF600865110 | Non-compliance | Due 2025-04-29

Code area

10.A Environment 2-Pillar

Workplace requirement

10.A.B Comply with relevant local, regional and national laws or regulations, and have the correct documentation or permits, including for resource use (e.g. water, energy, material) and waste disposal.

Issue title

606 - Environmental certifications or environmental management systems documentation were not available to review

Description

During site observation, document review, and interview, it was noted that the facility did not establish Environmental incident response drill plan.

Corrective and preventative actions

It is recommended that the facility shall establish Environmental incident response drill plan as law requirement.

Local law reference

Pursuant to Article 108 of Decree 08/2022/ND-CP regulating environmental incident response plans

Status

Open*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

* PDF generated at 08:59 (UTC) on 30 Mar 2025. View this finding on the Sedex platform for live updates and closure details.

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?	Nil
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	Yes The facility has valid certificates such as ASC.
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	Yes The facility started to record the GHG emission since 2024.

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Local law	Finding
10.B. Environment 4-Pillar	10.B.G Establish resource-use targets and a p...		NC ZAF600865108

Systems and evidence examined to validate this code section	Current systems: 1. Environmental policy was established by the facility. 2. The factory has assigned Mr. Nguyen Vu Linh - QHSE Supervisor to be in charge of environmental requirements as per local authority. The environmental policy/ procedure is responsible for updating the environmental law and conducting the compliance assessment of environment. 3. The facility obtained sufficient legal documents and permits from local authorities such as approval for environmental impact assessment. 4. The facility signed a contract with licensed contractors to collect and treat living waste and production waste and hazardous waste as per the law. 5. Supply water was used and provided invoice monthly for review 6. Wastewater from production was treated by the onsite wastewater treatment system then released to the industrial zone for final treatment. Evidence examined: 1. Facility tour 2. Environmental policy 3. All legally required environmental documents were provided for review. 4. The registration of hazardous waste resource owner book 5. Approval of environment impact assessment 6. Contract for wastewater treatment 7. Contract of transportation and treatment of hazardous waste. 8. Waste transfer documentation 9. Worker and management interview. 10. Energy bills; Water bill 11. Environment monitoring records 12. Training records 13. Hazardous waste management report.

Findings: non-compliances

ZAF600865108

Non-compliance

Due 2025-06-28

Code area
10.B Environment 4-Pillar

Workplace requirement
10.B.G Establish resource-use targets and a plan to reach them.

Issue title
953 - Site has not established resource targets and/or has not developed a plan to reach them

Description
During site observation, document review, and interview, it was noted that the facility did not not establish resource targets and not developed a plan to reach them.

Status
Open*

Time given to resolve
90 days

Verification method
Desktop audit

Area of non-compliance/non-conformance
Base code

Corrective and preventative actions
It is recommended that the facility shall establish resource targets and develop a plan to reach them.

* PDF generated at 08:59 (UTC) on 30 Mar 2025. View this finding on the Sedex platform for live updates and closure details.

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 Prioritising local suppliers Other (provide details) Sustainable material sourcing Complying with applicable requirements.
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes The facility has system in place and assigned person in charge for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues.
Does the site have reduction targets in place to manage climate related risks?	None
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))?	No
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 facility conducted annual screening for sub-contracting agencies or business partners operating on the premises on a yearly basis to ensure they have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility.

Usage/discharge analysis

	Last full calendar year (2024)	Previous full calendar year (2023)
Total electricity consumption from non-renewable sources (kWh)	14,958,400	18,889,316
Total electricity consumption from renewable sources (kWh)	0	0
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)	6,912	7,014
Usage of other purchased fuels	D0 2000 lít	Data not available
Has the site completed any carbon footprint analysis?	No	No
Water sources	river	well
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	321,877	314,979
Water discharged	river	river
Water volume discharged (m3)	261,042	260,147
Water volume recycled (m3)	0	0
Total waste produced (mt)	771	1,728
Total hazardous waste produced (mt)	472	480
Waste to recycling (mt)	0	0
Waste to landfill (mt)	0	0
Waste to other (mt)	0	0
Total product produced (mt)	15,350,150	12,885,659

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	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policies and Procedures: The factory established the relevant policy and procedure that are appropriate for the site context and are very likely to lead to sustainable compliance with this section. The site has a detailed Business Ethic Policy which includes commitment to all the SMETA requirements, as well as key responsibilities and procedures by which it will be implemented. The policy outlined the detailed statement and clear guidance to no bribery, corruption cases or any type of fraudulent Business Practices was reported in the factory; a mechanism to report ethical issues; etc. Resources: Mr. Nguyen Quoc Dao- General Director, Human Resources Department have been clearly appointed as responsible persons to implement and maintain systems for compliance issues. Human Resources staff are allocated responsibility to implement the procedure at the facility, which includes all areas of the business. Procedures are in place for assigning interim responsibility in the case of person in charge change or absence. Communication and Training: Training on Business Ethic Policy was provided to relevant staff (purchasing Department; HR department; Im-export Department; by HR Department (Those staffs shows fully aware off this policy) and the policy was communicate business partners for understanding and implementation. The company also set up a training plan to ensure training was provided regularly. Business Ethic Policy was posted at public area. However, it was noted that some workers were not clearly aware of business ethics policy. The company shall ensure to Regularly promote business ethic policy through posters, internal newsletters, and weekly meetings to raise employee awareness. Monitoring: Monitoring of the implementation of the Business Ethic Policy is carried out by human resources staff. Monitoring includes reviewing of contract; training record; grievance record; supplier and subcontractor monitoring record; etc. The monitoring (internal audit) was conducted to cover this code and overall, to cross-check, the result is reported to the relevant senior management in management review. Record was available to review.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section	Current systems: The policy of business ethic, anti-bribery and corruption was established. - Mr. Nguyen Quoc Dao was responsible for implementing Ethic Business policy in the facility. - There are many ways for the facility to identify the ethical issues in the facility, including feedbacks of employees through hot lines and suggestion boxes. - Employees including purchasing staff were received training on Business Practice policy together with the induction training prior to recruitment and the annual refresher training. - No bribery, corruption cases or any type of fraudulent Business Practices was reported in the facility. - The facility communicates the Business Ethic requirements covering bribery, corruption to the business partners for understanding and implementation. - Supplier evaluation & selection against its Business Practice Policy was conducted prior to signing contract with suppliers. Evidence examined: - Business ethic and Anti-bribery policy– No.08/2025/CS-TGD. Dated 02/01/2025 - Grievance policy - Mail box records - Management and worker interview - Training document

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	During the documentary review and management interview, it was noted that the site did not have any certified anti-bribery Management Systems.

Attachments

Photo Form.pdf

For more information visit https://www.sedex.com