SMETA
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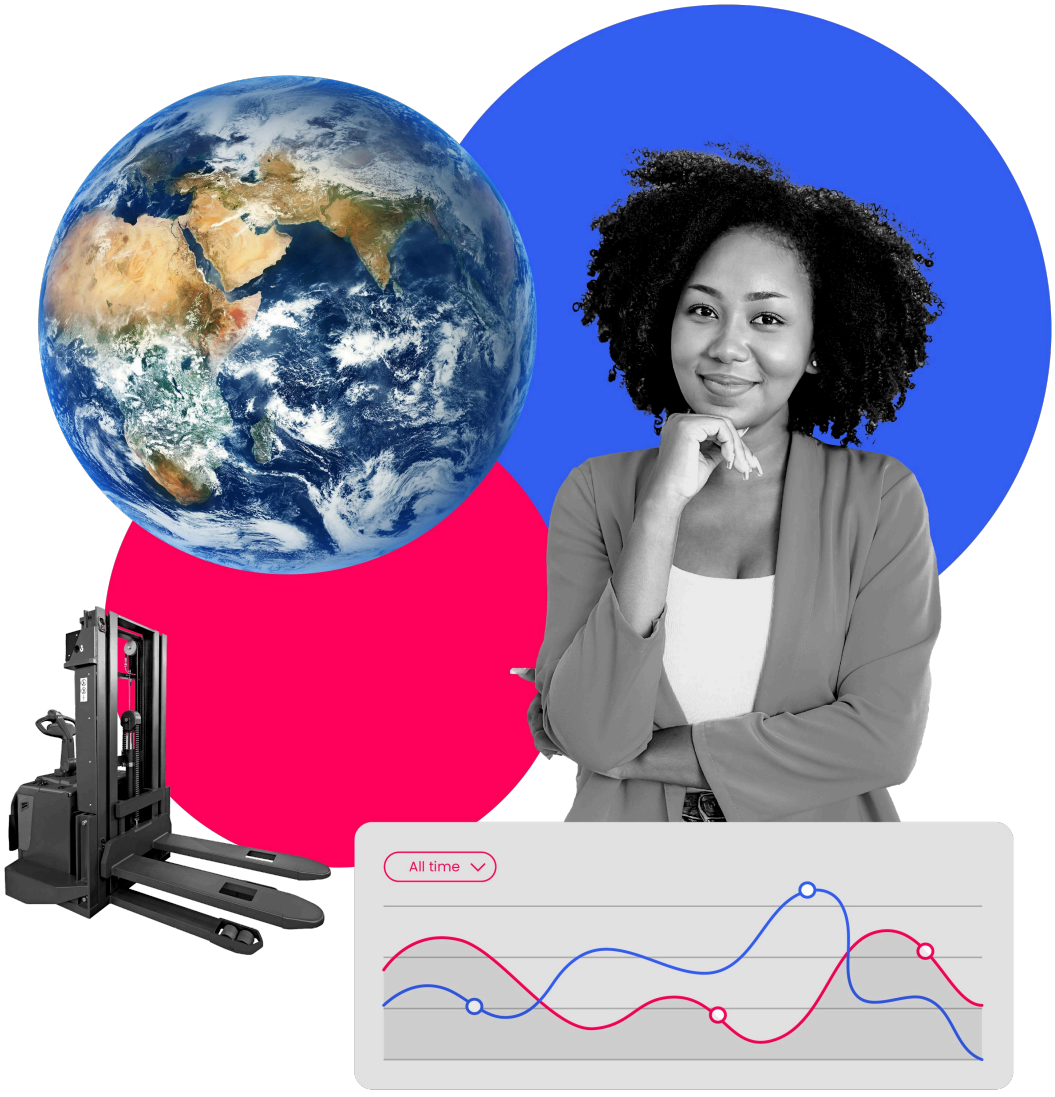
Sedex Members Ethical Trade Audit Report

Version 7



Sedex, 18 St Swithin's Lane, London, EC4N 8AD, United Kingdom

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- 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

10.A. Environment 2-Pillar

Attachments

Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and 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 code areas below.

2-pillar audits include:

- Labour standards:
  - 0. Enabling accurate assessment
  - 1. Employment is freely chosen
  - 1.A. Responsible recruitment and 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
- Health and safety:
  - 3. Working conditions are safe and hygienic
- Environment:
  - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
  - 10.B. Environment 4-pillar
- Business ethics:
  - 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.

← Contents

Findings →

Audit details

Site details

Sedex site reference	ZS1000037713	**Site name**	Fashion Mania LTD
Business name	Fashion Mania LTD	**Site address**	Grenaderska 116 Pleven BG 5800

Audit details

Sedex company reference	ZC5000032212	**Auditor company name**	Intertek Bulgaria
Audit company address	24 A Acad. Metodi Popov Str., Sofia, Sofia, BG, 1113		
Date of audit	2026-05-18	**Audit conducted by**	Svetlana Slavova
Audit pillars	Labour Standards | Health and safety		
Time in and out	Day 1 In 08:30 Out 17:00		
Audit type	Periodic		
Was the audit announced?	Semi announced		
Was the Sedex SAQ available for review?	Yes		

← Contents

Findings →

Who signed and agreed CAPR?	Nadhezda Gencheva / General Manager
Any conflicting information SAQ/Pre-Audit Info	No
Is further information available?	No

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	No	Yes	No
Reason for absence at the opening meeting	There is no Trade Union in place.		
Reason for absence during the audit	There is no Trade Union in place.		
Reason for absence at the closing meeting	There is no Trade Union in place.		

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Findings →

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)	- WP 14/05/2026-14/06/2026

Lead auditor	Svetlana Slavova	**APSCA Number**	21701291
Additional auditor			
Date of declaration	2026-05-18		

← Contents

Findings →

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	Nadhezda Gencheva
Title	General Manager
Date of declaration	2026-05-18

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Findings →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
5. Legal wages are paid	5.A Ensure that all workers (including non-em...		GE ZAF601452454
	5.E Ensure workers are renumerated for all ti...		GE ZAF601452453

← Contents

Management systems →

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

← Summary of findings

Site details →

	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	✓	✓	✓	ⓘ

✕ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

← Summary of findings

Site details →

Site details

Company and site details

Sedex company reference	ZC5000032212	
Sedex site reference	ZS1000037713	
Company name	Fashion Mania LTD	
Business ownership type	GOODS	
Site name	Fashion Mania LTD	
Site name in local language	ФЕШЪН МАНИЯ ООД	
GPS location	**GPS address**	116 Grenaderska str., Pleven 5800, Bulgaria
	Coordinates	43.4181101; 24.6287521
Is the worksite in a remote location, far from habitation?	No	
Site contact	**Contact name**	Nadezhda Gencheva
	Job title	General Manager
	Phone number	+359879395282
	Email	factory@fashionmanialtd.com
Applicable business and other legally required business license numbers and documents	- Company registration 1197/2003, dated 17/12/2003, Pleven district court - Structural evaluation/permit by DNSK-Pleven 96 dated 08/08/2017 - Contract for the supply of steam for production needs, HEATING Pleven, 14/01/2026 - Contract for security services, TOREADOR GARD-PLEVEN, 03/01/2026	

← Management systems

Worker analysis →

Site activities

Site function	Factory Processing/Manufacturer Finished Product Supplier	
Site activities	**Primary**	Manufacture of knitted and crocheted fabrics
	Secondary	
	Other	
Product type	Garment manufacture	
Process overview	Production processes – incoming materials quality control, knitting, sewing, linking, washing, ironing, quality control, packing	
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?	1000m²	
Building 1	**Last construction works on site**	2017
	If building is shared, provide details	The building is own, not shared.
	Number of floors	2
	Description of floor activities	production building and warehouse, administrative offices

← Site details

Worker analysis →

Site scope

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 No transportation is provided. The facility is located in city of Pleven, Well organized public transport is available.

Work patterns

Approximate workers on site per month (% of peak)	**January**	90-100%	**February**	90-100%
	March	90-100%	**April**	90-100%
	May	90-100%	**June**	90-100%
	July	90-100%	**August**	90-100%
	September	90-100%	**October**	90-100%
	November	90-100%	**December**	90-100%

← Site details

Worker analysis →

Work patterns

Is there any night shift work at the site?	Yes The night shifts are applicable only for knitting department. 8:00-17:00 – administrative staff, maintenance staff, part of production staff – sewing, ironing, packing, quality control – 1 hour lunch break, 2x15 minutes breaks knitting department: 1st shift – 06:00-15:00 – 1 hour lunch break, 2x15 minutes breaks 13:00-22:00 – 1 hour lunch break, 2x15 minutes breaks 22:00-06:00 – 1 hour lunch break, 2x15 minutes breaks
What night shift audit activities were conducted?	Interviews conducted during day shift (rotated workers) Documents reviewed in the sample
What percentage of the workforce, including temporary and agency workers, work during the night shift?	20%
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 Workers from all shifts and departments were included in the sample and interviews.

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	Other certification GRS and RAF certification
Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	No The site has been not assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.

← Site details

Worker analysis →

Site assessments

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	No There has been not a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site.

← Site details

Worker analysis →

Worker analysis

Gender disaggregated data available	Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	16 *(19.3%)*	67 *(80.7%)*	- -	83 *(100%)*

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	16 *(19.3%)*	67 *(80.7%)*	- -	83 *(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	0 -	0 -	- -	0 *(0%)*
Informal workers including home workers	0 -	0 -	- -	0 *(0%)*
Apprentices, trainees or interns	0 -	0 -	- -	0 *(0%)*

* % of total workforce

← Site details

Worker interviews →

Migrant workers

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

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from	Not applicable.

Workers by age

	Men	Women	Other	Total
18 - 24 years old	1 *(100%)*	0 *(0%)*	- -	1 *(1.2%)*
15 - 17 years old	0 -	0 -	- -	0 *(0%)*
Under 15 years old	0 -	0 -	- -	0 *(0%)*

* % of total workforce

← Worker analysis

Worker interviews →

Is the worker analysis data relevant for peak season and current to the audit?	Yes
Please list the nationalities of all workers, with the three most common nationalities listed first	Bulgarian

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Bulgarian	19%	81%	-	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	16	*(19.3%)*	67	*(80.7%)*	-	-	83	*(100%)*

* % of total workforce

← Worker analysis

Worker interviews →

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 *(0%)*
Paid weekly	0 -	0 -	- -	0 *(0%)*
Paid monthly	16 *(19.3%)*	67 *(80.7%)*	- -	83 *(100%)*
Other	0 -	0 -	- -	0 *(0%)*

* % of total workforce

If other payment cycle entered, please provide details	Not applicable.

People in managerial, supervisorial and administrative roles

	Men	Women	Other	Total
Employees in management positions	3 *(42.9%)*	4 *(57.1%)*	- -	7
Supervisors or team leaders	0 *(0%)*	4 *(100%)*	- -	4
Administrative staff	2 *(40%)*	3 *(60%)*	- -	5

← Worker analysis

Worker interviews →

Worker interview summary

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

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?	
Was the interview sample representative of all types of nationality and employment types of workers?	Yes
Was the interview sample representative of the gender composition of the workforce?	Yes
Number and size of group interviews	1 group of 5 workers
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

← Worker analysis

Measuring workplace impact →

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.
What did the workers like the most about working at this site?	Communication (e.g. from management) Contracts Equal opportunities Facilities (e.g. rest area, recreation, canteen) Freedom of movement Grievance mechanisms Hours worked, rest days or breaks Work atmosphere (e.g. treatment by supervisors) Work environment – comfort (e.g. temperature, noise or dust levels)
Additional comments	Calm working environment, respectful relationships with management and supervisors, timely payment of salaries. Stability of the company.
Attitude of workers' committee/union representatives	- Worker representative was interviewed individually. - No complaints were reported.
Attitude of managers	- Management and administration were well prepared for the audit and available during the whole audit. - They were very supportive and open during the audit process. - Full access to all premises and documentation was allowed. - Pictures were taken with management permission. - All questions were discussed and cleared. - No bribery or misleading attempts on management side occurred.

← Worker analysis

Measuring workplace impact →

Workers interviewed by type

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

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	0	5	-	5
Workers interviewed individually	2	3	-	5

← Worker analysis

Measuring workplace impact →

Migrant workers interviewed

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

← Worker interviews

Measuring workplace impact →

Measuring workplace impact

Gender disaggregated data available	Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	2.91%	0.97%	-	3.88%
Last full calendar year (2025)	5.3%	2.17%	-	7.47%
Previous full calendar year (2024)	7.5%	22.5%	-	30.0%

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

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	1.66%	11.65%	-	13.31%
Last full calendar year (2025)	2.24%	15.7%	-	17.94%
Previous full calendar year (2024)	2.36%	16.54%	-	18.9%

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

Are accidents recorded?	Yes
	Injury log

← Worker interviews

Code area 0 →

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

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	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 (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	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 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%

← Worker interviews

Code area 0 →

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

Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

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

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

← Measuring workplace impact

Code area 0 →

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Measuring workplace impact

Code area 1 →

Systems and evidence examined to validate this code section	Current systems: - FASHION MANIA Ltd is a private company registered in Bulgaria -The facility management was well prepared for the audit and fully transparent. -Access to all facility premises/ locations was granted. All requested documentation was timely presented and supported with explanations when needed. - Photo permission was granted. - No misleading or bribery attempts occurred during the audit. - The facility has implemented and adheres to the principles outlined in its internal policies and procedures (covering human rights, child labor and young workers, FOA, safe working environment, regular working time, etc.) which is part of the Social Responsibility system in place. The facility has a suggestion box installed, where any kind of grievances be can reportedp including such on breaches of human rights. - The policies are endorsed by the Manager. - The facility has a designated person for implementing standards concerning Human rights and the facility HR Manager, who is also overseeing the overall social accountability standards of the company. - Facility has all legally required certificates and licenses Evidence examined: - Company registration Decision 1197 dated 17/12/2003 - Social responsibility Management declaration - Production structure - Human Rights policy dated 21/03/2017 - Human rights responsible person, Order 110, 14/07/2024 - Social Compliance Policy dated 21/03/2017 - Anti-discrimination policy dated 22/04/2019 - Human rights policy, freedom of association and the right to collective bargaining - Personal data protection policy - Personal data protection team – Order 109/03.07.2024 - Personnel training and development policy - Internal Rules dated 07/08/2019, last revision 01/06/2025 - H&S company policy - Policy on the prohibition of forced, compulsory labor and disciplinary measures - Leave Use Policy - Wage Calculation rules dated 05/01/2026 - Policy of wages and working hours - Emergency Preparedness Policy and Procedures - Policy of Energy Management dated 10/04/2018 - Environmental safety policy dated 22/04/2019 - Plan of energy intensity reducing - Plan of water resource optimization

← Measuring workplace impact

Code area 1 →

- Decarbonization and sustainability plan 2025-2028
- Program of environmental performance improvement
- Environmental assessment by "Labora-2006"
- Waste disposal plan and practices

← Measuring workplace impact

Code area 1 →

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 any external stakeholders such as consultants, customer representatives, industry experts etc. present during the audit?	No

← Code area 0

Code area 1 →

1. Employment is freely chosen

Management systems

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

← Code area 0

Code area 1.A →

Management systems

Explanation for management systems grades	1) Policies & Procedures: Grade: Robust The facility had elaborated and implemented a Human Rights policy, Social compliance policy, Hiring procedure and policy, stressing on all fundamental human rights, including Freely chosen employment. The whole process - from identifying the need for hiring new employees up to finishing the hiring process is regulated in the Internal Rulebook, Personal data protection policy, Hiring procedure. 2) Resource Grade: Robust The Manager of the facility, HR Manager and CSR responsible are responsible for overseeing compliance and implementation of all facility policies in the area of social responsibility, covering: human rights, child labor, forced labor, discrimination, FOA, work environment, wages, overtime, working hours, anti-corruption. The implementation of the Internal Rules is the responsibility of the HR Manager, Manager of the facility and CSR responsible. 3) Communication & Training: Grade: Robust Facility has an annual training plan covering all necessary initial and periodical training that have to be conducted - qualification ones, soft-skills ones, on policies and procedures. All new facility employees undergo induction training to acquaint them not only with the job-related information but also with all facility policies and procedures. 4) Monitoring: Grade: Some Improvements Recommended Monitoring is carried out in an operational manner, as confirmed by the facility CSR officer and company Manager. Regular internal audits will be planned and documented. Periodic Management review according to the policies and procedures developed and implemented in accordance with SMETA and Social responsibility requirements will be planned and documented.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

← Code area 0

Code area 1.A →

← Code area 0

Code area 1.A →

Systems and evidence examined to validate this code section	Systems: - Facility has own Social compliance system, adopted and follows the ETI Base Code, which prohibits child labour, and forced, bonded, or involuntary prison labour. - Internal Hiring Procedure clearly states that employment is freely chosen and that no forced or involuntary labour is allowed. - No cases of forced labour, human trafficking, debt bondage or bonded labour or any other form of modern slavery observed during the site tour or reported during the interviews. - Facility does not use an agency for hiring employees but hires them directly, seeking recommendation from other workers. - Applicants have to present their ID cards upon employment, therefore age is verified. - Individual labour contracts comply with the Bulgarian Labour Law. - Workers are selected, based on their professional qualification, skills and experience. - All employees have introductory interviews, prior to starting work. -All workers have signed individual labour contracts for employment. - Workers resign with 1-month notice. - There is designated Internal Rules and manual presented. - The facility's Internal Rules, hiring procedure and relevant policies include articles on prohibition of forced labor and prison labor, discrimination and emotional or sexual harassment. - The HR responsible manager regularly check all personnel files, to guarantee that no personal documents are kept. - No loans are given to employees. This was also confirmed during the interviews. - As per workers interviews, there is no forced labor, no deposits or withheld personal documents. - All employees' files contain job description, signed individual labor contract and other documents, as required by the law. - Employees are free to leave the facility upon the end of the working day. Evidence examined: - Human Rights policy dated 21/03/2017 - Human rights responsible person, Order 110, 14/07/2024 - Social Compliance Policy dated 21/03/2017 - Anti-discrimination policy dated 22/04/2019 - Human rights policy, freedom of association and the right to collective bargaining - Personal data protection policy - Personal data protection team – Order 109,03/07/2024 - Personnel training and development policy - Internal Rules dated 07/08/2019, last revision 01/06/2025 - Policy on the prohibition of forced, compulsory labor and disciplinary measures

← Code area 0

Code area 1.A →

- Social compliance system training with protocols
- Hiring procedure
- Management and workers interviews

← Code area 0

Code area 1.A →

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

← Code area 1

Code area 1.A →

1.A. Responsible recruitment and entitlement to work

Management systems

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

← Code area 1

Code area 2 →

Management systems

Explanation for management systems grades	1) Policies & Procedures: Grade: Robust The facility had elaborated and implemented Social Compliance Policy, Human rights policy and Internal labor rules, stressing on all fundamental human rights, including Freely chosen employment. The whole process - from identifying the need for hiring new employees up to finishing the hiring process is regulated in the Internal Rulebook. All workers are direct recruited and hired by the facility. No agency are used. 2) Resource Grade: Robust The Manager of the facility and HR Manager are responsible for overseeing compliance and implementation of all facility policies in the area of social responsibility, covering: human rights, child labor, forced labor, discrimination, FOA, work environment, wages, overtime, working hours, anti-corruption. The implementation of the Internal Rules is the responsibility of the HR Manager, Human rights responsible person and Manager of the facility. 3) Communication & Training: Grade: Robust Facility has an annual training plan covering all necessary initial and periodical training that have to be conducted - qualification ones, soft-skills ones, on policies and procedures. All new facility employees undergo induction training to acquaint them not only with the job-related information but also with all facility policies and procedures. 4) Monitoring: Grade: Some Improvements Recommended Monitoring is carried out in an operational manner, as confirmed by the facility CSR officer and facility Manager. Regular internal audits will be planned and documented. Periodic Management review according to the policies and procedures developed and implemented in accordance with SMETA and Social responsibility requirements will be planned and documented.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

← Code area 1

Code area 2 →

Systems and evidence examined to validate this code section	System: - The recruitment process is fair, transparent and sufficiently documented. - From the sample checked of 10 employees, all of them had signed individual permanent labor contracts and annexes upon changes in conditions. - During interviews all confirmed that they have copies of their contracts. - Contracts clearly state duration, probation period, leave notice period, wage, working hours. - Probation period is set in the contract and compliance with local law and leave notice period is 1 month for both sides. - All contracts are accompanied by Terms of reference. - No apprentices or trainees at the facility. - There are no migrant workers employed in the facility. - All workers are hired directly, meaning no employment agencies are used. - Facility management is aware that in case agencies are used those should be monitored for social compliance and accountability, and no any fees should be imposed. - Contracts are with fixed monthly salaries – no piece rates are used. - All contracts are noted signed and valid. Evidence examined: - Social responsibility Management declaration - Human Rights policy dated 21/03/2017 - Human rights responsible person, Order 110, 14/07/2024 - Social Compliance Policy dated 21/03/2017 - Anti-discrimination policy dated 22/04/2019 - Human rights policy, freedom of association and the right to collective bargaining - Personal data protection policy - Personal data protection team – Order 109/03.07.2024 - Internal Rules dated 07/08/2019, last revision 01/06/2025 - Policy on the prohibition of forced, compulsory labor and disciplinary measures - Social compliance system training with protocols - Hiring procedure - management and workers interviews

← Code area 1

Code area 2 →

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 (excluding 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

← Code area 1.A

Code area 2 →

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

Recruitment fees

Have any workers who started at this site in the last 12 months (new workers) paid any recruitment fees or associated costs, such as visas or travel, which have not been fully repaid?	No - all new workers were recruited locally by the site
Select 1 to 3 sending countries/regions of new workers. Record fees and costs in the following tables.	Bulgaria

New workers totals

	Bulgaria
Number of workers	20

Recruitment fees

	Bulgaria
Payments made in exchange for work	-
Recruitment services which are not optional	-
Other or uncategorised	-

← Code area 1.A

Code area 2 →

Related costs

	Bulgaria
Medical costs	-
Insurance costs	-
Skills and qualification tests	-
Training and orientation	-
Equipment costs	-
Travel costs	-
Accommodation costs	-
Administrative costs	-
Other or uncategorised	-

Illegitimate costs

	Bulgaria
Payments made to illegitimate actors involved in the recruitment process	-
Payments made to illegitimate actors during the course of employment	-
Other or uncategorised	-

← Code area 1.A

Code area 2 →

Was any worker in this group in debt as a result of these costs?

	Bulgaria
Yes - to a recruiter	-
Yes - to the audited site	-
Yes - to a third party	-
No - could not verify	✓

Highest total costs incurred

	Bulgaria
Currency	EUR
Highest total costs incurred	0.0
Additional comments	No additional comments

← Code area 1.A

Code area 2 →

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	Some Improvements Recommended

← Code area 1.A

Code area 3 →

Management systems

Explanation for management systems grades	1) Policies & Procedures: Grade: Robust The facility had elaborated and implemented Social Compliance Policy, Human rights policy, freedom of association and the right to collective bargaining and Internal labor rules, stressing on all fundamental human rights, including freedom of association and rights to CBA. 2) Resource Grade: Robust The Manager of the facility and CSR officer are responsible for overseeing compliance and implementation of all facility policies in the area of social responsibility, covering human right and FOA. The implementation of the Internal Rules is responsibility of the Manager of the facility and CSR officer. 3) Communication & Training: Grade: Robust Facility has an annual training plan covering all necessary initial and periodical trainings that have to be conducted - qualification ones, soft-skills ones, on policies and procedures. All new facility employees undergo induction training acquainting them not only with the job related information but also with all facility policies and procedures. 4) Monitoring: Grade: Some Improvements Recommended Monitoring is carried out in an operational manner, as confirmed by the facility Manager and CSR officer. Regular internal audits will be planned and documented. Periodic Management review according to the policies and procedures developed and implemented in accordance with SMETA and Social responsibility requirements will be planned and documented.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Code area 1.A

Code area 3 →

Systems and evidence examined to validate this code section	Current Systems: - There is no trade union and no collective bargaining agreement; also, this is not a legal requirement. - During the interviews, workers stated that they feel free to join a union if and whenever interested in such representation. - There are 3 Workers' Representatives in the facility, freely elected by the workers and part of the joint management-workers committees, required by Bulgarian HSE law, who deal with all occurrences, related to workers' rights in the facility. - The purpose of such committee is to participate in the resolution of labour, health and safety, and social activities. - Worker representatives were freely elected among all workers. The one representative, who was interviewed during the audit, conducts monthly meetings with the workers. - All related information is visible on the main notice board within the facilities' premises. - During the workers interviews it was confirmed that the Worker Representative system is effective and appreciated. - There is a Compliance and grievance procedure and mechanism which prescribes how complaints are noted and handled in the manufacturing unit. - Responsible person for the grievance process is the relevant HR manager together with the workers' representatives in place. - During the audit it was concluded that the employees' representatives are treated with respect by the management and there is no interference in performing their activities. Evidence examined: - Human rights policy, freedom of association and the right to collective bargaining - Order 122,07/01/2025 – H&S Committee establishment – 6 people (3 workers representative) - H&S Committee meetings – 02/10/2025, 06/04/2026, 02/07/2025 - Management/workers interviews - Workers representative interview

← Code area 1.A

Code area 3 →

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?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are there alternative worker representative bodies in place?	Yes, other (provide details) Workers representatives
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?	Yes

← Code area 2

Code area 3 →

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

← Code area 2

Code area 3 →

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

← Code area 2

Code area 4 →

Management systems

Explanation for management systems grades	1) Policies and procedures: Grade: Robust The facility had elaborated and implemented Social Compliance Policy, H&S policy, Safety instructions, and Internal labor rules. H&S and Fire safety procedures and rules are implemented. The Declaration of Management outlines the general engagement of the facility regarding providing safe and secure work environment and employee well being. The specific policies and procedures are set in different documents like - Risk Assessment of the working positions; Safety Working Instructions; Fire and Emergency Plan; training plans; first aid procedure and instructions. 2) Resource Grade: Robust The Manager of the facility and H&S and FS officer are responsible for overseeing compliance and implementation of all facility policies in the area of social responsibility, covering H&S and Fire safety. The implementation of the Internal Rules, Procedures and Instructions is the responsibility of the H&S and FS officer and the Manager of the facility. The H&S responsible works in cooperation with the external licensed company providing OHS services to the facility. There is also an OHS Committee consisting of workers and management representatives, who also assist the implementation and improvement of the safety practices in the facility. 3) Communication & Training: Grade: Robust Facility has an annual training plan covering all necessary initial and periodical trainings that have to be conducted - qualification ones, soft-skills ones, on policies and procedures. All new facility employees undergo induction training acquainting them not only with the job related information but also with all facility policies and procedures and H&S and Fire safety rules. 4) Monitoring: Grade: Some Improvements Recommended Monitoring is carried out in an operational manner, as confirmed by the facility Manager and CSR officer. Regular internal audits will be planned and documented. Periodic Management review according to the policies and procedures developed and implemented in accordance with SMETA and Social responsibility requirements will be planned and documented.

Summary of findings

← Code area 2

Code area 4 →

Code area	Workplace requirement	Area of NC	Finding

No findings

← Code area 2

Code area 4 →

Systems and evidence examined to validate this code section	Current Systems: - The health and safety system in place, along with the fire safety of the facility are maintained with system approach and continuous monitoring. - Iliana Valcheva, HSE manager and Svetoslav Ivanov, HSE responsible, are managing the Health and safety system and activities. - There is detailed risk assessment that covers buildings, processes and positions, designated appointed HSE service provider “Labora-2006” and regular equipment inspections and maintenance. - Health and safety instructions are posted in close proximity to the machines in the facility, health and safety trainings are regularly conducted for all workers. - Machine safety checks are conducted regularly by licensed mechanic, the facility has a dedicated machine maintenance schedule. - Fire safety is well organized along with the firefighting equipment checks as there are fire extinguishers of different types, fire hose reels, centralized fire alarm system with both smoke detectors and panic buttons, effective fire safety plan and procedures. - Fire drills are conducted every year for all employees. - All workers of all positions are trained and provided with required PPE (earplugs, gloves and goggles for designated processes). - All used machines are observed properly safeguarded. - Emergency evacuation plan is in place and posted next to each emergency exit. - Fire safety plan is implemented. - Emergency response team (6 members) is assigned for fire rescue action and evacuation. - First aid training program is implemented, there are workers designated and trained for first aid assistance. - There are sufficient and well-supplied first aid kits in all production and warehousing premises. - Risk assessment of the workplace is prepared and updated by “Labora-2006”, licensed Occupational Health services provider on 29/05/2024. - All required measurements were timely performed. - There are adopted procedures for coping with emergency situations like fire, earthquake, flood or air attack. - Facility has procedures for health and safety training of the workers. - Periodic occupational health examinations are conducted for relevant positions. - Periodic HSE training took place for all employees - There is implemented procedure for control and maintenance of the equipment and machinery in place. - Injury log is maintained, no recent injuries occurred. - The firefighting equipment is inspected by licensed external company “Zhar” (fire extinguishers and fire hose reels) and "Berkut" (fire alarm) regularly, and inspection protocols are maintained.

← Code area 2

Code area 4 →

- Potable water is available in the facility, and periodically checked by licensed laboratory.
- Employees have access to clean toilets and lockers.
- The electricity system in the facility is maintained regularly and by licensed electricians from "ABV Project".
- Switchboards are locked and secured.
- The special equipment in place (elevator and compressor) is agreed for maintenance under service contract with licensed service providers. Registry books for all special equipment are timely completed.
- Overall, there chemicals processed in washing department and approved and safe, also general cleaning materials are handled safely.
- There is dining area, provided for all employees, supplied with kitchen amenities.

Evidence examined:
- H&S company policy
- Emergency Preparedness Policy and Procedures
- Procedure in case of an accident at work
- Morbidity analysis, issued by “Labora-2006”
- Internal fire protection Rules and emergency plan
- List of fire extinguishers
- Order 21, 07/08/2019 – ear protectors using
- Order 133, 24/04/2026 – first aid training – 4 people
- First aid training protocol, 148,27/04/2026, issued by LABORA-2006 Ltd
- Order 134, 12/05/2026 – periodic medical checks – 04-05/06/2026
- Order 122,07/01/2025 – H&S Committee establishment – 6 people (3 workers representative)
- H&S Committee meetings – 02/10/2025, 06/04/2026, 02/07/2025
- Fire drill order #132,06/04/2026
- Fire drill protocol, 09/04/2026
- Order for periodic measurements #130, 129,10/09/2025
- Order 3, 19/03/2018 – smoking forbidden
- Order 112, 09/09/2024 – responsible person of H&S briefings
- Order 111, 09.09.2024 - type of H&S briefings
- Order 131/09/01/2026 - Commission for Employment for People with Disabilities and Reduced Ability to Work – 6 members – 8 workplaces
- Fire certificate of the firefighting equipment and periodical inspection: Zhar” licensed service provider
- Fire alarm last inspection by "Berkut" licensed service provider
- HSE Training program with planned activities and testing for year 2025 and 2026
- Last periodic HSE training for all employees took place in April 2026
- Elevator check protocol by "Astroy Montage" dated 01/02/2026
- Diary for turning off electricity supply in a sewing workshop, daily records

← Code area 2

Code area 4 →

- Medical exam for the relevant workers by "Labora-2006" health services providers, yearly
- Risk assessment of the workplace, performed by “Labora-2006”, update issued on 29/05/2024
- Contract with LABORA-2006 (labor medical service), 29/05/2025
- An Injury log is available at the facility, registered with the local authorities.
- Workplace occupational factors testing for microclimate, performed by “ProControl” licensed laboratory (microclimate, noise, lighting, chemical residue and dust, electrical system, lightning protection, insulation resistance)
- Site tour and management and workers’ interviews

← Code area 2

Code area 4 →

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	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?	Yes Structural evaluation/permit by DNSK-Pleven 96 dated 08/08/2017
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

← Code area 3

Code area 4 →

Does the site have a structural engineer evaluation?	Yes

← Code area 3

Code area 4 →

4. Child labour shall not be used

Management systems

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

← Code area 3

Code area 5 →

Management systems

Explanation for management systems grades	1) Policies & Procedures: Grade: Robust The facility had elaborated Internal labor rules and Social Compliance Policy, Child labor procedure and Social protection of young workers procedure stressing on all fundamental human rights, including prohibition for child labor. 2) Resource Grade: Robust The Manager of the facility, CSR officer and HR/accounting office are responsible for overseeing compliance and implementation of all facility policies in the area of social responsibility, covering: human rights and child labour. The implementation of the Internal Rules is responsibility of the HR/accounting office, CSR officer and Manager of the facility. 3) Communication & Training: Grade: Robust Facility has an annual training plan covering all necessary initial and periodical trainings that have to be conducted - qualification ones, soft-skills ones, on policies and procedures. All new facility employees undergo induction training acquainting them not only with the job related information but also with all facility policies and procedures. 4) Monitoring: Grade: Some Improvements Recommended Monitoring is carried out in an operational manner, as confirmed by the facility CSR officer and facility Manager. Regular internal audits will be planned and documented. Periodic Management review according to the policies and procedures developed and implemented in accordance with SMETA and Social responsibility requirements will be planned and documented.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Code area 3

Code area 5 →

Systems and evidence examined to validate this code section	Current Systems: - Facility's hiring system is part of the Internal Rules and HR and legislation compliance system. - There is designated Social compliance policy which forbids the use of child labour and includes a remediation part. All employees are hired directly. - Facility uses internal announcement of the job position. - Most of the interviewed employees stated that they have read there are open positions and applied. - Employees have to present their ID cards upon hire so that their age is verified. - Main criteria for recruitment are relevant education and experience. - The facility verifies all workers' original ID cards at the time of recruitment. - In Bulgaria the minimum age for starting work is 18 years old or 16 years old with restrictions. - The facility does not hire workers below 18 years old. - The youngest employee in the facility currently is 22 years of age; hired in February 2024. - Also, facility had adopted and posted the ETI Base Code and adheres to its requirements on child labour. - No young-looking employees observed during the site tour. Evidence examined: - Internal Rules dated 07/08/2019, last revision 01/06/2025 - Child labor procedure - Social protection of young workers - Social compliance Policy dated 21/03/2017 - Social protection of young workers - Declaration of management - Posted ETI Base Code - Employees' personnel files for 10 workers - Interviews with employees - Management interview

← Code area 3

Code area 5 →

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	1%
Enter the legal age of employment	18
Enter the age of the youngest worker identified	22
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

← Code area 4

Code area 5 →

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

← Code area 4

Code area 5.A →

Management systems

Explanation for management systems grades	1) Policies and procedures: Grade: Robust The Internal Wage Calculation rules regulates the rules regarding the wages in the facility. The document defines the basic gross wages. The individual wages are set in the labour contracts. They also contain information on the pay dates. Such information is also included in the Wage Calculation rules. Analysis of living wages was done. There is a plan in place to improve wages (with a living wage as a goal). 2) Resource Grade: Robust The Manager of the facility, CSR officer and HR and accounting office are responsible for overseeing compliance and implementation of all facility policies in the area of social responsibility, covering wages, overtime and working hours. The implementation of the Internal Rules is responsibility of the HR and accounting office, CSR officer and Manager of the facility. 3) Communication & Training: Grade: Robust Facility has an annual training plan covering all necessary initial and periodical trainings that have to be conducted - qualification ones, soft-skills ones, on policies and procedures. All new facility employees undergo induction training acquainting them not only with the job related information but also with all facility policies and procedures. 4) Monitoring: Grade: Some Improvements Recommended Monitoring is carried out in an operational manner, as confirmed by the facility CSR officer. Regular internal audits will be planned and documented. Periodic Management review according to the policies and procedures developed and implemented in accordance with SMETA and Social responsibility requirements will be planned and documented.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
5. Legal wages are paid	5.A Ensure that all workers (including non-em...		GE ZAF601452454
	5.E Ensure workers are renumerated for all ti...		GE ZAF601452453

← Code area 4

Code area 5.A →

← Code area 4

Code area 5.A →

Systems and evidence examined to validate this code section	Current Systems: - Wages are paid regularly via bank transfer on the 15th day of the month for the previous month. - As of 01 January 2026, the Republic of Bulgaria have adopted EUR as a national currency, instead of Bulgaria Leva (BGN). All salaries are recalculated on a fixed rate: 1 EUR = 1.95583 BGN. - Noted wages overcome or meet legal minimum wage in Bulgaria (1077 BGN /month gross in 2025 and 620.20 Euro/month gross in 2026 year). Minimum legal wage has been increased to EUR 620.20 as of 01 Jan 2026. - There is added experience allowance. - Night work is properly paid, as 1.20 euro/hour. - Internal Rules and Wage Calculation policy prescribe strict team and individual performance bonus system, designed and given to all operators, last updated in January 2026. - There is no overtime work needed by now, no busy months and no production demand in the last 12 months were noted. - The months in sample are: April 2026 (last paid month), December 2025 (random month) and August 2025 (peak month). - All sampled workers were observed with valid signed labor contracts which carry all lawfully required requisites: wage and working days, paid leave, notice period, etc. - All legally required taxes, social/ pension securities are transferred to the National Revenue Agency on a monthly basis. - No original documents found in the employee's files. - Registration of the contracts with the Employment Agency was done and reports included in the files. - No illegal deductions observed or reported. No deductions from wages are made as punishment (disciplinary measures). - This was confirmed during workers interviews and this is also forbidden by the Bulgarian Labor Code. - Each month employees receive detailed pay slips. All interviewed employees confirmed that they know how to read and understand their pay slips. - No discrepancies between the time records and the pay slips were observed. Evidence examined: - Workers payroll records for April 2026 (last paid month), December 2025 (random month) and August 2025 (peak month) for 10 workers - Wage Calculation policy dated January 2026 - Policy of wages and working hours - Internal Rules dated 07/08/2019, last revision 01/06/2025 - Hiring procedure - Procedure work and working hours, wages and compensation - Order regarding transportation costs, 21, 06/08/2019 - Management and workers interviews

← Code area 4

Code area 5.A →

Findings: good examples

ZAF601452454

Good example

Code area

5 Legal wages are paid

Workplace requirement

5.A Ensure that all workers (including non-employee workers) are paid at least the legal minimum wage or legally recognised collective bargaining agreement (CBA) where one exists, whichever is higher.

Description

The facility paid 1.2 euro per hour which is higher than law requirements.

ZAF601452453

Good example

Code area

5 Legal wages are paid

Workplace requirement

5.E Ensure workers are renumerated for all time worked, including meetings and essential training. Meetings and essential training shall take place at no cost to the worker and during remunerated working hours.

Description

The facility provides stimulus bonus to all employees based on performance. Also transportation expenses are reimbursed to workers living outside the city of Pleven (bus card cost reimbursement).

← Code area 5

Code area 5.A →

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	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?	Between 1 and 10%
Where the site has undertaken a Living Wage gap analysis against a credible Benchmark which Benchmark have they used?	WageIndicator Typical Family Methodology

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

← Code area 5

Code area 5.A →

Maximum legal working hours	**Max hours per day**	8.0
	Max hours per week	40.0
	Max hours per month	184.0
Actual required working hours	**Required hours per day**	8.0
	Required hours per week	40.0
	Required hours per month	184.0
Maximum legal overtime hours	**Max hours per day**	6.0
	Max hours per week	6.0
	Max hours per month	30.0
Actual overtime hours	**Max hours per day**	0.0
	Max hours per week	0.0
	Max hours per month	0.0
Minimum legal wage	**Min per hour**	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	620.2
Actual minimum wage	**Actual per hour**	3.74
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	620.2

← Code area 5

Code area 5.A →

Minimum legal overtime wage	**Min per hour**	5.61
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	**Actual per hour**	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	30
Provide the date and details of the records	10 sampled workers sampled months: April 2026 last paid month December 2025 random month August 2025 peak month
Are there different legal minimum/ legally recognised CBAs wage grades?	No
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Meets legal minimum
Indicate the breakdown of workforce per earnings	minimum legal wage - 40% of sampled workers above legal minimum - 60% of sampled workers

← Code area 5

Code area 5.A →

Are there any bonus schemes used?	Yes - performance bonus
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

← Code area 5

Code area 5.A →

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Systems: - The analysis of living wage have been prepared - The WageIndicator Typical Family Methodology have been applied - It has been found that the Standard of Living wage has been met. - It was calculated living wage for Pleven region 650 euro per month. - The minimum base salary in the company is 620,20 euro, but the real remuneration includes additional payments for night work, long-term work in the company and performance bonuses, and the salary exceeds the living wage. - Wage improvement plan for the year 2026 is under development. Evidence examined: - Analysis of Living wage - Procedure work and working hours, wages and compensation - Order regarding transportation costs, 21, 06/08/2019 - Workers payroll records for April 2026 (last paid month), December 2025 (random month) and August 2025 (peak month) for 10 workers - Wage Calculation rules dated 05/01/2026 - Policy of wages and working hours - Internal Rules dated 07/08/2019, last revision 01/06/2025 - Hiring procedure - Annual leave use Policy - Management and workers interviews

← Code area 5

Code area 6 →

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	Some Improvements Recommended

← Code area 5.A

Code area 7 →

Management systems

Explanation for management systems grades	1) Policies and procedures: Grade: Robust The main document regulating the working time; daily and weekly breaks; annual paid leave; unpaid leave are the Internal Rulebook which is a legally required document and Policy of wages and working hours. Summarized working hours calculation and Procedure work and working hours, wages and compensation are implemented. Also, this information is included in the individual labour contracts. 2) Resource Grade: Robust The Manager of the facility, CSR officer and HR and accounting office are responsible for overseeing compliance and implementation of all facility policies in the area of social responsibility, covering wages, overtime, working hours. The implementation of the Internal Rules is responsibility of the CSR officer and Manager of the facility. 3) Communication & Training: Grade: Robust Facility has an annual training plan covering all necessary initial and periodical trainings that have to be conducted - qualification ones, soft-skills ones, on policies and procedures. All new facility employees undergo induction training acquainting them not only with the job related information but also with all facility policies and procedures. 4) Monitoring: Grade: Some Improvements Recommended Monitoring is carried out in an operational manner, as confirmed by the facility Manager and CSR officer. Regular internal audits will be planned and documented. Periodic Management review according to the policies and procedures developed and implemented in accordance with SMETA and Social responsibility requirements will be planned and documented.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Code area 5.A

Code area 7 →

Systems and evidence examined to validate this code section	Current Systems: - The facility adopted working hours and rest days are stated in the Internal Rules and posted in the production premises. - The 12-month period of available financial documents for this audit was 01/05/2025 to 30/04/2026. - The factory operates in three alternating shifts for the production employees in knitting process, fourth shift is rest, as first shift: 06:00 to 15:00; second shift: 13:00 to 22:00; and third shift: 22:00 to 06:00. The shift alternates every 2 days. - Operating hours for all other processes and for administration are from 08:00 to 17:00, Monday to Friday. - Summarized working hours calculation is implemented with 1 month period of calculation - There is 1x60 minutes break included in the working time. Standard hours on site are 8 hours per day, 40 hours per week. - Company implemented daily time recording with cards, time in/out records are kept and available for the last 12 months, therefore verification of all hours worked was possible. - During the audit, based on the sampled payroll and time records and workers interviews, it was noted that there is no overtime work, performed in the facility. - All workers are hired on individual labor contracts, stating working hours and wages. - The last peak production months identified were June to August last year. - It was confirmed during workers interviews that overtime work is performed in the range of legal limits, it is voluntary and announced in advance. Evidence examined: - Internal order of summarized working hours calculation, 2026-02-01/23.02.2026 – 1 month period of calculation - Procedure work and working hours, wages and compensation - Internal Rules dated 07/08/2019, last revision 01/06/2025 - List of familiar employees - Policy of wages and working hours - Annual Leave Use Policy - Employees' time records for 10 sampled employees for April 2026 (last paid month), December 2025 (random month) and August 2025 (peak month) - Employees' payroll records for 10 sampled employees for April 2026 (last paid month), December 2025 (random month) and August 2025 (peak month) - Management and workers interviews

← Code area 5.A

Code area 7 →

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?	40.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	40.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	40.0
Maximum number of days worked without a day off in sample	5

← Code area 6

Code area 7 →

7. No discrimination is practiced

Management systems

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

← Code area 6

Code area 8 →

Management systems

Explanation for management systems grades	1) Policies and procedures: Grade: Robust The facility had elaborated and implemented Social Compliance policy, Social responsibility Management declaration, Anti-discrimination policy, Human rights policy, freedom of association and the right to collective bargaining and Internal labor rules, stressing on all fundamental human rights, including anti-discrimination. All employees sign individual labour contract. All employees are permanent and directly hired. 2) Resource Grade: Robust The Manager of the facility, CSR officer and HR are responsible for overseeing compliance and implementation of all facility policies in the area of social responsibility, covering human rights, forced labour and discrimination. The implementation of the Internal Rules is responsibility of the CSR officer and Manager of the facility. 3) Communication & Training: Grade: Robust Facility has an annual training plan covering all necessary initial and periodical trainings that have to be conducted - qualification ones, soft-skills ones, on policies and procedures. All new facility employees undergo induction training acquainting them not only with the job related information but also with all facility policies and procedures. 4) Monitoring: Grade: Some Improvements Recommended Monitoring is carried out in an operational manner, as confirmed by the facility CSR officer. Regular internal audits will be planned and documented. Periodic Management review according to the policies and procedures developed and implemented in accordance with SMETA and Social responsibility requirements will be planned and documented.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

← Code area 6

Code area 8 →

Systems and evidence examined to validate this code section	Current Systems: - Internal Rules, Social compliance system and employment procedures are implemented - The facility adopted and implemented the ETI base code. - The facility follows own Social Compliance policy, and there is designated Policy against Discrimination and Harassment which clearly states that all forms of discrimination are unacceptable and that all employees have equal right regardless of their ethnicity, religion, sex, age or disabilities. - The payment is equal for similar positions, and all employees are hired on the identified monthly salary. - Hiring is always processed directly. Applicants fill in a request and undergo job interview. - Individual work contracts are noted with equal conditions for all facility employees. - No pregnancy tests are required. No questions raised during the initial interviews regarding marital status, religion, sexual orientation or other discriminatory fields. Notice period for terminating the contract is 1 month for both sides. - During the interviews all employees confirmed that the facility is free from any kind of discrimination and that management attitude is positive to all employees. - Training program is accessible for all employees - Bonus system and benefits are applicable for all employees - During the site tour no discriminatory practices were observed. - Employees shared that there is an open door policy adopted, as well as designated Complaints mechanism for anonymously reporting of issues or possible harassment. - During interviews workers shared that they prefer direct communication and would discuss problems comfortably with supervisors or management. - All religious holidays are celebrated accordingly. Evidence examined: - Employment contracts for the sample of 10 workers - Social responsibility Management declaration - Human Rights policy dated 21/03/2017 - Human rights responsible person, Order 110, 14/07/2024 - Social Compliance Policy dated 21/03/2017 - Anti-discrimination policy dated 22/04/2019 - Human rights policy, freedom of association and the right to collective bargaining - Personnel training and development policy - Internal Rules dated 07/08/2019, last revision 01/06/2025 - Posted ETI Base Code - Management and employees' interviews

← Code area 6

Code area 8 →

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)?	9%
Representation of women in managerial roles (ratio of women workers to women managers)	5%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	5%
Three most common nationalities in managerial and supervisory roles	100% Bulgarian

← Code area 7

Code area 8 →

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	Some Improvements Recommended

← Code area 7

Code area 8.A →

Management systems

Explanation for management systems grades	1) Policies & Procedures: Grade: Robust The facility had elaborated and implemented Social Compliance Policy, hiring procedure and Internal labor rules, stressing on all fundamental human rights, including Freely chosen employment and regular legal employment. All workers are directly employed. 2) Resource Grade: Robust The Manager of the facility, CSR officer and HR are responsible for overseeing compliance and implementation of all facility policies in the area of social responsibility, covering human rights, forced labour, discrimination and Regular employment. The implementation of the Internal Rules is responsibility of the HR and the Manager of the facility. 3) Communication & Training: Grade: Robust Facility has an annual training plan covering all necessary initial and periodical trainings that have to be conducted - qualification ones, soft-skills ones, on policies and procedures. All new facility employees undergo induction training acquainting them not only with the job related information but also with all facility policies and procedures. 4) Monitoring: Grade: Some Improvements Recommended Monitoring is carried out in an operational manner, as confirmed by the facility CSR officer. Regular internal audits will be planned and documented. Periodic Management review according to the policies and procedures developed and implemented in accordance with SMETA and Social responsibility requirements will be planned and documented.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Code area 7

Code area 8.A →

Systems and evidence examined to validate this code section	Current Systems: - The recruitment process is fair, transparent and sufficiently documented. - From the sample of 10 employees all had signed individual permanent labour contracts and annexes upon changes in conditions. - During interviews all confirmed that they have copies of their contracts. - Contracts clearly state duration, probation period, leave notice period, wage, working hours. - No apprentices or trainees at the facility. - All workers are directly employed by the facility. - There are security officers (non-employee workers) employed by "Toreador Group" licensed security company. They are properly contracted, trained and paid, as per interviews. - There are no migrant employees, all workers are employed directly and no agencies are used. - Production workers are hired on communicated salary, updated yearly. - All contracts are noted signed and valid. Evidence examined: - Human Rights policy dated 21/03/2017 - Social compliance policy dated 21/03/2017 - Contract with "Toreador Group" licensed security company, dated 09/06/2017 - Internal Rules dated 07/08/2019, last revision 01/06/2025 - Hiring procedure and records - Grievance procedure - Employees' personnel files checked for 10 sampled workers - Workers' interviews

← Code area 7

Code area 8.A →

8. Regular employment is provided

Data points

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

← Code area 8

Code area 8.A →

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	Some Improvements Recommended

← Code area 8

Code area 9 →

Management systems

Explanation for management systems grades	1) Policies and procedures: Grade: Robust The facility was elaborated and implemented Internal Social management system. The facility does use subcontractors. There are no home-workers and agency workers. 2) Resource Grade: Robust The Manager of the facility and CSR officer are responsible for overseeing compliance and implementation of all facility policies in the area of social responsibility and subcontracting. The implementation of the Internal Rules is responsibility of the Manager of the facility and CSR officer. 3) Communication & Training: Grade: Robust Facility has an annual training plan covering all necessary initial and periodical trainings that have to be conducted - qualification ones, soft-skills ones, on policies and procedures. All new facility employees undergo induction training acquainting them not only with the job related information but also with all facility policies and procedures. 4) Monitoring: Grade: Some Improvements Recommended Monitoring is carried out in an operational manner, as confirmed by the facility CSR officer. Regular internal audits will be planned and documented. Periodic Management review according to the policies and procedures developed and implemented in accordance with SMETA and Social responsibility requirements will be planned and documented.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

← Code area 8

Code area 9 →

Systems and evidence examined to validate this code section	Systems: - The facility does not use subcontractors - No homework declared to be used by the facility. That was confirmed during the management and workers' interviews as well. - Simple check during site tour shows that number of machinery correspond to the number of workers observed in place. - Also, facility is aware that since subcontractors are used, clients have to be informed, and clear and uniform selection and evaluation procedures are followed. Evidence examined: - Processes completed by the facility - Number of machines and employees - Management and employees' interviews - Site tour

← Code area 8

Code area 9 →

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 It was confirmed during Management interviews.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?	No None observed during the document review, site tour and interviews.

← Code area 8.A

Code area 9 →

Are any sub-contractors used?	No

← Code area 8.A

Code area 9 →

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	Some Improvements Recommended

← Code area 8.A

Code area 10.A →

Management systems

Explanation for management systems grades	1) Policies and procedures: Grade: Robust The facility has elaborated and implemented Internal Social management system (Social compliance policy, Human rights Policy, Internal labor regulations, Internal rules for wages, Grievance procedure, Human rights policy included). All fundamental human rights, including Discrimination and right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment and harassment are covered. Also, the Internal Rulebook describes the disciplinary measures (which are in line with the ones noted in the Bulgarian Labour Code) and the respective breaches that can lead to them. 2) Resources Grade: Robust HR officer and facility Human rights responsible are responsible for procedures and implementation of Policies and procedures. The Manager of the facility and HR officer are responsible for conforming to legal requirements, clients' requirements, social responsibility and other applicable requirements. 3) Communication and Training Grade: Robust Employees are trained and are aware of the relevant requirements as confirmed during the interviews. Introductory training SMETA upon entry into employment is performed. Refresher training, once a year, included in the annual training plan. 4) Monitoring Grade: Some Improvements Recommended Monitoring is carried out in an operational manner, as confirmed by facility Manager and HR officer. Annual Management review according to the policies and procedures developed and implemented in accordance with SMETA was performed but not documented.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Code area 8.A

Code area 10.A →

Systems and evidence examined to validate this code section	Current Systems: - Facility follows designated Social compliance policy, Internal Rules and the ETI Base Code which prohibits child labour, and forced, bonded, or involuntary prison labour. - The Internal Policy against Discrimination and Harassment clearly states that no physical or verbal harassment is allowed, and that sexual harassment is prosecuted. - No such cases observed during the site tour or reported during the interviews. - Disciplinary actions follow the Bulgarian Labour Law and are clearly stated in the Internal Rules: warning, notice of dismissal and dismissal. In case a disciplinary measure is to be imposed, the following documentation should be kept on file: written statement of the breach; written explanation from the worker of the situation from personal point of view; management order with the disciplinary measure imposed. - No disciplinary actions observed in the personnel files checked or reported by the employees. - No monetary sanctions used by the facility. - No violations observed in case of terminating contracts, 1-month notice requests available. Employees stated that they are provided with good work conditions and that management attitude is open and fair. Work-related atmosphere was noted calm, relaxed and friendly. - There is electronic mailing address and suggestion box, with Complaints procedure that allows employees to complain and report anonymously. - The workers stated also that they are comfortable to make suggestions and report grievance to their supervisors, workers representatives, to the managers directly. - Employees confirmed they feel respected and discuss issues freely with their direct supervisors and coworkers. Evidence examined: - Social responsibility Management declaration - Human Rights policy dated 21/03/2017 - Human rights responsible person, Order 110, 14/07/2024 - Social Compliance Policy dated 21/03/2017 - Anti-discrimination policy dated 22/04/2019 - Human rights policy, freedom of association and the right to collective bargaining - Personal data protection policy - Personal data protection team – Order 109/03.07.2024 - Personnel training and development policy - Internal Rules dated 07/08/2019, last revision 01/06/2025 - Policy on the prohibition of forced, compulsory labor and disciplinary measures - Annual Leave Use Policy - Social compliance system training with protocols - Workers and Management interviews

← Code area 8.A

Code area 10.A →

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 The grievance process is available to members of the local community
What type of grievance mechanism(s) are available?	- Suggestion and complaints box - open door policy - client's hot line
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

← Code area 9

Code area 10.A →

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

← Code area 9

Management systems

Explanation for management systems grades	1) Policies and procedures: Grade: Robust The facility was elaborated and implemented Environmental policy. Separate waste collection has been organized. Environmental aspects have been analyzed and evaluated. Plan of energy intensity reducing, Plan of water resource optimization, Decarbonization and sustainability plan 2025-2028 and Program of environmental performance improvement have been implemented. 2) Resources Grade: Robust Environmental responsible and facility Manager are responsible for procedures and implementation of Policies and procedures. The Manager of the facility and environmental responsible officer are responsible for conforming to legal requirements, clients' requirements, social responsibility and other applicable requirements. Environmental responsible person and Chemicals responsible person are appointed. 3) Communication and Training Grade: Robust Employees are trained and are aware of the relevant requirements as confirmed during the interviews. Introductory training SMETA upon entry into employment is performed. Refresher training, once a year is included in the annual training plan. Initial and periodic trainings regarding environmental protection, proper separation and storage of waste, proper storage and use of chemicals are carried out. 4) Monitoring Grade: Some Improvements Recommended Monitoring is carried out in an operational manner, as confirmed by facility Manager and environmental responsible officer. Annual Management review according to the policies and procedures developed and implemented in accordance with SMETA was performed but not documented.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Code area 9

Systems and evidence examined to validate this code section	Current Systems: - Whole specter of activities performed at facility - Plan of energy intensity reducing - Plan of water resource optimization, Decarbonization and sustainability plan 2025-2028, Program of environmental performance improvement are implemented - There is no increased risk or major impact since the facility is cut-and-sew process only, and washing process has assigned water testing and monitoring. - The washing chemicals used in the facility are safety-graded and approved by implemented GRS certification, same approval is valid for cleaning materials and machinery oils. - Facility has elaborated and adopted an environmental safety policy, part of their Social Compliance system. - There is Waste management plan and licensed waste disposal service contractor handles all general waste. - There is recycling process agreed with "Hart 7", licensed waste recycling service. - Facility aims at reducing the waste and electricity consumption in place. - Environment safety responsible person in place is appointed Evidence examined: - Environmental safety policy dated 22/04/2019 - Policy of Energy Management dated 10/04/2018 - Environmental training, 16/06/2025 - Plan of energy intensity reducing - Plan of water resource optimization - Decarbonization and sustainability plan 2025-2028 - Program of environmental performance improvement - Environmental assessment by "Labora-2006" - Waste disposal plan and practices - Waste disposal contract with licensed recycling service "Hart 7” - Wastewater testing records by "ALIMENTI-OMNILAB” laboratory dated 15/01/2026; 03/06/2025 - Wastewater testing records by RIOSV laboratory dated 10/02/2025 - Waste contract SUNNY ECO-1 Ltd, 01/01/2024 - Chemicals using register, monthly records - Waste register, monthly records - Chemicals handling training records - Management interview - Site tour

← Code area 9

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	No environmental or energy management certificates.
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	Yes GLOBAL RECYCLED STANDARD (GRS) (Version 4.0) RESPONSIBLE ANIMAL FIBER covering RESPONSIBLE ALPACA STANDARD (RAS) (Version 1.0) RESPONSIBLE MOHAIR STANDARD (RMS) (Version 1.2) RESPONSIBLE WOOL STANDARD (RWS) (Version 2.2 - valid until 2026-08-29 - issued by Control Union
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	Yes - ensuring a suitable temperature in the work premises through air conditioning - ensuring a potable water - Plan of energy intensity reducing - Plan of water resource optimization - Decarbonization and sustainability plan 2025-2028 - Program of environmental performance improvement

← Code area 10.A

Attachments

break area (2).jpg

assembly point.jpg

air purifier.jpg

signed capr fashion mania.pdf

exit sign.jpg

compressor.jpg

break area.jpg

changing room.jpg

fire hose, fire alarm button and instructions.jpg

fire detection-fire alarm system.jpg

fire extinguisher.jpg

evacuation plan.jpg

electrical box.jpg

electrical transformer station.jpg

smoke detector and exit sign.jpg

fire extinguisher inspection sticker.jpg

facility main entrance.jpg

eye wash station.jpg

fire hose inspection sticker.jpg

first aid box.jpg

toilets.jpg

sanitary facility.jpg

external hydrant.jpg

facility overview.jpg

chemicals storage.jpg

potable water.jpg

stairs hand reels.jpg

first aid box content.jpg

production area - linking.jpg

suggestion and compliant box.jpg

warehouse.jpg

production area - washing.jpg

production area - sewing (2).jpg

production area - sewing.jpg

quality control knitting area.jpg

production area - pressing.jpg

posted MSDS.jpg

production premises - knitting.jpg

posted ETI Base code, policies and hot line.jpg

production area - ironing.jpg

outside break area.jpg

safety railing.jpg

information board.jpg