

# SMETA Corrective Action Plan Report (CAPR)



## **Audit Content:**

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

#### 2-Pillar SMETA Audit

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

#### **4-Pillar SMETA**

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.



## Guidance

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

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

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

#### Root cause (see column 4)

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

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

#### **Next Steps:**

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



2024-09-02



SMETA Sedex Audit Reference: ZAA600085526

		Audit	Details			
Sedex Company Reference: (only available on Sedex Syst	ZC415074384			eference: n Sedex System)	ZS415317932	
Business name (Company name):	Northern Food Cor	Northern Food Complex Company Limited				
Site name:	NORTHERN FOOD	COMPL	EX LIMITED C	OMPANY		
Site address:	99/3 Moo1 Chiangi Dongmada Road Maekorn Muang 57000 TH	rai-	Country:		ТН	
Site contact and job tit	le: Ms. Kotchaporn Ku	idnanoi	i / Human Res	ource Manage	er	
Site phone:	+6653673985	+6653673985 Site e-mail:		m_konhong@yahoo.com		
SMETA Audit Pillars:	Labour Standards		Health and Safety (plus Environment 2-Pillar)	Environ 4-pillar	ment	Business Ethics
Date of Audit:	2024-09-02	-				
	Auc	iit Com	pany Name:			
	1	ntertek	Thailand			
	Au	ıdit Cor	nducted By			
Affiliate Audit Company	Purchaser	r		Retailer		
Brand owner	NGO			Trade U	nion	
Multi- stakeholder	,		Combined A	udit (select all	that a	pply)

Audit Parameters			
Time in and time out	Day 1		
	In	09:00	
	Out	17:30	
Audit type:	PERIODIC		
Was the audit announced?	ANNOUNCED		
Was the Sedex SAQ available for review?	Yes		
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No		
Who signed and agreed CAPR	Ms. Kotchaporn Kudnanoi / Human Resource Manager		
Is further information available	No		



Audit attendance	Management	Management Worker Representatives			
	Senior management	Worker Committee representatives	Union representatives		
A: Present at the opening meeting?	Yes	No	No		
B: Present at the audit?	Yes	No	No		
C: Present at the closing meeting?	Yes	No	No		
Reason for absence at the opening meeting	There is no Worker Com However, two (2) welfar the audit.	nmittee/ Union established e committee representativ	l as it is not required by law. ves are interviewed during		
Reason for absence during the audit	There is no Worker Com However, two (2) welfar the audit.	nmittee/ Union established e committee representativ	l as it is not required by law. ves are interviewed during		
Reason for absence at the closing meeting	There is no Worker Com However, two (2) welfar the audit.	nmittee/ Union established e committee representativ	l as it is not required by law. ves are interviewed during		

# **Summary of Findings**

Issue		Area of Non-Conformity		mber of iss	sues	Findings	
(please click on the issue title to go direct to the appropriate audit results by clause)	ETI	Local Law	NC	Obs	GE		
8 - Regular employment is provided	8.4		1	0	0	NC - ZAF600611192	
5 - Living wages are paid	5.1	§1	1	0	1	NC - ZAF600611193 GE - 73627708-de12-4cec- b173-15b76bb590a4	
6 - Working hours are not excessive	6.3 6.5 6.6		3	0	0	NC - ZAF600611194 NC - ZAF600611197 NC - ZAF600611198	
3 - Working conditions are safe and hygienic	3.1 3.1 3.1 3.1 3.1 3.1	§2 §3 §4 §5 §6	5	0	1	NC - ZAF600611195 NC - ZAF600611196 NC - ZAF600611199 NC - ZAF600611200 NC - 1b4a3799-a0af-48d2- 94f2-9bd22d8fe6dd GE - f087b178-25bf-4162- 9a04-c30f87d8a236	
0B - Management Systems and code implementation			0	0	1	GE - 6ebb0e97-009a-48e4- a583-03a3fef52fbc	
10B4 - Environment 4–pillar			0	0	1	GE - 5cf3b173-dfa0-45a0- 9345-f243c3900b2d	

## **Local Law Issues**

Issue	Description
§1	1. In accordance with the Notification of Wage Committee Re: Minimum Wage Rate (Issue No. 10) B.E. 2562, Clause 10: Minimum wage is Baht 315 per day in area of Chiangrai Province. 2. In accordance with the Notification of Wage Committee Re: Minimum Wage Rate (Issue No. 11) B.E. 2565, Clause 9: Minimum wage is Baht 332 per day in area of Chiangrai Province.
§2	1. In accordance with the Ministry of Industry Re: Fire prevention and protection in the factory B.E. 2552 Section 4 The facility building shall be provided with detection and fire alarm system throughout the building as appropriate to local conditions, especially in areas where there is no active task performance and installation or use electrical equipment or storage of flammable or combustible materials are easy to install detection devices and automatic alarm. 2. In accordance with the Ministry of Industry Re: Fire prevention and protection in the factory B.E. 2552 Section 4 Fire alarm equipment must be signaled without the need of electricity used for lighting and machinery or have the backup power supply for the system not less than 2 hours.
§3	In accordance with the Notification of Ministry of Industry Re: Fire prevention and protection in the factory B.E. 2552 Section 12 The factory which store materials or products which are flammable objects and the continued is 1,000 square meters or more, must install automatic fire extinguishing system such as automatic Sprinkler System or other equivalent coverage to that area.



§4	In accordance with Ministerial Regulations Re: The standards in the management and implementation of occupational health and safety in the work environment with dangerous chemicals B.E. 2556; Chapter 4 Storage, packaging and transport of hazardous chemicals, Clause 17: The employer storage facility for hazardous chemicals and having the following features; (8) A dam wall cofferdam walls or anything else that looks similar. To prevent trapping liquid hazardous chemicals. Out of the door on the storage of hazardous chemicals. And conduit, hazardous chemical spills to be collected for safe disposal. To prevent the accumulation of residues. Must be separated by a conduit drainage system.
§5	In accordance with Notification of the Ministry of Labour B.E. 2555 (A.D. 2012) Re: Prevention and suppression of fire in the factory, Chapter 2 Building safety and fire escapes, Clause 8: The employer shall provide a fire escape routes leading to all floors of the building at least two evacuation routes, which can be employed to work at the same time to secure the safe in less than five minutes.
\$6	The Ministerial Regulation on the Prescribing of standard for administration and management of Occupational safety, health and environment relating to protection and prevention of fire B.E. 2555 (2012) Clause 9 The facility which consists of two storey building, or have the business area more than 300 square meters onwards, the employer shall install the fire alarm system at all storey.

# Corrective Action Plan - Non Compliances

	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	OPEN	
Reference	ZAF600611192	
Clause	8 - Regular employment is provided	
Issue Title	550 - No / inadequate system in place to monitor labour providers	
Subcategory	Labour Provider Management	
New or carried over?	☐ New ☐ Carried Over	
Raised by audit	ZAA415962902	
Root cause	☐ Training ☐ System	
	☐ Costs ☐ Lack of workers	
	☑ Other	
Root cause - Other	N/A	
ETI code	8.4 - There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.	
Explanation to the non compliance	It was noted that the facility has an no system to monitor the subcontracted security guard service (Lucky Security Guard Co., Ltd.) and the subcontracted janitor service (NT. Super Clean Limited Partnership.) to ensure the compliance with local law and ETI Base Code.  1) There is non-compliance concerned the subcontracted security guard service as follows.  1.1 One (1) subcontracted security guard worked more than 60 hours per week at 84 hours per week in August 2024 but it is complied with the local law.  1.2 One (1) subcontracted security guard worked 13 consecutive days in August 2024.  1.2 Auditors cannot be verified the wages of subcontracted security guard due to the wage's records have been kept at the head office of subcontracted janitor service as follow.  2.1 Auditors cannot be verified the wages of subcontracted janitor service due to the wage's records have been kept at the head office of subcontracted janitor service due to the wage's records have been kept at the head office of subcontracted janitor service due to the wage's records have been kept at the head office of subcontracted janitor service.	
Follow up method	☑ Follow up audit ☐ Desktop audit	
Timescale	☐ Immediate ☐ 30 days ☐ 60 days	

Audit company:

Report reference:

Start Date: 2024-09-02

End Date:

2024-09-02



## SMETA Corrective Action Plan Report (CAPR)

	□ 90 days	□ 120 days	☐ 180 days
	☐ 365 days	□ Other	
Actions	It is recommen systems and pr control subcon adequate control according to the	ded that the facility ocesses to identify tracted service color of for comply with the ETI base code as	ry should establish y, monitor and mpanies to I Social Compliance nd local law.

	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	CLOSED	
Reference	ZAF600611193	
Clause	5 - Living wages are paid	
Issue Title	438 - Isolated instances of workers paid less than the legal minimum wage	
Subcategory	Payment of Wages	
New or carried over?	☐ New ☑ Carried Over	
Raised by audit	ZAA415962902	
Resolved by audit	ZAA600085526	
Root cause	☐ Training ☐ System	
	☐ Costs ☐ Lack of workers	
	☑ Other	
Root cause - Other	N/A	
Local law issue	1. In accordance with the Notification of Wage Committee Re: Minimum Wage Rate (Issue No. 10) B.E. 2562, Clause 10: Minimum wage is Baht 315 per day in area of Chiangrai Province. 2. In accordance with the Notification of Wage Committee Re: Minimum Wage Rate (Issue No. 11) B.E. 2565, Clause 9: Minimum wage is Baht 332 per day in area of Chiangrai Province.	
ETI code	5.1 - Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.	
Explanation to the non compliance	It was noted that auditors cannot be verified the wages of subcontracted security guard due to the wage's records have been kept at the head office of subcontracted security guard service. Remark: This finding will be closed, and it will be re-issued as a finding in section 8.	
Follow up method	☑ Follow up audit ☐ Desktop audit	
Timescale	□ Immediate □ 30 days □ 60 days	
	☐ 90 days ☐ 120 days ☐ 180 days	
	□ 365 days □ Other	
Actions	It is recommended that the facility should monitor the wages of subcontracted security guard service to	

Audit company: Intertek Thailand Report reference:

Start Date:

End Date:

ZAA600085526 2024-09-02 2024-09-02

	ensure following the local law and ETI Base Code.	
Additional comments	The subcontractor security guard. It is in the procurement process for the subcontractor security guard received wage not less than THB 39.375 hour. Periodic audit on 27 – 28 September 2023: Open It was noted that based on payroll record review in December 2022, April 2023 and September 2023 found the subcontractor security guards receive wage THB 39.30 per hour instead of THB 41.5 hour which follow as minimum wage THB 332 per day for Chiangrai Province (effective since 1 October 2022). The subcontractor security guard. It is in the procurement process for the subcontractor security guard received wage not less than THB 39.375 hour. Periodic audit on 27 – 28 September 2023: Open It was noted that based on payroll record review in December 2022, April 2023 and September 2023 found the subcontractor security guards receive wage THB 39.30 per hour instead of THB 41.5 hour which follow as minimum wage THB 332 per day for Chiangrai Province (effective since 1 October 2022). Periodic audit 2 September 2024: It was noted that auditors cannot be verified the wages of subcontracted security guard due to the wage's records have been kept at the head office of subcontracted security guard service. Remark: This finding will be closed, and it will be re-issued as a finding in section 8.  Periodic audit 2 September 2024: It was noted that auditors cannot be verified the wages of subcontracted security guard due to the wage's records have been kept at the head office of subcontracted security guard due to the wage's records have been kept at the head office of subcontracted security guard service. Remark: This finding will be closed, and it will be re-issued as a finding in section 8.	

	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	CLOSED	
Reference	ZAF600611194	
Clause	6 - Working hours are not excessive	
Issue Title	457 - Overtime hours are not paid according to SMETA guidance (at the premium rate of 125% basic hours), but this is not contrary to law - systemic	
Subcategory	Overtime Premium	
New or carried over?	☐ New ☐ Carried Over	
Raised by audit	ZAA415962902	
Resolved by audit	ZAA600085526	
Root cause	☐ Training ☐ System	
	☐ Costs ☐ Lack of workers	
	☑ Other	
Root cause - Other	N/A	
ETI code	6.3 - All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.	
Explanation to the non compliance	It was noted that auditors cannot be verified the wages of subcontracted security guard due to the wage's records have been kept at the head office of subcontracted security guard service. Remark: This finding will be closed, and it will be re-issued as a finding in section 8.	
Follow up method	☑ Follow up audit ☐ Desktop audit	
Timescale	☐ Immediate ☐ 30 days ☐ 60 days	
	☐ 90 days ☐ 120 days ☐ 180 days	
	□ 365 days □ Other	
Actions	It is recommended that the facility should monitor the wages of subcontracted security guard service to ensure following the local law and ETI Base Code.	
Additional comments	The subcontractor security guard. It is in the procurement process for the subcontractor security guard received wages for additional working hour more 8 hours and working on holiday at 125% as per	

.600085526 Version 6.1

standard requirement.

Periodic audit on 27 – 28 September 2023: Open It was noted that the subcontractor security guard receive wages for additional working hour more eight (8) hours and working on holiday at one (1) time of basic wage per hour instead of 125% as per standard requirement.

The subcontractor security guard. It is in the procurement process for the subcontractor security guard received wages for additional working hour more 8 hours and working on holiday at 125% as per standard requirement.

standard requirement.
Periodic audit on 27 – 28 September 2023: Open It was noted that the subcontractor security guard receive wages for additional working hour more eight (8) hours and working on holiday at one (1) time of basic wage per hour instead of 125% as per standard requirement

standard requirement.
Periodic audit 2 September 2024: It was noted that auditors cannot be verified the wages of subcontracted security guard due to the wage's records have been kept at the head office of subcontracted security guard service. Remark: This finding will be closed, and it will be re-issued as a finding in section 8.
Periodic audit 2 September 2024: It was noted that auditors are the wages of subcontracted security guard due to the wage's

Periodic audit 2 September 2024: It was noted that auditors cannot be verified the wages of subcontracted security guard due to the wage's records have been kept at the head office of subcontracted security guard service. Remark: This finding will be closed, and it will be re-issued as a finding in section 8.

	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	OPEN	
Reference	ZAF600611195	
Clause	3 - Working conditions are safe and hygienic	1
Issue Title	192 - Absence of functional fire alarms / smoke detectors	
Subcategory	Fire Safety - Fire alarms & Evacuation	
New or carried over?	☐ New ☐ Carried Over	
Raised by audit	ZAA415962902	ì
Root cause	☐ Training ☐ System	
	☐ Costs ☐ Lack of workers	!
	☑ Other	
Root cause - Other	N/A	
Local law issue	1. In accordance with the Ministry of Industry Re: Fire prevention and protection in the factory B.E. 2552 Section 4 The facility building shall be provided with detection and fire alarm system throughout the building as appropriate to local conditions, especially in areas where there is no active task performance and installation or use electrical equipment or storage of flammable or combustible materials are easy to install detection devices and automatic alarm. 2. In accordance with the Ministry of Industry Re: Fire prevention and protection in the factory B.E. 2552 Section 4 Fire alarm equipment must be signaled without the need of electricity used for lighting and machinery or have the backup power supply for the system not less than 2 hours.	No automatic detecti installed at finished goods in building B1.
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was noted that there was no automatic fire detection (heat, smoke, or beam detector) installed at finished goods warehouse in building no. B1. Remark: 7 out of 7 smoke detectors have been installed at packaging storage at mezzanine floor in building no. B4. The manual fire alarm issues have been separated as a new finding.	
Follow up method	☐ Follow up audit ☐ Desktop audit	

Audit company:

Report reference:

Start Date:

2024-09-02 2024-09-02

End Date:

Sedexglobal.com





## SMETA Corrective Action Plan Report (CAPR)

Timescale	☐ Immediate	☑ 30 days	□ 60 days	
	☐ 90 days	□ 120 days	☐ 180 days	
	☐ 365 days	□ Other		
ctions	automatic fire d	letection (heat, sn ed at finished god	ty should install the noke, or beam ods warehouse in	

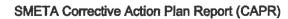
	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	OPEN	
Reference	ZAF600611196	!
Clause	3 - Working conditions are safe and hygienic	
Issue Title	194 - Sprinkler system does not meet legal requirements	
Subcategory	Fire Safety - Fire Fighting Equipment	
New or carried over?	☐ New ☐ Carried Over	i
Raised by audit	ZAA415962902	i
Root cause	☐ Training ☐ System	
	☐ Costs ☐ Lack of workers	1
	☑ Other	i
Root cause - Other	N/A	
Local law issue	In accordance with the Notification of Ministry of Industry Re: Fire prevention and protection in the factory B.E. 2552 Section 12 The factory which store materials or products which are flammable objects and the continued is 1,000 square meters or more, must install automatic fire extinguishing system such as automatic Sprinkler System or other equivalent coverage to that area.	No sprinkler system installed at finished
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	goods warehouse building B1.JPG
Explanation to the non compliance	It was noted that there was no sprinkler system installed at finished goods warehouse building B1 where stored the combustible materials which is a continuous area of 1,185 square meters.	
Follow up method	☐ Follow up audit ☐ Desktop audit	
Timescale	☐ Immediate ☐ 30 days ☐ 60 days	
	□ 90 days □ 120 days □ 180 days	
	□ 365 days □ Other	
Actions	It is recommended that the facility should install sprinkler system at finished goods warehouse building B1 where stored the combustible materials which is a continuous area of 1,185 square meters.	

Audit company: Intertek Thailand Report reference:

Start Date:

End Date:

ZAA600085526 2024-09-02 2024-09-02



Audit company: Intertek Thailand Report reference: ZAA600085526

Start Date: 2024-09-02

End Date: 2024-09-02

Sedexglobal.com

	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	i
Status	OPEN	
Reference	ZAF600611197	
Clause	6 - Working hours are not excessive	
Issue Title	473 - Total hours exceed 60 hours per week - ETI requirements are not met - systemic	
Subcategory	Excessive hours	
New or carried over?	☐ New ☐ Carried Over	
Raised by audit	ZAA415962902	i
Root cause	☐ Training ☐ System	
	☐ Costs ☐ Lack of workers	ļ
	☑ Other	İ
Root cause - Other	N/A	
ETI code	6.5 - Working hours may exceed 60 hours in any 7- day period only in exceptional circumstances where all of the following are met:	
Explanation to the non compliance	It was noted that based on time attendance records review in February 2024, May 2024 and August 2024, some selected employees work more than 60 hours per week as follows.  - 2 out of 26 selected employees from the production and quality assurance worked 66.5 – 73.5 hours per week in February 2024.  - 3 out of 26 selected employees from the production worked 60.5 – 69 hours per week in May 2024.  - 9 out of 26 selected employees from the production, warehouse, quality assurance engineering and subcontracted security guard worked 62 – 84 hours per week in August 2024. However, it is compiled local law.	
Follow up method	☑ Follow up audit ☐ Desktop audit	
Timescale	□ Immediate □ 30 days ☑ 60 days	
	□ 90 days □ 120 days □ 180 days	i
	□ 365 days □ Other	
Actions	It is recommended that the facility should control and reduce the total working hour to be not more than 60 hours per week as per ETI requirement.	

Audit company: Intertek Thailand Report reference:

Start Date:

End Date:

ZAA600085526 2024-09-02 2024-09-02

	Non-Compliance		
[Back to findings	summary]		
	Non-Compliance		
Status	OPEN		
Reference	ZAF600611198	ļ	
Clause	6 - Working hours are not excessive		
Issue Title	485 - Workers do not take off 1 day in 7, and this is contrary to law or collective bargaining agreement (CBA) – systemic		
Subcategory	Rest breaks and rest days		
New or carried over?	☐ New ☐ Carried Over		
Raised by audit	ZAA415962902		
Root cause	☐ Training ☐ System		
	☐ Costs ☐ Lack of workers		
	☑ Other		
Root cause - Other	N/A		
ETI code	6.6 - Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.		
Explanation to the non compliance	It was noted that based on time attendance records review in February 2024, May 2024 and August 2024, some selected employees worked more than six (6) consecutive days without a day off as follows.  - 6 out of 26 selected employees from the production and quality assurance worked 8 – 17 consecutive days in February 2024.  - 7 out of 26 selected employees from the production, warehouse and account worked 9 – 16 consecutive days in May 2024.  - 8 out of 26 selected employees from the production, warehouse, quality assurance engineering, purchase and subcontracted security guard worked 12 – 19 consecutive days in August 2024.		
Follow up method	☑ Follow up audit ☐ Desktop audit		
Timescale	☐ Immediate ☐ 30 days ☐ 60 days		
	□ 90 days □ 120 days □ 180 days	ļ	
	□ 365 days □ Other	1	
Actions	It is recommended that the facility should provide at least one day off after working six (6) consecutive days.		

Audit company: Report reference: Start Date: End Date: Sedexglobal.com 2024-09-02



SMETA Sedex Audit Reference: ZAA600085526

	Non-Compliance		
[Back to findings	summary]		
	Non-Comp	liance	i
Status	CLOSED		
Reference	ZAF600611199		
Clause	3 - Working condition	ons are safe and hygienic	
Issue Title	explosion measures	te safety measures / anti- for chemicals (e.g. no anti- condary container / unbunded)	
Subcategory	Chemicals		
New or carried over?	□ New	☑ Carried Over	
Raised by audit	ZAA600027301		
Resolved by audit	ZAA600085526		
Root cause	☐ Training	□ System	
	□ Costs	☐ Lack of workers	
	☑ Other		
Root cause - Other	N/A		
Local law issue	standards in the ma of occupational hea environment with d Chapter 4 Storage, I hazardous chemical storage facility for h the following featur walls or anything els trapping liquid haza on the storage of ha hazardous chemical disposal. To prevent	Ministerial Regulations Re: The inagement and implementation lith and safety in the work angerous chemicals B.E. 2556; packaging and transport of ls, Clause 17: The employer razardous chemicals and having res; (8) A dam wall cofferdam se that looks similar. To prevent radious chemicals. Out of the door radious chemicals. And conduit, is spills to be collected for safe the accumulation of residues. by a conduit drainage system.	
ETI code	be provided, bearin knowledge of the in hazards. Adequate s accidents and injury associated with, or o by minimising, so fa	ienic working environment shall g in mind the prevailing dustry and of any specific steps shall be taken to prevent to health arising out of, occurring in the course of work, ar as is reasonably practicable, ds inherent in the working	
Explanation to the non compliance	been provided at ch	e secondary containment has lemical storage area but did not storage area inside warehouse	
Follow up method	☐ Follow up audit	☑ Desktop audit	

Audit company:

Report reference:

Start Date:

End Date: 2024-09-02



SMETA Sedex Audit Reference: ZAA600085526

Timescale	☐ Immediate	☑ 30 days	□ 60 days	
	□ 90 days	□ 120 days	□ 180 days	
	☐ 365 days	□ Other		l I
Actions	N/A			
Additional comments	containment ha	orage area in the	condary for the chemical te and Lactic Acid in warehouse building	

	Non-Compliance	Evidence
Back to findings	summary]	
	Non-Compliance	2
Status	OPEN	
Reference	ZAF600611200	!
Clause	3 - Working conditions are safe and hygienic	1
Issue Title	203 - Fire exits are inadequate by design/construction, location, etc.	
Subcategory	Fire Safety - Fire exits	i
New or carried over?	☐ New ☐ Carried Over	i
Raised by audit	ZAA600027301	i
Root cause	☐ Training ☐ System	
	☐ Costs ☐ Lack of workers	!
	☑ Other	1
Root cause - Other	N/A	
Local law issue	In accordance with Notification of the Ministry of Labour B.E. 2555 (A.D. 2012) Re: Prevention and suppression of fire in the factory, Chapter 2 Building safety and fire escapes, Clause 8: The employer shall provide a fire escape routes leading to all floors of the building at least two evacuation routes, which can be employed to work at the same time to secure the safe in less than five minutes.	Only one secondary
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	at mezzanine floor obuilding no. B4 .JPC
Explanation to the non compliance	It was noted that there was no secondary exit provided at mezzanine floor of building no. B4 which used for packaging storage area. Remark: The facility has already installed the secondary exit at mezzanine floor of the building no. B1.	
Follow up method	☐ Follow up audit ☐ Desktop audit	
Timescale	☐ Immediate ☐ 30 days ☐ 60 days	
	☐ 90 days ☐ 120 days ☐ 180 days	
	☐ 365 days ☐ Other	
Actions	It is recommended that the facility should install a secondary exit provided at mezzanine floor of building no. B4 which used for packaging storage	

Audit company: Intertek Thailand Report reference:

Start Date:

End Date:

ZAA600085526 2024-09-02 2024-09-02



## SMETA Corrective Action Plan Report (CAPR)

Version 6.1

202	
area.	

2024-09-02

#### Evidence Non-Compliance [Back to findings summary] Non-Compliance Status **OPEN** 1b4a3799-a0af-48d2-94f2-9bd22d8fe6dd Reference 3 - Working conditions are safe and hygienic Clause **Issue Title** 192 - Absence of functional fire alarms / smoke detectors No manual fire alarm installed at building no. Subcategory Fire Safety - Fire alarms & Evacuation B5.JPG New or carried □ Carried Over over? Root cause □ Training ☑ System ☐ Costs □ Lack of workers □ Other Root cause -Other The Ministerial Regulation on the Prescribing of Local law issue No manual fire alarm installed at building no. B4.JPG standard for administration and management of Occupational safety, health and environment relating to protection and prevention of fire B.E. 2555 (2012) Clause 9 The facility which consists of two storey building, or have the business area more than 300 square meters onwards, the employer shall install the fire alarm system at all storey. 3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent ETI code accidents and injury to health arising out of, associated with, or occurring in the course of work, No manual fire alarm installed at building no. B3.JPG by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. Explanation to It was noted that there is no manual fire alarm installed at building no. B2, building no. B3, building the non compliance no. B4, and building no. B5. Follow up ☐ Follow up audit Desktop audit method Timescale ☐ Immediate ☑ 30 days ☐ 60 days □ 120 days □ 90 days □ 180 days No manual fire alarm installed at building no. B2.JPG ☐ 365 days □ Other It is recommended that the facility should install Actions manual fire alarm in appropriate area.





Audit company: Intertek Thailand Report reference: ZAA600085526

Start Date: 2024-09-02

End Date:

2024-09-02



Sedex Audit Reference:

# Corrective Action Plan - Good Examples

	Good Example	Evidence
[Back to findings	s summary]	
	Good Example	
Status	OPEN	
Reference	6ebb0e97-009a-48e4-a583-03a3fef52fbc	
Clause	0B - Management Systems and code implementation	
Issue Title	35 - Presence of relevant certifications certification that address labour rights / human rights, environmental impact or corruption (OHSAS 18001, ISO 14001, ISO 50001, ISO 37001, SA8000 etc.)	
Subcategory	Site's licenses & Certifications	
New or carried over?	☑ New ☐ Carried Over	
Explanation to the good example	The facility has been certified as follows: •ISO 45001:2018 standard; refer to certificate no. S 0020, effective since 18 October 2022 and valid until 17 October 2025 which issued by TISTR. •ISO 14001:2015 standard; refer to certificate no. E 0025, effective since 18 October 2022 and valid until 17 October 2025 which issued by TISTR.	
Evidence	Based on certification review.	
Evidence	Based on certification review.	

	Good Example	Evidence
Back to findings	summary]	
	Good Example	
Status	OPEN	
Reference	f087b178-25bf-4162-9a04-c30f87d8a236	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	155 - Site has internationally recognised health and safety certification e.g. OHSAS 18000	
Subcategory	Health & Safety Management	
New or carried over?	☑ New ☐ Carried Over	
Explanation to the good example	The facility has been certified ISO 45001:2018 standard; refer to certificate no. S 0020, effective since 18 October 2022 and valid until 17 October 2025 which issued by TISTR.	
Evidence	Based on certification review.	

	Good Example	Evidence
[Back to findings	summary]	
	Good Example	
Status	OPEN	
Reference	73627708-de12-4cec-b173-15b76bb590a4	
Clause	5 - Living wages are paid	
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	
Subcategory	Benefits & Insurance	
New or carried over?	☑ New ☐ Carried Over	
Explanation to the good example	The facility provides additional benefits beyond the legal requirement such as health insurance, accident insurance, free streamed rice, shift allowance, free uniform, medical treatment and annual bonus.	
Evidence	Based on selected employees' interview and the facility's representative interview.	

Audit company: Intertek Thailand

Report reference:

Start Date: End Date:

ZAA600085526 2024-09-02 2024-09-02

	Good Example	Evidence
[Back to findings	s summary]	
	Good Example	
Status	OPEN	
Reference	5cf3b173-dfa0-45a0-9345-f243c3900b2d	
Clause	10B4 - Environment 4–pillar	
Issue Title	615 - The site has an internationally recognised environmental certificate e.g. ISO 14000	
Subcategory	General Environmental Permits, & Management systems	
New or carried over?	☑ New ☐ Carried Over	
Explanation to the good example	The facility has been certified ISO 14001:2015 standard; refer to certificate no. E 0025, effective since 18 October 2022 and valid until 17 October 2025 which issued by TISTR.	
Evidence	Based on certification review.	

### **SMETA Declaration**

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

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

Auditor Team			
Lead Auditor:	Phatara Thitiwimol Phan APSCA Number:	21704393	
Additional Auditors:	Parinya Ouarerun Parinya O	21700715	
	Rangsan Sukruang	21701580	
Date of declaration:	2024-09-02		

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

	with the state of			
Site Representation				
Full Name:	Ms. Kotchaporn Kudnanoi	THE WAY		
Title:	Human Resource Manager			
Date of declaration:	2024-09-02	บริษัท นอร์รเทอร์น ฟู๊ด คอมเพล็กซ์ จำกัด NORTHERN FOOD COMPLEX CO.,LTD.		
Sampled wage reco started last Sep 202	?0). nan-days (9AM-6PM per day). Audit time was exte			

None observed.







## **Guidance on Root Cause**

## **Explanation of the Root Cause Column**

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

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

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

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

#### Some examples of finding a "root cause"

#### Example 1

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

#### Example 2

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

#### Example 3

A site uses fines to control unacceptable behaviour of workers.

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

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

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

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

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





For more information visit: Sedexglobal.com

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

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

Click here for Buyer (A) & Buyer/Supplier (A/B) members:

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw\_3d 3d

Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\_2brg\_3d\_3d

Click here for Auditors:

https://www.surveymonkey.co.uk/r/BRTVCKP

