

Sedex Members Ethical Trade Audit Report

Version 7



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Audit content

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

Audit details

Site details

Sedex site reference	ZS408120413	Site name	Frutales Las Lajas
Business name	Frutales Las Lajas S.A	Site address	Kilómetro 1 vía Zarzal Cartago Zarzal CO 762527

Audit details

Sedex company reference	ZC408062085	Auditor company name	Intertek Colombia Chile Ecuador Venezuela			
Audit company address	Calle 127 a #53A-45 Torre 2 Oficina 1103, Bogota, CO, .					
Date of audit	2025-12-09	Audit conducted by	Natalia Rueda			
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics					
Time in and out	Day 1		Day 2		Day 3	
	In	10:30	In	07:30	In	07:30
	Out	16:00	Out	16:00	Out	12:00
Audit type	Periodic					
Was the audit announced?	Semi announced					

Was the Sedex SAQ available for review? Yes

Who signed and agreed CAPR? Daniel Perez / Certifications Coordinator

Any conflicting information SAQ/Pre-Audit Info No

Is further information available? No

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	No union at site as not required by law.		
Reason for absence during the audit	No union at site as not required by law.		
Reason for absence at the closing meeting	No union at site as not required by law.		

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)

In compliance with applicable privacy and data management laws and regulations, the use of images depicting production processes, individuals, or equipment was not permitted.

Lead auditor

Natalia Rueda

APSCA Number

21703498

Additional auditor

Date of declaration

2025-12-11

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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	Daniel Perez
Title	Certifications Coordinator
Date of declaration	2025-12-11

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	Local law	NC ZAF601237055
	3.H Where identified as necessary to reduce r...	Local law	NC ZAF601213797
	3.L Implement effective processes to manage f...	Local law	NC ZAF601237054
	3.M Ensure all machinery is installed, mainta...	Local law	NC ZAF601213795
	3.R Provide clean and secure toilets, wash ar...	Local law	NC ZAF601213796
5. Legal wages are paid	5.G Maintain records to demonstrate that work...	Base code	NC ZAF601237058
5.A. Living wages are paid	5.A.B Put in place a wage improvement plan th...	Base code	NC ZAF601237056
6. Working hours are not excessive	6.J Comply with all other applicable laws tha...	Local law	NC ZAF601237057
10.B. Environment 4-Pillar	10.B.G Establish resource-use targets and a p...	Base code	NC ZAF601237059

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[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	i	✓	!	!
4. Child labour shall not be used	✓	✓	✓	✓
5. Legal wages are paid	!	✓	!	!
6. Working hours are not excessive	!	✓	i	!
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	i	✓	⚠	i
10.C. Business ethics	✓	✓	✓	✓



Not addressed



Fundamental improvements required



Some improvements recommended



Robust management systems

Site details

Company and site details

Sedex company reference	ZC408062085	
Sedex site reference	ZS408120413	
Company name	Frutales Las Lajas S.A	
Business ownership type	GOODS	
Site name	Frutales Las Lajas	
Site name in local language	Frutales Las Lajas S.A	
GPS location	GPS address	Km 1 via Zarzal -Cartago, Zarzal, Valle del Cauca, Colombia.
	Coordinates	4.411011521095281, -76.06230460486486
Is the worksite in a remote location, far from habitation?	Yes	
	The company is located on a farm that is far from the urban area.	
Site contact	Contact name	Daniel Perez
	Job title	Certifications coordinator
	Phone number	3137432024
	Email	certificaciones@frutaleslaslajas.com
Applicable business and other legally required business license numbers and documents	Facility is registered in the "Cámara de Comercio de Tuluá" with registration number 62782. NIT 830515183-1 ICA certificate number # 768950001, valid thru August 2033	

[← Management systems](#)

[Worker analysis →](#)

Site activities

Site function	Grower Pack house	
Site activities	Primary	Packaging activities
	Secondary	Growing of other fruit-bearing vegetables
	Other	
Product type	Lemon Cultivation, agronomy, and production (fruit selection and packing) for fruit export (Aguacate y Limon taiti).	
Process overview	The fruit is harvested, transported to the selection plan, where a receipt and weighing of the fruit is made, the respective quality tests are made, then the fruit is fed into the fruit sorting machine, the fruit is washed and disinfected, cut and cut stalk, according to customer requirements is made application of food wax, then goes to drying, a final selection is made, it is packaged, and stored in cold rooms, and shipment is made to the customer. Main equipment used: Selector machines, cold rooms, plant electrical, forklift, tractors.	
What level of mechanization best describes the work at this site?	Low mechanisation / high manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes
What is the area of audited site to its boundary?	1000000m ²

[← Management systems](#)

[Worker analysis →](#)

Site scope

Building 1	Last construction works on site	1989
	If building is shared, provide details	No shared building
	Number of floors	2
	Description of floor activities	1st floor Supply storage, administrative offices, national dispatch area, selection plant, cold rooms, reception fruit area, mechanical taller, restrooms, laboratory, lockers and restrooms, supply warehouse, aliquot room, tool storage, fuel tank. 2nd floor: administrative offices, Restrooms.
Building 2	Last construction works on site	1989
	If building is shared, provide details	No shared building
	Number of floors	2
	Description of floor activities	1st floor: Canteen, Accommodation rooms (2 administrative employees), Infirmary and training room, and rest area. 2nd floor: Accommodation rooms (1 administrative employee).
Building 3	Last construction works on site	1989
	If building is shared, provide details	No shared building
	Number of floors	1
	Description of floor activities	Agricultural Workshop, parking area, harvest.

[← 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?

Yes

Is the accommodation within the perimeter of the site audited?

Onsite

Is the accommodation contractually mandated for workers?

Optional

Who provides the accommodation?

Site

Was all accommodation (whether directly or via third parties, off or onsite) included in this audit?

All

On the day of the audit accommodation was not in use.

Does the site organise worker transport to the worksite?

Not provided

All employees must arrive by their own means.

[← Site details](#)

[Worker analysis →](#)

Work patterns

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

Is there any night shift work at the site? Yes

Company has two packing area shifts form 6:00 to 14:00 and 14:00 to 22:00

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

Company has two shifts one of which started at 14:00 and was in the scope.

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? Other certification

BASC

Global GAP + GRASP

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

No, the site has 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 No, the site has not assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.
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Worker analysis

Gender disaggregated data available

Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	123 (58.6%)	87 (41.4%)	- -	210 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	123 (58.6%)	87 (41.4%)	- -	210 (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

No migrant workers

Workers by age

	Men	Women	Other	Total
18 - 24 years old	1 (100%)	0 (0%)	- -	1 (0.5%)
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 Colombian

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Colombian	59%	41%	-	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	123 (58.6%)	87 (41.4%)	- -	210 (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	0 -	0 -	- -	0 (0%)
Other	123 (58.6%)	87 (41.4%)	- -	210 (100%)

* % of total workforce

If other payment cycle entered, please provide details

Bi-weekly

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	1 (33.3%)	2 (66.7%)	- -	3
Supervisors or team leaders	4 (50%)	4 (50%)	- -	8
Administrative staff	3 (23.1%)	10 (76.9%)	- -	13

[← 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 4 groups of 5 employees

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 complaints

What did the workers like the most about working at this site?

Pay

Work environment – comfort (e.g. temperature, noise or dust levels)

Additional comments

Workers were cooperative throughout the audit process and interviews. Their attitude was open and natural. Employees stated that the company provides job stability and good working conditions.

Attitude of workers' committee/union representatives

Representatives of Labour Coexistence Committee and Health and Safety Committee stated that they are treated with respect.

Attitude of managers

All the necessary information was provided to validate the development of the action plans for the findings evidenced in the initial audit; Management was good disposition to present the evidence, as well as to commit to the development of corrective actions for the findings that remain open.

Workers interviewed by type

	Total
Permanent workers	28
Temporary or fixed-term employees	0

[← Worker analysis](#)

[Measuring workplace impact →](#)

Workers interviewed by type

Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	28

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	10	10	-	20
Workers interviewed individually	5	3	-	8

Migrant workers interviewed

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

Measuring workplace impact

Gender disaggregated data available Men and women

Annual worker turnover (%)*

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

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

Rate of absenteeism (%)*

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

Number of days lost through job absence in the year, calculated as: (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

All accidents are reported and recorded to the labor risk administrator.

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

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

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

* 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 (2024)	0.0%	0.0%	-	0.0%

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

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

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	Full access was provided to the audit team, including all requested documents, interviewees and the facility. No offering of bribes to or threaten the auditor, no unethical practices noted during the audit. Facility has a written policy covering human rights. All employees and suppliers know the human right policy. Intertek auditor provided a brief description of the assessment process, scope, required documentation, and client's expectations.		

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

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Robust Management Systems

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

Robust Management Systems

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

Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements

Robust Management Systems

Explanation for management systems grades

The company has appointed a designated person responsible for overseeing the management systems related to the labor aspects of the business. This includes ensuring compliance with internal work regulations and other procedures associated with labor practices.

In line with promoting a fair and respectful work environment, the company has implemented indicators to measure factors such as labor climate and employee satisfaction, which are important for understanding and addressing workers' needs.

The company is committed to providing the necessary resources to maintain an effective labor management system, ensuring that it is both adequate and aligned with principles of free choice of employment, fairness, and respect for workers' rights. This system supports the company's ongoing efforts to create a positive and empowering workplace for all employees.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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[← Code area 0](#)

[Code area 1.A →](#)

No findings

Systems and evidence examined to validate this code section

According to interviews, employees indicated that they were hired and are working in a facility by their own free will; they can terminate with employment relationship whenever they want.

Original personal documents are not retained by the company, only a copy of them.

There is no forced, bonded, or involuntary prison labor for employees.

Surveillance cameras are used for security reasons only, not for the purpose of controlling or intimidating workers.

Internal Labor Regulation and Social Policy describe commitment to freely chosen employment.

[← 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

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The company has designated a person responsible for the company's management systems of the company's labor part. The company has documented internal work regulations and other and other procedures associated with the labor part of the company. The company has indicators that measure the labor climate among other factors and importance for the workers. The company designates the necessary resources to ensure that the labor management system in this section is adequate.

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**

Employees are hired directly by the company.
 Company has defined and documented recruitment and hiring procedure, which is in compliance with the local law, the internal work regulations states employment requirements (no child labour hiring, anti-discrimination practices and no conflict of interest during recruitment).
 During interviews the employees stated that the facility offers stability in its employments.
 During interviews the employees stated that they do not pay any fees, taxes, deposits or bonds for the purpose of recruitment.

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? Directly

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

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process? Not Applicable

Were recruitment fees or costs identified during worker interviews? No
No recruitment fees.

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

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The company has designated a person responsible for the company's management systems of the company's labor part. The company has documented internal work regulations and other and other procedures associated with the labor part of the company. The company has indicators that measure the labor climate among other factors and importance for the workers. The company designates the necessary resources to ensure that the labor management system in this section is adequate.

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	Facility does not have Union labor or collective agreement, however, employees stated that they are free to express any complaint to their respective Managers, chiefs and committee. The company has established other channels where the employees can exposure grievances, complaints, suggestions and opportunities for improvement such as suggestion box and labor coexistence committee.
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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 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
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	Some Improvements Recommended
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	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

Management systems

Explanation for management systems grades

While the company has identified a person responsible for overseeing labour practices and health and safety matters, the role lacks sufficient authority and documented accountability to ensure effective implementation of the management system.

The site has some internal rules and health and safety practices in place; however, these are inconsistently implemented. As a result, these gaps substantially reduce the site's ability to manage labour and health and safety risks in a systematic and sustainable manner.

Monitoring of labour and health and safety conditions is limited. Key indicators are not consistently reviewed, which weakens the site's ability to identify trends, prevent recurrence of issues, and drive continuous improvement.

Although management expresses commitment to employee welfare, the allocation of resources and the structure of the management system are insufficient to ensure effective and ongoing compliance. Fundamental improvements are required to strengthen documentation, clarify responsibilities, formalize monitoring mechanisms, and ensure the system is fit for purpose and capable of supporting sustained compliance over time.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	Local law	NC ZAF601237055
	3.H Where identified as necessary to reduce r...	Local law	NC ZAF601213797
	3.L Implement effective processes to manage f...	Local law	NC ZAF601237054
	3.M Ensure all machinery is installed, mainta...	Local law	NC ZAF601213795
	3.R Provide clean and secure toilets, wash ar...	Local law	NC ZAF601213796

[← Code area 2](#)

[Code area 4 →](#)

Systems and evidence examined to validate this code section

The company has implemented a health and safety management system as required by law, which is aligned with ISO45000 standard, though it is not certified. The latest health and safety system audit took place on 2024.

Adriana Paredes has been designated as the individual responsible for the health and safety management system. She is the Health and Safety at Work external assessor and has been accredited by Res No. 122003013007 from September 15th, 2025, to act as responsible for managing, design, and implementing health and safety at work management systems since 2021.

The Health and Safety Management at work Policy was last reviewed and updated in January 2025 and is displayed in various locations throughout the organization.

The health and safety system self-assessment required by SURA (labor risk administrator) was conducted on February 14th, 2025, with a score of 98.75%, and Labor Ministry assessment was submitted on March 25th, 2025, with a score of 98.75%.

The annual health and safety work plan was reviewed and updated for 2025; it is being executed as defined by company.

The Health and Safety Committee was freely elected by employees on April 2nd, 2025, for the 2025-2027 term. The most recent meetings were held on October 28th, 2025, and September 29th, 2025.

Potable water is guaranteed using filters and it is distributed all over the farm and monthly analysis are requested and verified.

The risk identification matrix is updated and includes a COVID-19 protocol, the most relevant risks are Biomechanical and Chemical.

Work accidents are thoroughly investigated and reported to SURA, to date there has been one accident

Professional Illness: 0
The emergency plan was last updated in October 2025.
The company has 20 active and trained brigade members.

All emergency equipment is regularly inspected in a monthly basis, records are kept, and the auditor verified this monthly activity was performed.

The last emergency brigade training was held on September 15th, 2025, Complete

Training.

The last emergency drills were performed on November 12th, 2025, with 39 employee's participation at 2:45 pm.

Health Exams are performed on an annual basis and documented on matrix.

Findings: non-compliances

ZAF601237055

Non-compliance

Due 2026-01-18

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

317 - No medical examinations or regular occupational health checks, including disease checks, of workers in hazardous situations (e.g. exposed to noise or dust) or working with hazardous substances (e.g. chemicals and pesticides)

Area of non-compliance/non-conformance

Local law

Description

The company has not conducted periodic occupational medical examinations for its workers since 2023. According to company information, these examinations should be performed every two years. In addition, kitchen personnel have not undergone pre-employment medical examinations.

La empresa no ha realizado exámenes médicos ocupacionales periódicos para sus trabajadores desde 2023. Según la información suministrada por la empresa, estos exámenes deben realizarse cada dos años. Además, el personal de cocina no ha sido sometido a exámenes médicos pre-ocupacionales.

Corrective and preventative actions

Please ensure to perform occupational examinations as required by law.
Por favor asegúrese de realizar los exámenes ocupacionales de acuerdo a lo requerido por la ley.

[← Code area 3](#)

[Code area 4 →](#)

Local law reference

Resolution 1843 of 2025, Article 8. Types of Occupational Medical Evaluations.
 The occupational medical evaluations that must be carried out mandatorily by public and private employers or contractors include, at a minimum, the following:
 a)Pre-employment medical evaluation.
 b)Periodic medical evaluations (scheduled or due to changes in occupation).
 c)Exit medical evaluation.
 d)Post-disability medical evaluation.
 e)Return-to-work medical evaluation.
 f)Follow-up or control occupational medical evaluation.

Resolucion 1843 de 2025, Artículo 8. Tipos de Evaluaciones médicas ocupacionales. Las evaluaciones médicas ocupacionales que debe realizar el empleador público y privado o contratante en forma obligatoria son como mínimo, las siguientes:
 a)Evaluación médica de pre-ingreso.
 b)Evaluaciones médicas periódicas (programadas o por cambios de ocupación).
 c)Evaluación médica de egreso.
 d)Evaluación médica post - incapacidad.
 e)Evaluación médica por retorno laboral.
 f)Evaluación médica ocupacional de seguimiento o de control.

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ZAF601213797

Non-compliance

Due 2025-01-25

Code area

3 Working conditions are safe and hygienic

Status

Closed (2025-12-11)*

[← Code area 3](#)

[Code area 4 →](#)

Workplace requirement

3.H Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).

Time given to resolve

30 days

Issue title

277 - Workers are not issued with Personal Protective Equipment, or it is not appropriate to the risk - isolated

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Description

Through the document review and interviews with employees, it was evident that workers performing lifting and handling tasks with fruit-filled baskets (weighing approximately 19 to 20 kilos) in the plant are not provided with personal protective equipment for their feet (safety boots) until after three months of employment. Additionally, for office cleaning staff and administrative personnel earning less than two minimum wages, there is no evidence of the provision of work footwear.

A través de la revisión documental y entrevistas con los trabajadores, se evidenció que a los trabajadores que realizan labores de levantamiento y manipulación de canastas llenas de fruta (con un peso aproximado de 19 y 20 kilos) en la planta no se les entrega equipo de protección personal para los pies (botas de seguridad) sino hasta después de tres meses de trabajo. Además, para el personal de aseo de oficinas y el personal administrativo que devenga menos de dos salarios mínimos, no se evidencia la entrega de calzado de dotación.

Description (carried over)

Through the document review and interviews with employees, it was evident that workers performing lifting and handling tasks with fruit-filled baskets (weighing approximately 19 to 20 kilos) in the plant are not provided with personal protective equipment for their feet (safety boots) until after three months of employment. Additionally, for office cleaning staff and administrative personnel earning less than two minimum wages, there is no evidence of the provision of work footwear.

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Corrective and preventative actions

Please ensure that work clothing and personal protective equipment are provided in accordance with local law.

Por favor, asegúrese de que se entregue la dotación de ropa de trabajo y elementos de protección personal conforme a lo establecido por la ley local.

Corrective and preventative actions (carried over)

Please ensure that work clothing and personal protective equipment are provided in accordance with local law.

Por favor, asegúrese de que se entregue la dotación de ropa de trabajo y elementos de protección personal conforme a lo establecido por la ley local.

Local law reference

Colombian Law 9 / 1979, Article 122. All employers are obliged to provide each worker, free of charge, with personal protection elements in quantity and quality in accordance with the real or potential risks existing in the workplace.

Substantive Labor Code, ARTICLE 230. SUPPLY OF SHOES AND LABOR CLOTHING. Every {employer} who habitually employs one (1) or more permanent workers, shall supply every four (4) months, free of charge, one (1) pair of shoes and one (1) work clothes to the worker, whose monthly remuneration is up to two (2) months the highest minimum wage in force. The worker who on the dates of delivery of shoes and clothing has completed more than three (3) months in the service of the employer is entitled to this benefit.

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ZAF601237054

Non-compliance

Due 2026-01-18

Code area

3 Working conditions are safe and hygienic

Status

Open*

[← Code area 3](#)

[Code area 4 →](#)

Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

197 - Inadequate signage/instructions of fire alarm

Area of non-compliance/non-conformance

Local law

Description

During the document review and facility walkthrough, it was observed that the alarm system does not meet the minimum legal requirements. Currently, whistles are being used.

Durante la revisión documental y recorrido por las instalaciones se evidencio que la alarma no cumple con los requisitos mínimos exigidos por la ley. Actualmente usan silbatos.

Corrective and preventative actions

Please ensure to implement a fire alarm system according to law requirement.

Por favor asegúrese de implementar un sistema contra incendios de acuerdo al requisito de ley.

Local law reference

Colombian Resolution 2400 / 1979, Article 231. Fire alarm systems, as a safety measure and rapid action to extinguish fire, should follow requirements: a) They must transmit trustworthy signals. b) Signals should reach trained people to respond to them. c) They must immediately call the attention "fire" unequivocally. d) They must indicate the place of the fire. e) The means to transmit the alarm must be accessible and very simple, not giving occasion to delays or errors, on the part of the person in charge. f) The alarm will be strong so that occupants of the building or workplace, etc. be warned.

Resolución 2400 de 1979, Artículo 231. Los sistemas de alarmas para los conatos de incendio, como medida de seguridad y actuación rápida para extinguir el fuego, deberán reunir los siguientes requisitos: a) Deberán transmitir señales dignas de confianza. b) Las señales deberán llegar a las personas capacitadas para que respondan a ellas. c) Deberán llamar inmediatamente la atención "fuego" en forma inequívoca. d) Deberán indicar el lugar del incendio. e) Los medios para transmitir la alarma deberán ser accesibles y muy simples, no dando ocasión a demoras o errores, por parte de la persona encargada. f) La alarma será fuerte para que los ocupantes del edificio o local de trabajo, etc. queden advertidos.

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ZAF601213795

Non-compliance

Due 2023-11-24

[← Code area 3](#)

[Code area 4 →](#)

Code area

3 Working conditions are safe and hygienic

Status

Closed (2025-12-11)*

Workplace requirement

3.M Ensure all machinery is installed, maintained, and used in a safe manner.

Time given to resolve

30 days

Issue title

267 - No/inadequate certificates for inspections of machinery, or machines not registered as required by law

Verification method

Desktop audit

Description

Por medio de revisión documental se evidencio que la canastilla y el andamio usados para trabajo en alturas no están certificados. / Through documentary review, it was noted that the basket and the scaffolding used for work at heights are not certified.

Area of non-compliance/non-conformance

Local law

Description (carried over)

Por medio de revisión documental se evidencio que la canastilla y el andamio usados para trabajo en alturas no están certificados. / Through documentary review, it was noted that the basket and the scaffolding used for work at heights are not certified.

Corrective and preventative actions

Por favor asegúrese que se tienen equipos de alturas certificados. / Please make sure that you have certified height equipment.

Corrective and preventative actions (carried over)

Por favor asegúrese que se tienen equipos de alturas certificados. / Please make sure that you have certified height equipment.

Local law reference

Resolution 4272 of 2021, Article 16. Access systems for work at heights. The following are considered as access systems for work at heights: scaffolds, ladders, personnel elevators, and all those means whose purpose is to allow access and/or support of workers to places for work at heights. All access systems for working at heights and their components must comply with the following conditions or requirements for their selection and use: 1. they must be certified according to the specific standard applicable for the selected access system and the manufacturer must provide information in Spanish, about the main characteristics of the system, a manual and/or parts catalog with its engineering characteristics, recommendations for storage, maintenance, inspection and safety measures in its assembly and disassembly (when applicable), use and operation.

[← Code area 3](#)

[Code area 4 →](#)

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ZAF601213796

Non-compliance

Due 2023-11-24

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.R Provide clean and secure toilets, wash areas, and worker changing facilities, with adequate hygiene supplies separated by gender or with effective privacy. Ensure potable water is easily accessible by workers and, where appropriate, clean storage facilities for food and personal belongings.

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

329 - Sanitary facilities (e.g. toilets, hand basins) are unhygienic/not clean

Area of non-compliance/non-conformance

Local law

Description

Por medio del recorrido en campo se evidencio: Baños en mal estado de limpieza. El baño de la zona 13, no cierra la puerta. En entrevistas se identifica que algunos colaboradores no piden el papel higiénico lo traen de la casa. /The field visit revealed the following: Restrooms in a poor state of cleanliness. The bathroom in zone 13 does not close the door. In interviews it was identified that some employees do not ask for toilet paper, they bring it from home.

Description (carried over)

Por medio del recorrido en campo se evidencio: Baños en mal estado de limpieza. El baño de la zona 13, no cierra la puerta. En entrevistas se identifica que algunos colaboradores no piden el papel higiénico lo traen de la casa. /The field visit revealed the following: Restrooms in a poor state of cleanliness. The bathroom in zone 13 does not close the door. In interviews it was identified that some employees do not ask for toilet paper, they bring it from home.

Corrective and preventative actions

Por favor asegúrese que se tienen baños en condiciones adecuadas para los trabajadores de campos. / Please ensure that adequate restrooms are available for field workers.

Corrective and preventative actions (carried over)

Por favor asegúrese que se tienen baños en condiciones adecuadas para los trabajadores de campos. / Please ensure that adequate restrooms are available for field workers.

[← Code area 3](#)

[Code area 4 →](#)

Local law reference

Colombian Resolution 2400 / 1979, Article 17. All workplaces (except for mining companies, quarries and other extractive activities) where there is public sewerage, which operate or are established in the national territory, must have or install a toilet (1) for every fifteen (15) workers, separated by sex, and equipped with all the essential elements for their service, consisting of toilet paper, collection containers, paper towels , Soap, disinfectants and deodorants.

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3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes Pesticides
Who organises accommodation for workers?	The company owns or operates worker accommodation (onsite)
Who organises worker transportation between accommodation and worksite?	Not applicable
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable No additions
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? No

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The company has appointed a designated person responsible for overseeing the management systems related to the labor aspects of the business, ensuring compliance with legal and ethical standards, including the prohibition of child labor. The company maintains documented internal work regulations, Social Policy and Remediation system where is indicated Child labour shall not be used the company is committed to allocating the necessary resources to maintain an adequate labor management system, ensuring that it complies with ethical standards, including the strict non-use of child labor, and provides a safe, fair, and supportive workplace for all employees. The company has defined and documented a training plan for all relevant workers, managers and supervisors, including evaluation of effectiveness, updating training needs, awareness and performance activities, and maintaining records. The company monitors policies and procedures, conducts periodic internal assessments, and utilizes key performance indicators for analyzing and improvement actions.

Summary of findings

[← Code area 3](#)

[Code area 5 →](#)

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	The Internal Regulations explicitly prohibit the hiring of individuals under the age of 18. The company has established Recruitment and Hiring policies, which also includes a strict ban on employing anyone under 18. The facility does not employ workers under the age of 18. During the hiring process, the applicant's age is verified through photocopies of their ID, which are kept in their personnel file. No evidence of child labor was observed at the facility. Child remediation included in the procedure for evaluation and management for human rights violations.		

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	0%
Enter the legal age of employment	18
Enter the age of the youngest worker identified	18
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
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?	No

[← 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	Fundamental Improvements Required
--	-----------------------------------

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	Fundamental Improvements Required
--	-----------------------------------

Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
---	-----------------------------------

Management systems

Explanation for management systems grades

While the company pays at least the legal minimum wage in all cases, the management system for wage and compensation does not adequately ensure transparency, consistency, and sustainable compliance with the Workplace Requirements.

Payslips provided to workers are not sufficiently clear or detailed, as they do not consistently itemize wage components, deductions, and the basis for calculation in a manner that can be easily understood by workers. This lack of clarity reduces workers' ability to verify that they are being paid correctly in line with legal and contractual requirements.

In addition, the site does not have a documented wage and compensation policy defining pay structures, calculation methods, piece-rate arrangements, overtime premiums, and applicable deductions. The absence of a written policy significantly weakens the site's ability to manage legal wages in a systematic and sustainable manner.

Furthermore, the site uses piece-rate contracts for some employees; however, in practice these are paid at the level of the legal minimum wage, without a clear methodology to demonstrate how piece-rate earnings are calculated.

Although current practices result in payment of at least the legal minimum wage, the gaps in documentation, transparency, and formal wage management processes indicate that fundamental improvements are required to ensure ongoing compliance and to reduce the risk of future non-compliances.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
5. Legal wages are paid	5.G Maintain records to demonstrate that work...	Base code	NC ZAF601237058

[← Code area 4](#)

[Code area 5.A →](#)

Systems and evidence examined to validate this code section

The company provides compensation to all of its employees, which is consistent with their term of employment and in accordance with local laws and regulations.

The company provides social benefits to all of its employees.

Amount of Social Security and Annuity are based on the corresponding percentages established by Local Law.

All workers' wages were calculated by monthly rate.

Minimum wage for the company is COP \$1.423.500.

Findings: non-compliances

ZAF601237058

Non-compliance

Due 2026-02-17

Code area

5 Legal wages are paid

Status

Open*

Workplace requirement

5.G Maintain records to demonstrate that workers receive a wage statement, or payslip each pay period with a clear and understandable breakdown of their wages, benefits and any deductions.

Time given to resolve

60 days

Issue title

409 - Isolated incidents of payslips inconsistent with wages paid

Verification method

Desktop audit

Description

During the document review, it was noted that the pay stubs do not reflect the deductions applied for absences and/or suspensions.

Durante la revisión documental se evidenció que los desprendibles de nómina no reflejan las deducciones aplicadas por inasistencias y/o suspensiones.

Area of non-compliance/non-conformance

Base code

Corrective and preventative actions

Modify the pay stubs to ensure that they clearly include all deductions applied for absences and/or suspensions.

Modifique los desprendibles de nómina para asegurar que incluyan de manera clara todas las deducciones aplicadas por inasistencias y/o suspensiones.

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[← Code area 5](#)

[Code area 5.A →](#)

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Only digital payments
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

Worker remuneration

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

Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	7.33
	Max hours per week	44.0
	Max hours per month	220.0

[← Code area 5](#)

[Code area 5.A →](#)

Actual required working hours	Required hours per day	7.33
	Required hours per week	44.0
	Required hours per month	220.0
Maximum legal overtime hours	Max hours per day	2.0
	Max hours per week	12.0
	Max hours per month	Non applicable
Actual overtime hours	Max hours per day	2.0
	Max hours per week	7.0
	Max hours per month	Non applicable
Minimum legal wage	Min per hour	6470.0
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	1423500.0
Actual minimum wage	Actual per hour	6470.0
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	1423500.0
Minimum legal overtime wage	Min per hour	8088.0
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable

[← Code area 5](#)

[Code area 5.A →](#)

Actual minimum overtime wage	Actual per hour	8088.0
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked 78

Provide the date and details of the records Payrolls of 26 employees were reviewed as follows:
26 samples for November 2025 (Recent month)
26 samples for July 2025 (Non-Peak month)
26 samples for March 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 10% above minimum wage
90% meets minimum wage

Are there any bonus schemes used? No

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
5.A. Living wages are paid	5.A.B Put in place a wage improvement plan th...	Base code	NC ZAF601237056
Systems and evidence examined to validate this code section		The company has defined and documented a procedure to calculate living wage on an annually basis and has reviewed workers' total pay including benefits and compare it with value of living wage. The methodology for living wage calculation is based on IDH index (Anker methodology).	

[← Code area 5](#)

[Code area 6 →](#)

Findings: non-compliances

ZAF601237056

Non-compliance

Code area

5.A Living wages are paid

Status

Open*

Workplace requirement

5.A.B Put in place a wage improvement plan that aims to pay workers a living wage within a stated timeframe.

Time given to resolve

Verification method

Collaborative action required

Issue title

905 - CAR: A wage improvement plan (with Living Wage as the goal) has not been completed

Area of non-compliance/non-conformance

Base code

Description

It was identified that the company has not established or implemented a wage improvement plan aimed at ensuring that workers whose earnings show gaps in relation to a living wage are able to receive it within a defined timeframe.

Se evidenció que la empresa no ha establecido ni implementado un plan de mejora salarial orientado a garantizar que los trabajadores cuyos ingresos presentan brechas frente al salario digno puedan percibirlo dentro de un plazo definido.

Corrective and preventative actions

The company shall design, approve, and implement a wage improvement plan that includes an analysis of the existing gaps between current wages and the living wage. This plan must define clear objectives, specific timeframes, and mechanisms to ensure that workers progressively achieve a living wage. In addition, the process must be documented and communicated transparently to the workers.

La empresa deberá diseñar, aprobar e implementar un plan de mejora salarial que incluya un análisis de las brechas existentes entre los salarios actuales y el salario digno. Este plan deberá definir metas claras, plazos específicos y los mecanismos para asegurar que los trabajadores alcancen progresivamente un salario digno. Asimismo, deberá garantizar que el proceso se documente y comunique de manera transparente a los trabajadores.

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[← Code area 5.A](#)

[Code area 6 →](#)

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Fundamental Improvements Required

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

Robust Management Systems

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

Some Improvements Recommended

Monitor the effectiveness of procedures to meet policy and workplace requirements

Fundamental Improvements Required

Explanation for management systems grades

While working hours observed at the site are generally within legal limits, the management system in place does not adequately ensure ongoing compliance with updated legal requirements related to working hours.

The site does not maintain the legally required overtime records in accordance with the most recent labour law reform. This indicates that existing procedures for recording and monitoring overtime are incomplete and not aligned with current legal obligations.

The absence of compliant overtime records reflects a lack of systematic review and updating of internal policies and procedures in response to changes in applicable labour legislation. As a result, the site's ability to effectively manage working hours and overtime in a sustainable and legally compliant manner is substantially reduced.

Although the identified non-compliance is limited to overtime recordkeeping, the gap in monitoring legal updates and revising internal controls demonstrates that the management system is not fully fit for purpose. Fundamental improvements are therefore required to ensure policies, procedures, and recordkeeping practices are regularly reviewed, updated, and implemented in line with current legal requirements.

[← Code area 5.A](#)

[Code area 7 →](#)

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
6. Working hours are not excessive	6.J Comply with all other applicable laws tha...	Local law	NC ZAF601237057
Systems and evidence examined to validate this code section	Employees hired directly by facility and perform the following shifts: Operational hours are 6 days' week. Administrative 7:30 to 17:30 (Monday to Friday) 7:30 a 16:45 (Monday to Friday) Saturday 8:00 to 12:00 Farm 6:00 to 15:00 (Monday to Thursday) Friday 6:00 to 14:00 Saturday 6:00 to 11:45 (120 min for meals) Packing 6:00 to 14:00 an 14:00 a 22:00 Farm Time System: Manual System.		

Findings: non-compliances

ZAF601237057

Non-compliance

Due 2026-01-18

Code area

6 Working hours are not excessive

Status

Open*

Workplace requirement

6.J Comply with all other applicable laws that impose conditions on Code Area 6.

Time given to resolve

30 days

Issue title

910 - A systemic breach of a local law that could present a danger to workers or violate upon a human right (relating to Code Area 6: Working Hours are not Excessive but which cannot be captured under another Workplace Requirement)

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

Description

During the document review, it was noted that the overtime record does not contain the minimum information required by law, as the document does not specify the activity performed.

Durante la revisión documental se evidenció que el registro de horas extra no contiene la información mínima requerida por la ley, ya que el documento no especifica la actividad realizada.

Corrective and preventative actions

Please ensure that the records of hours worked are completed directly by the workers and fully comply with the applicable legal requirements.

Por favor asegúrese de que los registros de horas laboradas sean diligenciados directamente por los trabajadores y que cumplan plenamente con los requisitos legales aplicables.

[← Code area 6](#)

[Code area 7 →](#)

Local law reference

Law 2466 of 2025

Article 12. Record of Overtime Hours. Amend numeral 2 of Article 162 of the Substantive Labor Code, which shall read as follows:

“2. The employer must keep a record of the supplemental work performed by each worker, specifying the name, activity carried out, and number of hours worked, indicating whether they are daytime or nighttime hours.

This record may be maintained according to the needs and specific conditions of the company.

The employer is required to provide any worker who requests it with a report of the overtime hours worked, including the same specifications mentioned above. This record must be delivered together with the supporting documentation that proves the corresponding payment.”

Ley 2466 de 2025 ARTICULO 12°. Relación de Horas Extras. Modifíquese el numeral 2 del artículo 162 del Código Sustantivo del Trabajo, el cual quedara así:

“2. El empleador deberá llevar un registro del trabajo suplementario de cada trabajador en el que se especifique el nombre, actividad desarrollada y número de horas laboradas con la precisión de si son diurnas o nocturnas.

Este registro podrá realizarse de acuerdo a las necesidades y condiciones propias de su empresa.

El empleador está obligado a entregar al trabajador que lo solicite, una relación de las horas extras laboradas, con las mismas especificaciones anteriores. Este registro deberá entregarse junto con el soporte que acredite el correspondiente pago.

* PDF generated at 20:54 (UTC) on 19 Dec 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

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	125%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	Not applicable as premium is not less than 125%.
Excluding overtime, what are the regular working hours per week for workers at this site?	44.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	48.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	51.0
Maximum number of days worked without a day off in sample	6

[← 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	Robust Management Systems
Explanation for management systems grades	The company has defined and implemented policies and procedures appropriate for the site context, that lead the compliance with workplace requirements. The Site has a Social Policy and Human Rights Policy, and procedures for human rights and labor practices. There are roles and responsibilities to implement the policies and procedures. The management provides resources to implement policies and procedures. The company has defined and documented a training plan for all relevant workers, managers and supervisors, including evaluation of effectiveness, updating training needs, awareness and performance activities, and maintaining records. The company monitors policies and procedures and utilizes key performance indicators for analyzing and improving actions. The company has procedures in case of any remediation.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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[← Code area 6](#)

[Code area 8 →](#)

No findings

Systems and evidence examined to validate this code section

During the facility tour and employee's interviews, it was noted that in this facility there are people working from different races, gender and age. The facility employs, pays, promotes and terminates workers on the basis of their ability to do the job rather than on the basis of personal characteristics or beliefs. Employees indicated during the interviews that they have never suffered any discriminatory practice.

[← 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)?	0%
Representation of women in managerial roles (ratio of women workers to women managers)	2%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	4%
Three most common nationalities in managerial and supervisory roles	Colombian

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The company has defined and implemented policies and procedures appropriate for the site context. Regular employment is mentioned in Social Policy. There are roles and responsibilities to implement the policies and procedures. Documents are periodically updated, as necessary. Systems and processes are reactive to changing, as necessary for the company. The management provides resources to implement policies and procedures. The company has defined and documented a training plan for all relevant workers, managers and supervisors, including evaluation of effectiveness, updating training needs, awareness and performance activities, and maintaining records. The company monitors policies and procedures, conducts periodic internal assessments, and utilizes key performance indicators for analyzing and improvement actions.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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[← Code area 7](#)

[Code area 8.A →](#)

No findings

Systems and evidence examined to validate this code section

Employees are hired directly by the facility, through labor agency and contractors. No apprenticeship schemes or home employees were identified by the auditor. No subcontractor was used.

The company has defined and documented recruitment and hiring procedures, which is in compliance with Internal Labor Regulation, and states ethical requirements (no child labor hiring, anti-discrimination practices and no conflict of interests during recruitment).

Employees are not required to pay fees, applications, medical examinations, among other practices against the law.

During interviews, the employees stated that the facility offers stability in its employment.

[← 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%

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

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Facility does not subcontract any production process.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	No Sub-contracting and homeworkers.		

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 homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? Information not available
Based on interviews, the supplier does not buy products or services from suppliers that use homeworkers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No
No concerns noted or reported about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity.

[← Code area 8.A](#)

[Code area 9 →](#)

Are any sub-contractors used? No

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Facility has a written procedures to comply with this workplace requirement: Internal Job Regulations and Social Policy. The Administrative Director is responsible for ensuring compliance with this policy. The frequency of policy review was established each year. The training for relevant workers, managers and supervisors, including evaluation of effectiveness is established on an annual basis by a training plan. There is monitoring of the implementation of procedures through an internal audit.

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

During the facility tour, no observed any sings of physical abuse such as: obvious physical injuries, physical punishment or bruises.

During employees' interviews, employees stated that they are always treated with respect by their respective supervisors; they have not suffered abuse or harassment. The facility has defined and documented the Internal Labor Regulation in which the disciplinary procedure is described.

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process The grievance process is available to all workers
What type of grievance mechanism(s) are available?	Suggestion box
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
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	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

Management systems

Explanation for management systems grades

The site has basic environmental management practices in place and demonstrates general awareness of applicable environmental requirements. Key environmental aspects are identified, and some procedures are implemented to manage environmental impacts.

However, gaps were identified in the formalisation and consistency of the environmental management system. Environmental procedures are not always fully documented, or documentation lacks sufficient detail to clearly define responsibilities, monitoring methods, and review processes. This reduces the likelihood of ensuring sustained compliance over time.

Monitoring of environmental practices is conducted on a limited basis and is not consistently documented or reviewed to support continuous improvement. In addition, periodic reviews of environmental procedures to reflect operational changes or updated legal requirements are not fully embedded in the management system.

While these gaps have not resulted in significant environmental non-compliances at the time of the audit, improvements are recommended to strengthen documentation, formalise monitoring mechanisms, and ensure the environmental management system is fit for purpose and capable of supporting ongoing compliance with the Workplace Requirements.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	The facility has legal requirements matrix, last updated for 2025. The most important aspects are greenhouse gas generation, water consumption, energy consumption, and waste generation. The Company implemented controls to mitigate associated risks to the identified aspects. The company uses water from water bodies with proper permission. The RUA (Unique Environmental Register) was updated according to legal requirement. The company uses waste collection/disposal services with authorized companies and respective legal permissions of these external operators are presented. The Company maintains a list and inventory of the chemical products used.
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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?

Global GAP

Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?

No

Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?

No

[← Code area 10.A](#)

[Code area 10.B →](#)

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
10.B. Environment 4-Pillar	10.B.G Establish resource-use targets and a p...	Base code	NC ZAF601237059
Systems and evidence examined to validate this code section The Company has defined an environmental policy, this policy is posted on boards and describes key impacts from operations and commitment to improvement, legal compliance, conservation of ecosystems, rational use of water, non-contamination of water sources, proper and responsible use of agrochemicals, integrated management of all waste generated on the farm, reduction of erosion and maintenance of soil fertility. The Company has defined and documented a procedure for identification and monitoring of environmental legal requirements and others, including for clients. There is a matrix with legal requirements and evidence of compliance. The Company provides trainings to employees about environmental issues during on-boarding trainings and periodic. The Company has not established, nor implemented a full environmental management system, they have been keeping record of waste, water and energy, however there are no reduction and/or consumption targets.			

[← Code area 10.A](#)

[Code area 10.C →](#)

Findings: non-compliances

ZAF601237059

Non-compliance

Due 2026-03-19

Code area

10.B Environment 4-Pillar

Status

Open*

Workplace requirement

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

Time given to resolve

90 days

Issue title

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

Verification method

Desktop audit

Description

It was identified that the site has not defined resource efficiency targets (e.g., water, energy, materials) nor developed a plan to achieve them.

Se evidenció que el sitio no ha definido metas de eficiencia en el uso de recursos (por ejemplo, agua, energía, materiales), ni ha desarrollado un plan para alcanzarlas.

Area of non-compliance/non-conformance

Base code

Corrective and preventative actions

The company shall establish measurable resource efficiency targets and implement a documented plan to achieve them. The plan must include monitoring mechanisms and be aligned with environmental best practices.

La empresa deberá establecer metas medibles de eficiencia en el uso de recursos e implementar un plan documentado para alcanzarlas. El plan deberá incluir mecanismos de seguimiento y estar alineado con buenas prácticas ambientales.

* PDF generated at 20:54 (UTC) on 19 Dec 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

[← Code area 10.B](#)

[Code area 10.C →](#)

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Biodiversity and eco system impact management
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes Company has environmental impacts and aspects matrix and a legal matrix.
Does the site have reduction targets in place to manage climate related risks?	None
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	No
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Not Applicable

Usage/discharge analysis

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

[← Code area 10.B](#)

[Code area 10.C →](#)

Total electricity consumption from non-renewable sources (kWh)	0	0
Total electricity consumption from renewable sources (kWh)	2,561,191	2,630,957
Sources of renewable energy used	Utility provider	Utility provider
Types of renewable energy used	Hydroelectric	Hydroelectric
Total natural gas consumption (kWh)	0	0
Usage of other purchased fuels	ACPM: 32.003,5 GAL FUEL: 3.276,8 GAL	ACPM: 33.400,7 GAL FUEL: 4.749 GAL
Has the site completed any carbon footprint analysis?	No	No
Water sources	Deep Well	Deep Well
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	387,736.7	436,783.7
Water discharged	Body water	Body water
Water volume discharged (m3)	898.6	533
Water volume recycled (m3)	0	0
Total waste produced (mt)	148.6	150.3
Total hazardous waste produced (mt)	1.8	2.2

[← Code area 10.B](#)

[Code area 10.C →](#)

Waste to recycling (mt)	0.9	1.1
Waste to landfill (mt)	145.9	147.2
Waste to other (mt)	0	0
Total product produced (mt)	7,854	6,347

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The company has established and implemented policies and procedures tailored to the site context, ensuring compliance with workplace requirements. Clear roles and responsibilities are assigned to support their effective implementation. These documents are reviewed and updated periodically, as needed. Systems and processes are adaptable and respond as necessary to organizational changes. Management allocates the resources required to support the implementation of these policies and procedures. A documented training plan is in place for all relevant workers, managers, and supervisors. This plan includes effectiveness evaluations, updates to training needs, awareness and performance activities, and proper recordkeeping. The company monitors its policies and procedures through regular internal assessments and uses key performance indicators to guide analysis and continuous improvement efforts.

[← Code area 10.B](#)

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	The Company has designated the person responsible for implementing standards concerning Business Ethics: Compliance Officer. The Company has defined and determined an Anti-Corruption and Bribery Policy, and Data protection and Confidentiality Policy immersed on the integral policy. The company has defined a risk management system, money laundering, terrorism prevention. The Company provides trainings to new workers and all staff about Business Ethics and Transparency Program. The system for confidentially reporting is through communications to the suggestion box, grievance procedure, Compliance Officer. Based on documents review and interview with managers, no issue was detected during the audit process concerning business ethics, bribery, corruption, or any kind of unfair business practices. The Company has implemented methods to identify and verify the accomplishment with law requirements.		

[← Code area 10.B](#)

10.C. Business ethics

Data points

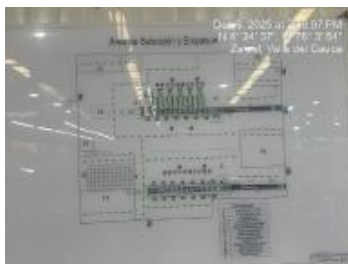
Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?	No
Provide any certified anti-bribery management systems for the site	BASC

[← Code area 10.C](#)

Attachments



[Fire Extinguisher.JPG](#)



[Evacuation Plan \(2\).JPG](#)



[Evacuation Plan.JPG](#)



[Hydration Point.JPG](#)



[Boards.JPG](#)



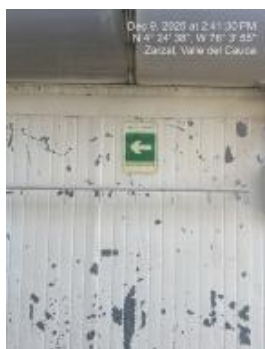
[Cold Room.JPG](#)



[Cold Room \(2\).JPG](#)



[Farm Bathroom.JPG](#)



[Evacuation Signage.JPG](#)



[Eyewash Shower.JPG](#)



[Electric Panel.JPG](#)



[Bathrooms.JPG](#)



[Farm Toilet \(2\).JPG](#)



[Evacuation Route Signage.JPG](#)



[Boards \(2\).JPG](#)



[Eco Station.JPG](#)



[Electric Panel \(2\).JPG](#)



[Emergency Exit.JPG](#)



[Emergency Station.JPG](#)



[Lemon Selection Area.JPG](#)



[Farm Toilet.JPG](#)



[Farm Rest Area.JPG](#)



[Chemicals Storage Area.JPG](#)



[Farm Boards.JPG](#)



[Emergency Exit \(2\).JPG](#)



[Dining Room.JPG](#)



[Packing Toilet.JPG](#)



[Soap.JPG](#)



[Smoke Detector \(2\).JPG](#)



[Smoke Detector.JPG](#)



[Reservoir.JPG](#)



[PPE Use Signade.JPG](#)



[Packing Bathrooms.JPG](#)



[Packing Entrance.JPG](#)



[Machinery Warnings.JPG](#)



[Supplies Warehouse.JPG](#)



[Suggestion Box.JPG](#)



[Plantation.JPG](#)



[Maintenance Area.JPG](#)



[Main Entrance.JPG](#)



[Machine Warnings.JPG](#)



[Soils Nutrients Pumps.JPG](#)



[Parking.JPG](#)



[Plantation \(3\).JPG](#)



[National Dispatch Area.JPG](#)



[Packing Area.JPG](#)



[Plantation \(2\).JPG](#)



[Meeting Point.JPG](#)



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[Emergency Station \(2\).JPG](#)



[Machinery Emergency Stop.JPG](#)



[Hydration Point \(2\).JPG](#)

