

SMETA Corrective Action Plan Report (CAPR)

Version 5.0 Dec 2014, 2/4 Pillar Audit; replaces version 4.0 May 2012

Supplier name:	Berger Logistik GmbH	
Site country:	Austria	
Site name:	Berger Logistik GmbH	
Parent Company name (of the site):	-	
SMETA Audit Type:	☐ 2-Pillar	☒ 4-Pillar
Date of Audit	May 15/16/17, 2017	

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 Best Practice Guidance Version 5 December 2015 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:

Please check appropriate SMETA Audit Type in the above box:

2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
 - Management systems and code implementation,
 - Entitlement to Work and Immigration,
 - Sub-Contracting and Home working

4-Pillar SMETA Audit

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics

The new ETI Working Hours Clause

- Now integrated into this latest SMETA version.

Where appropriate non-compliances were raised against the ETI code / SMETA Additions and local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.





Audit Company Name:	Report Owner (payee): <i>(If paid for by the customer of the site, please remove for Sedex upload)</i>
<i>Sedex Company Reference: (only available on Sedex System)</i>	ZC: 1024322
<i>Sedex Site Reference: (only available on Sedex System)</i>	ZS: 1024403

Audit Conducted By			
Commercial	☒	Purchaser	☐
NGO	☐	Retailer	☐
Trade Union	☐	Brand Owner	☐
Multi-stakeholder	☐	Combined Audit (select all that apply)	

<i>Auditor Reference Number: (If applicable)</i>	
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Audit Details

Audit Details			
A: Report #:			
B: Time in and time out (SMETA BPG recommends 9.00-17.00 hrs. if any different please state why in the SMETA declaration)	Day 1 Time in: 13:00 Day 1 Time out: 17:00	Day 2 Time in: 09:00 Day 2 Time out: 17:00	Day 3 Time in: 09:00 Day 3 Time out: 17:00
C: Number of Auditor Days Used: (number of auditor x number of days)	1 Auditor, 2,5 days on site		
D: Audit type:	☒ Full Initial ☐ Periodic ☐ Full Follow-up ☐ Partial Follow-Up ☐ Partial Other - Define		
E: Was the audit announced?	☒ Announced ☐ Semi – announced: Window detail: weeks ☐ Unannounced		
F: Was the Sedex SAQ available for review?	☒ Yes ☐ No		
If No, why not? (Examples would be, site has not completed SAQ, site has not been asked to complete the SAQ.)			
G: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes ☒ No If Yes, please capture detail in appropriate audit by clause		
H: Auditor name(s) and role(s):	Harald Willenig, Lead Auditor		
I: Report written by:	Harald Willenig		
J: Report reviewed by:			
K: Report issue date:	May 18, 2017		
L: Supplier name:	SGS Austria Controll-Co GesmbH		
M: Site name:	Berger Logistik GmbH		
N: Site country:	Austria		
O: Site contact and job title:	Mr. Markus Ambach, Quality and Apprentice Training, Adminstration		
P: Site address: (Please include full address)	Bahnhofplatz 1, 6300 Wörgl		

Site phone:	+43 5532 71170-0		
Site fax:	+43 5532 71170-93000		
Site e-mail:	office@berger-logistik.com		
Q: Applicable business and other legally required licence numbers: for example, business license no, and liability insurance	Commercial register FN 184194z, Landesgericht Innsbruck VAT/UID ATU62611338		
R: Products/Activities at site, for example, garment manufacture, electricals, toys, grower	Transport by road, ocean, air and rail		
S: Audit results reviewed with site management?	Yes		
T: Who signed and agreed CAPR (Name and job title)	Mr. Markus Ambach, Quality and Apprentice Training, Administration		
U: Did the person who signed the CAPR have authority to implement changes?	Yes		
V: Present at closing meeting (Please state name and position, including any workers/union reps/worker reps):	Mr. Bernhard Ebner, CEO Mr. Markus Ambach, QM Mr. Roman Kopetzky, Head of HR		
W: What form of worker representation / union is there on site?	☐ Union (name) ☒ Worker Committee ☐ Other (specify) ☐ None		
X: Are any workers covered by Collective Bargaining Agreement (CBA)	☒ Yes ☐ No		
Y: Previous audit date:	n/a		
Z: Previous audit type:		SMETA 2-pillar	SMETA 4-pillar
	Full Initial	☐	☐
	Periodic	☐	☐
	Full Follow-Up Audit	☐	☐
	Partial Follow-Up	☐	☐
	Partial Other*	☐	☐
*If other, please define:			

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 re-record 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)

Note: it is not mandatory to complete this column at this time.

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 non-compliance 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 follow-up 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).

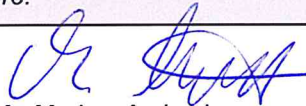
Corrective Action Plan

Corrective Action Plan – non-compliances									
Non-Compliance Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new non-compliance identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Non-Compliance <i>Details of Non-Compliance</i>	Root cause <i>(completed by the site)</i>	Preventative and Corrective Actions <i>Details of actions to be taken to clear non-compliance, and the system change to prevent re-occurrence (agreed between site and auditor)</i>	Timescale <i>(Immediate, 30, 60, 90, 180, 365)</i>	Verification Method <i>Desktop / Follow-Up [D/F]</i>	Agreed by Management and Name of Responsible Person: <i>Note if management agree to the non-compliance, and document name of responsible person</i>	Verification Evidence and Comments <i>Details on corrective action evidence</i>	Status <i>Open/Closed or comment</i>

Corrective Action Plan – Observations				
Observation Number <i>The reference number of the observation from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Observation <i>Details of Observation</i>	Root cause <i>(completed by the site)</i>	Any improvement actions discussed <i>(Not uploaded on to SEDEX)</i>

Good examples		
Good example Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	Details of good example noted	Any relevant Evidence and Comments
ETI 0.3 Management systems	Berger-Logistik uses a "Wiki-Platform" for all relevant informations like Organigram, processes, forms and all informations which belongs to the ISO 9001/14001-System	
ETI 2.2: Freedom of Association	Positive co-operation between employer and worker representative Regularly meetings between worker representative and operating manager. Ad hoc-meetings between employer representative and operating manager.	

Confirmation

Please sign this document confirming that the above findings have been discussed with and understood by you: (site management) <i>If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.</i>		
A: Site Representative Signature:	 Mr. Markus Ambach	Title: Quality Manager May 17, 2017
B: Auditor Signature:	 Harald Willenig	Title Lead Auditor May 17, 2017
C: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes.		
D: I dispute the following numbered non-compliances:		
E: Signed: <i>(If <u>any</u> entry in box D, please complete a signature on this line)</i>		Title Date
F: Any other site Comments:		

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 non-compliance 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 re-occurring.

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.

**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 A & AB members:

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

Click here for B members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgLY_2brg_3d_3d



For more information on Sedex please go to www.sedexglobal.com
or email helpdesk@sedexglobal.com
