

# 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

<b>Sedex site reference</b>	ZS408067304	<b>Site name</b>	Livonia Print SIA
<b>Business name</b>	Livonia Print SIA	<b>Site address</b>	15/25 Jurkalnes Str Riga LV LV1046

## Audit details

<b>Sedex company reference</b>	ZC408056164	<b>Auditor company name</b>	Intertek Czech											
<b>Audit company address</b>	Sokolovská 131/86, Zirkon Office Center, Prague, CZ, 186 00													
<b>Date of audit</b>	2025-10-15	<b>Audit conducted by</b>	Zsolt Badacsonyi											
<b>Audit pillars</b>	Labour Standards   Health and safety   Environment 4-Pillar   Business ethics													
<b>Time in and out</b>	<table> <tr> <td>Day 1</td> <td>Day 2</td> <td></td> </tr> <tr> <td>In</td> <td>09:00</td> <td>In</td> <td>09:00</td> </tr> <tr> <td>Out</td> <td>17:00</td> <td>Out</td> <td>15:00</td> </tr> </table>			Day 1	Day 2		In	09:00	In	09:00	Out	17:00	Out	15:00
Day 1	Day 2													
In	09:00	In	09:00											
Out	17:00	Out	15:00											
<b>Audit type</b>	Periodic													
<b>Was the audit announced?</b>	Semi announced													
<b>Was the Sedex SAQ available for review?</b>	Yes													

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**Who signed and agreed CAPR?** Baiba Kapteine / Quality manager

**Any conflicting information SAQ/Pre-Audit Info** No

**Is further information available?** No

## Audit attendance

	Senior management	Worker representative	Union representative
<b>A: Present at the opening meeting?</b>	Yes	Yes	No
<b>B: Present at the audit?</b>	Yes	Yes	No
<b>C: Present at the closing meeting?</b>	Yes	Yes	No
<b>Reason for absence at the opening meeting</b>	There was no Trade Union in the factory.		
<b>Reason for absence during the audit</b>	There was no Trade Union in the factory.		
<b>Reason for absence at the closing meeting</b>	There was no Trade Union in the factory.		

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# 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)**

This semi-announced audit was conducted by 2 auditors in 3.5 mandays in the window of Oct 13-27, 2025.

<b>Lead auditor</b>	Zsolt Badacsonyi	<b>APSCA Number</b>	21701449
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<b>Additional auditor</b>	Csilla Kiraly	<b>APSCA Number</b>	21704061
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<b>Date of declaration</b>	2025-10-16
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## Site representation

<b>Declaration</b>	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.
<b>Full name</b>	Baiba Kapteine
<b>Title</b>	Quality manager
<b>Date of declaration</b>	2025-10-16

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## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
10.A. Environment 2-Pillar	10.A.C Have a system in place for identifying...	GE	<a href="#">ZAF601148581</a>

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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	✓	✓	✓	✓
4. Child labour shall not be used	✓	✓	✓	✓
5. Legal wages are paid	✓	✓	✓	✓
6. Working hours are not excessive	✓	✓	✓	✓
7. No discrimination is practiced	✓	✓	✓	✓
8. Regular employment is provided	✓	✓	✓	✓

✗ Not addressed

⚠ Fundamental improvements required

ℹ Some improvements recommended

✓ Robust management systems

[← Summary of findings](#)

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	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	✓	✓	✓	✓
9. No harsh or inhumane treatment is allowed	✓	✓	✓	✓
10.A. Environment 2-Pillar	✓	✓	✓	✓
10.C. Business ethics	✓	✓	✓	✓

✗ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

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# Site details

## Company and site details

**Sedex company reference** ZC408056164

**Sedex site reference** ZS408067304

**Company name** Livonia Print SIA

**Business ownership type** GOODS

**Site name** Livonia Print SIA

**Site name in local language**

<b>GPS location</b>	<b>GPS address</b>	Jūrkalnes iela 15/25, Zemgales priekšpilsēta, Rīga
	<b>Coordinates</b>	56.943577173548235, 24.033273697925544

**Is the worksite in a remote location, far from habitation?** No

<b>Site contact</b>	<b>Contact name</b>	Baiba Kapteine
	<b>Job title</b>	Quality manager
	<b>Phone number</b>	+371 67442831
	<b>Email</b>	baiba.kapteine@livoniaprint.lv

**Applicable business and other legally required business license numbers and documents** Business License (Nr. 40003827729, without expiry)

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[Worker analysis →](#)

## Site activities

Site function	Factory Processing/Manufacturer Finished Product Supplier
Site activities	<b>Primary</b> Manufacture of other articles of paper and paperboard
	<b>Secondary</b> <b>Other</b>
Product type	Printed paper products
Process overview	Off-set printing (4 Heidelberg Speedmasters), binding (Muller Martini, Ecosystem MODULO DRY 76), Saddle-stitching Heidelberg Stitchmaster ST270, saddle stitching line. Soft-cover book production (on Muller Martini Alegro), Hard-cover book production (on Muller Martini Kolibri/Diamant MC, hard cover book line with ribbon inserting, jacketing, shrinkwrapping and palletizer), Binding and finishing for digital production (on Hunkeler book line, digitally printed reels to signatures or sheets, 2 Muller Martini Ventura MC Digital, sewing machine for digitally printed sheets and on Muller Martini Diamant MC Digital, casing-in line for digital production), Lamination (on Ecosystem MODULO DRY 76, dry laminating machine, Ecosystem AQUA 102, wet/dry laminating machine, D&K Europa, compact fully automated B2 size lamination system), Folding (on 10 Heidelberg Stahlfolders and 3 Heidelberg TH82-P Stahlfolders), Sewing (on 4 Muller Martini Ventura Connect sewing systems, 12-24 feeders), Cutting (on 5 Polar cutting machines), Board Cutting (on Kolbus PK-PK 170, PK 170 and IDEAL Gandria 130 board cutters), Case making (on Kolbus DA 280 and 3 Horauf BDM book case making machines), Embossing and Foiling (on KAMA ProCut 76 Foil, 2 Kolbus PE 312 and Kolbus PE 70 embossing and foiling presses) and UV coating (on ECOSYSTEM EcoScreen 106 and ECOSYSTEM EcoDigital UV).
What level of mechanization best describes the work at this site?	High mechanisation / low manual Labour

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## Site scope

**Is the audited site a physically continuous area?** Yes

**What is the area of audited site to its boundary?** 26500m<sup>2</sup>

**Building 1** **Last construction works on site** 2010

**If building is shared, provide details**  
 The factory rents sits premises from the landlord. One part of the building is occupied by the factory, rest part are occupied by other entities.

**Number of floors** 2

**Description of floor activities**  
 Offices, break room and social premises on first floor. Production, warehouses, offices and social premises on ground floor.

**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

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[Worker analysis →](#)

## Worker accommodation and transport

**Are there any site-provided worker accommodation buildings?** No

**Does the site organise worker transport to the worksite?** Not provided  
 The factory does not provide transportation for workers.

## Work patterns

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

**Is there any night shift work at the site?** Yes

There were several shift patterns in the factory. There were 3 shifts in digital printing: 1st: 07:00-15:00, 2nd: 15:00-23:00, 3rd: 23:00-07:00. There were two shifts in binding, internal logistic, folding, maintenance, warehouse, off-set printing, post-process and cover production: 1st: 07:00-19:00, 2nd: 19:00-07:00 in different working schedules (3+3, 4+4 or other) in 3 months long time bank system starting from January 1 each year.

**What percentage of the workforce, including temporary and agency workers, work during the night shift?** 77%

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## Work patterns

<b>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?</b>	Yes  The interviewed workers have night shift also, thus they were involved into the sample.
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## Site assessments

<b>Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?</b>	ISO 50001 (Energy management), ISO 14001 (Environmental management)
<b>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?</b>	No  The site was not assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.
<b>Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?</b>	No  There was no Human Rights Impact Assessment in the factory.

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# Worker analysis

Gender disaggregated data available Men and women

## Worker totals

	Men	Women	Other	Total
<b>Number of workers</b>	373 (68.4%)	172 (31.6%)	- -	545 (100%)

## Workers by type

	Men	Women	Other	Total
<b>Permanent workers (employees)</b>	373 (68.4%)	172 (31.6%)	- -	545 (100%)
<b>Temporary or fixed term employees</b>	0 -	0 -	- -	0 (0%)
<b>Agency or subcontracted workers</b>	0 -	0 -	- -	0 (0%)
<b>Seasonal workers</b>	0 -	0 -	- -	0 (0%)
<b>Self-employed workers</b>	0 -	0 -	- -	0 (0%)
<b>Informal workers including home workers</b>	0 -	0 -	- -	0 (0%)
<b>Apprentices, trainees or interns</b>	0 -	0 -	- -	0 (0%)

\* % of total workforce

[← Site details](#)

[Worker interviews →](#)

## Migrant workers

	Men	Women	Other	Total
<b>Domestic migrant workers</b>	0 -	0 -	- -	0 (0%)
<b>International migrant workers</b>	16 (55.2%)	13 (44.8%)	- -	29 (5.3%)
<b>Total migrant workers</b>	16 (55.2%)	13 (44.8%)	- -	29 (5.3%)

\* % of total workforce

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

## Workers by age

	Men	Women	Other	Total
<b>18 - 24 years old</b>	30 (75%)	10 (25%)	- -	40 (7.3%)
<b>15 - 17 years old</b>	0 -	0 -	- -	0 (0%)
<b>Under 15 years old</b>	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? No

Describe how this may vary during peak periods There is no peak season in the factory.

Please list the nationalities of all workers, with the three most common nationalities listed first

Latvian  
Ukrainian

### Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Latvian	66%	29%	-	95%
Ukrainian	2%	3%	-	5%

### 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	373 (68.4%)	172 (31.6%)	- -	545 (100%)

\* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

## Workers by payment cycle

	Men	Women	Other	Total
<b>Paid daily</b>	0 -	0 -	- -	0 (0%)
<b>Paid weekly</b>	0 -	0 -	- -	0 (0%)
<b>Paid monthly</b>	373 (68.4%)	172 (31.6%)	- -	545 (100%)
<b>Other</b>	0 -	0 -	- -	0 (0%)

\* % of total workforce

If other payment cycle entered, please provide details      Not applicable

## People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
<b>Employees in management positions</b>	2 (40%)	3 (60%)	- -	5
<b>Supervisors or team leaders</b>	12 (70.6%)	5 (29.4%)	- -	17
<b>Administrative staff</b>	8 (33.3%)	16 (66.7%)	- -	24

[← 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	6 groups of 5			
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)

None reported

**What did the workers like the most about working at this site?** Other (provide details)

None reported

## Additional comments

The interviewees showed a cooperative attitude during the interview. The workers were satisfied with factory management, working hour and benefits in the factory. The information of interview was as below: For child labor issue, all interviewed workers said they were required to submit the effective personal ID cards for checking and interviewed by HR staff before entering the factory, all applicants should be over 18 years old. For freedom of association issue, there was no Trade Union, but a freely elected Workers Council was formed in the factory. Workers may issue their concerns through grievance box. For forced labor issues, workers were not required to deposit or leave their personal ID cards, they had access to toilets and potable water freely during working time. For discrimination issues, workers said they got the job based on working experiences and abilities, the female workers or male worker's wages obtained the same compensation at the same position, and all interviewees confirmed that no discrimination occurred in the factory. For disciplinary practice issues, workers would be warned, fired and trained, when they broke the factory rules. For safety and health issues, the factory provided on-the-job training for new workers and health& safety training to all workers annually. PPEs were given for all workers for free. For working hour, production-related workers said that they work in two shifts which is 12 hour long in 3 months long time bank in various schedules (3+3, 4+4). They confirmed that sometimes they have overtime, which is paid at the end of the time bank period. They have minimum one day off in 7 days period. For wages issues, all workers said they were paid by monthly rate and their overtime hours were compensated according to law.

[← Worker analysis](#)

[Measuring workplace impact →](#)

## Attitude of workers

<b>Attitude of workers' committee/union representatives</b>	The representatives confirmed that the management is open to solve any concerns raised by the workers. They corroborated that the Council meets at regular interval and discuss the actual issues.
<b>Attitude of managers</b>	Positive attitude, transparent and open-minded atmosphere. The attitude of management has been cooperative and transparent throughout the audit.

## Workers interviewed by type

	Total
<b>Permanent workers</b>	42
<b>Temporary or fixed-term employees</b>	0
<b>Agency or subcontracted workers</b>	0
<b>Seasonal workers</b>	0
<b>Other workers</b>	0
<b>Total number of workers interviewed</b>	42

## Workers interviewed by group/individual

	Men	Women	Other	Total
<b>Workers interviewed in groups</b>	15	15	-	30
<b>Workers interviewed individually</b>	8	4	-	12

[← Worker analysis](#)
[Measuring workplace impact →](#)

## Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	1	1	-	2
Total migrant workers interviewed	1	1	-	2

[← Worker interviews](#)
[Measuring workplace impact →](#)

# Measuring workplace impact

Gender disaggregated data available Men and women

## Annual worker turnover (%)<sup>\*</sup>

	Men	Women	Other	Total
Last full quarter (90 days)	2.0%	3.0%	-	5.0%
Last full calendar year (2024)	8.0%	15.0%	-	23.0%
Previous full calendar year (2023)	8.0%	12.0%	-	20.0%

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

## Rate of absenteeism (%)<sup>\*</sup>

	Men	Women	Other	Total
Last full quarter (90 days)	3.0%	4.0%	-	7.0%
Last full calendar year (2024)	3.0%	6.0%	-	9.0%
Previous full calendar year (2023)	3.0%	4.9%	-	7.9%

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

[← Worker interviews](#)

[Code area 0 →](#)

**Are accidents recorded?**

Yes

The company is aware how to record the accidents. Accident reporting format is defined by law and the factory submitted the reports to the authorities as required by law.

[← Worker interviews](#)

[Code area 0 →](#)

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

	Men	Women	Other	Total
Last full quarter (90 days)	0.18%	0.0%	-	0.18%
Last full calendar year (2024)	0.74%	0.0%	-	0.74%
Previous full calendar year (2023)	0.0%	0.35%	-	0.35%

\* 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)	2.02%	0.0%	-	2.02%
Last full calendar year (2024)	10.22%	0.0%	-	10.22%
Previous full calendar year (2023)	0.0%	32.45%	-	32.45%

\* 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%

[← Measuring workplace impact](#)

[Code area 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%

[← Measuring workplace impact](#)
[Code area 0 →](#)

# 0. Enabling accurate assessment

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
<b>Systems and evidence examined to validate this code section</b>	<p>Full access to premises, records, documents and interviews was assured by the factory. The factory did not try to bribe or influence the auditors. The documents were not falsified. The site profile was valid and accurate. The factory established a Corporate Social Responsibility and Business Ethics Policy, which is endorsed by the CEO, posted on notice boards and available in factory's intranet.</p> <p>Evidence examined:</p> <ul style="list-style-type: none"> <li>Corporate Social Responsibility and Business Ethics Policy</li> <li>Factory tour</li> <li>Management and worker interviews</li> </ul>		

[← Measuring workplace impact](#)

[Code area 1 →](#)

## 0. Enabling accurate assessment

### Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment? No

Did any workers selected by the auditor decline to be interviewed? No

[← Code area 0](#)

[Code area 1 →](#)

# 1. Employment is freely chosen

## Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met** Robust Management Systems

**Appoint a manager with sufficient seniority who is responsible for implementing procedures** Robust Management Systems

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures** Robust Management Systems

**Monitor the effectiveness of procedures to meet policy and workplace requirements** Robust Management Systems

**Explanation for management systems grades** Livonia Print established a Corporate Social Responsibility and Business Ethics Policy, which bans the forced labor and control the measures taken to prevent forced labor. The responsible person for the implementation and compliance to the Policy is the HR manager. The Corporate Social Responsibility and Business Ethics Policy is trained and communicated in intranet to all employees. The workers are aware of the content of the Policy. The factory monitors the efficiency of the implementation of the Policy through meetings, employee satisfactory surveys, internal audits and other channels which assure the robust management system.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 0](#)

[Code area 1.A →](#)

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**Systems and evidence examined to validate this code section**

There is no forced, bonded or involuntary prison labor in the factory. They do not retain original identity papers of employees, as well as do not require any deposits from employees. Workers are free to leave the workplace after reasonable notice. It was corroborated by the interviews.

Evidence examined:

Corporate Social Responsibility and Business Ethics Policy  
Job contracts  
Pay slips  
Factory tour  
Management and worker interviews

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[← Code area 0](#)

[Code area 1.A →](#)

1. Employment is freely chosen

## Data points

If required under local law, is there a published 'modern slavery' or similar statement? Not Applicable

Does the site utilise any workers who are prisoners? No

Does the site use the labour of persons required to work under any government scheme? No

[← Code area 1](#)

[Code area 1.A →](#)

# 1.A. Responsible recruitment and entitlement to work

## Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met** Robust Management Systems

**Appoint a manager with sufficient seniority who is responsible for implementing procedures** Robust Management Systems

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures** Robust Management Systems

**Monitor the effectiveness of procedures to meet policy and workplace requirements** Robust Management Systems

**Explanation for management systems grades** The company established a Personal Policy for recruitment and election of candidate employees, which details the recruitment, hiring and on-boarding process of an employee. The responsible person for the implementation and compliance to the Policy is the HR manager. The policy is trained to workers. The workers are aware of the policy. The factory monitors the efficiency of the implementation of the Policy through internal and external quality management system audits which assure the robust management system.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 1](#)

[Code area 2 →](#)

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**Systems and evidence examined to validate this code section**

There are Latvian and Ukrainian workers in the factory. The workers were employed by the factory. The factory does not ask workers to pay fees. The HR department checks the identity of each employed worker prior to employment and submits employment report during contracting. There were no costs related to the employment of migrant workers as they were already within the country.

Evidence examined:

Corporate Social Responsibility and Business Ethics Policy

Job contracts

Pay slips

Management and worker interviews

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[← Code area 1](#)

[Code area 2 →](#)

## 1.A. Responsible recruitment and entitlement to work

### Data points

#### Labour hire

<b>Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?</b>	Workers are recruited, selected, and hired directly by our company
<b>How do the labour providers recruit and hire workers?</b>	N/A - Recruitment providers not used
<b>Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?</b>	0
<b>Are there any subcontracted workers (excluding dispatched labour) on site?</b>	No
<b>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?</b>	Not Applicable
<b>Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?</b>	Not Applicable

#### Migrant workers

<b>Do any workers migrate across international borders to work at this site?</b>	Yes
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[← Code area 1.A](#)

[Code area 2 →](#)

List the sending countries Ukraine

Percentage of workers that are migrant 5%

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 Not Applicable and costs paid by workers during the recruitment and employment process?

Were recruitment fees or costs identified No during worker interviews?

There is no recruitment fee applied by the factory as was confirmed by workers.

[← Code area 1.A](#)

[Code area 2 →](#)

Audit company:  
Intertek Czech

Audit reference:  
ZAA600153051

Start Date:  
2025-10-15

End Date:  
2025-10-16

## 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 Corporate Social Responsibility and Business Ethics Policy controls the right of freedom of association and collective bargaining. The responsible person is the HR manager, who has a nomination. The workers are aware of the Policy and their rights. There is no Trade Union in the factory, but there is a Workers Council with freely elected representatives. The Policy is trained to workers. The factory monitors the efficiency of the implementation of the policy through annual employee surveys and internal audits which assure the robust management system

### 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**

There is no Trade Union in the factory, but a freely elected Workers Council is in place in the factory. Open door policy, as well as meetings are applied. Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

Evidence examined:

Corporate Social Responsibility and Business Ethics Policy

Meeting minutes of Worker's Council

Management and worker interviews

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[← Code area 1.A](#)

[Code area 3 →](#)

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

### Data points

Are trade unions allowed by law in the national context? Yes

Are there any registered trade unions in the workplace? No

Are they active?

Does the employer recognise the trade union? Yes

Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)? Yes

Are the worker representatives freely elected by the workforce as a whole? Yes

Does union/worker committee membership reflect the gender composition of the workforce? Yes

Does the membership reflect the nationality composition of the workforce? 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** 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 occupational and fire safety rules are controlled in internal regulations and working instructions. Health&Safety officer is nominated and have Job description detailing responsibilities and authorities. The workers are trained on safety procedures and policies annually and they are aware of these policies. The implementation of H&S policies is monitored by the management team on GEMBA walks, during quarterly safety walk-throughs by external service provider, as well as trainings and tests are conducted which assure the robust management system.

#### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 2](#)

[Code area 4 →](#)

**Systems and evidence examined to validate this code section**

Risk Assessments for all departments, processes and job positions were conducted by the site in April 3, 2023 (updated in CTP on April 3, 2025). PPEs are assured for workers for free according to the Risk Assessment and Working Instructions. Employees are surveyed by the company doctor according to law. Air quality, noise, vibration measurement was conducted by accredited lab in July 29, 2025. Inspection report of forklifts and production equipment were available. There are trained first aid staff. First aid kits are available in each workplace and fully stocked. Eye-wash kit is available where chemicals are in use. Safety Data Sheets of chemicals are available. There were 4 accidents with lots days in 2025 so far, reports were submitted to the authority. Safety trainings were held for the personnel annually. Last fire drill was conducted in April 9&25, 2025, in October 1&9, 2025 for all shifts and areas. The factory has a set of Safety Instructions which control safety rules. The building is rented and was built in the 2000s. The electrical equipment was in good condition and were inspected according to law. The Health&Safety issues can be raised by the workers and reported electronically to the management. Evacuation signs, evacuation plans with "You are here" mark and safety lighting were provided. The site was equipped with fire sprinkler, fire extinguishers, fire hydrants, emergency exits, fire resistant doors on the perimeter of single fire areas, lighting and emergency doors. The fire sprinkler, extinguishers and hydrants, emergency exits, fire resistant and lighting were inspected at regular intervals (on annual basis, according to law). Access to clean toilet and to potable water, sanitary facilities for food storage was provided. There was no dormitory on the site.

Evidence examined:

- Fire safety training attendance logs
- Fire drill reports
- Fire detection and alarm system
- Fire extinguishers inspection report
- Fire hose reels inspection report
- Fire Emergency Plan
- Risk Assessment
- Workplace (dust, noise) measurement
- Forklift inspection reports
- Safety training attendance logs
- Electrical inspection report
- First aid training certificates
- Management interview
- Worker Interview
- Accident logs and reports

[← Code area 2](#)

[Code area 4 →](#)

### 3. Working conditions are safe and hygienic

## Data points

Is someone within the company responsible for health and safety?	Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes Printing chemicals, solvents for cleaning
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Workers organise their own transport
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable There were no structural 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 Yes  
evaluation?**

[← Code area 3](#)

[Code area 4 →](#)

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Audit company:  
**Intertek Czech**

Audit reference:  
**ZAA600153051**

Start Date:  
**2025-10-15**

End Date:  
**2025-10-16**

## 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 factory established its child labor policy in the Corporate Social Responsibility and Business Ethics Policy and Personal Policy. The responsible person for the area is the HR manager. The policies are trained to the workers, and the workers know that the factory does not employ juvenile or children. The implementation of the policies is monitored by the management through walk-throughs, internal audits, document reviews and interviews which assure the robust management system.

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 3](#)

[Code area 5 →](#)

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**Systems and evidence examined to validate this code section**

The factory established its Corporate Social Responsibility and Business Ethics Policy stating that child labor is not allowed. Personnel files are indicating the birth date of employee. It is impossible to employ underage person, since the facility shall submit the name to the Authority, where the person is registered and the authority has all relevant data of employee (birth date, etc.). There was no young labor as well in the company, which was corroborated by interviews and company tour.

Evidence examined:

Corporate Social Responsibility and Business Ethics Policy  
Job contracts  
Personal files  
Factory tour  
Management and worker interviews

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[← Code area 3](#)

[Code area 5 →](#)

#### 4. Child labour shall not be used

## Data points

Percentage of workers that are age 24 or younger 7%

Enter the legal age of employment 16

Enter the age of the youngest worker identified 18

Enter the number of workers under local legal minimum age 0

Enter the number of workers under 15 years old 0

Percentage of workers that are apprentices, trainees or interns 0.0%

Were there children present on the work floor but not working at the time of audit? No

Do children live at the accommodation provided to workers? Not Applicable

[← Code area 4](#)

[Code area 5 →](#)

## 5. Legal wages are paid

### Management systems

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

Robust Management Systems

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

Robust Management Systems

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

Robust Management Systems

**Monitor the effectiveness of procedures to meet policy and workplace requirements**

Robust Management Systems

**Explanation for management systems grades**

The wages are controlled in the Job contracts and by Remuneration Policy. The factory is aware of living wage calculation, using Anker methodology. The HR manager takes the responsibility for the area of wages. The workers are trained on wage policy and this is communicated to them in intranet (Next system). The implementation of the Remuneration policy is monitored by the Chief Accountant through payroll audits, as well as external financial audits are also conducted which assure the robust management system.

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 4](#)

[Code area 5.A →](#)

---

**Systems and evidence examined to validate this code section**

Wages and hours records from July 2025 (random month), August 2025 (random month), and September 2025 (last current month) of 42 employees (including 2 Ukrainian workers) were reviewed. It was observed during documentation review and employees' interview, that all workers' wages are above the legal minimum. The employees signed their contract and the employment conditions upon hiring. They all stated that payrolls were clear and all deductions are understood. They also confirmed that there is no delay in payment. Review of pay slips showed that all the legally required deductions (pension, unemployment, income tax) were made and conformed to the legal requirements. The pay slips are understood by the employees. The factory pays bonuses to workers according the its Bonus policy and the overtime is paid at the end of the time bank period according to law.

Evidence examined:

Corporate Social Responsibility and Business Ethics Policy  
Job contracts  
Pay slips  
Personnel files  
Bonus policy  
Management and worker interviews

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[← Code area 4](#)

[Code area 5.A →](#)

## 5. Legal wages are paid

### Data points

**What is the basic wage paid to workers?** The legal minimum wage  
 Wages meet a living 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 renumeration

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

### Summary information

**Is legal wage/legally recognised CBAs data available for any of these options?** Monthly

**Is actual wage data available on site for any of these options?** Monthly

<b>Maximum legal working hours</b>	<b>Max hours per day</b>	12.0
	<b>Max hours per week</b>	Non applicable
	<b>Max hours per month</b>	Non applicable

[← Code area 5](#)

[Code area 5.A →](#)

<b>Actual required working hours</b>	<b>Required hours per day</b>	12.0
	<b>Required hours per week</b>	Non applicable
	<b>Required hours per month</b>	Non applicable
<b>Maximum legal overtime hours</b>	<b>Max hours per day</b>	4.0
	<b>Max hours per week</b>	Non applicable
	<b>Max hours per month</b>	Non applicable
<b>Actual overtime hours</b>	<b>Max hours per day</b>	0.0
	<b>Max hours per week</b>	11.0
	<b>Max hours per month</b>	32.0
<b>Minimum legal wage</b>	<b>Min per hour</b>	Non applicable
	<b>Min per day</b>	Non applicable
	<b>Min per week</b>	Non applicable
	<b>Min per month</b>	740.0
<b>Actual minimum wage</b>	<b>Actual per hour</b>	Non applicable
	<b>Actual per day</b>	Non applicable
	<b>Actual per week</b>	Non applicable
	<b>Actual per month</b>	950.0
<b>Minimum legal overtime wage</b>	<b>Min per hour</b>	8.8
	<b>Min per day</b>	Non applicable
	<b>Min per week</b>	Non applicable
	<b>Min per month</b>	Non applicable

[← Code area 5](#)
[Code area 5.A →](#)

<b>Actual minimum overtime wage</b>	<b>Actual per hour</b>	11.3
	<b>Actual per day</b>	Non applicable
	<b>Actual per week</b>	Non applicable
	<b>Actual per month</b>	Non applicable

## Wage analysis

<b>Number of workers' records checked</b>	126
<b>Provide the date and details of the records</b>	42 pay slips from July 2025 (random month), 42 from August 2025 (random month) and 42 from September 2025 (last current month)
<b>Are there different legal minimum/legally recognised CBAs wage grades?</b>	No
<b>For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?</b>	Above legal minimum
<b>Indicate the breakdown of workforce per earnings</b>	100% of workers were paid above the legal minimum.
<b>Are there any bonus schemes used?</b>	Yes  Quality and presence bonus is paid.
<b>Were accurate records shown at the first request?</b>	Yes
<b>Were any inconsistencies found?</b>	No

[← Code area 5](#)
[Code area 5.A →](#)

## 5.A. Living wages are paid

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			
<b>Systems and evidence examined to validate this code section</b>	<p>The factory is aware of calculation (using Anker methodology) of living wage and prepared it for 2025. The calculated net living wage was 645 EUR, the lowest net wage was 832 EUR.</p> <p>Evidence examined:</p> <ul style="list-style-type: none"> <li>Corporate Social Responsibility and Business Ethics Policy</li> <li>Living wage calculation (Anker)</li> <li>Pay slips</li> <li>Management and worker interviews</li> </ul>		

[← Code area 5](#)

[Code area 6 →](#)

## 6. Working hours are not excessive

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The working hours and related rules are controlled in the Job Contracts and Working Hour Policy. The HR manager is responsible for working hour management. The workers are trained on working hour policy which is available electronically in IT (Next) system. The working hour policy implementation is monitored by the HR department on monthly basis through document (attendance log) review, as well as internal and external audits are conducted which assure the robust management system.

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 5.A](#)
[Code area 7 →](#)

---

**Systems and evidence examined to validate this code section**

There were several shift patterns in the factory. There were 3 shifts in digital printing: 1st: 07:00-15:00, 2nd: 15:00-23:00, 3rd: 23:00-07:00. There were two shifts in binding, internal logistic, folding, maintenance, warehouse, off-set printing, post-process and cover production: 1st: 07:00-19:00, 2nd: 19:00-07:00 in different working schedules (3+3, 4+4 or other) in 3 months long time bank system starting from January 1 each year. The attendance is logged by using of swipe cards by the employees. Attendance logs of 42 sampled workers from July 2025 (random month), August 2025 (random month), and September 2025 (last current month) showed that the employees work maximum 12 hours per day and maximum 44 hours per week, but 40 hours in average of time bank. OT was found in the samples and were paid according to law at the end of the month, and additional payment at the end of the time bank.

Evidence examined:

Corporate Social Responsibility and Business Ethics Policy  
Job contracts  
Pay slips  
Attendance logs  
Factory tour  
Management and worker interviews

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[← Code area 5.A](#)

[Code area 7 →](#)

## 6. Working hours are not excessive

### Data points

Is the sample size the same as in the wages section? Yes

Normal day overtime premium as a percentage of standard wages 200%

If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations? Not applicable

Excluding overtime, what are the regular working hours per week for workers at this site? 40.0

Including overtime, what is the average number of working hours per week for full-time workers at this site? 41.0

In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site? 44.0

Maximum number of days worked without a day off in sample 5

[← Code area 6](#)

[Code area 7 →](#)

## 7. No discrimination is practiced

### Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met** Robust Management Systems

**Appoint a manager with sufficient seniority who is responsible for implementing procedures** Robust Management Systems

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures** Robust Management Systems

**Monitor the effectiveness of procedures to meet policy and workplace requirements** Robust Management Systems

**Explanation for management systems grades** The Corporate Social Responsibility and Business Ethics Policy bans all type of discrimination. The responsible person for the human rights is the HR Manager. The workers are trained on the Corporate Social Responsibility and Business Ethics Policy. The workers are aware of the basic human rights, as they are trained. The efficiency of the implementation of Corporate Social Responsibility and Business Ethics Policy is monitored by the managers and supervisors through interviews, document review, and employee surveys which assure the robust management system.

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 6](#)

[Code area 8 →](#)

---

**Systems and evidence examined to validate this code section**

Employees may speak freely with the management. None type of discrimination is used, as was stated by the employees. All employees participate on mandatory trainings. Analysis of payroll confirmed the application of principle of "equal pay for equal work". There was no evidence of sexual harassment. Anti-discrimination policy is established in Corporate Social Responsibility and Business Ethics Policy

Evidence examined:

Corporate Social Responsibility and Business Ethics Policy

Job contracts

Personnel files

Pay slips

Factory tour

Management and worker interviews

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[← 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)?** 16%

**Representation of women in managerial roles (ratio of women workers to women managers)** 1%

**Representation of women in supervisory roles (ratio of women workers to women supervisors)** 2%

**Three most common nationalities in managerial and supervisory roles** Latvian

[← Code area 7](#)

[Code area 8 →](#)

## 8. Regular employment is provided

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The employment policy is written in the Personal Policy which is available electronically in the intranet. The HR manager is responsible for the implementation of employment policy. The workers are aware of employment policy, which was trained to them. The implementation of employment policy is monitored during internal and external audits, as well as document reviews and employee surveys are conducted which assure the robust management system.

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 7](#)

[Code area 8.A →](#)

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**Systems and evidence examined to validate this code section**

The employees are contracted for determinate or indeterminate period of employment with 3 months' probation period. This is stated in all labor contracts, which conforms to the legal requirements. Contracts are signed by the employee and the Managing director. The workers received contracts in their language and were valid. The migrant workers obtained work visa before employment.

Evidence examined:

Corporate Social Responsibility and Business Ethics Policy  
Job contracts  
Personnel files  
Factory tour  
Management and worker interviews

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[← Code area 7](#)

[Code area 8.A →](#)

## 8. Regular employment is provided

### Data points

Percentage of workers that are permanently or temporarily employed 100.0%

Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment 0.0%

Percentage of workers employed as apprentices, trainees or interns 0.0%

[← Code area 8](#)

[Code area 8.A →](#)

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

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	There is no homeworking in use either by the factory or by suppliers. The factory uses subcontractor and it is announced to the affected Client, as well as approval is obtained when necessary. The responsible person is the Production manager. The workers do not have responsibility or authority in contracting. The area is monitored by the management, which assure the robust management system.

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 8](#)
[Code area 9 →](#)

---

**Systems and evidence examined to validate this code section**

There were no homeworkers, as was corroborated during the factory tour, interviews and document review. The factory uses subcontractors, but not in Client's-related product. If subcontractor is used, then Client informed (and approval is obtained if needed) prior to production.

Evidence examined:

Factory tour

Management and worker interviews

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[← Code area 8](#)

[Code area 9 →](#)

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

### Data points

Are homeworkers employed directly or engaged through an agent? Not applicable

Gender disaggregated data available

#### Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-
What processes are carried out by homeworker?				
Are full records of homeworkers available at the site?				
Does the supplier buy products or services from suppliers that use homeworkers?	No  The factory does not buy products from suppliers using homeworkers.			

#### Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No  
  
There were no subcontractors in use for the Client's product production.

[← Code area 8.A](#)

[Code area 9 →](#)

**Are any sub-contractors used?** No

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[← Code area 8.A](#)

[Code area 9 →](#)

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Audit company:  
**Intertek Czech**

Audit reference:  
**ZAA600153051**

Start Date:  
**2025-10-15**

End Date:  
**2025-10-16**

## 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	Harsh and inhuman treatment, violence and harassment are prohibited by the Corporate Social Responsibility and Business Ethics Policy. The factory has a clear disciplinary policy. There is a Grievance policy and mechanism is in place, which is available on internal network electronically. The HR manager has the general responsibility for the area together with mid-level managers (supervisors). The workers are aware of the rights and obligations and they are trained. The management evaluates the efficiency of the implementation of the policies through interviews and questionnaires where workers may provide feedback to the management annually, which assure the robust management system.

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
		No findings	

[← Code area 8.A](#)

[Code area 10.A →](#)

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**Systems and evidence examined to validate this code section**

Employees were aware of the disciplinary practice which is controlled in their contracts also. There is an on-line whistleblower system in the factory. Grievance policy and mechanism is in place, which is available on company's internal network electronically. There were no reported compliants in the factory. There was no sign of abuse or harassment.

Evidence examined:

Corporate Social Responsibility and Business Ethics Policy  
Job contracts  
Personal files  
Factory tour  
Management and worker interviews

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[← Code area 8.A](#)

[Code area 10.A →](#)

## 9. No harsh or inhumane treatment is allowed

### Data points

<b>Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?</b>	Yes, there is a formal grievance process The grievance process is available to all workers The grievance process is available to members of the local community
<b>What type of grievance mechanism(s) are available?</b>	Anonymous web-based grievance platform.
<b>Number of grievances raised in the last 12 months</b>	0
<b>Number of grievances resolved in the last 12 months</b>	0

[← Code area 9](#)

[Code area 10.A →](#)

## 10.A. Environment 2-Pillar

### Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met** Robust Management Systems

**Appoint a manager with sufficient seniority who is responsible for implementing procedures** Robust Management Systems

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures** Robust Management Systems

**Monitor the effectiveness of procedures to meet policy and workplace requirements** Robust Management Systems

**Explanation for management systems grades** The environmental protection is controlled in the Corporate Social Responsibility and Business Ethics Policy, and in the Environmental Management System, which is certified against ISO 14001, ISO 50001, FSC and PEFC. The environmental policy is reviewed by the management on annual basis. The Quality manager is nominated and has Job description detailing the responsibilities and authorities. The workers are trained on all related policies annually. The implementation of policies is monitored during walk-throughs, internal and external audits, which assure the robust management system.

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
10.A. Environment 2-Pillar	10.A.C Have a system in place for identifying...	GE	<a href="#">ZAF601148581</a>

[← Code area 9](#)

[Code area 10.B →](#)

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**Systems and evidence examined to validate this code section**

The factory is certified against ISO 14001. A general environmental permit (without expiry) is in place. The factory established its environmental policy. The environmental requirements of the Clients are considered and implemented by the factory, if any.

**Evidence examined:**

Corporate Social Responsibility and Business Ethics Policy  
Environmental permit  
Environmental policy  
Factory tour  
Management and worker interviews

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[← Code area 9](#)

[Code area 10.B →](#)

# Findings: good examples

ZAF601148581

Good example

## Code area

10.A Environment 2-Pillar

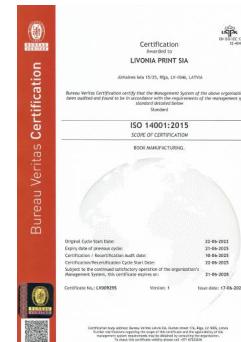
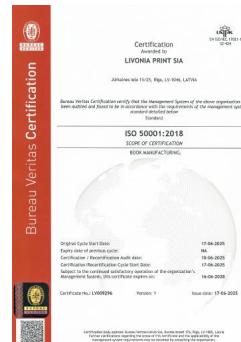
## Workplace requirement

10.A.C Have a system in place for identifying and remediating gaps between their clients' environmental standards and the environmental impact of their own operations.

## Description

The factory is certified against ISO 14001 (Nr. LV009295, valid till June 21, 2028), ISO 50001 (Nr. LV009296, valid till June 16, 2028), FSC (Nr. PBN-COC-012296, valid till January 9, 2028) and PEFC (Nr. VK-PEFC-COC-009, valid till December 12, 2026).

## Evidence



[PEFC Certificate.jpg](#)

[ISO 50001 Certificate.jpg](#)

[ISO 14001 Certificate.jpg](#)

[FSC Certificate.jpg](#)

[← Code area 10.A](#)

[Code area 10.B →](#)

Audit company:  
Intertek Czech

Audit reference:  
ZAA600153051

Start Date:  
2025-10-15

End Date:  
2025-10-16

## 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?	ISO 14001 (Nr. LV009295, valid till June 21, 2028), ISO 50001 (Nr. LV009296, valid till June 16, 2028)
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC))?	Yes  FSC (Nr. PBN-COC-012296, valid till January 9, 2028) and PEFC (Nr. VK-PEFC-COC-009, valid till December 12, 2026)
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	Yes  Breaks and potable water are provided.

[← Code area 10.A](#)

[Code area 10.B →](#)

## 10.B. Environment 4-Pillar

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
<b>Systems and evidence examined to validate this code section</b>	<p>The Environmental depute is responsible for environmental issues including communication with authorities and tracking of the legal requirements. The emissions to air are measured by accredited laboratory and found to be in compliance. The industrial wastewater is discharged to municipal system after pre-treatment and checked by the wastewater company at regular intervals. There were hazardous chemicals in the company and Safety Data Sheets were available in local language. The wastes are collected separately. Licensed vendors are used for delivery and disposal. The factory was never fined by the authorities. Electricity and gas consumption is monitored by the Environmental depute.</p> <p>Evidence examined:</p> <ul style="list-style-type: none"> <li>Corporate Social Responsibility and Business Ethics Policy</li> <li>Environmental permit</li> <li>Safety Data Sheets</li> <li>Environmental policy</li> <li>Factory tour</li> <li>Management and worker interviews</li> </ul>		

[← Code area 10.A](#)

[Code area 10.C →](#)

## 10.B. Environment 4-Pillar

### Data points

<b>Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?</b>	Yes
<b>What additional specific environmental policies does the site capture?</b>	Circular economy and resource efficiency Zero-waste and recycling protocols Sustainable material sourcing Biodiversity and eco system impact management Switching to renewable energy sources Packaging optimization
<b>Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?</b>	Yes  Managed by the Quality department, if therer is a requirement by the Client.
<b>Does the site have reduction targets in place to manage climate related risks?</b>	Yes, to reduce scope 1 greenhouse gases (GHGs) Yes, to reduce scope 2 greenhouse gases (GHGs) Yes, to reduce scope 3 greenhouse gases (GHGs)
<b>Are any of these science-based targets?</b>	Yes, approved by the Science Based Targets initiative (SBTi)
<b>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 &amp; 3))?</b>	Yes  Decrease Scope 1, Scope 2 and Scope 3 emissions,

[← Code area 10.B](#)

[Code area 10.C →](#)

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)
<b>Total electricity consumption from non-renewable sources (kWh)</b>	0	0
<b>Total electricity consumption from renewable sources (kWh)</b>	9,490,362	8,799,855
<b>Sources of renewable energy used</b>	Utility provider	Utility provider
<b>Types of renewable energy used</b>	Wind Hydroelectric	Wind Hydroelectric
<b>Total natural gas consumption (kWh)</b>	3,335,180	4,360,000
<b>Usage of other purchased fuels</b>	LPG - 7656 kg for forklifts	Data not available
<b>Has the site completed any carbon footprint analysis?</b>	Yes  <b>Scope 1: 716 (tCO<sub>2</sub>e)</b> <b>Scope 2: 2537 (tCO<sub>2</sub>e)</b> <b>Scope 3: 3376 (tCO<sub>2</sub>e)</b>	Yes  <b>Scope 1: 906 (tCO<sub>2</sub>e)</b> <b>Scope 2: 716 (tCO<sub>2</sub>e)</b> <b>Scope 3: 2490 (tCO<sub>2</sub>e)</b>
<b>Water sources</b>	municipal	municipal

[← Code area 10.B](#)

[Code area 10.C →](#)

Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	13,952	11,871
Water discharged	municipal	municipal
Water volume discharged (m3)	13,952	11,871
Water volume recycled (m3)	0	0
Total waste produced (mt)	7,478	7,666
Total hazardous waste produced (mt)	347	273
Waste to recycling (mt)	6,915	7,242
Waste to landfill (mt)	108	122
Waste to other (mt)	106	29
Total product produced (mt)	18,044	117,715

[← Code area 10.B](#)

[Code area 10.C →](#)

## 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 Corporate Social Responsibility and Business Ethics Policy controls anti-bribery, anti-corruption, conflict of interest and other business integrity rules. The Managing director is responsible for the implementation of the Code, which is available for employees and they are trained on it. The efficiency of the implementation of the Corporate Social Responsibility and Business Ethics Policy is evaluated during internal audits and external audits, which assure the robust management system.

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 10.B](#)

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**Systems and evidence examined to validate this code section**

Managers understand the importance of ethical business practices and aware of the legal requirements on bribery and corruption. All employees are trained on basic business ethics which is controlled in the Corporate Social Responsibility and Business Ethics Policy. The company was never fined due to unethical practice. Confidential reporting of integrity issues is assured in company's internal network electronically. The personal data of workers are managed according to GDPR Regulation.

**Evidence examined:**

Corporate Social Responsibility and Business Ethics Policy  
Management and worker interviews

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[← 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)?**

**Provide any certified anti-bribery management systems for the site**

[← Code area 10.C](#)

## Attachments



[Smoke detector.jpg](#)

[Laser fire detector.jpg](#)

[Eye-wash kit.jpg](#)

[Fire hydrant.jpg](#)



[Fire sprinkler.jpg](#)

[Toilet.jpg](#)

[Chemical label.jpg](#)

[Spill kit.jpg](#)



[Assembly point.jpg](#)

[Fire extinguisher.jpg](#)

[Locker room.jpg](#)

[Waste segregation.jpg](#)



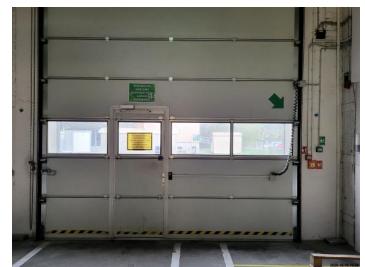
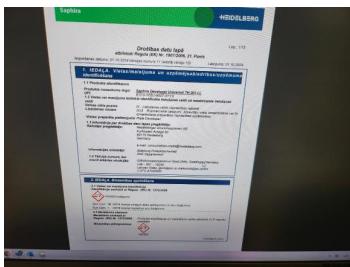
[Fire siren.jpg](#)

[Break room.jpg](#)

[Notice board.jpg](#)

[Electrical room.jpg](#)



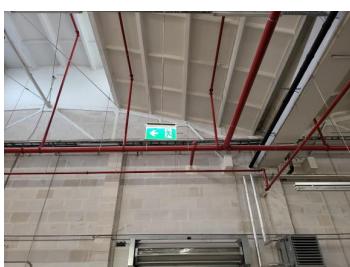


[SDS.jpg](#)

[First aid kit.jpg](#)

[CTP department.jpg](#)

[Fire exit.jpg](#)



[Emergency lighting.jpg](#)

[Potable water.jpg](#)

[Off-set printing department.jpg](#)

[Evacuation map.jpg](#)



[Fire alarm.jpg](#)

[Safety signs.jpg](#)

[UV dryer machines-UV printing.jpg](#)

[Aisle.jpg](#)



[Secondary containment.jpg](#)

[Chemicals.jpg](#)

[Main entrance.jpg](#)

[Cutting machines.jpg](#)





[Raw material storage.jpg](#)



[Digital printing.jpg](#)



[PPE.jpg](#)



[Chemical storage.jpg](#)



[Bonding department.jpg](#)



[Folding&sewing  
department.jpg](#)



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