



SMETA Corrective Action Plan Report (CAPR)

Version 6.1



Audit Content:

- (1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.
- (2) The audit scope was against the following reference documents
2-Pillar SMETA Audit
 - ETI Base Code
 - SMETA Additions
 - Universal rights covering UNGP
 - Management systems and code implementation,
 - Responsible Recruitment
 - Entitlement to Work & Immigration,
 - Sub-Contracting and Home working,**4-Pillar SMETA**
 - 2-Pillar requirements plus
 - Additional Pillar assessment of Environment
 - Additional Pillar assessment of Business Ethics
 - The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Guidance

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

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).

Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC402567601	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS415253514
Business name (Company name):	LARTIGIANABOTTONI SPA		
Site name:	LARTIGIANABOTTONI SPA		
Site address:	VIALE PAPA GIOVANNI XXIII NR 26 BOLGARE 24060 IT	Country:	IT
Site contact and job title:	Stefano Gualini / Administrator		
Site phone:	39 0354423144	Site e-mail:	info@lartigianabottoni.it
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar
			<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2023-09-14		

Audit Company Name:
Intertek Italy

Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

Audit Parameters

Audit Parameters				
Time in and time out	Day 1		Day 2	
	In	14:00	In	09:00
	Out	18:00	Out	17:00
Audit type:	PERIODIC			
Was the audit announced?	ANNOUNCED			
Was the Sedex SAQ available for review?	Yes			
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No			
Who signed and agreed CAPR	Stefano Gualini / Administrator			
Is further information available	No			

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	Yes
B: Present at the audit?	Yes	Yes	Yes
C: Present at the closing meeting?	Yes	Yes	Yes
<i>Reason for absence at the opening meeting</i>			
<i>Reason for absence during the audit</i>			
<i>Reason for absence at the closing meeting</i>			

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>3 - Working conditions are safe and hygienic</u>	3.1	§1	1	0	2	NC - ZAF600151664 GE - ZAF600151665 GE - ZAF600183832
<u>5 - Living wages are paid</u>			0	0	1	GE - ZAF600183833
<u>10B4 - Environment 4-pillar</u>			0	0	2	GE - ZAF600183834 GE - ZAF600183835

Local Law Issues

Issue	Description
§1	Local Laws DM 03/98 and Dlgs 81/08 require that emergency alarm tools are clearly marked.

Corrective Action Plan - Non Compliances

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600151664	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	197 - Inadequate signage / instructions of fire alarm	
Subcategory	Fire Safety - Fire alarms & Evacuation	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA414750117	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	N/A	
Local law issue	Local Laws DM 03/98 and Dlgs 81/08 require that emergency alarm tools are clearly marked.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	The emergency alarm tools, which are present in each departments, are not marked	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	There emergency alarm tools should have proper signage)	

Corrective Action Plan - Good Examples

Good Example		Evidence																				
[Back to findings summary]																						
<table border="1"> <thead> <tr> <th colspan="2">Good Example</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600151665</td> </tr> <tr> <td>Clause</td> <td>3 - Working conditions are safe and hygienic</td> </tr> <tr> <td>Issue Title</td> <td>293 - Excellent first aid facilities</td> </tr> <tr> <td>Subcategory</td> <td>First Aid / Accidents</td> </tr> <tr> <td>New or carried over?</td> <td><input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over</td> </tr> <tr> <td>Raised by audit</td> <td>ZAA414750117</td> </tr> <tr> <td>Explanation to the good example</td> <td>There is a defibrillator and 6 people trained in using it</td> </tr> <tr> <td>Evidence</td> <td>Facility tour, Document review</td> </tr> </tbody> </table>		Good Example		Status	OPEN	Reference	ZAF600151665	Clause	3 - Working conditions are safe and hygienic	Issue Title	293 - Excellent first aid facilities	Subcategory	First Aid / Accidents	New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	Raised by audit	ZAA414750117	Explanation to the good example	There is a defibrillator and 6 people trained in using it	Evidence	Facility tour, Document review	
Good Example																						
Status	OPEN																					
Reference	ZAF600151665																					
Clause	3 - Working conditions are safe and hygienic																					
Issue Title	293 - Excellent first aid facilities																					
Subcategory	First Aid / Accidents																					
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over																					
Raised by audit	ZAA414750117																					
Explanation to the good example	There is a defibrillator and 6 people trained in using it																					
Evidence	Facility tour, Document review																					

Good Example		Evidence																		
[Back to findings summary]																				
<table border="1"> <thead> <tr> <th colspan="2">Good Example</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600183832</td> </tr> <tr> <td>Clause</td> <td>3 - Working conditions are safe and hygienic</td> </tr> <tr> <td>Issue Title</td> <td>275 - Protective equipment above industry standard available on all machines</td> </tr> <tr> <td>Subcategory</td> <td>Machinery</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Explanation to the good example</td> <td>In milling department new aspiration hoods have been installed in order to avoid risk of explosion.</td> </tr> <tr> <td>Evidence</td> <td>Facility tour and document review</td> </tr> </tbody> </table>		Good Example		Status	OPEN	Reference	ZAF600183832	Clause	3 - Working conditions are safe and hygienic	Issue Title	275 - Protective equipment above industry standard available on all machines	Subcategory	Machinery	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	In milling department new aspiration hoods have been installed in order to avoid risk of explosion.	Evidence	Facility tour and document review	
Good Example																				
Status	OPEN																			
Reference	ZAF600183832																			
Clause	3 - Working conditions are safe and hygienic																			
Issue Title	275 - Protective equipment above industry standard available on all machines																			
Subcategory	Machinery																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
Explanation to the good example	In milling department new aspiration hoods have been installed in order to avoid risk of explosion.																			
Evidence	Facility tour and document review																			

Good Example		Evidence
[Back to findings summary]		
Good Example		
Status	OPEN	
Reference	ZAF600183833	
Clause	5 - Living wages are paid	
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	
Subcategory	Benefits & Insurance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	All employees received in 2022 an annual premium of Euro 1000,00	
Evidence	Document review, interviews	

Good Example		Evidence
[Back to findings summary]		
Good Example		
Status	OPEN	
Reference	ZAF600183834	
Clause	10B4 - Environment 4-pillar	
Issue Title	649 - The sites uses renewable energy (as a significant proportion of their total energy)	
Subcategory	Energy usage	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	The factory has installed a photovoltaic plant of 280 Kwh	
Evidence	Document review, interviews	

Good Example		Evidence																		
[Back to findings summary]																				
<table border="1"> <thead> <tr> <th colspan="2">Good Example</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600183835</td> </tr> <tr> <td>Clause</td> <td>10B4 - Environment 4-pillar</td> </tr> <tr> <td>Issue Title</td> <td>644 - The site has achieved climate neutrality (zero net anthropogenic greenhouse gas emissions)</td> </tr> <tr> <td>Subcategory</td> <td>Air emissions & GHG (Green House Gas)</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Explanation to the good example</td> <td>New aspiration system has been installed in laser cutting department in order to reduce air emissions</td> </tr> <tr> <td>Evidence</td> <td>Facility tour, Document review</td> </tr> </tbody> </table>		Good Example		Status	OPEN	Reference	ZAF600183835	Clause	10B4 - Environment 4-pillar	Issue Title	644 - The site has achieved climate neutrality (zero net anthropogenic greenhouse gas emissions)	Subcategory	Air emissions & GHG (Green House Gas)	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	New aspiration system has been installed in laser cutting department in order to reduce air emissions	Evidence	Facility tour, Document review	
Good Example																				
Status	OPEN																			
Reference	ZAF600183835																			
Clause	10B4 - Environment 4-pillar																			
Issue Title	644 - The site has achieved climate neutrality (zero net anthropogenic greenhouse gas emissions)																			
Subcategory	Air emissions & GHG (Green House Gas)																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
Explanation to the good example	New aspiration system has been installed in laser cutting department in order to reduce air emissions																			
Evidence	Facility tour, Document review																			

SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Eugenio Peluso	APSCA Number:	21701574
Additional Auditors:			
Date of declaration:	2023-09-15		

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

Site Representation	
Full Name:	Stefano Gualini
Title:	Administrator
Date of declaration:	2023-09-15
Comments: <i>Any exceptions to this must be recorded here (e.g. different sample size): Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020). The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i>	
- Due to industrial secrets the auditor was not allowed to take photos. - Due to very bad internet connection the word CAPAR was used for the signature.	

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.



For more information visit: [Sedexglobal.com](https://www.sedexglobal.com)

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

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

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)
http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

[Click here for Supplier \(B\) members:](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)
http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d

[Click here for Auditors:](https://www.surveymonkey.co.uk/r/BRTVCKP)
<https://www.surveymonkey.co.uk/r/BRTVCKP>