

Avery Dennison

ICAP Audit Report

Audit ID: 88512117

Audit Date: 7/12/2024

Company ID: 88331116

Company Name: DILCOM BULGARIA
EOOD




Company Basic Information
Audit Basic Information

AD region	DILCOM BULGARIA EOOD	Audit ID	88512117
Country	«SURVEYCOUNTRY»	Audit Type	ICAP
Company Type*	5976	Survey Name	
Company Name	DILCOM BULGARIA EOOD	Audit Method	Semi-announced
Company contact name	«0113SURVEYCONTACTNAME»	Audit Category	Full initial
Email	«0115EMAIL»	Audit firm	BV
Phone	«CON_PHONE_NUM»	Audit date	7/12/2024
Address	«SURVEYCOMPADDRESS»	Audit standard	ICAP Standards
		Is CW covered?	NO

*Company Type: 5975= Avery Dennison Inhouse sites (Tier 1 Company)
 5976= Avery Dennison Suppliers (Tier 2 Company)


Assessment Summary

ICAP score	93	ICAP rating	Highly Critical
Number of Open Non-Compliance	0		


Company Overview information

Year of Establish ment	«YEAR_ESTABLISHMENT»	Physical location changed	«012_LOCATION_CHANGE»	If yes, please state the current factory location address	«012_NEW_LOCATION»
Main Product	«MAIN_PRODUCT»	Manufacturing Process Overview	«015_MANUFACTURING»		
Peak Season	«PEAK_SEASON»	Trade Union?	«TRADE_UNION»		

Payment method
 (Bank transfer or cash) «PAYMENT_METHOD»

Wage calculation
 (piece rate wage, hourly wage) «WAGE_CALC»

0.2 Factory overview information: Factory Building and Capacity

Total surface Area of Campus (square meter)	«TOTAL_AREA_CAMPUS»	Building situation (list out the no.of building, and no.of building involved in production and warehouse)	«BUILDING_NR»
Any Workshop /warehouse locates out of factory campus	«023_WORKSHOP»	If yes, are outside units audited in this audit?	«024_UNITS»
Canteen in place?	«025_CA_NTEEN»	Dormitory in place?	<p>If yes, No. of Dormitory building</p> <p>If yes, is female dormitory separate d from male dormitory ?</p>
Are buildings owned/rented by factory owner?	«029_BUILDINGS_OWN»	If leased, please state owner information, and lease contract information.	«029_B_BUILDINGS_OWN»
Is factory share permise with other units? (Y/N)	«0210_SHARE_D_PREMISES»	If yes, please state the sharing factories' information, including product type in shared factories, independent business license available?	<p>If yes, are these shared factories available for audit?</p> <p>«0212_SHARED_PREMISES»</p>
Factory annual production capacity? (by unit or by turnover)		«028_ANNUAL_PRODUCTION»	

0.3 Factory overview information: Worker analysis

Total number of permanent workers	«031_NR_PER MANENT_WO RKERS»	Total number of contingent workers (CW)	«032_NR_CON T_WORKERS»	Total number of in plant contractor workers	«CONTRACTO RS»
No of female workers	«033_FEMALE_WORKERS»			No of male workers	«034_MALE_WORKERS »
Age of Youngest worker	«YOUNGWORKERS»	Are young workers working in the factory?	«YOUNGWORKERS_FACTORY»	If yes, number of young workers?	«YOUNGWORKERS_FACTORY_NR»
Any employees from minority (applicable to China only)	«039_MINORITY_WR»			If yes, list out the minority type and no.of employees	«039_B_MINORITY_WR»

0.4 Factory overview information: Subcontracting information

Any subcontractors used by audited factory	«041_SUBCONTRACTORS»	If yes	«041_B_SUBCONTRACTORS»
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0.5 Factory overview information: Audit Executive Summary

Audit process description (specify auditor name, auditor arrival & leave time, audit timeframe scope, open/close meeting summary)	«051_PROCESS_DESCRIPTION»		
Workers Interview Summary	0.5.2 Number of interviewed Workers	«052_NR_INTERV_WR»	
	0.5.3 Number of individual interviewed Workers	«053_NR_INDIVIDUAL_WR»	
	0.5.4 Number of individual interviewed Workers	«054_NR_GROUP_WR»	
	0.5.5 Number of IPC Workers interviewed	«054_NR_IPCC_WR»	



Additional Information- Compensation

Minimum legal wage at site	«121A»
Actual minimum wage at site	«121B»
Legal payment date	«122C»
Minimum legal overtime wage at site	«123A»
Actual minimum overtime wage at site	«123B»
Legal time frame and actual time frame the resigned workers must be paid upon	«1212A»



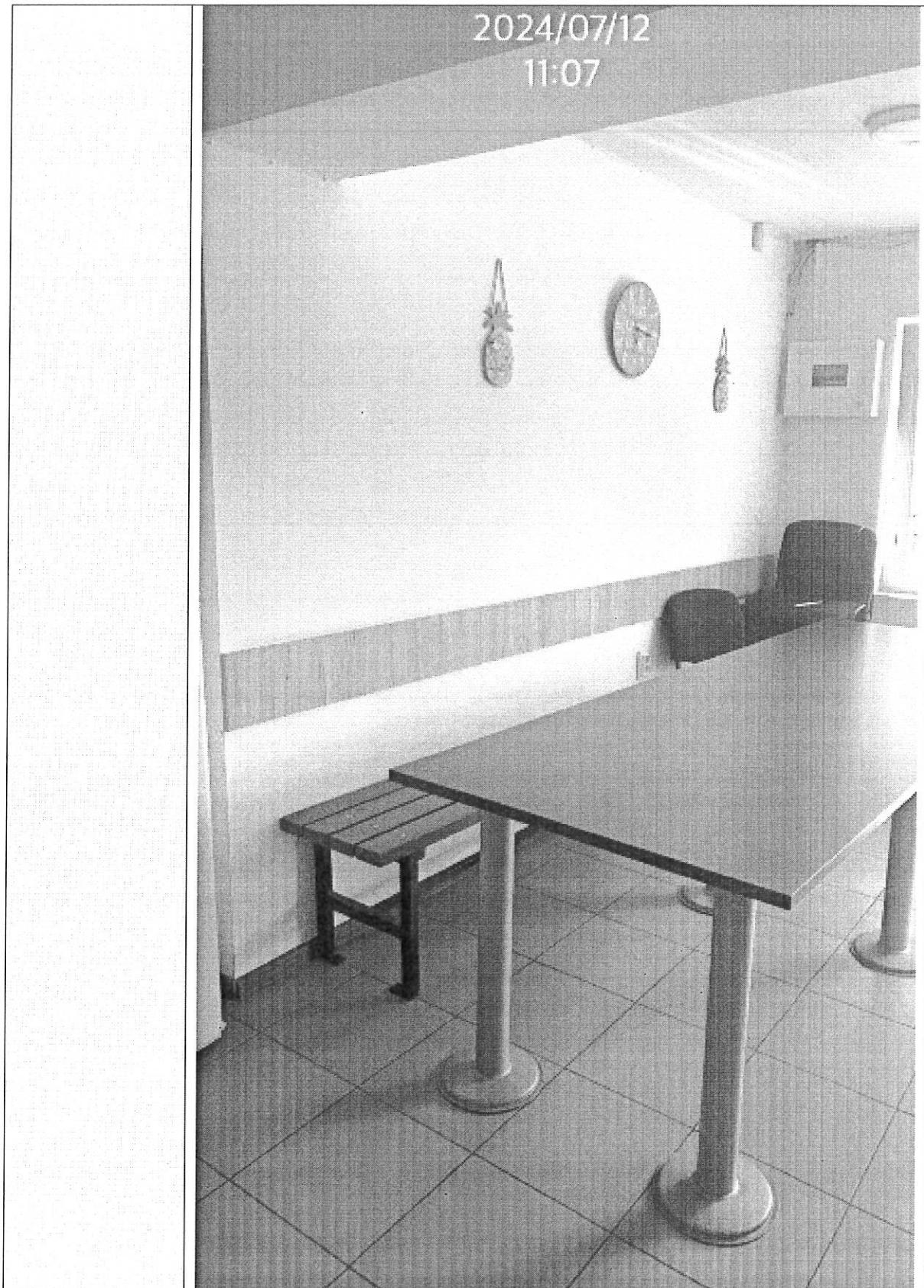
Audit Details – Non-Compliance

8.3.3.6 Health and Safety - Fire and Building Safety

8.3.3.6 Fire detection system (such as heat detector/smoke detector/etc.) must be in place if required by local law; Facilities must have effective fire alarm systems that provide audible and visual occupant notification to initiate evacuation in the event of an emergency and operate as one system throughout all areas and floors of the building. Notification methods include, but are not limited to, alarms and flashing lights.

Response	Non-compliance	Repeat?	False	Rating	<u>Highly Critical</u>
Details	1) No buttons for manual activation of the fire alarm system are available, except next to 2 exits (out of 5) from production and warehousing areas. 2) Visual emergency notification for work places and areas where hearing protection is used was not demonstrated. 3) The control panel of the fire alarm system was obstructed by light movable objects (dining chairs).				
Legal reference	3) Ordinance 8121z-647-2014- update 2021, Art. 32(5) In buildings and premises it is not permitted to obstruct the access to electrical panels, fire extinguishers, internal fire hydrants and control points of fire announcing systems, fire suppression systems and [...] the fire and smoke control systems. 1, 2) Legal reference- N/A				

	<p>Client's requirement: Fire detection system (such as heat detector/smoke detector/etc.) must be in place if required by local law; Facilities must have effective fire alarm systems that provide audible and visual occupant notification to initiate evacuation in the event of an emergency and operate as one system throughout all areas and floors of the building. Notification methods include, but are not limited to, alarms and flashing lights.</p>
Suggested actions	<p>1) Buttons for manual activation of fire alarm shall be available in each premise, to allow imminent and simultaneous emergency notification from each area towards all facility areas.</p> <p>2) In areas where hearing protection is used, visual emergency notification upon triggering the fire alarm shall be ensured.</p> <p>3) The control panel of fire alarm system and the buttons for its manual activation shall be always kept free from obstructions.</p>
Photos for Non-compliance	



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7.2.8 Disciplinary Process - Grievance mechanism

7.2.8 Supplier's management must have written grievance procedures in place that protect employee privacy, protect against possible retribution and permit workers to report unfair treatment to someone other than their supervisor

Response	Non-compliance	Repeat?	False	Rating	Major
Details	According to the management, there is no documented grievance process.				
Legal reference	Legal reference- N/A Client requirement: Supplier's management must have written grievance procedures in place that protect employee privacy, protect against possible retribution and permit workers to report unfair treatment to someone other than their supervisor.				
Suggested actions	It is recommended to implement, communicate to workers, and document such process.				
Photos for Non-compliance					

7.2.9.1 Disciplinary Process - Grievance mechanism

7.2.9.1 The facility should use a clearly defined and documented system for resolving disputes in the workplace, whether between co-workers or between workers and supervisors. Workers should have the ability to report problems to a person or committee other than a direct supervisor. This system should be communicated both verbally and in writing to the workers.

Response	Non-compliance	Repeat?	False	Rating	Major
Details	There is no documented system for resolving workplace disputes.				
Legal reference	Legal reference- N/A Client's requirement: The facility should use a clearly defined and documented system for resolving disputes in the workplace, whether between co-workers or between workers and supervisors. Workers should have the ability to report problems to a person or committee other than a direct supervisor. This system should be communicated both verbally and in writing to the workers.				
Suggested actions	It is recommended to implement, communicate to workers, and document such process.				
Photos for Non-compliance					

7.2.9.2 Disciplinary Process - No /ineffective Grievance mechanism

7.2.9.2 The facility must adopt and communicate a non-retaliation policy that guarantees that workers who report on problems or abuses do not suffer negative consequences.

Response	Non-compliance	Repeat?	False	Rating	Major
Details	There is no non-retaliation policy.				
Legal reference	Legal reference: N/A Client's requirement: The facility must adopt and communicate a non-retaliation policy that guarantees that workers who report on problems or abuses do not suffer negative consequences.				

Suggested actions	It is recommended to implement and communicate such policy.
Photos for Non-compliance	

7.2.10.1 Disciplinary Process - Grievance mechanism

7.2.10.1 Policy and procedures should be present in employee handbooks and manuals

Response	Non-compliance	Repeat?	False	Rating	Major
Details	There are no grievance policy and documented grievance process (procedures) included in Internal Regulations or in an employee handbook.				
Legal reference	Legal reference: N/A Client's requirement: Grievance Policy and procedures should be present in employee handbooks and manuals.				
Suggested actions	It is recommended to implement documented grievance policy and process, and to include these in employee handbooks and manuals (i.e. Internal Regulations and/or similar).				
Photos for Non-compliance					

7.2.10.2 Disciplinary Process - Grievance mechanism

7.2.10.2 Grievance procedures should be included in orientation for new and temporary hires and in periodic training for existing employees, supervisors, and managers

Response	Non-compliance	Repeat?	False	Rating	<u>Improved</u>
Details	There are no grievance policy and documented grievance process (procedures) included in orientation training and periodical training to workers/ supervisors, and managers.				
Legal reference	Legal reference: N/A Client's requirement: Grievance procedures should be included in orientation for new and temporary hires and in periodic training for existing employees, supervisors, and managers.				
Suggested actions	It is recommended to implement, communicate to workers, and document such policy and related process.				
Photos for Non-compliance					

7.2.10.4 Disciplinary Process - Grievance mechanism

7.2.10.4 A discreet, effective complaint procedure should be in place for all employees. A trusted person, such as an appointed counselor, should be the administrator of the system

Response	Non-compliance	Repeat?	False	Rating	<u>Major</u>
Details	There is no documented complaint process.				
Legal reference	Legal reference: N/A Client's requirement: A discreet, effective complaint procedure should be in place for all employees. A trusted person, such as an appointed counselor, should be the administrator of the system.				

Suggested actions	It is recommended to implement, communicate to workers, and document such process.
Photos for Non-compliance	

7.2.10.5 Disciplinary Process - Grievance mechanism

7.2.10.5 There should be an internal, confidential appeal procedure that employees can use if management does not adequately respond to their complaint. Written records of appeal procedures (including their outcome) should be kept.

Response	Non-compliance	Repeat?	False	Rating	Major
Details	The company does not have internal, confidential appeal procedure that employees can use if management does not adequately respond to their complaint.				
Legal reference	Legal reference: Not applicable Client's requirement: There should be an internal, confidential appeal procedure that employees can use if management does not adequately respond to their complaint. Written records of appeal procedures (including their outcome) should be kept.				
Suggested actions	It is recommended to implement, communicate to workers, and document such process.				

Photos for Non-compliance 	
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7.2.10.6 Disciplinary Process - Grievance mechanism
7.2.10.6 There should be an appeal procedure for employees who feel unjustly warned or disciplined

Response	Non-compliance	Repeat?	False	Rating	Major
Details	There is no documented appeal process for employees who feel unjustly warned or disciplined.				
Legal reference	Legal reference: N/A Client's requirement: There should be an appeal procedure for employees who feel unjustly warned or disciplined.				
Suggested actions	It is recommended to implement, communicate to workers, and document such process.				
Photos for Non-compliance					

7.2.10.7 Disciplinary Process - Grievance mechanism
7.2.10.7 There should be suggestion boxes in private and secure locations that are easily accessed by the employees. The facility may also provide a telephone 'hotline' number or post office box address for employees to report grievances

Response	Non-compliance	Repeat?	False	Rating	<u>Major</u>
Details	There are no suggestion boxes, 'hotline' or other means of confidential raising grievances.				
Legal reference	Legal reference: N/A Client's requirement: There should be suggestion boxes in private and secure locations that are easily accessed by the employees. The facility may also provide a telephone 'hotline' number or post office box address for employees to report grievances.				
Suggested actions	It is recommended to implement, communicate to workers, and document such process and relevant mechanisms.				
Photos for Non-compliance					

7.2.10.9 Disciplinary Process - Grievance mechanism

7.2.10.9 Supplier's management should be trained in disciplinary procedure compliance and where possible, employees should receive instruction on their rights under national law and company expectations and where relevant, best practices and international standards.

Response	Non-compliance	Repeat?	False	Rating	<u>Minor</u>
Details	No training in disciplinary process of management is available.				
Legal reference	Legal reference: N/A Client's requirement: Supplier's management should be trained in disciplinary procedure compliance and where possible, employees should receive instruction on their rights under national law and company expectations and where relevant, best practices and international standards.				
Suggested actions	It is recommended to provide such training to manager/-s who are authorized to implement and communicate disciplinary actions.				

Photos for Non-compliance	
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4.2.3 Child Labor - Child labor					
4.2.3 Factory management is required to implement effective age-verification procedures. Each personnel file should contain copies of the applicants' formal ID documentation (such as birth certificates, national ID cards or school certificates). The person assigned for recruitment, selection, and hiring position should be provided with a detailed SOP and is trained in interview and other age verification techniques.					
Response	Non-compliance	Repeat?	False	Rating	<u>Critical</u>
Details	No documented process and training in age verification process of the person assigned for recruitment, selection, and hiring position.				
Legal reference	Legal reference: N/A Client's requirement: The person assigned for recruitment, selection, and hiring position should be provided with a detailed SOP and is trained in interview and other age verification techniques.				
Suggested actions	It is recommended to implement documented age verification process and provide documented training on it of the person assigned for recruitment, selection, and hiring.				
Photos for Non-compliance					

8.2.1.1 Health and Safety - EHS Management Systems

8.2.1.1 Each facility must conduct the fire safety risk assessment on annual basis

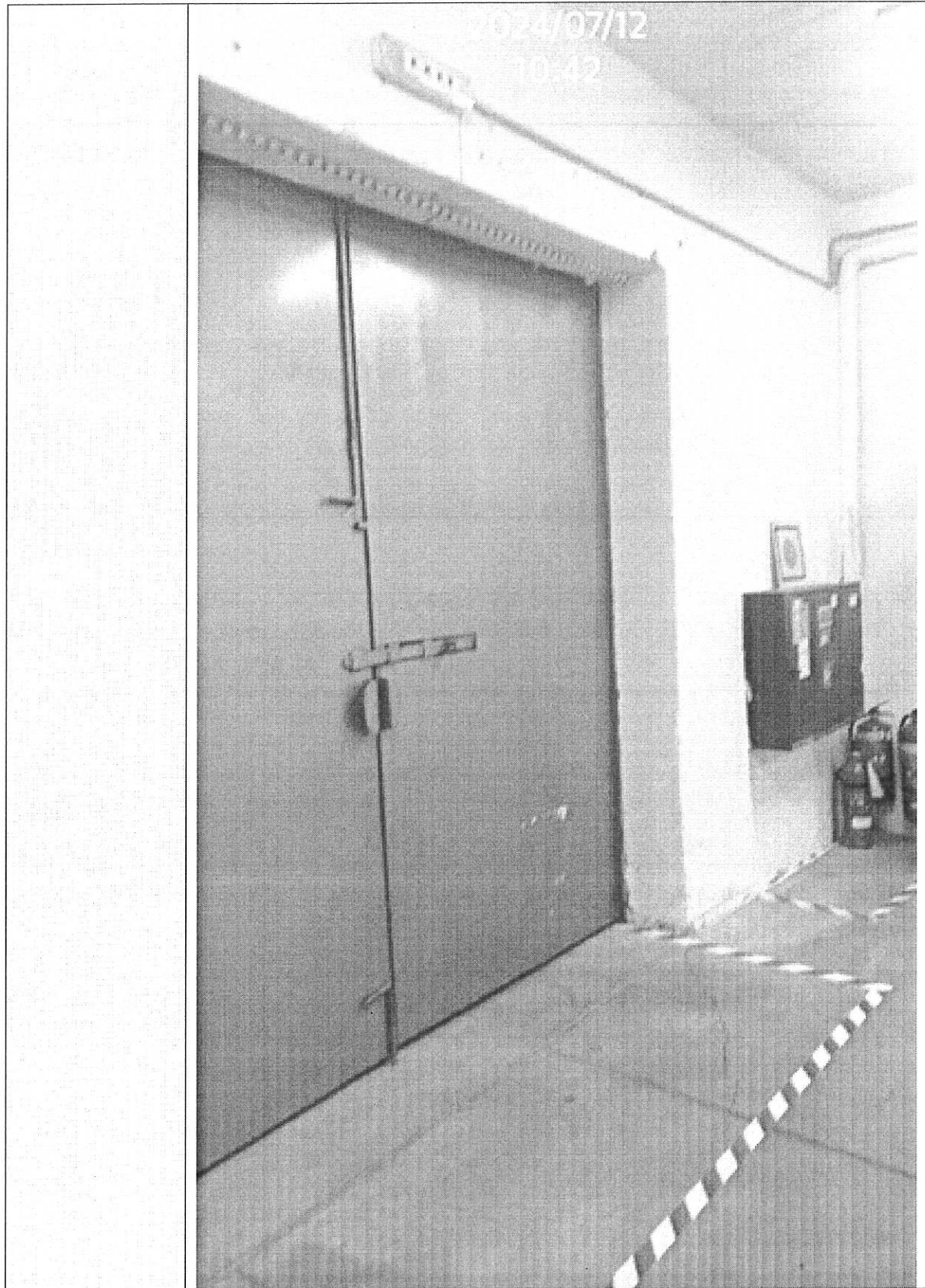
Response	Non-compliance	Repeat?	False	Rating	<u>Major</u>
Details	<p>The facility does not conduct fire risk assessment on regular annual basis. Auditor's note: Risk assessment of entire facility and all work places and areas includes the individual fire risk of the aforementioned components, and is done per local law each 5 years or upon significant changes.</p>				
Legal reference	<p>Legal reference: N/A Client's requirement: Each facility must conduct the fire safety risk assessment on annual basis.</p>				
Suggested actions	<p>It is recommended to conduct fire risk assessment on regular annual basis and to document it.</p>				
Photos for Non-compliance					

8.3.2.1 Health and Safety - Fire and Building Safety

8.3.2.1 Aisles, exits and stairwells are kept clear, unblocked and unlocked at all times

Response	Non-compliance	Repeat?	False	Rating	<u>Highly Critical</u>
Details	<p>Inappropriate type of door of one (out of 5) exits from ground level floor: effort and 1 motion are needed for unlocking half of it; effort and 3 motions are needed to unlock and open it completely.</p> <p>The same exit was found locked during the tour (this was immediately corrected). There are 4 alternative exits at distance approx. 2 minutes or less. Location: warehouse finished product.</p>				
Legal reference	<p>Legal reference: Ordinance 8121z-647/ 2014- update 2021, Art. 34(1) During exploitation, it is not permitted: 2. Locking (blocking in closed condition) of doors along the evacuation exits during and out of working time when there are people.</p>				

	Client's requirement: Aisles, exits and stairwells are kept clear, unblocked and unlocked at all times.
Suggested actions	It is recommended to ensure that the doors of all emergency evacuation exits are always unlocked and unobstructed during all hours of building occupancy. The doors shall be of adequate type, opening towards evacuation, with one single motion, not requiring effort of special knowledge.
Photos for Non-compliance	



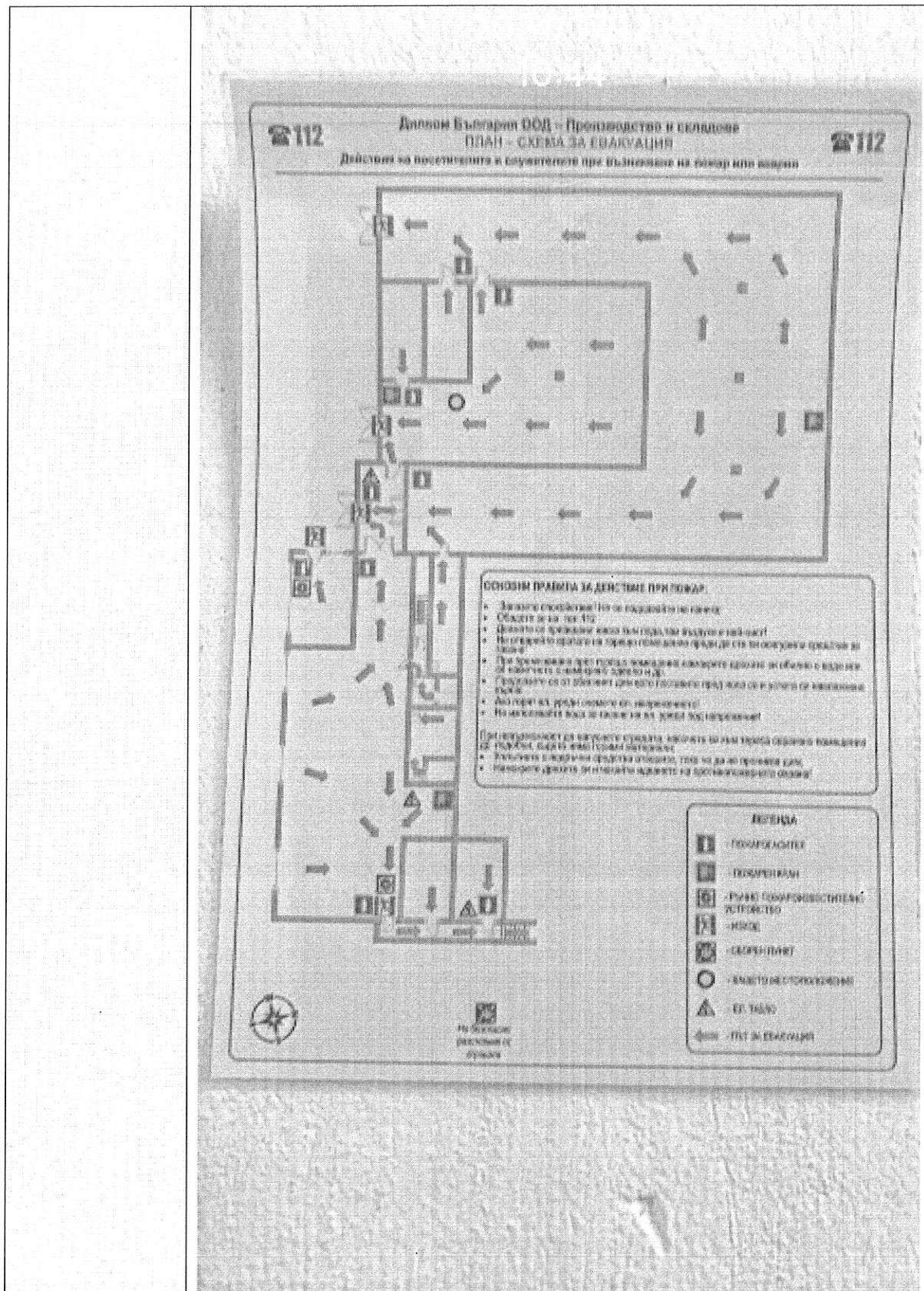
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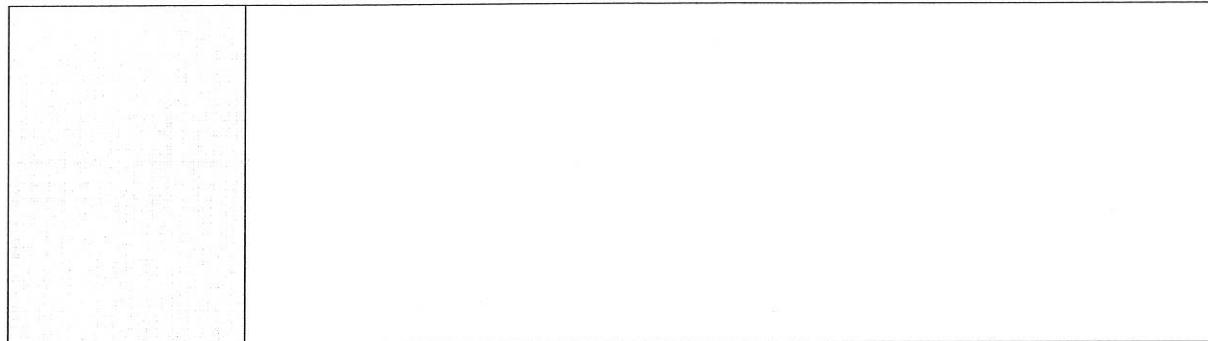
8.3.2.2 Health and Safety - Fire and Building Safety

8.3.2.2 Facilities will establish an adequate evacuation plan complying with local law, in any event such a plan, must include key information such as the location of emergency exits, fire alarms and fire extinguishers; evacuation route; assigned responsible personnel; and meeting location after exiting the building.

Response	Non-compliance	Repeat?	False	Rating	<u>Improved</u>
Details	No training records for the assigned emergency responsible personnel (except for first aiders).				
Legal reference	Details: Evacuation plot plans are posted throughout the facility areas. The facility has detailed evacuation plan process including assigning emergency responders. Training certificates and records are available only for first aiders.				
	Act on Health and Safety at Work (1997), Art.20: For the prevention of harmful consequences due to unforeseeable circumstances and taking into consideration the nature of activities and size of the facility, the employer shall : [...] 2. assign employees required to implement the measures for elimination of the danger, first aid, firefighting and evacuation of employees and ensure that the number of such employees and their training is adequate to the specific hazards and the size of the undertaking.				
Suggested actions	The emergency response team shall be adequately trained in firefighting and evacuation rescue; the training shall be documented.				

Photos for Non-compliance



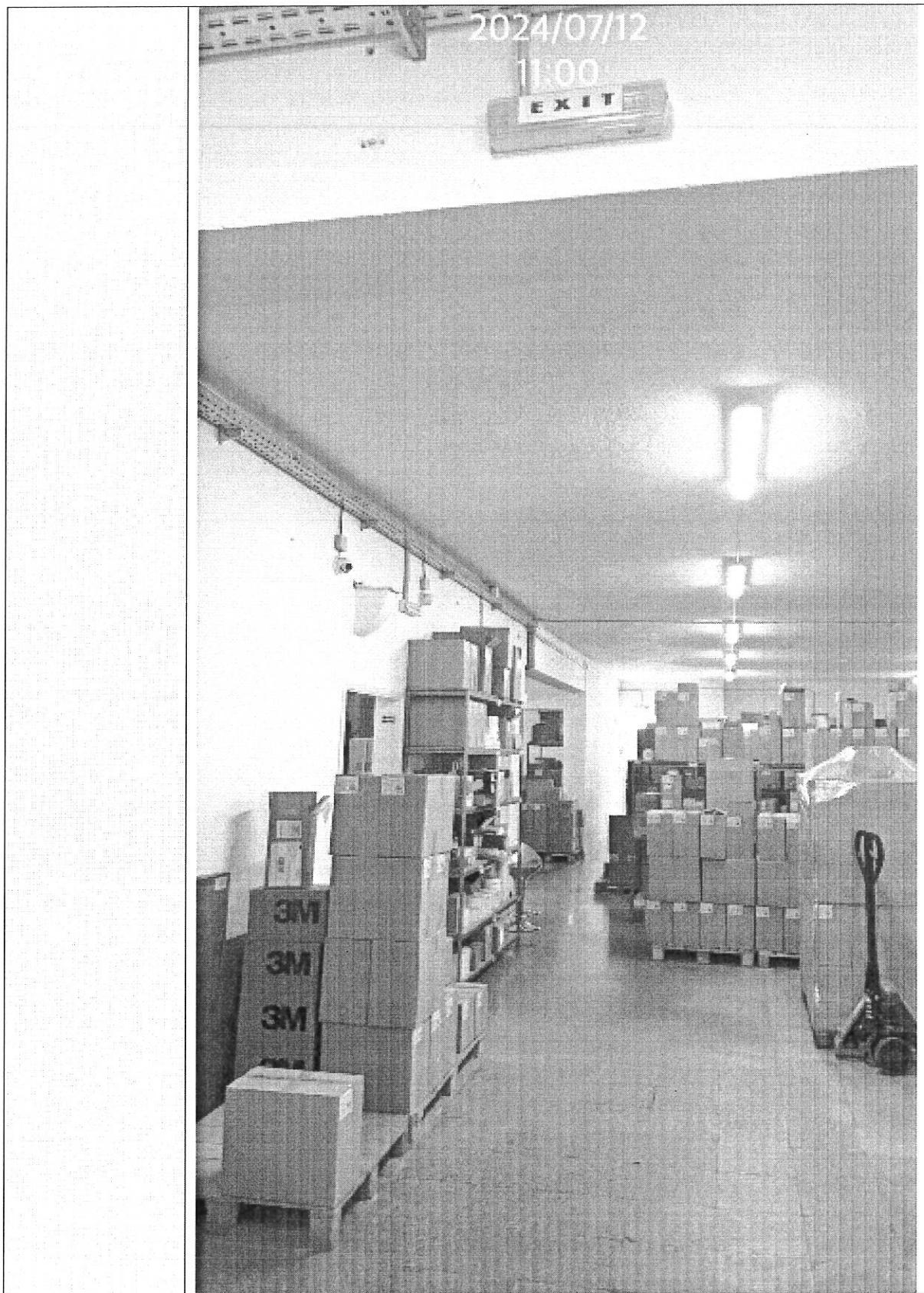


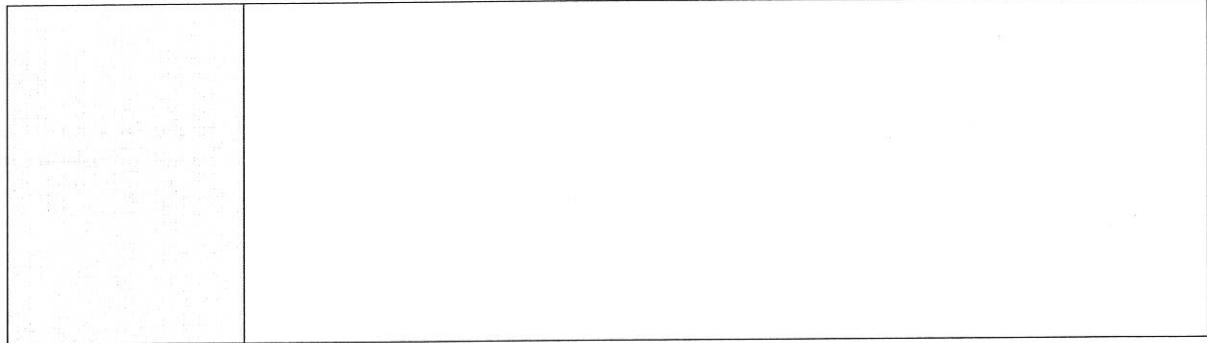
8.3.2.5 Health and Safety - Fire and Building Safety

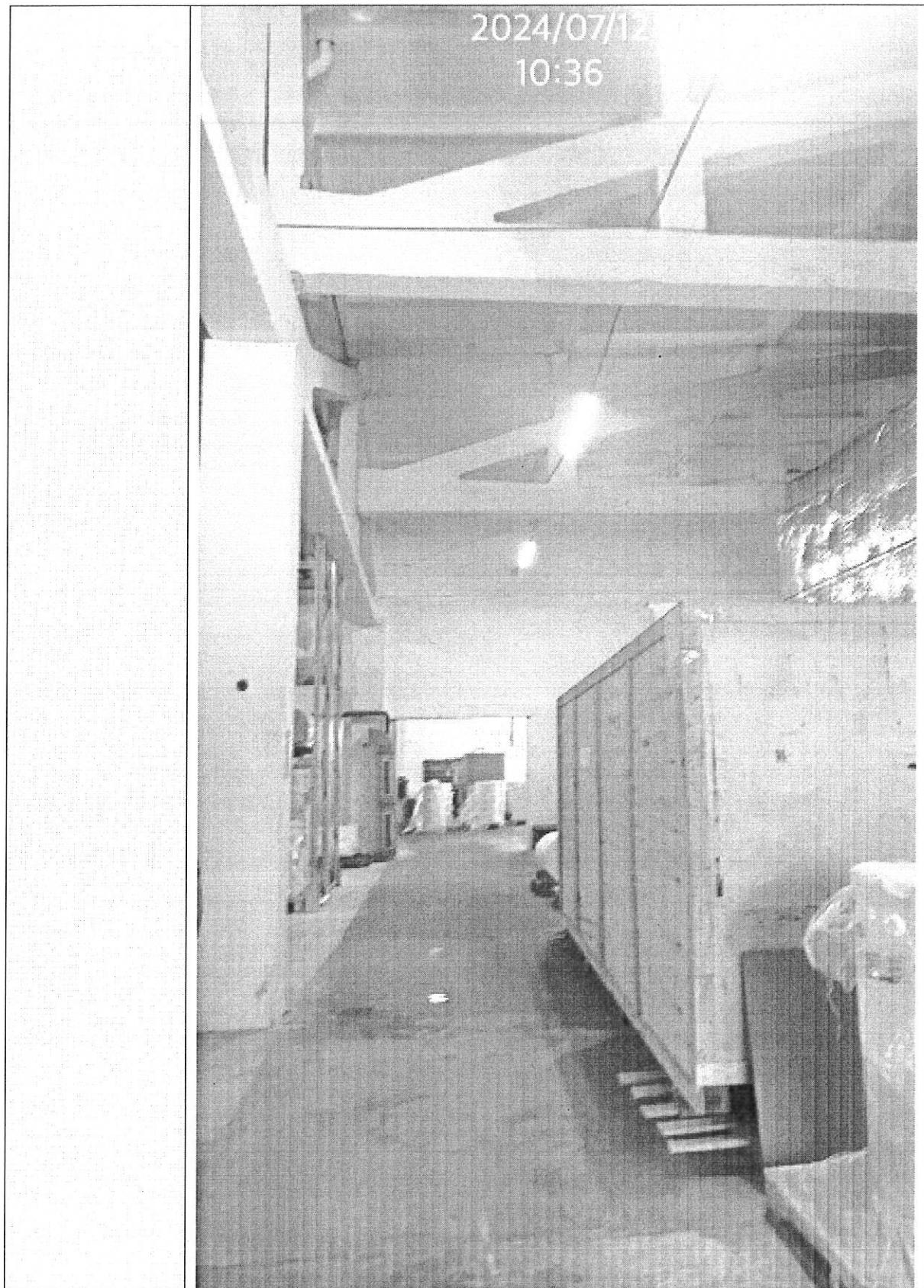
8.3.2.5 Facilities must be marked and lighted emergency exit routes for all occupied floors and areas of the building, including stairwells. Emergency lights for such exit routes must be fire grade 'commercial emergency lights' for use in smoke and fire environments, and facilities must have a secondary power source connected to these in the event of electricity power failure.

Response	Non-compliance	Repeat?	False	Rating	<u>Improved</u>
Details	Evacuation escape routes are not marked on the floor, and were insufficiently marked by lit wall signs.				
Legal reference	Legal reference: N/A Client's requirement: Facilities must be marked and lighted emergency exit routes for all occupied floors and areas of the building, including stairwells. Emergency lights for such exit routes must be fire grade 'commercial emergency lights' for use in smoke and fire environments, and facilities must have a secondary power source connected to these in the event of electricity power failure.				
Suggested actions	It is recommended to ensure that the width of evacuation aisles and the direction of evacuation are visibly marked and equipped with sufficient emergency lighting.				
Photos for Non-compliance					











8.3.2.6 Health and Safety - Fire and Building Safety

8.3.2.6 Facilities must have evacuation routes without any obstructions that lead to safe assembly points located outside the facility at a safe distance away. Assembly points must be designated and kept clear at all times.

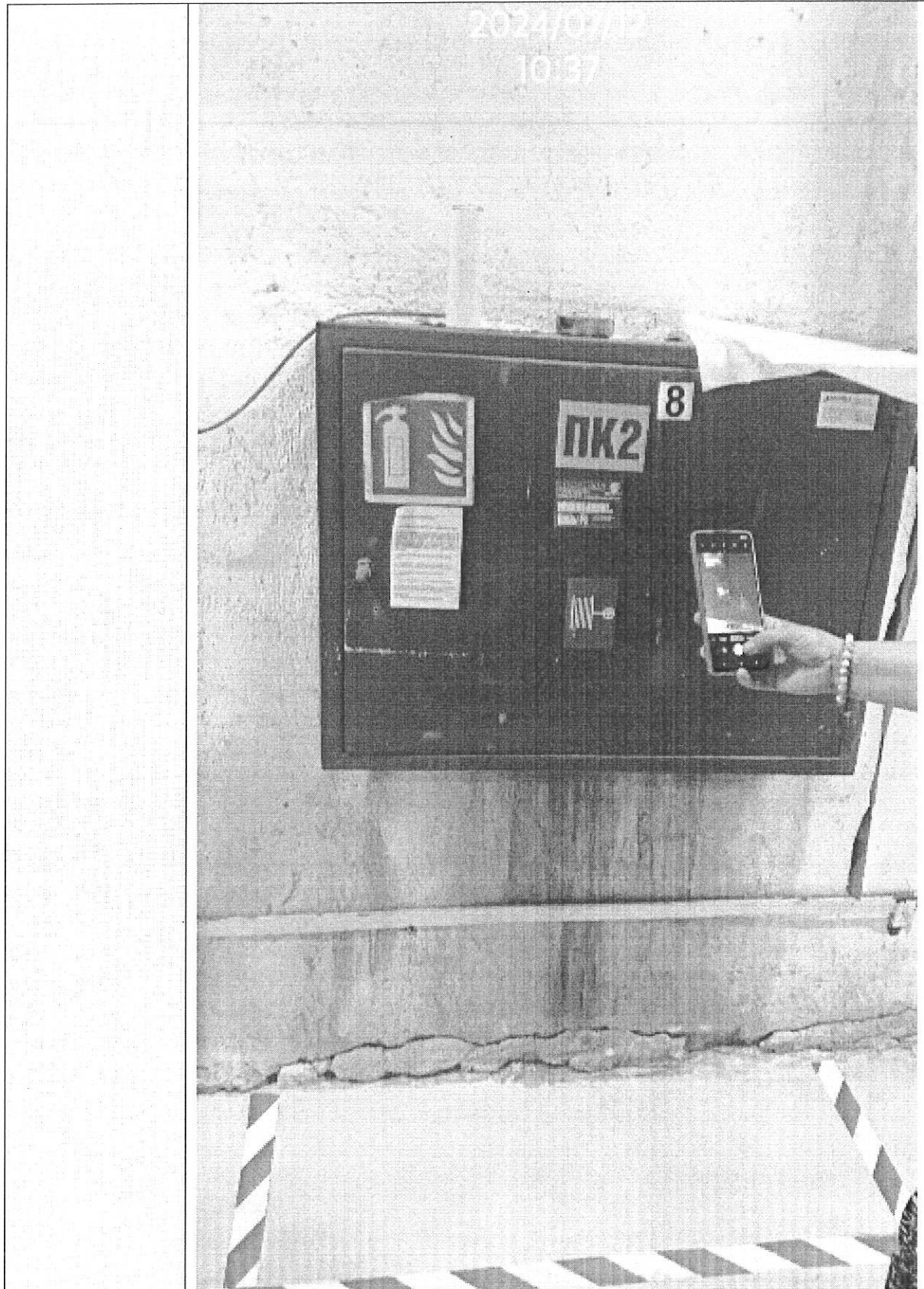
Response	Non-compliance	Repeat?	False	Rating	<u>Critical</u>
Details	No evacuation assembly points markings (only available at evacuation plot plans but not available at actual physical location/-s).				
Legal reference	Legal reference: N/A Client's requirement: Facilities must have evacuation routes without any obstructions that lead to safe assembly points located outside the facility at a safe distance away. Assembly points must be designated and kept clear at all times.				
Suggested actions	It is recommended that the evacuation assembly point is indicated at its actual physical location in/ outside the facility yard, consistent with the evacuation plot plan.				

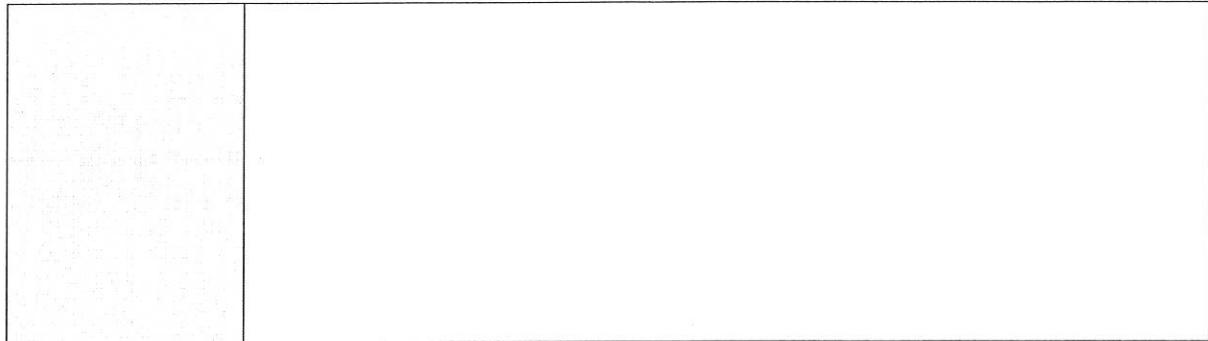
Photos for Non-compliance	
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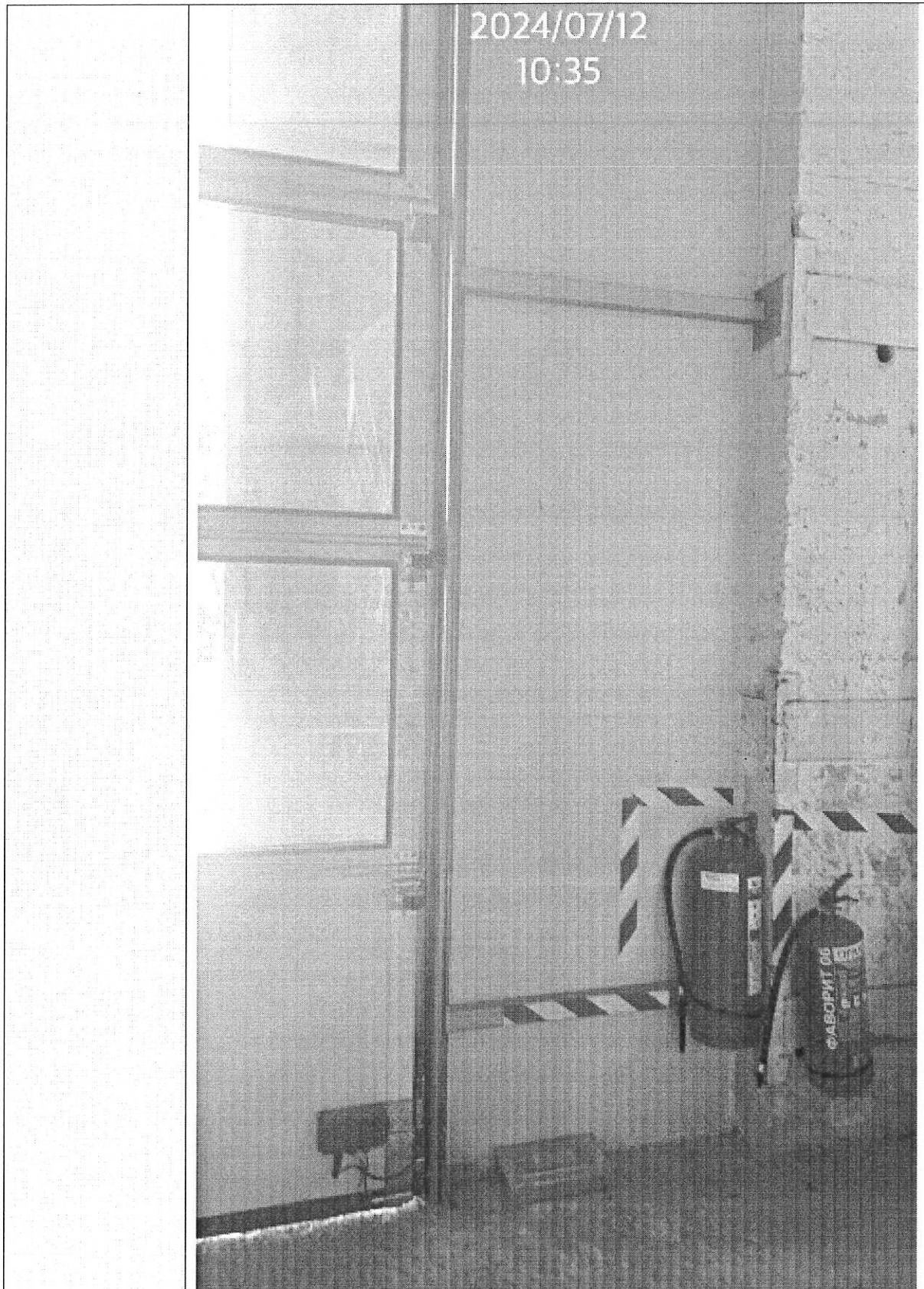
8.3.3.1 Health and Safety - Fire and Building Safety

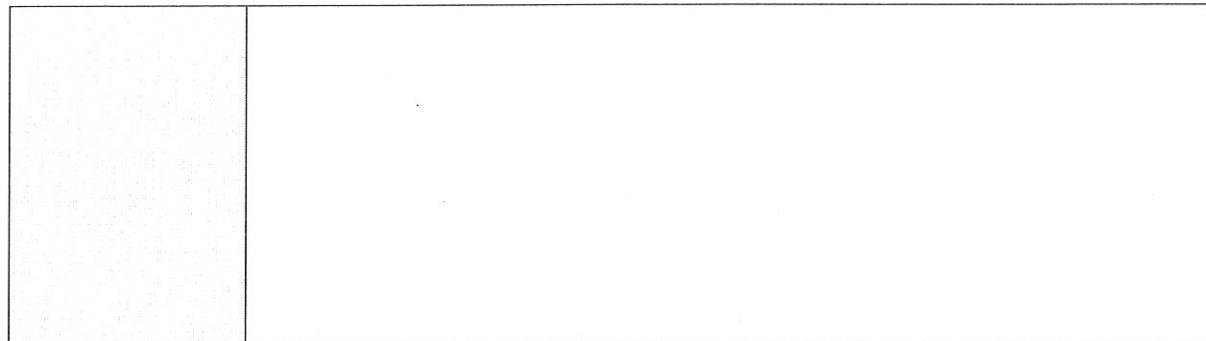
8.3.3.1 Facilities have functional, accessible, and properly maintained fire extinguishing equipment that is adequate for the hazard level of operation, and which at a minimum must include fire extinguishers.

Response	Non-compliance	Repeat?	False	Rating	<u>Highly Critical</u>
Details	Unmarked or inadequately (not visibly) marked firefighting equipment (fire extinguishers and fire hydrants).				
Legal reference	Ordinance 8121z-647-2014- update 2021, Art. 23(4)- The fire suppression equipment, fire hydrants, staircases for firefighting and emergency- rescue activities, the devices for announcing, the devices for manual activation of alarms, the evacuation aisles and exits, as well as the locations without direct visibility to the evacuation exits, shall be marked by signs per Ordinance No. RD-07/8 of 2008 on Minimum Requirements for Signs and Signals for Safety and Health at Work.				
Suggested actions	The firefighting and emergency notification facilities shall be marked with standard signs in a way ensuring their visibility from afar.				
Photos for Non-compliance					





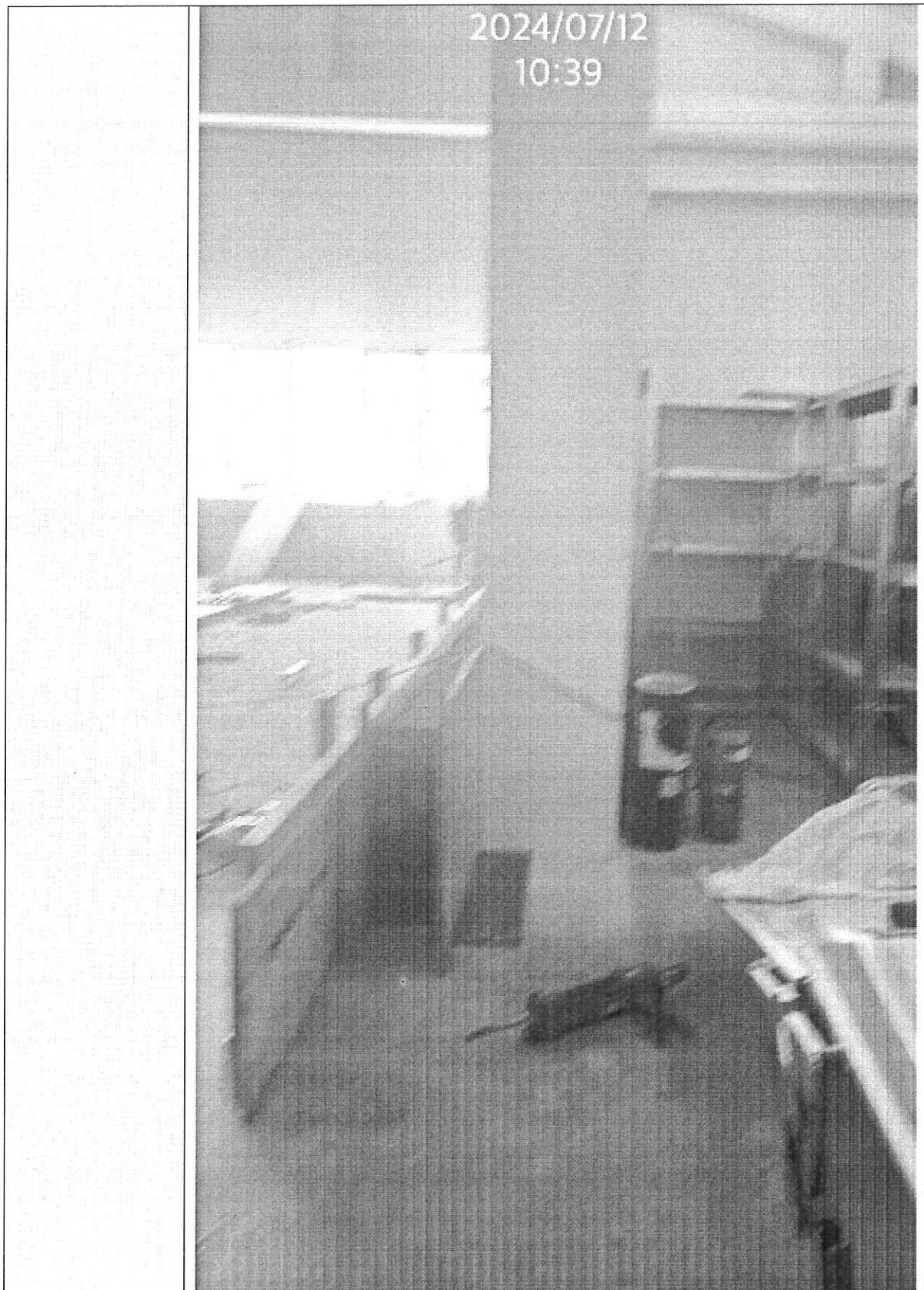


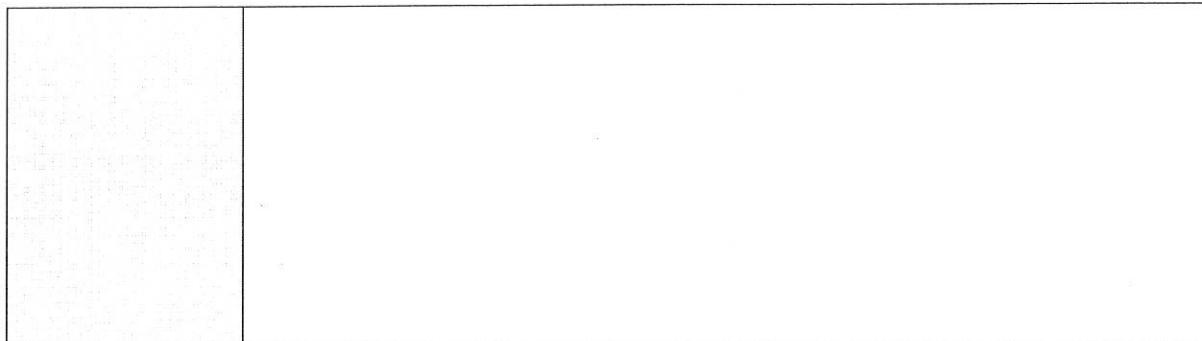


8.3.3.3 Health and Safety - Fire and Building Safety

8.3.3.3 Fire equipment must be kept clear and unblocked at all times.

Response	Non-compliance	Repeat?	False	Rating	Highly Critical
Details	One fire extinguisher (out of 1 in the same area and out of 40 in total) in the new warehouse (under re-construction) was placed on the floor and not safely accessible due to cable hung in front of it and materials around it.				
Legal reference	Ordinance 8121z-647-2014- update 2021, Art. 23 (2) The fire extinguishers shall be placed at easily accessible and well visible locations [...] onto stands, at consoles/stands or into cabinets. Fire extinguishers with total weight of 18 kg or less shall be mounted in a way so that the distance of the upper part of fire extinguisher from the floor is not more than 1,5 meters; those with total weight above 18 kg (except for movable types) shall be mounted so that the distance between the floor and the upper part of fire extinguisher is not more than 1,0 meters; for those mounted on consoles/stands, the distance between the bottom of fire extinguisher and the floor shall be not less than 3 cm.				
Suggested actions	All fire extinguishers shall be placed or mounted per applicable legal requirements and shall all the time be kept fully accessible.				
Photos for Non-compliance					





8.3.3.7 Health and Safety - Fire and Building Safety

8.3.3.7 Sprinkler or fire hydrant systems are inspected quarterly by competent internal staff and annually by an independent fire inspection company. Records of inspections must be maintained for audit.

Response	Non-compliance	Repeat?	False	Rating	<u>Critical</u>
Details	The fire hydrants are inspected annually but not quarterly.				
Legal reference	Legal reference: N/A Client's requirement: Sprinkler or fire hydrant systems are inspected quarterly by competent internal staff and annually by an independent fire inspection company. Records of inspections must be maintained for audit.				
Suggested actions	It is recommended to conduct inspections of the fire hydrants on regular quarterly basis by competent internal staff.				
Photos for Non-compliance					

2024/07/12
13:53



ДЖАМБО ОДА
БАНКУР 69А/П.Б. 170/БД, Асеновград 6000
тел: +359 32 538061 / e-mail: info@jambo.bg

ПРДТОКОЛ
№ ШД 601 / 17.04.2024 г

За контрол и поддържане на стартови и покривни инсталации в съответствие с ЕС СЕП 6
Издаващо този документ: Държавна ОХД приложно Решение №70/125/07.2017 г.

Сфера:	Недвижима собственост	Фирма:	ДИКИО БЪЛГАРИЯ ЕООД
Адрес на обекта:	210, ул. „Немчуг“ 142	Адрес на фирмата:	210, ул. „Немчуг“ 162

Вид на инсталации към поддържането:	Софийският град	Дати:
Сподадък:	07.04.2024	07.04.2028
Сподадък:	17.04.2024	17.04.2028

№ на РДК ПДР	Идентификационен номер на инсталацията	Степен на износ от бар	Напълнение при запълване бар	Дебит Q, л/с	Дължест на запълване бар		Капацитет на запълване бар	Ред
					запълване	изпразнение		
1	1	3	4	3	0	7	8	
1	София, за къща	0,2	2,6	284	116	-	-	Го
2	Промислител	0,2	2,6	284	116	-	-	Го
3	София за готова продукция	0,2	2,6	284	116	-	-	Го
4	Помоечни съдъи	0,2	2,6	284	116	-	-	Го
5	Линия за съдъи	0,2	2,6	284	116	-	-	Го
6	Ремонтни съдъи	0,2	2,6	284	116	-	-	Го
7	Софийска кухня	0,2	2,6	284	116	-	-	Го
8	Софийска кухня	0,2	2,6	284	116	-	-	Го
9	Софийска кухня	0,2	2,6	284	116	-	-	Го
10	Софийска кухня	0,2	2,6	284	116	-	-	Го
11								
12								
13								
14								
15								

За котва № 1 – изпразните бакове са със сърдечник с диаметър 12 см.
ПДР "Покривни инсталации" съдържа също от: къща, риман спирален вентил, плосък маркуч със
стъргнати и струпани със затворици устройства

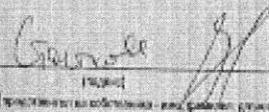
Изпълнител на контрол и поддържане: Стасър /ПРОВЕРЕН/ | Следващ контрол и поддържане: АПРИЛ |

Допълнителни действия: НЕ

Този протокол се състави във един и същи инсталатор – по един за всички здания, изпълнящи обслугуването
обекта от инсталацията.

ПРЕДАЛ
Година и час



ПРИЕЛ 
Година и час

Печат на инсталатора – или съдържанието на печата

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8.3.5.2 Health and Safety - Fire and Building Safety

8.3.5.2 Facilities should have a documented electrical maintenance program. The maintenance program should include at a minimum the routine inspection of the electrical system of the building for damaged wiring, separated conduits, improper installations, and overloaded / damaged circuits. The facilities should ensure that extension cords are not being utilized for permanent application and that multiple outlet adapters or "surge protector strips" are not being connected to each other.

Response	Non-compliance	Repeat?	False	Rating	Major
Details	Process of inspections of the electrical system and facilities is conducted (as reported by management) but is not documented.				
Legal reference	Legal reference: N/A Client's requirement: Facilities should have a documented electrical maintenance program. The maintenance program should include at a minimum the routine inspection of the electrical system of the building for damaged wiring, separated conduits, improper installations, and overloaded / damaged circuits. The facilities should ensure that extension cords are not being utilized for permanent application and that multiple outlet adapters or "surge protector strips" are not being connected to each other.				
Suggested actions	It is recommended to conduct such inspections of the electrical system and its components on regular basis, with the minimum criteria per client's requirement.				

Photos for Non-compliance	
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8.3.5.3 Health and Safety - Fire and Building Safety

8.3.5.3 Facilities must have a fire safety committee, or assign this responsibility to an existing committee. Such a committee must be made up of employees, management, and representatives from high hazard areas to discuss and address any concerns and improve practices on fire safety in the facility including dormitories and canteens, and all fire safety committee meetings must be documented.

Response	Non-compliance	Repeat?	False	Rating	Major
Details	The facility does not have a fire safety committee.				
Legal reference	Legal reference: N/A Client's requirement: Facilities must have a fire safety committee, or assign this responsibility to an existing committee. Such a committee must be made up of employees, management, and representatives from high hazard areas to discuss and address any concerns and improve practices on fire safety in the facility including dormitories and canteens, and all fire safety committee meetings must be documented.				
Suggested actions	It is recommended to establish a fire safety committee, or to assign fire safety responsibility to an existing committee (i.e. the Work Conditions Committee). The activity (including meetings) shall be documented.				
Photos for Non-compliance					

8.3.5.7 Health and Safety - Fire and Building Safety

8.3.5.7 Facilities and buildings should have internal inspection on a routine basis but not less than once a month by trained personnel to ensure that all of the above fire safety standards are met at all times.

Response	Non-compliance	Repeat?	False	Rating	<u>Major</u>
Details	No internal inspections for fire safety standards are conducted, other than firefighting equipment inspections.				
Legal reference	Legal reference: N/A Client's requirement: Facilities and buildings should have internal inspection on a routine basis but not less than once a month by trained personnel to ensure that all of the above fire safety standards are met at all times.				
Suggested actions	It is recommended to conduct internal inspections for compliance with legal and customer's fire safety standards.				
Photos for Non-compliance					

8.4.1 Health and Safety - Accident and Incident

8.4.1 Detailed records are required that provide evidence for injury, near miss and incidents that have occurred at the site

Response	Non-compliance	Repeat?	False	Rating	<u>Minor</u>
Details	The facility has record for legally reportable injuries. However, no records and no process for the non-reportable ones, including near-misses.				
Legal reference	Legal reference: N/A Client's requirement: Detailed records are required that provide evidence for injury, near miss and incidents that have occurred at the site				

Suggested actions	It is recommended to train / instruct workers to report also accidents, injuries and near-misses which are not legally eligible to reporting. Records shall be maintained and analyzed for addressing the identified risks.
Photos for Non-compliance	

8.5.3 Health and Safety - First Aid

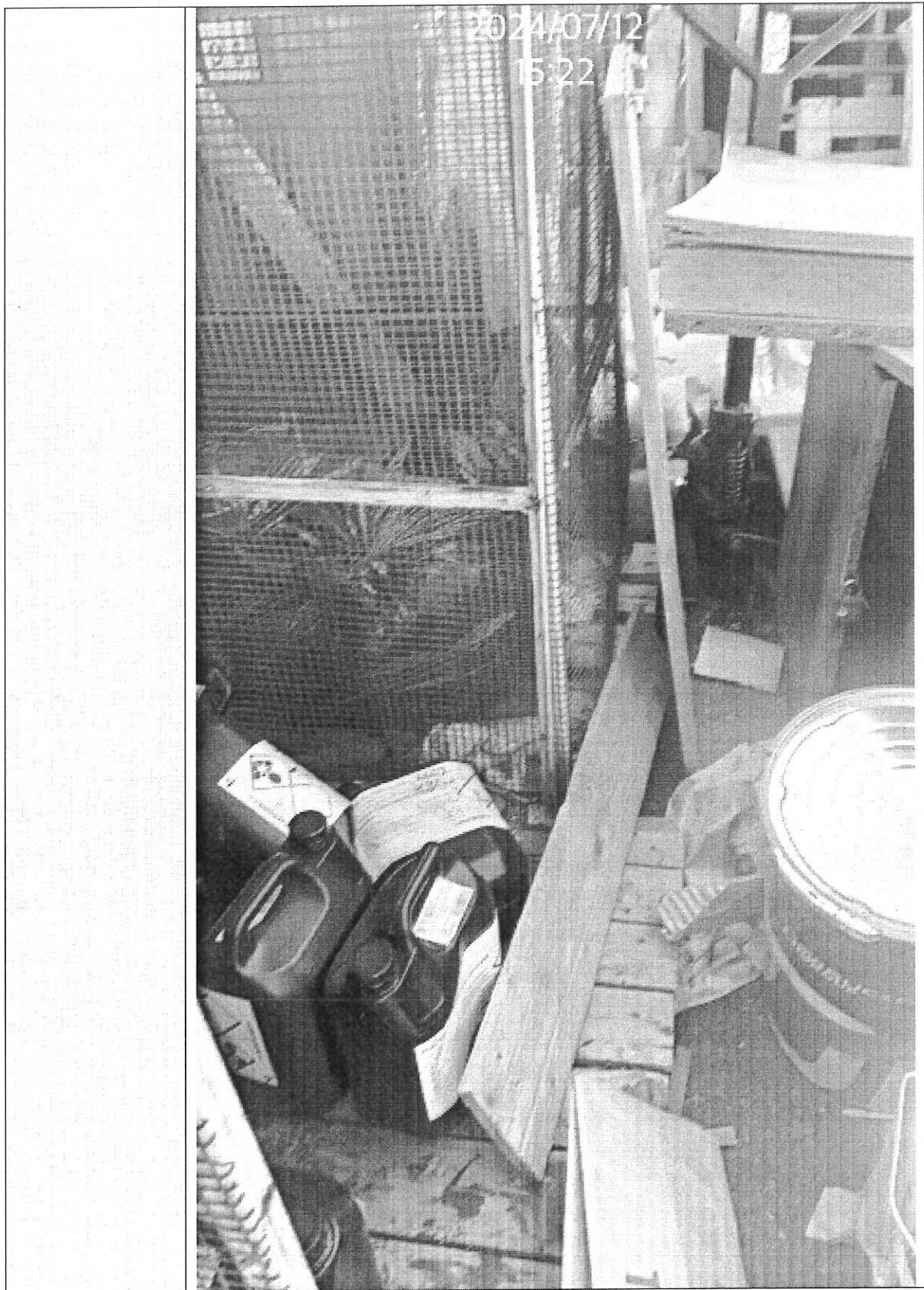
8.5.3 Factory should provide regular first aid and safety training to workers and First aid responders should be identified and properly trained. The first aid responder should be in the place for each shift and equipped followed the local law.

Response	Non-compliance	Repeat?	False	Rating	Major
Details	No visual identification of first aiders. Only one first aider at the production and warehouse areas.				
Legal reference	Legal reference: N/A Client's requirement: Factory should provide regular first aid and safety training to workers and First aid responders should be identified and properly trained. The first aid responder should be in the place for each shift and equipped followed the local law.				
Suggested actions	The first aiders shall be visually identifiable. First aiders shall be available for each area and shift.				
Photos for Non-compliance					

8.10.5 Health and Safety - Chemical management

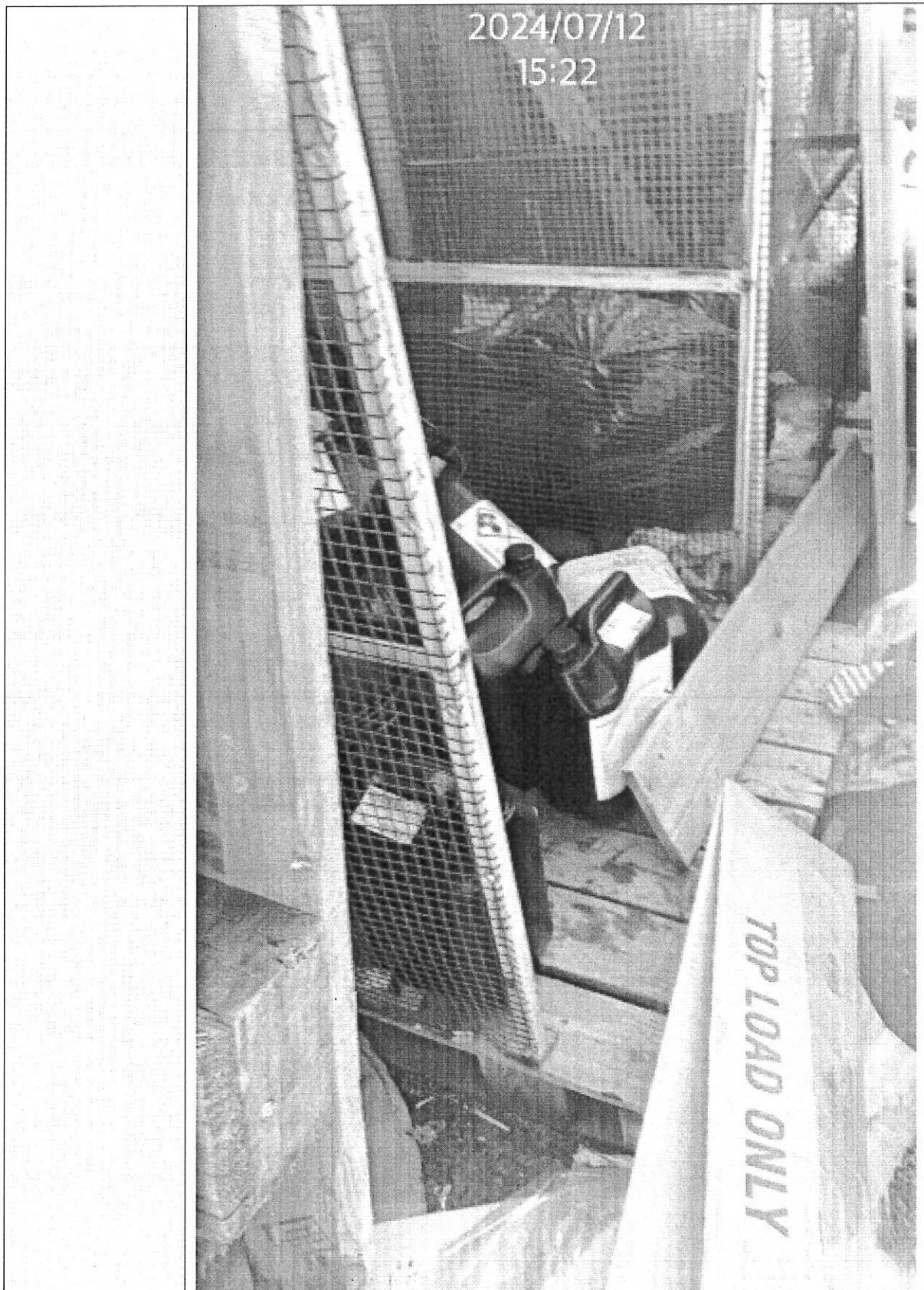
8.10.5 Hazardous waste is separated from ordinary waste and are checked regularly for spills.

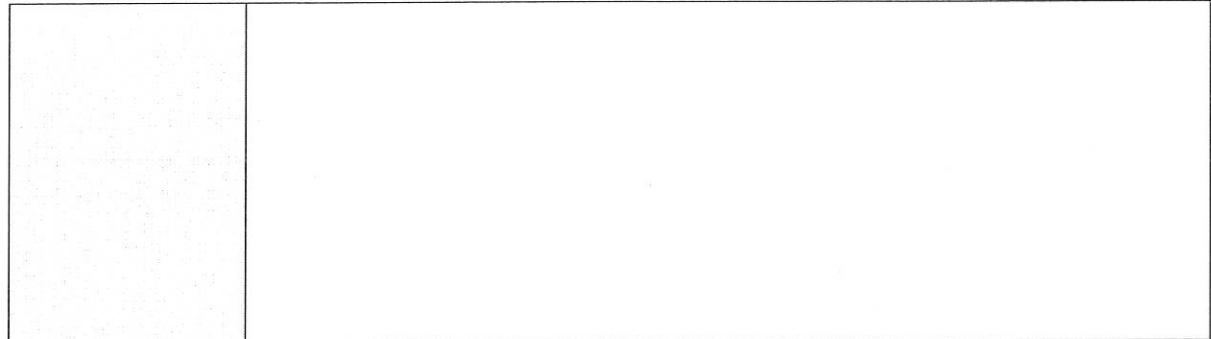
Response	Non-compliance	Repeat?	False	Rating	<u>Critical</u>
Details	The hazardous waste (empty chemical containers and plastic bags with absorbents) was not separated from other waste.				
Legal reference	Legal reference: N/A Client's requirement: Hazardous wastes are separated from ordinary waste and are checked regularly for spills.				
Suggested actions	The hazardous wastes shall be separated from the regular waste and from other materials, to avoid contact and negative impact.				
Photos for Non-compliance					

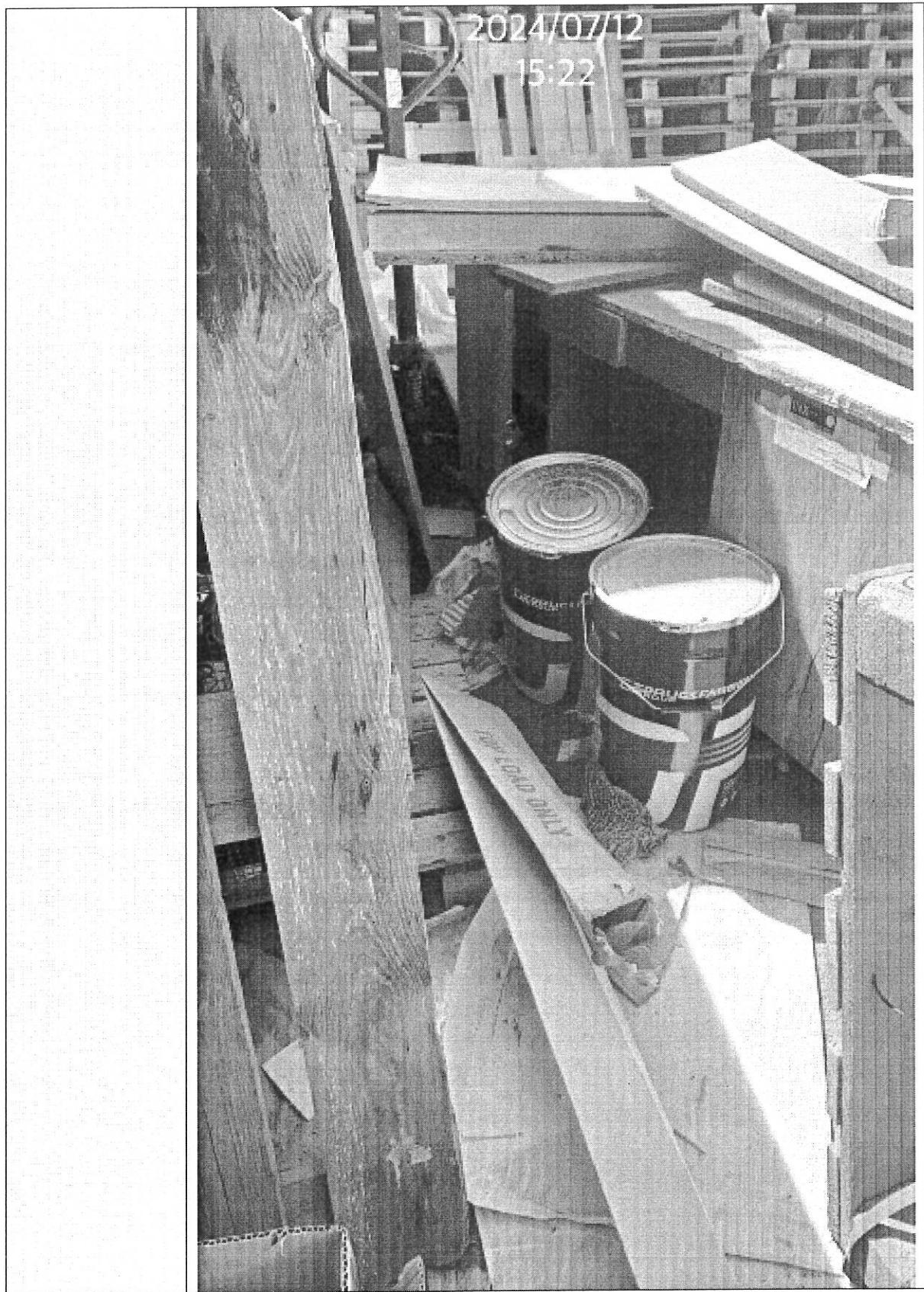


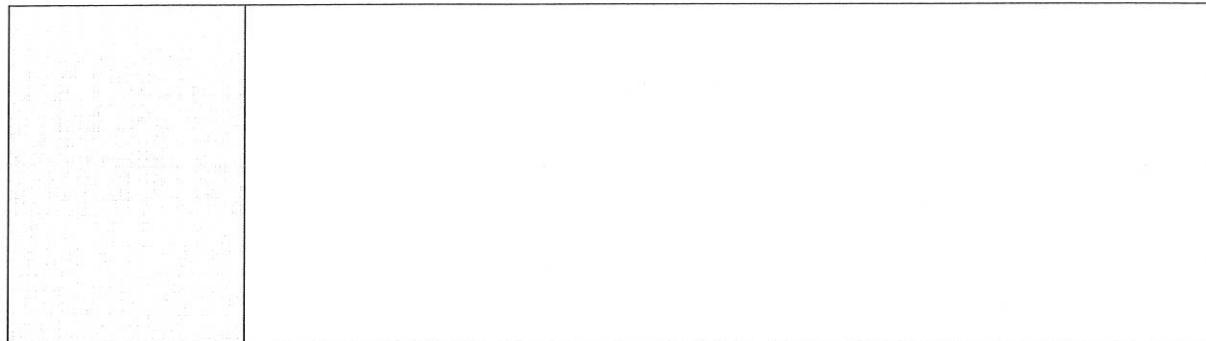
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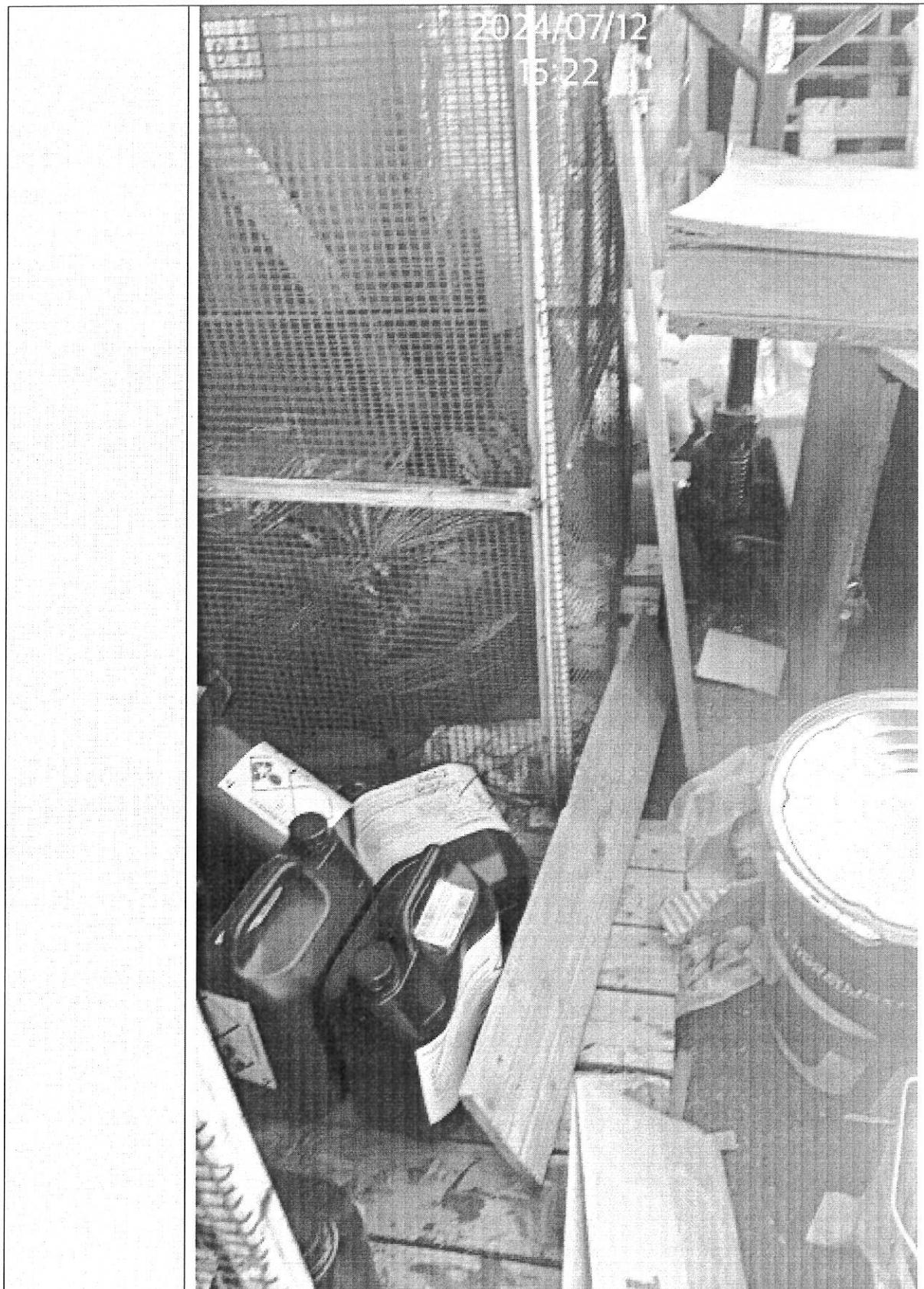
8.10.6 Health and Safety - Chemical management					
Response	Non-compliance	Repeat?	False	Rating	Critical
Details	Waste chemical containers and plastic bags with absorbents were not separated from flammable materials (wooden pallets). Note: This finding describes same situation (but different aspect of it) as the one in points 8.10.5 and 8.10.8.				
Legal reference	Legal reference: N/A Client's requirement: Incompatible materials (including waste materials) such as acids/bases, oxidizers and flammable/combustibles, must be separated and stored in designated areas only.				
Suggested actions	Compatibility shall be taken into consideration for materials (including wastes) storage.				
Photos for Non-compliance					

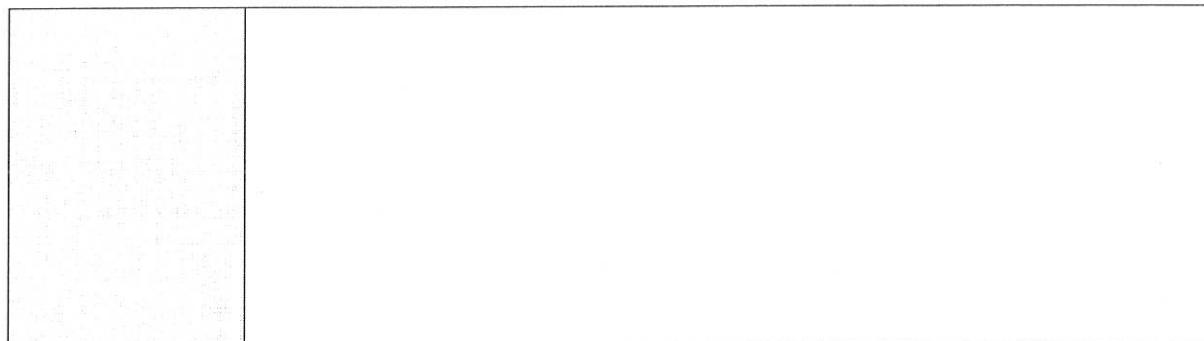








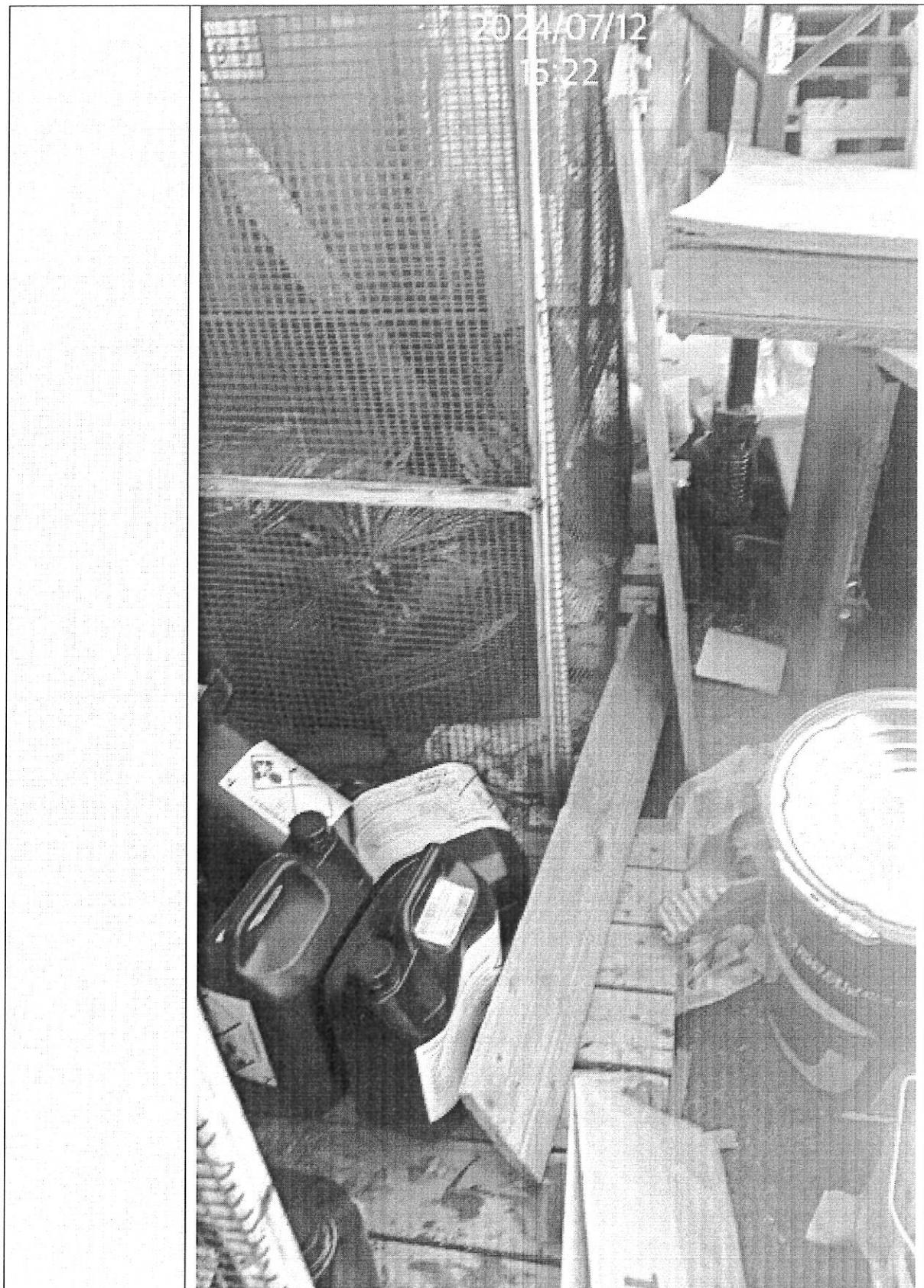


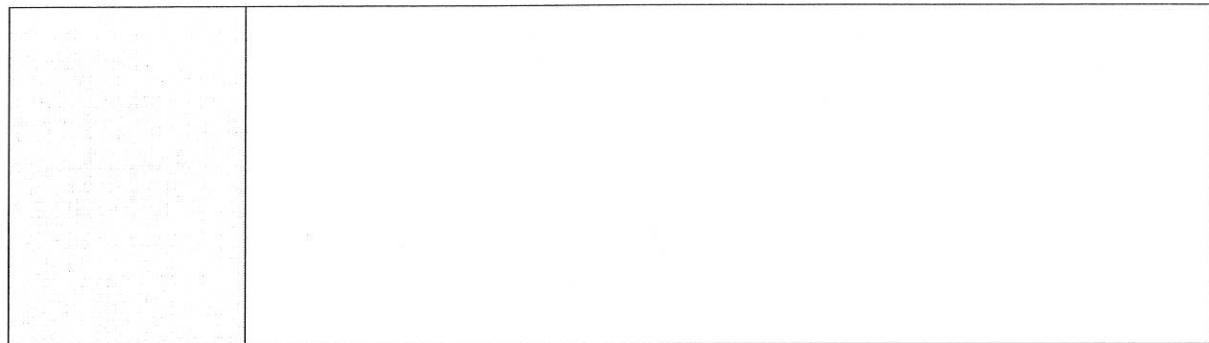


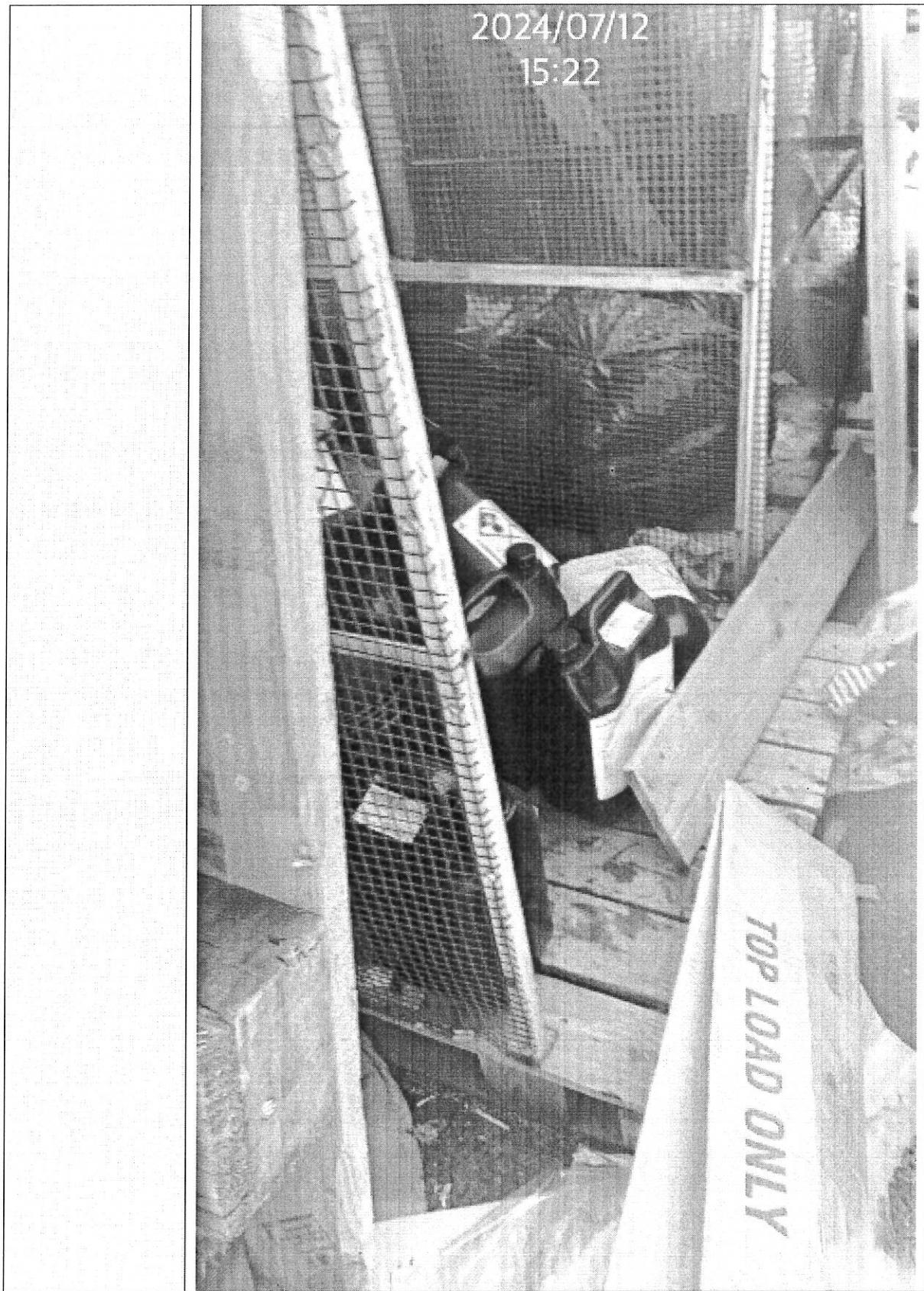
8.10.8 Health and Safety - Chemical management

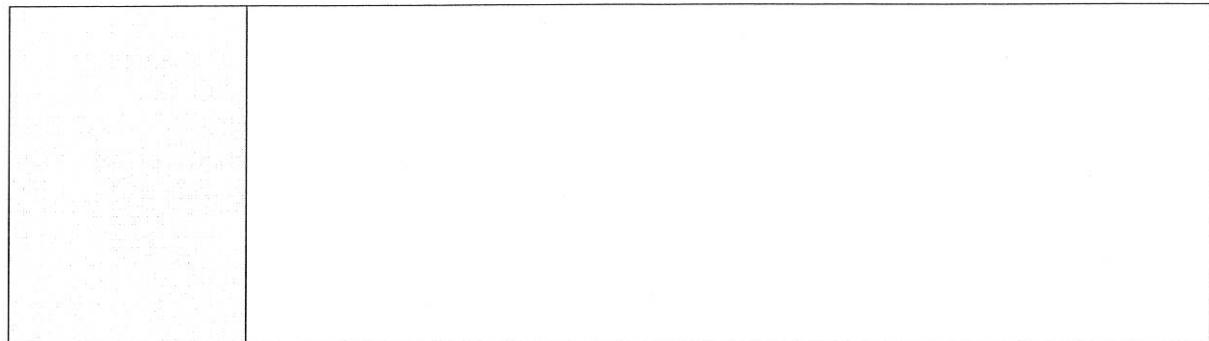
8.10.8 Chemicals, chemical containers and their waste containers (e.g. drums, dumpsters, skips) should be stored properly.

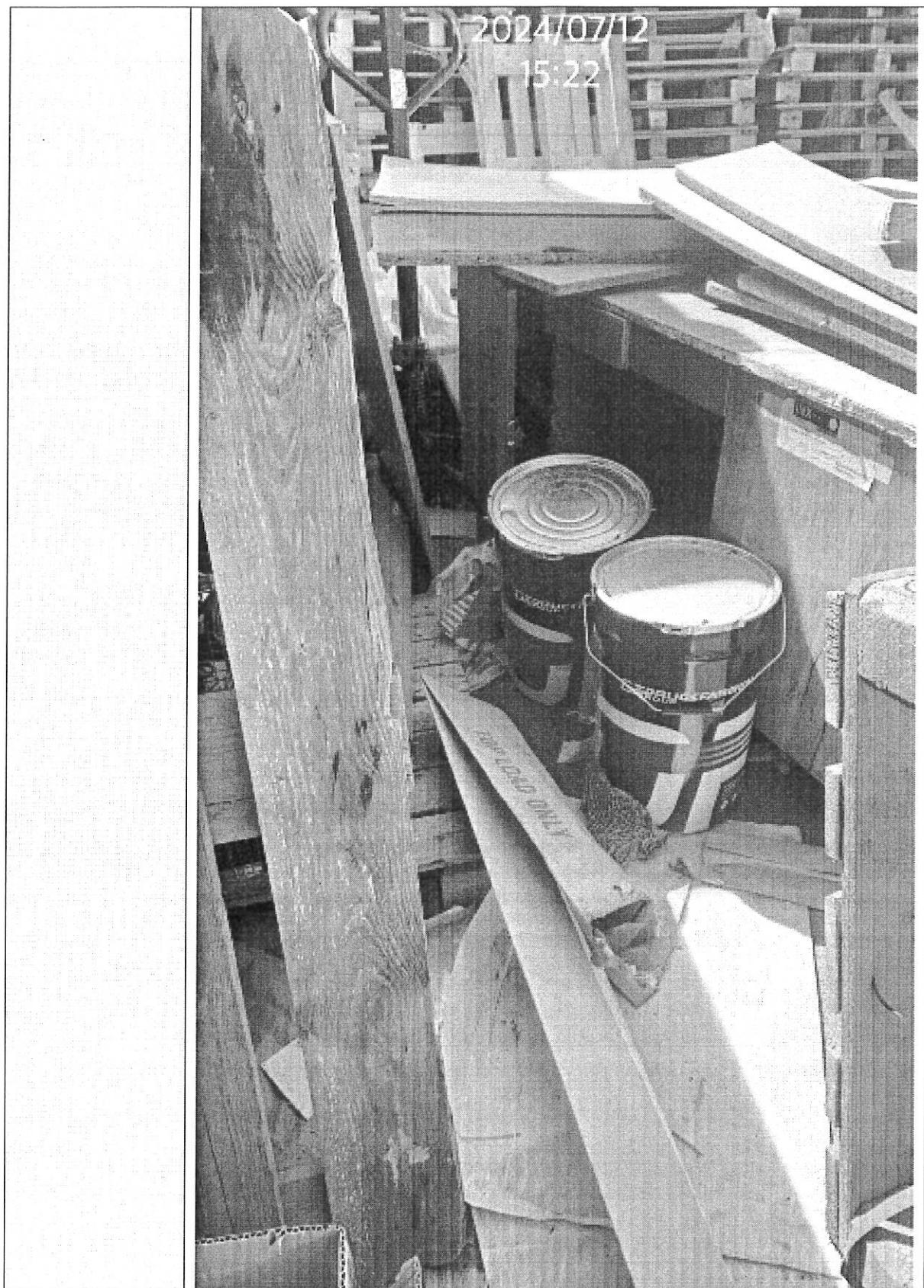
Response	Non-compliance	Repeat?	False	Rating	<u>Major</u>
Details	Waste chemical containers and plastic bags with absorbents were unsheltered and not separated from flammable materials (wooden pallets). Note: This finding describes same situation (but different aspect of it) as the one in points 8.10.5 and 8.10.5.				
Legal reference	Legal reference: N/A Client's requirement: Chemicals, chemical containers and their waste containers (e.g. drums, dumpsters, skips) should be stored properly.				
Suggested actions	The chemical and chemical-contaminated materials and wastes shall be separately from other materials (including wastes), to avoid contact and negative impact. These shall be kept in designated and sheltered area.				
Photos for Non-compliance					

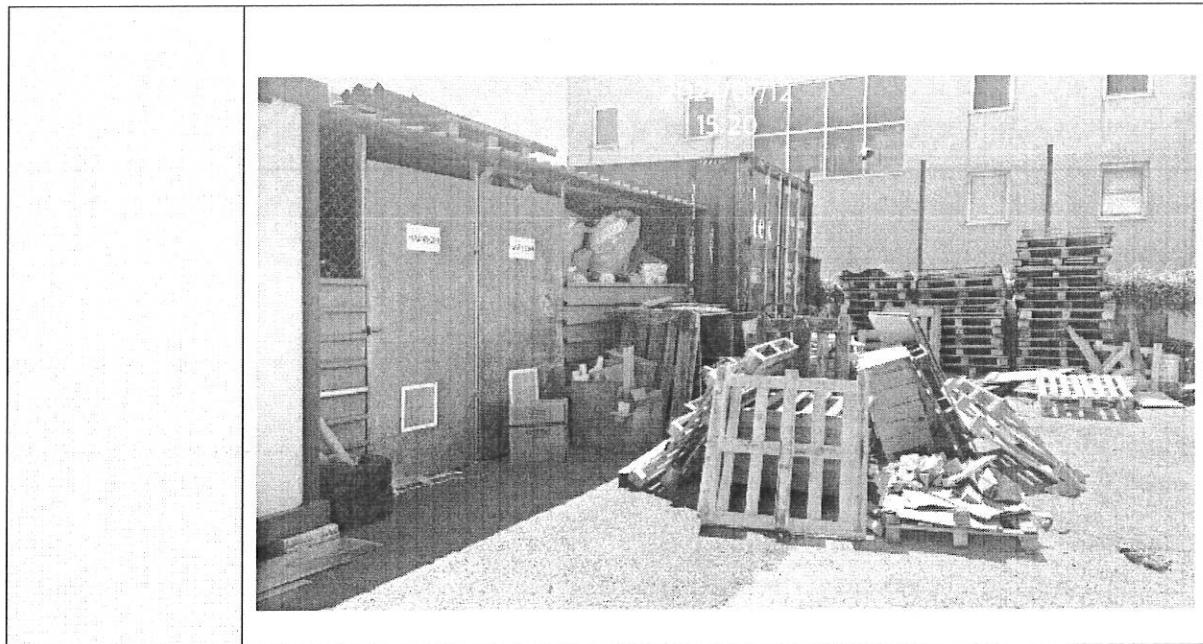












8.12 Health and Safety - No OHS management system established

8.12 The location should ensure all contractor activities whilst on site comply with local legislation and any Avery Dennison Health & Safety requirements.

Response	Non-compliance	Repeat?	False	Rating	Minor
Details	No HSE training is provided to the external workers (for example those currently performing reconstruction works).				
Legal reference	Legal reference: N/A Client's requirement: The location should ensure all contractor activities whilst on site comply with local legislation and any Avery Dennison Health & Safety requirements.				
Suggested actions	The external workers and visitors shall be provided documented HSE training/instructions prior to being allowed access to the work areas.				

Photos for Non-compliance	
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