



Audit Manual ABVTEX Program

ABVTEX – Associação Brasileira do Varejo Têxtil

Version 5.0 – January 2024



Summary

1. INTRODUCTION	4
2. THE ABVTEX PROGRAM.....	5
3. CONDUCT OF THE PROFESSION/AL AUDITOR.....	6
3.1. Audit principles	6
3.1.1. Integrity.....	6
3.1.2. Professional independence	7
3.1.3. Technical efficacy.....	7
3.1.4. Impartiality	7
3.1.5. Confidentiality.....	8
3.1.6. Privacy and protection of the personal data	8
3.2. Responsibilities of the audit organizations in the ABVTEX Program	10
4. GENERAL RULES FOR CARRYING OUT AND FILLING IN THE CHECKLIST.....	12
4.1. Glossary for evidence requested by the program	12
4.2. Notes of the results in the checklist.....	13
4.3. Requirements for pointing out nonconformities	14
4.4. Situation of denied access / audit interruption	14
4.5. Record of evidence for the interviews	15
4.6. Record of evidence for traceability, validation of the subcontractors and/or evidence regarding outsourcing.....	15
5. EVALUATING THE REQUIREMENTS AND COMPLETING THE CHECKLIST	16
Thematic Block #1 – Formalization and documentation.....	16
Thematic Block #2.1 - Working conditions/Child labor.....	21
Thematic Block #2.2 – Working conditions/Forced labor or analogous to slave labor	25
Thematic Block #2.3 – Working conditions/Irregular foreign worker labor.....	29
Thematic Block #2.4 – Working conditions/Recruitment and selection	31
Thematic Block #2.5 – Working conditions/Housing.....	33
Thematic Block #2.6 – Working conditions/Freedom of association	35
Thematic Block #2.7 – Working conditions/Discrimination.....	36
Thematic Block #2.8 – Working conditions/Abuse and harassment.....	38
Thematic Block #2.9 – Working conditions/Salary and compensation	40

Thematic Block #2.10 – Working conditions/Worked hours	49
Thematic Block #3.1 – Occupational health and safety/Working conditions and infrastructure	52
Thematic Block #3.2 – Occupational health and safety/Changing rooms and bathrooms.....	56
Thematic Block #3.3 – Occupational health and safety/Dining hall.....	58
Thematic Block #3.4 – Occupational health and safety/Regulatory standards.....	61
Thematic Block #3.5 – Occupational health and safety/Personal protective equipment (PPE)	68
Thematic Block #3.6 – Occupational health and safety/Handling of chemicals.....	70
Thematic Block #4.1 - Emergency response/Electrical installations	75
Thematic Block #4.2 - Emergency response/Fire prevention and firefighting	76
Thematic Block #5.1 - Validation of the production chain/Invoices.....	79
Thematic Block #5.2 - Validation of the production chain/Supply chain monitoring (only applicable to suppliers).....	80
Thematic Block #5.3 - Validation of the production chain/Validation of the list of subcontractors (only applied to suppliers).....	83
Thematic Block #5.4 – Validation of the production chain/Subcontracting services (only applied to subcontractors).....	90
Thematic Block #6 – Transparency and management practices.....	91
Thematic Block #7.1 – Environment/Licenses.....	96
Thematic Block #7.2 – Environment/Management and general aspects.....	100
Thematic Block #7.3 – Environment/Wastes.....	102
Thematic Block #7.4 - Environment/Effluents.....	106
Thematic Block #7.5 – Environment/Atmospheric releases	109
ANNEX 1 - Table of CFOP codes for issuing invoices (traceability)	112
ANNEX 2 - Characterization of facilities with ‘Low Risk’ activities	113

1. INTRODUCTION

The theme of sustainability has been increasingly addressed and disseminated as a way of improving the performance of the facilities, promoting fairer, more competitive and lasting business relations in their production chains.

The sustainable management of the supply chain should be part of the facility strategy, since it allows the knowledge and monitoring of the main social and environmental impacts of raw materials, services from suppliers, subcontractors and service providers.

The supplier audit strengthens the link between contracting and contractors, increasing partnership and trust. It allows obtaining answers to questions related to the performance of the chain, directly influencing the final product or service. In addition, it allows the management of associated risks, thus achieving improvements in productivity and cost reduction, as well as preventing the occurrence of actions that may affect the reputation of a brand or facility.

The audit is the set of techniques that aims to evaluate, in a sample way, the main aspects of management of processes and results, through the verification of the situations found, in accordance with previously defined requirements.

The purpose of this **Manual** is to establish a set of principles, standards and methodologies for carrying out **ABVTEX Program** audits.

2. THE ABVTEX PROGRAM

The ABVTEX Program is a sector effort led by the Associação Brasileira do Varejo Têxtil (ABVTEX), which represents the main fashion retail chains, including clothing, footwear, accessories and textile articles for the home (bed, table, bath and decoration). The main objective is to promote the best practices with socio-environmental responsibility throughout the fashion value chain. Launched in 2010, it represents a successful tool to support the fight against analogous to slave labor and child labor in the supply chain of the signatory retailers. In general terms, it is a comprehensive compliance program for the development of the sector and a milestone in monitoring the fashion retail production chain.

The fashion retailers that are signatories of the ABVTEX Program understand that collaborative and joint work among the actors in the sector is the most effective way to advance the themes addressed by the program, since an institutional sector action has greater potential to provoke high-impact changes for the fashion value chain. In an assertive, systematized, coordinated and organized way, the program establishes guidelines for the adoption of socio-environmental responsibility actions in the supply chain of the fashion sector.

This is an initiative that results from the concern of the signatory fashion retailers and consumers for transparency of the manufacturing origin of the product they sell and consume, respectively. The program created a governance environment in the fashion value chain, improving labor relations, ensuring better health and safety conditions for the workers, as well as compliance with environmental regulations. It seeks to address these challenges by carrying out audits with independent organizations in the supply chain and their subcontractors and/or outsourced. In this way, the supplier that achieves a satisfactory degree of compliance with the minimum requirements determined by the program, especially regarding the non-precariousness of the work form, is able to supply to any of the signatory retailers.

Initially, the ABVTEX Program was aimed only to suppliers and subcontractors linked to the supply chain of the signatory retailers. However, as a natural process of evolution, and being an inclusive project, the facilities that are not part of the production chain of signatory retailers may join the program, identifying and adopting good practices as a way of improving their socio-environmental responsibility, expanding their opportunities of business in the sector.

The program contemplates the performance of an independent and impartial audit with the objective of verifying the adherence of suppliers and their subcontractors to the criteria and requirements established in the following aspects: formalization and documentation; child labor; forced or analogous to slave labor; irregular foreigner worker labor; existence of children in the work environment; housing; freedom of association; existence of discrimination, abuse or harassment; occupational health and safety; fire prevention and fire-fighting; monitoring and documentation; compensation; worked hours; supply chain monitoring; validation of the list of subcontractors and service subcontracting, in addition to the issues related to the environmental area.

ABVTEX provides a technological platform through the ABVTEX Web Portal (www.abvtex.org.br), which contains information about the ABVTEX Program (www.abvtex.org.br/sobre-o-programa).

3. CONDUCT OF THE PROFESSION/AL AUDITOR

The auditors should act independently, assisting the facilities in the process of evaluating their risks, contributing constructively to the creation of value. They should have technical skills and knowledge of the characteristics of the business and the audited process, having the ability to make impartial judgments, free from influences that may affect the objectivity of the process, having as main responsibilities:

- ✓ Comply with applicable audit requirements;
- ✓ Be objective;
- ✓ Communicate and clarify the audit requirements, if the audited facility it;
- ✓ Plan and carry out the assignments under their responsibility, effectively and efficiently;
- ✓ Document the observations;
- ✓ Report the audit results;
- ✓ Stay within the scope of the audit;
- ✓ Collect and analyze relevant and sufficient evidence to allow the formulation of conclusions regarding the requirements;
- ✓ Act ethically throughout the audit.

3.1. Audit principles

3.1.1. Integrity

The auditor integrity provides the basis for the reliability attributed to their judgments. He or she should perform his or her work with honesty, diligence and responsibility, observing the applicable and current law, not getting involved in any way in improper acts, respecting and contributing to legitimate and ethical objectives of the organization.

The following acts should discredit an auditor:

- ✓ To fail in reporting or conceal irregularities, incorrect information or data that are evidenced in the field evaluations or verification of documents and records;
- ✓ To formulate opinions, provide information or documents that do not adequately translate the expression of his or her best judgment and that, in any way, hide or distort facts, inducing misinterpretations;
- ✓ To accept personal advantages during the exercise of his or her activities.

3.1.2. Professional independence

The audit activity should be independent, and the auditor should be objective in the performance of his or her work, not subjecting his or her findings to the opinion of others.

The auditor should focus his or her activities on the verification process, refraining from performing acts or participating, in any way, in other activities that are incompatible with the fundamental provisions for the exercise of the profession.

The auditor should follow the principles of ethics, observing the technical and audit standards as a professional conduct standard, acting with absolute independence, not acting for his or her own convenience or that of third parties.

The auditor may not, directly or indirectly, receive earnings or rewards of any nature from people interested and/or involved in his or her work, except for his or her salaries and other official advantages granted by the employer.

3.1.3. Technical efficacy

The auditor should have the knowledge, mastery of the techniques and other skills necessary to fulfill his or her individual responsibilities. He or she should commit him or her only to those services for which he or she has the necessary knowledge, skills and experience. In addition, he or she should seek continuous improvement of his or her proficiency, increasing the effectiveness and quality of his or her services.

To carry out the **ABVTEX Program** audits, the auditor should have knowledge compatible with the criteria of Health, Safety, Environment and Labor Law. In addition, he or she should have present evidence of participation or follow-up in audits of the program, as well as a record of training in this program.

The scope established for the audit service should be previously evaluated by the auditor, judging the technical feasibility for its execution, in terms of deadlines and information about the facility to be verified. It should be ensured that the work to be developed meets the conditions that provide the expected technical performance.

3.1.4. Impartiality

The auditor should have an attitude of impartiality, free from prejudice, and avoid any conflicts of interest.

The rules on impartiality should basically guide the conduct of the auditor in all his or her manifestations and circumstances, being forbidden, under any pretext, conditions and advantages, to take sides in the interpretation of facts, dispute of interests, conflicts of parties or any other event.

3.1.5. Confidentiality

The professional confidentiality is a mandatory and indeclinable rule in the exercise of an audit. The auditor is required to use the data and information available to him or her exclusively in the performance of the services entrusted to him or her. Unless legally determined or expressly authorized by the competent authority, no document, data or information may be provided or disclosed to third parties, nor may be used, directly or indirectly, for his or her personal interests or of third parties.

3.1.6. Privacy and protection of the personal data

Regarding the preservation of the privacy and protection of personal data to which the auditor has access during the audit process, everyone should observe and comply with the applicable law and standards, in particular the Brazilian Federal law 13,709/2018 – Lei Geral de Proteção de Dados Pessoais (LGPD – General Law for the Protection of Personal Data).

In addition to the principles defined in this **Manual**, it is essential that the auditor observes the specific principles of **(i)** transparency, **(ii)** security of the information accessed and **(iii)** accountability, when and if required by the holders of the personal data.

For the purposes of this **Manual** and clarification of the concepts and definitions, the following items should be considered:

- ✓ **personal data** – information related to an identified or identifiable natural person (for example: name, RG, CPF, e-mail, etc.);
- ✓ **sensitive personal data** – personal data about **(i)** racial or ethnic origin, **(ii)** religious conviction, **(iii)** political opinion, **(iv)** membership of a union or organization of a religious, philosophical or political nature, **(v)** data relating to the health or sexual life, **(vi)** genetic or biometric data, when linked to a natural person;
- ✓ **children and adolescent data** – personal and sensitive data related to a natural person under 18 (eighteen) years old;
- ✓ **anonymized data** – data related to a person that may not be identified, considering the use of reasonable technical means available at the time of its treatment;
- ✓ **holders of personal data** – natural person to whom the personal data are the object of treatment.

Note: data of legal entities such as corporate name, CNPJ, address and others are not classified as personal data. However, data from partners, legal representatives and/or workers, when individualized, are classified as personal data.

To this end, the auditor and the Audit Organization accredited to work in the **ABVTEX Program** should follow fundamental practices in preserving privacy and protecting personal data, such as, but not limited to:

- ✓ **purpose:** observe the sole and exclusive purpose of accessing data for the specific purpose of carrying out the audit;
- ✓ **access:** restrict the access to data only to authorized persons related to the audit process;
- ✓ **sharing:** not sharing data with unauthorized persons or indiscriminately, without due notice and communication and consent of the owners (holders) of the data and the managers of the **ABVTEX Program**;
- ✓ **storage:** comply with the storage rules and measures provided for by the respective Audit Organization to which he or she is part, adopting minimum measures that guarantee the data integrity and for the period determined for each audit performed or when its purpose is fulfilled;
- ✓ **elimination:** comply with the rules and standards for deleting accessed data when, and if so, determined by the **ABVTEX Program** rules or by legal determination; and
- ✓ **security:** follow and adopt security measures and good practices suggested by the Audit Organization to which he or she belongs, as well as by the managers of the **ABVTEX Program**.

Considering this, best practice recommendations in terms of preserving privacy and protecting personal data, both by the auditors and Audit Organizations, are the adoption of the following measures, but without limitation:

	<p>Access</p> <p>Access restricted only to auditors and/or audit responsible persons, respecting the scope defined by the Audit Organizations and approved by the managers of the Program ABVTEX, when required.</p> <p>Access blocked in case of termination and/or replacement of the auditors or Audit Organization.</p>
	<p>Sharing</p> <p>Guarantee of sharing only with those responsible and/or members of the audit area of the Audit Organizations.</p> <p>Guarantee of sharing only with the authorized members of the facilities belonging to the production chain linked to the audit (Associated Retailers).</p> <p>Communication, authorization and prior consent of the managers of the ABVTEX Program.</p>

	<p>Storage</p> <p>Use of an own network or secure and reliable corporate cloud storage service, contracted directly by the Audit Organizations.</p> <p>NEVER ALLOW the storage in individual machines and devices of the auditors (for example, notebooks, smartphones; pen drives; external HDs, etc.), even if they are a property of the Audit Organization.</p> <p>NEVER ALLOW the storage in private machines and devices of the auditors.</p>
	<p>Retention</p> <p>Any personal data collected may be retained for the maximum period of completion of the audits, regardless of their final result, plus the period for submitting of any appeals or for the period of up to 12 (twelve) months, whichever occurs first, respecting the provisions of the <u>General Regulation</u> of the ABVTEX Program.</p>
	<p>Elimination</p> <p>At the end of the retention period defined herein, the personal data collected during the audits, and related to them, should be discarded or anonymized, and may be used only for statistical purposes, if necessary.</p>
	<p>Security</p> <p>Mandatory use of strong passwords (for example, numbers, letters, upper and lower case, special characters and a minimum of 8 characters) to access environments where personal data are processed.</p> <p>If possible, use a multifactor authentication (for example, token, SMS, e-mail confirmation, etc.).</p> <p>If possible, use of data protection tools, such as firewalls and data encryption and storage database.</p> <p>In case of using a cloud services, verification and validation of security measures by the service provider.</p> <p>Contractual guarantees when contracting security, privacy and data protection services.</p>

3.2. Responsibilities of the audit organizations in the ABVTEX Program

The Audit Organizations should be aware of their responsibility for the maintenance and development of the **ABVTEX Program**. Their commitment ranges from the selection of the designated auditors to carry out the verifications to the delivery of the audit results.

It is important to highlight that the professional selected by the Audit Organizations to carry out the audits on suppliers and subcontractors should have proven knowledge and skills to carry out the processes. Their attitudes should be guided by the compliance with the current law and the program requirements. All auditors should be evaluated, and the supporting documentation should be sent and kept updated with ABVTEX.

The [General Regulation](#) of the **ABVTEX Program** details the responsibility of the Audit Organizations, including the deadlines for carrying out the activities. The period for inserting the audit results in the [ABVTEX Program System](#) is highlighted.

4. GENERAL RULES FOR CARRYING OUT AND FILLING IN THE CHECKLIST

For the correct performance of the audit of the **ABVTEX Program** and the correct completion of the [ABVTEX Checklist](#), some general rules should be observed. Below, these rules are described, which should be followed for all the items requested in the different questions and in the different blocks that comprise the [ABVTEX Checklist](#).

4.1. Glossary for evidence requested by the program

In the requirements that comprise the [ABVTEX Checklist](#), associated with each of the Thematic Blocks, several observations and collection of evidence are requested so that the conclusions reached by the auditors are the most accurate. To facilitate the description of the evidence requested by the **ABVTEX Program**, for each action requested in the audit process, there is an associated icon that symbolizes the type of action.

The list of icons and their meaning are shown in the following table.

	<p>Analysis of the documents</p> <p>Objective evidence should be primarily obtained from document verification, according to the evaluated requirement.</p> <p>All documents listed next to this icon should be requested from the audited facility and evaluated by the auditor.</p> <p>The conditions for the evaluation and eventual exemption of the requirement are included in each of the actions presented in each of the Thematic Blocks.</p>
	<p>Visual inspection</p> <p>Identifies what evidence should be obtained when visiting the premises of the audited facility.</p>
	<p>Upload of evidence</p> <p>Indicates which evidence should be attached to the report. This evidence may be characterized by documents, pictures or any other form that allows this action.</p> <p>The instruction linked to this icon indicates the minimum list of evidence that should be attached to the Audit Report. However, any other evidence that the auditor considers important to characterize his or her judgment, and that is not part of the minimum recommendations, may and should be attached to the Audit Report.</p>
	<p>Interview with the workers</p> <p>Indicates evidence that should be identified through the interviews of the workers.</p>

	<p>Privacy and protection of personal data</p> <p>Indicates the need of observing the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.</p>
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4.2. Notes of the results in the checklist

After analyzing each of the requirements and based on the evidence obtained, the auditor should indicate the results in the checklist to consolidate the final audit report and give the final classification of the audited facility.

The possible notes for each of the requirements of the [ABVTEX Checklist](#) are:

NOTE	DESCRIPTION
YES	<p>Conformity</p> <p>Situation in which the facility fully complies with the proposed requirement, in accordance with the instructions presented in this Manual.</p> <p>This option is available for all checklist questions.</p>
NO	<p>Nonconformity</p> <p>Situation in which the facility does not comply with the proposed requirement, in accordance with the instructions presented in this Manual. In this case, the criticality level is assigned to the nonconformity.</p> <p>This option is available for all checklist questions.</p>
PN	<p>Partial nonconformity</p> <p>Situation in which the facility fails to partially complies with the proposed requirement. In this case, the specific criticality level is assigned.</p> <p>This option is presented only for some requirements that are defined in this Manual and in the Program System.</p>
N/A	<p>Not applicable</p> <p>Situation in which the requirement does not apply to about the audited facility. In this case, no criticality level is assigned.</p> <p>This option is presented only for some requirements that are defined in this Manual and in the Program System.</p>

4.3. Requirements for pointing out nonconformities

For all nonconformity, partial nonconformity or not applicable notes, the auditor should observe the following precautions:

- ✓ All nonconformities should be registered against a specific requirement (standard or ABVTEX requirement);
- ✓ The nonconformity should contain a clear statement of the nonconformity and a description of the identified irregularity, considering the identification of the location (if applicable, unit, sector, department, etc.) and significance of the evidence (quantity, volume, percentage, etc.).
- ✓ Each nonconformity should indicate (and should be clearly mentioned) the respective evidence on which the nonconformity was based and which has been attached to the [Program System](#), for the audit report.

Note: when the evidence of nonconformity involves the access or disclosure of personal data and that have no specific relevance for demonstrating the nonconformity, the personal data should be, as far as possible, kept confidential (anonymized), avoiding unnecessary exposure.

4.4. Situation of denied access / audit interruption

The facilities that prevent the performance of the steps of the audit process may be suspended, in accordance with the definitions presented in the [General Regulation](#) of the **ABVTEX Program**. The reasons for this suspension are:

- a) The already approved facility (supplier and/or subcontractor) does not authorize the access to at least one of these situations:
 - ✓ access to its premises to carry out the **Initial Audit, Renewal Audit, Follow-Up Audit, Verification Audit, Change of Address Audit, Physical Structure Audit, Agent Audit or New Workers Audit**;
 - ✓ access to important documents, requested by the auditor to evaluate any of the requirements classified as **ZERO TOLERANCE**;
 - ✓ access to the workers to carry out the interview process.
- b) The interruption of the audit by the auditor when he or she feels that he or she is at personal risk, due to the action of agents of the audited facility to maintain his or her physical integrity.

In these cases, the audit should not be started or should be immediately stopped. The auditor should keep the information obtained until the moment of the interruption and inform, in the specific function of the [Program System](#), the type and necessary observations that characterized the denial of access.

Note: no facility should be punishable when an audit interruption or non-performance is not clearly characterized as intent or fault by the audited facility. Situations such as absence of the person in charge of the facility due to force majeure, mismatch of schedules, among others, do not characterize responsibility of the audited facility, which should not be penalized, as described in the [General Regulation](#) of the program.

4.5. Record of evidence for the interviews

When carrying out the interviews with the workers of the audited facility, no evidence, information, list or questionnaire should be attached to the report and there should not be uploaded to the [ABVTEX Program System](#). However, the record keeping of the interviews is important. Thus, the auditor and the Audit Organization should keep all records and evidence of the interviews under their own control and on a **CONFIDENTIAL** basis, so that they may be consulted and evaluated, if requested by ABVTEX.

Note: all the principles and practices related to the privacy and protection of personal data recommended herein, as well as the applicable law, apply to the storage and disposal and/or elimination of the interview records.

4.6. Record of evidence for traceability, validation of the subcontractors and/or evidence regarding outsourcing

During the process of traceability or validation of the list of subcontractors, orders from the signatory retailers and invoices from the facility should be used as the basis for the process. In these cases, no document or picture that contains a logo, brand, corporate name, any evidence of commercial conditions (prices, deadlines, etc.) and/or eventually personal data characterized under the terms of LGPD should be attached to the report and there should not be uploaded in the [ABVTEX Program System](#). However, it is important to keep the record of this information, especially when proving nonconformities. Thus, the auditor and the Audit Organization should keep all documents and/or pictures under their control and on a **CONFIDENTIAL** basis, so that they may be consulted and evaluated, if requested by ABVTEX.

Note: all the principles and practices related to privacy and protection of personal data recommended herein, as well as the applicable law, apply to the storage and disposal and/or elimination of the records of the evidence mentioned herein.

5. EVALUATING THE REQUIREMENTS AND COMPLETING THE CHECKLIST

Thematic Block #1 – Formalization and documentation

This block evaluates the aspects that characterize if the facility is legally constituted, in accordance with the Brazilian law, and if it has documents that prove this regularity. In this case, the facility should have records that prove its size, in addition to the type of the activity it carries out.

Required checks in this block

	<p>Verify in the facility registration, in the ABVTEX Program, if the Participation Term in the program, is signed by the legal representative with a notarized signature, as described in the General Regulation of the ABVTEX Program.</p>
	<p>Verify the CNPJ (National Register of Legal Entities) card and if it has an “ACTIVE” registration status on the Receita Federal (Federal Revenue Service) website at www.receita.fazenda.gov.br/pessoajuridica/cnpj, Junta Comercial (Board of Trade) and other competent agencies. Cross-reference the information with the Articles of Association of the facility or invoices.</p> <p>Note: suppliers or subcontractors that adopt the form of Microempreendedor Individual (MEI – Individual Micro-entrepreneur) are not covered by the ABVTEX Program, as this type of production unit requires specialized audits, whose requirements are not currently provided for in the ABVTEX protocols. Thus, a MEI facility should not be audited by the ABVTEX Program.</p>
	<p>Verify if the code and description of the presented main economic activity and secondary activities are in accordance with those carried out in the facility.</p>
	<p>Verify in the Articles of Association of the facility: facility name; registered capital; full address; description of the corporate purpose; shareholding quota of the partners, corporate relationship and term of duration of the corporation – even if it is undetermined, it should be stated.</p>
	<p>Consult SINTEGRA or ICMS registration for confirming the Inscrição Estadual (State Registration).</p>
	<p>Evaluate GFIP and Employment Record Book. If the facility is already fully adapted to e-Social, it should present the reports regarding the respective events (DCTFWeb).</p>
	<p>Compare, through the CAGED extract, the number of workers in the facility and described in the Employment Record Book or RAIS. If the facility is already fully adapted to e-Social, it should present the reports regarding the respective events (S-1200, S-2200, S-2230, and S-2299).</p>
	<p>Verify the Alvará da Prefeitura (Municipal License) – Operating License in accordance with the municipal law – and Alvará Sanitário (Health Permit) in accordance with the municipal law. If the facility does not have licenses or permits, verify the existence of requesting protocols or if the facility activities are classified as ‘Low Risk’ (in accordance with Annex 2 of this Manual) and if the facility is exempt from presenting a license or permit.</p>

	<p>Evaluate the labor certificate. It should contain the information “nada consta” (nothing is reported) or “Certidão Positiva com Efeito Negativo” (Positive Certificate with Negative Effect). When there are pending lawsuits without reservations of guaranteed judgment, the number of pending labor lawsuits should appear on the certificate.</p> <p>If the facility does not have a Certidão Negativa de Débitos Trabalhistas (Debt Labor Clearance Certificate), it should present the last 12 (twelve) paid bills of INSS and the FGTS (same sample number of workers interviewed). If the facility is already fully adapted to e-Social, it should present the reports regarding the respective events (DCTFWeb, S-1200, and S-2299).</p>
	<p>Verify if the data of the facility is in accordance with the data shown in the documents, as well as updated in the competent agencies (Internet).</p> <p>Compare the main CNAE with the activity carried out by the facility.</p> <p>When the main CNAE does not correspond to the highest risk activity that the facility practices, carry out the entire audit process based on the highest risk activity and not by the main CNAE.</p>
	<p>Interview the workers and verify the way in which the facility operates, if the facility has a regular Articles of Association or if there is any made up subordinate labor, that is, some partners are true workers of other majority partners.</p>
	<p>When the facility is composed only of partners, verify if there is any subordinate work made up, that is, some partners are true workers of other majority partners. Compare with the Articles of Association.</p>
	<p>Verify the facility worker list, verifying that all information is presented in the updated GFIP. Verify the FGTS (Fundo de Garantia por Tempo de Serviço) paid bill and Previdência Social (Social Security) information, to make more agile access and increase the reliability of the information regarding the insured working life, enabling better service at INSS agencies.</p> <p>If the facility is already fully adapted to e-Social, it should present the reports regarding the respective events (DCTFWeb, S-1200, and S-2299).</p>
	<p>Verify the Operating License issued by the City Hall. It is important to verify that in some cities the document has an expiration period.</p> <p>The permit is a license granted by the City Hall, allowing the location and operation of commercial, industrial, agricultural establishments, service providers, as well as societies, institutions and associations of any nature, linked to natural persons or legal entities.</p> <p>The occupation of the property without the Operating License should subject the violator to a fine or the effective termination of the activities.</p>

	The facilities should demonstrate respect and compliance with the Brazilian Law. The facility documents should comply with the updated data from the competent agencies, including its Classificação Nacional de Atividade Econômica (CNAE – National Classification of Economic Activity).
	Verify the Certidão Negativa de Débitos Trabalhistas (Debt Labor Clearance Certificate) of the Justiça do Trabalho (Labor Court). This certificate may be accessed at the website http://www.tst.jus.br/certidao .
	Consult the Debt Clearance Certificate relating to Federal Taxes, with a date identical to or subsequent to the date of the audit.
	Enter in the report the observation of which type and size of facility it is.
	CNPJ card, Articles of Association, CAGED, GFIP, Operating License (or protocol), Health Permit (or protocol) and CNDT.
	Verify if the facility has published and/or exposed the Code of Conduct of the ABVTEX Program in common access areas such as a board of messages, dining hall, corridors, etc. It should be visibly available in at least one facility environment.
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

1.1 Is there evidence that the facility signed, updated and uploaded the Participation Term in the ABVTEX Program?

	YES	The Participation Term (Annex 3 of the General Regulation of the ABVTEX Program) is in the ABVTEX Program System , and it is updated and signed by the legal representative (notarized signature), in accordance with item 2.7 of the General Regulation of the program.	CONFORMITY
	NO	The Participation Term (Annex 3 of the General Regulation of the ABVTEX Program) is not in the ABVTEX Program System and/or it is incorrectly filled in and/or with no notarized signature and/or it is not signed by a person who is a legal representative of the facility.	CRITICAL

1.2 Is there evidence that the facility is incorporated as a legal entity in accordance with the Brazilian law?

YES	The facility is properly incorporated.	CONFORMITY
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	<p>NO</p>	<p>The facility is not properly incorporated. There are irregularities, the registration status in the Receita Federal (Federal Revenue Service) is not 'active', or the activities described in the CNPJ do not correspond to those carried out by the facility.</p>	<p>CRITICAL</p>
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1.3 Is there evidence that the facility has an updated CAGED statement or negative RAIS? Or, if the facility is already fully adapted to e-Social, does it present the reports regarding the respective events (S-1200, S-2200, S-2230, and S-2299)?

	<p>YES</p>	<p>The facility presents an updated CAGED or negative RAIS.</p>	<p>CONFORMITY</p>
	<p>NO</p>	<p>The facility does not present an updated CAGED or a negative RAIS.</p>	<p>CRITICAL</p>

1.4 Is there evidence that the facility corporate status is regular? If the facility does not have workers and is constituted only by partners, is the facility corporate status regular? Does the facility present an updated CAGED or negative RAIS?

	<p>YES</p>	<p>The articles of association and the facility form of operation are regular.</p>	<p>CONFORMITY</p>
	<p>NO</p>	<p>The referred partners are not included in the articles of association or, despite being included in the articles of association, there is a made up subordinate labor, that is, some partners are true workers of other majority partners.</p>	<p>CRITICAL</p>

1.5 Is there evidence that the facility has updated GFIP bill with the name of all workers? Or, if the facility is already fully adapted to e-Social, does it present the reports regarding the respective event (DCTFWeb)?

	<p>YES</p>	<p>The facility has updated GFIP bills.</p>	<p>CONFORMITY</p>
	<p>NO</p>	<p>The facility does not have updated GFIP bills. The list of workers in the GFIP bills is in accordance with the workers observed in the facility and in the employment record book.</p>	<p>MAJOR</p>
	<p>N/A</p>	<p>The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.</p>	<p>N/A</p>

1.6 Is there evidence that the facility has an Operating License?

	<p>YES</p>	<p>The facility has a valid Operating License, in accordance with the municipal law.</p>	<p>CONFORMITY</p>
	<p>PN1</p>	<p>The facility has an expired Operating License or exemption, but it has a renewal protocol.</p>	<p>MINOR</p>
	<p>PN2</p>	<p>The facility does not have an Operating License or exemption and it only has a protocol for the first license.</p>	<p>MAJOR</p>
	<p>NO</p>	<p>The facility does not have an Operating License or exemption, a protocol for renewal, or a protocol for the first license.</p>	<p>CRITICAL</p>

	N/A	The facility is not required to have an Operating License because its activities are classified as 'Low Risk' (in accordance with Annex 2 of this Manual).	N/A
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1.7 Is there evidence that the facility documents are updated (Internal Federal Revenue – Receita Federal, Board of Trade – Junta Comercial, and other competent agencies)?

	YES	The facility documents are updated (in this item, note the changes referring to EIs or in updating process).	CONFORMITY
	NO	The facility documents are not updated.	MINOR

1.8 Is there evidence that the facility publishes and/or exhibits the Code of Conduct of the ABVTEX Program to its workers?

	YES	The facility publishes and/or exhibits the Code of Conduct of the ABVTEX Program on its premises.	CONFORMITY
	NO	The facility does not publish and/or exhibit the Code of Conduct of the ABVTEX Program on its premises.	MINOR

1.9 Is there evidence that the facility has a valid Health Permit (when applicable)?

	YES	The facility has a valid Health Permit.	CONFORMITY
	PN1	The facility has an initial protocol or has an expired Health Permit with a renewal protocol within the deadline.	MINOR
	PN2	The facility has an expired Health Permit and an expired renewal protocol.	MAJOR
	NO	The facility does not have a Health Permit or it has an expired Health Permit without a renewal protocol.	REQUIRED SILVER
	N/A	The facility is not required to have a Health Permit, in accordance with the law, or its activities are characterized as 'Low Risk' (in accordance with Annex 2 of this Manual).	N/A

1.10 Is there evidence that the facility has a valid CNDT (Debt Labor Clearance Certificate) of the Labor Court?

	YES	The facility has a valid CNDT or Certidão Positiva com Efeito Negativo (Positive Certificate with Negative Effect) within the validity period and without labor debts.	CONFORMITY
	NO	The facility does not have a CNDT or Certidão Positiva com Efeito Negativo (Positive Certificate with Negative Effect), or the certificate is outdated, or it contains pending issues without reservations of guaranteed judgment.	REQUIRED SILVER

1.11 Is there evidence that the facility has a Debt Clearance Certificate (CND – Certidão Negativa de Débitos) relating to the federal taxes, valid at the audit date?

	YES	When the company presents the first copy of the Debt Clearance Certificate, or positive debt certificate with a negative effect, relating to federal taxes, with a date equal to or greater than the date of the Audit.	CONFORMITY
	NO	When the company does not present a Debt Clearance Certificate or a positive debt certificate with a negative effect, or presents a DCC dated before the audit date.	REQUIRED GOLD

Thematic Block #2.1 – Working conditions/Child labor

Child labor presents aspects of human degradation, regardless of the place or time when it occurs. The Brazilian Constitution, in its article 227, presents guarantees to children, young people and adolescents, imposing on the family, State and society the duty to ensure the necessary basic rights, protecting them from any form of abuse or disrespect for their integrity.

The “Estatuto da Criança e do Adolescente” (Child and Adolescent Statute), Law No. 8,069, 07/13/1990, corroborates these guidelines and defines, in its article 2, that a child is a person up to 12 years old and an adolescent is a person between 12 and 18 years old, with certain rights also being guaranteed to people between 18 and 21 years old. Article 4 expresses that no child or adolescent should be the object of any form of negligence, discrimination, exploitation, violence, cruelty and oppression.

The occurrence of child labor, in addition to the loss of basic rights, such as education, leisure and sport, makes possible the occurrence of serious psychological impacts, such as the reduction of the capacity for learning and relationships, in addition to promoting the emergence of serious health problems, such as excessive fatigue, sleep disturbances, irritability, allergies and respiratory problems.

In this sense, the facilities approved in the **ABVTEX Program** should not get involved in or support the use of child labor, except as an apprentice worker. What is established in Brazilian Law, in the Consolidação da Leis do Trabalho (CLT – Consolidation of Labor Laws), which determines that work in hazardous or unhealthy conditions, as well as night work, should be respected. Technical or administrative work is permitted, as long as it is carried out outside areas of risk to health and safety.

ILO Convention 182 determines work likely to harm the health, safety or morals of a child:

- ✓ work that exposes children to physical, psychological or sexual abuse;
- ✓ working underground, underwater, at hazardous heights or in confined spaces;
- ✓ working with hazardous machinery, equipment and tools, or work that involves manual handling or transport of heavy loads;
- ✓ working in an unhealthy environment that may, for example, expose children to hazardous substances, agents or processes, or to temperatures, noise levels or vibrations that are harmful to their health;

- ✓ working in particularly difficult conditions, such as working long hours or at night, or work where the child is unreasonably confined to the organization premises.

Also based on this Convention, in June/2008, Decree No. 6,481/2008 was enacted, approving the List of Worst Forms of Child Labor, presenting 89 activities, with their descriptions and consequences for the health and safety of children and adolescents.

Apprentice workers are owed at least the minimum federal salary, including the minimum hourly salary, since their working hours should be a maximum of 6 (six) hours a day, with extension and compensation of journey being prohibited. It is allowed to reach the limit of 8 (eight) hours per day as long as the apprentice has completed the Elementary School, and if the hours destined for theoretical learning are computed in them.

In addition to all these aspects, the employer should not allow young people who are not part of its workforce to remain on the facility premises (exclusively in the production area) during the working hours. This includes children, relatives or acquaintances of partners, workers or service providers. There is no specific national law on the subject; however, this restriction is applied to all approved facilities and subcontractors, as established in the [General Regulation](#) of the **ABVTEX Program**. This requirement seeks to ensure the integrity of minors in the face of the risks in the work environment and to curb the occurrence of child labor.

Required checks in this block

	Verify the list of the apprentice workers of the facility.
	Verify if the apprenticeship contracts are signed by the apprentice representative and by the apprentice and, in the case of minors, by the responsible person.
	Analyze the apprenticeship contract, verifying if it includes: <ul style="list-style-type: none"> ✓ apprentice worker personal data: full name, age (between 14 and 24 years old), address, documents (RG and CPF), number of the Carteira de Trabalho e Previdência Social (CTPS – Work and Social Security document); ✓ employer data: corporate name, CNPJ, address; ✓ technical and/or professional education and job within the facility: under-18 apprentice workers may not carry out hazardous and/or unhealthy and/or nighttime activities, in accordance with article 404 of CLT, article 7, XXXIII, of the Federal Constitution and Decree No. 6,481/2008, which approves the List of Worst Forms of Child Labor; ✓ expiration period: it may not exceed 3 (three) years, except if the apprentice worker was hired between the ages of 14 (fourteen) and 15 (fifteen) or with disability (PcD), situations in which the contract may last for 4 (four) years; ✓ working hours: may not exceed 6 (six) hours a day. If the apprentice worker has achieved the High School degree, an additional 2 (two) hours may be added, completing 8 (eight) hours a day, as long as these are used for theoretical learning.; apprentice workers who have completed the high school degree may have a daily working day of 8 (eight) hours, without including the period of theoretical learning; apprentice workers may not work overtime or perform night work; ✓ remuneration: it should be determined in accordance with the value of the minimum hourly salary set by the Ministério do Trabalho e Emprego (MTE –

	<p>Ministry of Labor and Employment) or Collective Bargaining Agreement and/or Convention of the predominant category of the facility. The apprentice remuneration should be based on the value considered most advantageous to the worker.</p> <ul style="list-style-type: none"> ✓ in the case of apprentice workers with disability, the limit age set out in the law does not apply; ✓ in the case of an apprentice worker who involves carrying out an activity prohibited to anyone under 21 years old, the apprenticeship contract may be carried out up to 29 years old.
	<p>Verify if the apprentice workers are included in the facility CAGED or if there is an agreement with regular non-profit institutions.</p>
	<p>Verify the apprentice workers personal documentation, including:</p> <ul style="list-style-type: none"> ✓ copy of the activity registration in the CTPS; ✓ copy of the personal documents to verify the age and other information described in the apprenticeship employment contract.
	<p>Analyze the apprentice worker timecard to verify if the work journey performed is the same as described in the contract (maximum of 6 (six) hours/day or 8 (eight) hours/day for those who have achieved the High School degree). The apprentice workers may not carry out activities beyond the described working hours. Overtime and night work are prohibited by law.</p>
	<p>Verify if the apprentice workers are receiving adequate transport vouchers for their journey to the facility.</p>
	<p>Verify the PGR to identify if the facility is unhealthy or if the activity is hazardous.</p>
	<p>Request the last 12 (twelve) payslips of the apprentice workers and verify 3 (three) of them: the most recent, the one in the period of the highest productivity (peak period) and the one in the period of the lowest productivity. It should be shown that the apprentice workers received the salary in accordance with the apprenticeship contract, respecting the value of the minimum hourly salary (set by the law or by the Collective Bargaining Agreement – whichever is more advantageous).</p> <p>It is necessary to show that the employer is collecting FGTS, which should be 2% of the remuneration paid or due. If the facility is already fully adapted to e-Social, the facility should present the reports regarding the respective events (S-1200, and S-2299).</p>
	<p>Interview the apprentice workers (non-confidential interviews, carried out with 20% of the apprentice workers or with 2 (two) apprentice workers, whichever is greater) and verify that the mandatory requirements are being complied with, including the facility infrastructure and labor law (salary payment, working hours, overtime, etc.).</p>
	<p>Interview the workers (Brazilian, foreign, and apprentice workers) and verify if there is evidence of the presence of underage workers in the facility premises.</p>

	<p>Carry out a visit to the facility, verifying the working conditions of the apprentice workers, including:</p> <ul style="list-style-type: none"> ✓ activities performed: apprentice workers may not perform hazardous and/or unhealthy activities, such as use of sharps¹ equipment, handling of hazardous chemicals, hot work, working at heights, among others (according to Decree No. 6,481/2008 articles 67, 68, 78, 80, and 83); ✓ night work: the night work is prohibited for the apprentice workers; ✓ ergonomic conditions: adequate furniture should be available for carrying out the activities.
	<p>Carry out a visit to the facility, verifying the absence of underage in the premises (except for contracted apprentice workers). If the presence is observed, immediately notify the responsible for the facility, asking him or her to remove the underage from the premises.</p>
	<p>Copy of PGR (at least the page with the PGR approval – responsible and date).</p>
	<p>Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.</p>

Checklist

2.1.1 Is there evidence that the facility, when having apprentice workers aged between 14 and 24 years old, develops the apprenticeship contract in accordance with the legal requirements?

	<p>YES</p>	<p>The facility has apprentice workers and complies with the requirements of the apprenticeship law.</p>	<p>CONFORMITY</p>
	<p>NO</p>	<p>The facility has apprentice workers in an irregular way in some criterion of the apprenticeship law.</p>	<p>ZERO TOLERANCE</p>
	<p>N/A</p>	<p>The facility does not have apprentice workers.</p>	<p>N/A</p>

2.1.2 Is there evidence that the facility does not have under-14 children in its premises? Is there evidence that the facility does not allow minors, who are not part of the workforce, to remain in its premises as a whole?

	<p>YES</p>	<p>The facility does not have under-14 children in its premises, even if they are circulating in the area.</p>	<p>CONFORMITY</p>
	<p>NO</p>	<p>The facility has under-14 children in its premises, even if they are circulating in the area.</p>	<p>CRITICAL</p>

2.1.3 Is there evidence that the facility, when having apprentice workers aged between 14 and 18 years old, complies with the labor laws (such as protection against exposure to hazardous and/or unhealthy work, prohibition of night shift work and legal employment contract)?

	<p>YES</p>	<p>The facility fully complies with the labor law.</p>	<p>CONFORMITY</p>
	<p>NO</p>	<p>The facility does not comply with the labor law.</p>	<p>CRITICAL</p>

	<p>N/A</p>	<p>The facility does not have underage workers.</p>	<p>N/A</p>
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<p>2.1.4 Is there evidence that the facility complies with the legal conditions for the apprentice workers quota?</p>			
	<p>YES</p>	<p>The facility complies with the minimum legal quota for apprentice workers or complies with the conditions of TAC signed with MTE or MPT.</p>	<p>CONFORMITY</p>
	<p>NO</p>	<p>The facility does not comply with the minimum legal quota for apprentice workers or does not comply with the conditions of TAC signed with MTE or MPT.</p>	<p>MINOR</p>
	<p>N/A</p>	<p>The facility is not required to have apprentice workers, in accordance with the conditions described in IN-146/2018 (Ministry of Labor).</p>	<p>N/A</p>

Thematic Block #2.2 – Working conditions/Forced labor or analogous to slave labor

In accordance with article 149 of the Brazilian Penal Code, the crime of slavery is defined as “reducing someone to a condition of analogous to slave, either by subjecting him or her to forced labor or exhausting work, or by subjecting him or her to degrading working conditions, or restricting, by any means, his or her mobility due to debt contracted with the employer or agent”.

The International Labor Organization (ILO) defines the practice as “all work or service required of an individual under threat of any penalty, for which he or she has not voluntarily presented himself or herself”.

The main characteristics of forced labor today are:

- ✓ degrading working conditions incompatible with human dignity, characterized by the violation of the fundamental rights that put the health and life of the worker at risk;
- ✓ exhaustive journey, in which the worker is subjected to excessive effort or work overload that causes damage to his or her health or risk of life;
- ✓ forced labor, keeping the worker in the service through fraud, geographic isolation, threats and physical and psychological violence;
- ✓ debt servitude, causing the worker to illegally contract a debt, binding him or her to it;
- ✓ document retention – workers documents are often retained during the period of service provision;
- ✓ overt surveillance, with the presence of armed guards who threaten workers and apply physical punishment.

Degrading conditions, in turn, are characterized by a combination of the following elements:

- ✓ housing: workers are commonly housed in disagreement with the provisions of NR-24 of the Ministry of Labor, being exposed to a series of risks;
- ✓ sanitation conditions: precarious sanitary conditions (absence of toilets, for example) and/or no supply of potable water;
- ✓ insufficient food to meet the workers caloric needs, and in inadequate conservation conditions;
- ✓ inadequate and late salaries: even when there is no debt servitude, workers do not receive salaries in kind, receive less than the agreed, or have their salaries withheld or paid late;
- ✓ mistreatment and violence: public humiliation, threats and even physical violence against the workers.

Article 5, III, of the Constitution of the Federative Republic of Brazil, prohibits the forced labor, provided “no one should be subjected to torture or inhuman or degrading treatment”. In item XVIII, it deals with the freedom of professional practice: “the exercise of any work, trade or profession is free, subject to the professional qualifications established by law”. Finally, in item XLVII “c”, it prohibits the adoption of the penalty of forced labor.

Therefore, the audited facilities should not get involved with or support the use of forced or analogous to slave labor, fighting its realization, guaranteeing all the rights to its workers and production chain.

Required checks in this block

	<p>Analyze the Collective Bargaining Agreement of the category, identifying the duties and, mainly, the rights of the workers, with emphasis on labor issues, including working hours, breaks (for lunch and rest), performance and compensation of overtime (including time bank), benefits, remuneration, etc.</p>
	<p>Verify the list of the facility workers, analyzing if all of them are registered with CTPS or have valid service contracts. All workers should be linked to the facility, as determined by CLT.</p>
	<p>Analyze the employment contracts and contractual amendments signed between the facility and its workers, verifying that:</p> <ul style="list-style-type: none"> ✓ they were developed in writing between the facility and the worker, being signed and duly completed. Contracts without signature or with mandatory fields blank are not considered valid; ✓ there is a clause that presents the working hours to be followed by the workers; ✓ there is an agreement clause for extension and/or compensation of hours (individual time bank); ✓ it presents the workers’ remuneration, including a clause for discounting vouchers, pharmacy, insurance, associations, market, etc. Without the contractual provision that allows such discounts, any payroll discount may be questioned, and the worker may request a refund of the discounted amounts (except for legal discounts such as INSS and IRRF);

	<ul style="list-style-type: none"> ✓ there was a change in the worker working hours, which should be done through a contractual amendment. When a worker is hired, defined working hours is stipulated – any difference from the contract may be characterized as a breach (unless the change in working hours is provided for in the contract). When there is a forecast that the worker may change hours, mention it in the employment contract; ✓ any amendment to the contract at the request of the worker is documented, upon request of the amendment and the respective term of contractual amendment; ✓ the probation contract does not exceed 90 (ninety) days; if it exceeds 90 (ninety) days (including the 1st day), alert the facility that the worker is due prior notice of a FGTS fine and other labor sums arising from the worker termination without just cause, as the probation contract is in force for an indefinite period; ✓ there is a time bank agreement in the employment contract or in a contractual amendment, whose compensation may not exceed 6 (six) months; ✓ there is payment of the time bank balance in case of compensation; ✓ the working hours controls contain the credit and debit statements of the time bank; ✓ a break of 1 (one) hour is used for rest and meal (intraday break) for the workers who work more than 6 (six) hours/day and, in case of an interval of less than 1 (one) hour, the Collective Bargaining Agreement authorizes such reduction, always observing the minimum break of 30 (thirty) minutes; ✓ a break of 15 (fifteen) minutes is used for rest and meal (intraday break) for the workers who work up to 6 hours/day; ✓ an inter-day break of 11 (eleven) hours is applied.
	<p>Analyze the Employment Record Book. It should be completed and have, at a minimum:</p> <ul style="list-style-type: none"> ✓ worker identification: full name, number of documents (RG, CPF, CTPS, and PIS), parents name, and address; ✓ admission date; ✓ time and workplace (except in cases of workers in a trust position); ✓ remuneration and benefits.
	<p>Verify if the facility has a copy of the workers’ documentation. Important: the facility may not retain any original documents from its workers. The CTPS should be returned within 48 hours to the respective owners. The employer should keep a record of delivery and return of the documents. It is not enough to have the proof of CTPS return: it is necessary that the facility also keeps a copy of the delivery document (in which the facility records the delivery of the CTPS to the worker) because only with the proof of delivery and return, the facility proves that it stayed only 48 hours with the workers CTPS.</p>
	<p>Visit the facility, checking the working conditions, including furniture, tools and equipment available for carrying out the activities.</p>
	<p>Verify if the facility keeps doors and windows locked with padlocks, bars or devices that prevent the free movement and/or exit of the workers. This practice is prohibited.</p>

	Verify the places for food (non-mandatory for all facilities, in accordance with item 3.3.1 of this Manual), toilets and if the facility provides drinking water for its workers (non-mandatory for all facilities, in accordance with item 3.1.4 of this Manual).
	Interview the workers and understand how the working relation of the interviewees with the leadership is, verifying if there is coercion or any form of action that prevents them from leaving the facility, such as loans made in which payment is linked to staying at work – this practice is also prohibited.
	Verify if the workers signed blank papers for later creation of documents.
	Verify if the workers are prevented from moving or leaving the facility premises and if they have free access to the bathrooms.
	Verify the facility conditions, based on the “MTE Document” for checking the analogous to slave labor.
	Contracts or loan receipts verified in the survey; any documents, pictures or evidence that corroborate the auditor evaluation.
	Pictures and documents proving evidence of nonconformities.
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

2.2.1 Is there evidence that the facility does not have forced labor or analogous to slave labor?			
	YES	The facility does not present situations that characterize forced labor or analogous to slave labor.	CONFORMITY
	NO	The facility presents situations that characterize forced labor or analogous to slave labor in accordance with article 149 of the Penal Code – Decree No. 2,848/40: “reducing someone to a condition of analogous to slave, either by subjecting him or her to forced labor or exhausting work, or by subjecting him or her to degrading working conditions, or restricting, by any means, his or her mobility due to debt contracted with the employer or agent” (wording given by law No. 10,803, 12/11/2003).	ZERO TOLERANCE
2.2.2 Is there evidence that the facility does not loan values or retains personal documents in exchange for labor? Do the workers sign blank papers without knowing what the objective is?			
	YES	There are no situations that characterize loan of values or retention of personal documents in exchange for labor.	CONFORMITY

	NO	There are some situations that characterize loan of values or retention of personal documents in exchange for labor.	ZERO TOLERANCE
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2.2.3 Is there evidence that the facility allows free movement of its workers in its premises?			
	YES	The facility allows the free movement of its workers.	CONFORMITY
	NO	The facility restricts in some form the free movement of its workers.	ZERO TOLERANCE

Thematic Block #2.3 – Working conditions/Irregular foreign worker labor

In accordance with article 2 of the International Convention on the Protection of the Rights of all Migrant Workers and Members of their Families, migrant workers are understood to be “the person, who is going to exercise, is exercising or has carried out a remunerated activity in a State of which he or she is not a national”.

In Brazil, the legal situation of foreign workers is regulated by Law No. 13,445/2017, also known as the Migration Law, a document that governs their condition in the country and defines that the Ministry of Economy (after the issuance of Provisional Measure 870/2019) has the legal competence framework to issue work permits.

Work visas are divided into 4 (four) categories: up to 90 days, up to 1 (one) year; up to 2 (two) years with an employment contract in Brazil; and up to 2 (two) years without an employment work contract in Brazil.

To obtain the permit to exercise remunerated activity, the applicants should have regular and current documentation: Registro Nacional de Estrangeiros (RNE – National Registry of Foreigners) and/or Cédula de Identidade de Estrangeiro (CIE – Foreigner Identity Card).

The suppliers that participate in the **ABVTEX Program** should not get involved with or support the use of work or service that is extracted from any person whose situation of residence and work in Brazil is not regularized with the competent agencies.

Required checks in this block

	<p>Verify if the Brazilian labor law and the Collective Bargaining Agreement and/or Convention of the category is being complied with. Foreign workers have the same labor rights (detailed in the previous item) as the Brazilian ones, including:</p> <ul style="list-style-type: none"> ✓ employment contract and registration form; ✓ FGTS and INSS; ✓ benefits and additional premiums provided for by law and Collective Bargaining Agreement and/or Convention of the category; ✓ control of working hours and overtime; ✓ vacations and 13th salary.
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	<p>Analyze if the timecards of the foreign workers are being registered. The same guidelines for Brazilian workers should be followed. The payment should also follow the provisions of CLT and the Collective Bargaining Agreement and/or Convention of the category. It is necessary to verify if the benefits are being paid and if the discounts are legal. Request the last 12 (twelve) payslips of the foreign workers and verify 3 (three) documents: the most recent, the one in the period of the highest productivity (peak period) and the one in the period of the lowest productivity.</p>
	<p>Verify if the foreign workers have a valid Registro Nacional de Estrangeiros (RNE – National Registry of Foreigners) in addition to CNTP and CPF (article 59 of CLT).</p>
	<p>Verify if there is a copy of the Employment Contract in the native languages of the foreign workers. The facility should have, at least, a “master copy” with a legal translation for the verification of the auditor of the contracts signed by the workers.</p>
	<p>During the visit to the facility, verify the places intended for carrying out the activities, places for meals and bathrooms, in addition to tools, instruments and furniture used by the foreign workers. It is important to note that the same working conditions should be offered to national and migrant workers, without distinction.</p>
	<p>Verify if the foreign workers have access to all the facility premises, which may not keep doors and windows locked with padlocks, bars or devices that prevent movement and/or exit of the workers. Drinking water should be available for all workers.</p>
	<p>Interview the foreign workers (individual interviews, in accordance with the selection criteria for interviews) and verify if the mandatory labor requirements are being met, such as payment of salaries, additional premiums provided by law, legal benefits and/or provided for in the Collective Bargaining Agreement and/or Convention, overtime or time bank.</p>
	<p>Determine if the facility retains personal documents, which is prohibited, and also if it maintains any type of conditional employment relation, such as loans, offer of integrated housing, etc. These practices are prohibited.</p>
	<p>Certified copies of documents should be accepted during the audit. Documents submitted (original or copy by mail) should be accepted within 3 (three) days of the audit. The submission of the SIAPRO protocol should be accepted.</p>
	<p>Pictures and documents proving evidence of nonconformities.</p>
	<p>Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.</p>

Checklist

2.3.1 Is there evidence that the facility does not have irregular foreign workers?			
	YES	The facility has regular foreign workers.	CONFORMITY
	NO	There is some irregularity in the documents of the foreign workers.	ZERO TOLERANCE
	N/A	The facility does not have foreign workers.	N/A

2.3.2 Is there evidence that the facility has copies of employment contracts and other contractual documents provided in the native languages of the foreign workers?			
	YES	The foreign worker signs the employment contract in his or her native languages. In addition, the facility has a translation of the employment contract in the native language of its worker (legal translation).	CONFORMITY
	NO	There is no employment contract in the worker native language.	MAJOR
	N/A	The facility does not have foreign workers.	N/A

Thematic Block #2.4 – Working conditions/Recruitment and selection

Required checks in this block

	Verify the admission documents of the selected workers (compare with PGR).
	Verify if the foreign workers have a valid Registro Nacional de Estrangeiros (RNE – National Registry of Foreigners) in addition to CNTP and CPF (article 59 of CLT).
	Interview the foreign workers (individual interviews, in accordance with the selection criteria for interviews) and verify the aspects and conditions of recruitment (if there is no evidence of human trafficking or forced recruitment). In this case, the investigation should not be restricted to the foreign workers, as there are situations of forced recruitment of Brazilian workers as well.
	Interview the workers, including pregnant women in the interview sample or, if there are no pregnant women, include other women to verify the existence of a pregnancy test during the recruitment process.
	Pictures and documents proving evidence of nonconformities.
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

2.4.1 Is there evidence that the facility does not require pregnancy tests during the recruitment process?			
	YES	The facility does not require a pregnancy test during the recruitment process.	CONFORMITY
	NO	The facility requires a pregnancy test during the recruitment process.	CRITICAL
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

2.4.2 Is there evidence that the facility, during the recruiting process, provides the workers' previous knowledge on the formal employment conditions, physical premises, and nature of the work, and that there are no special fees or obligations for the recruiters?			
	YES	The facility does not use intermediaries under charging fees during the recruitment process.	CONFORMITY
	NO	The facility uses intermediaries under charging fees during the recruitment process.	CRITICAL
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

2.4.3 Is there evidence that the facility does not employ threats, penalties, coercion and/or physical force as a means for recruiting (Brazilian or foreign) workers?			
	YES	The facility does not have any problem identified in the recruitment process.	CONFORMITY
	NO	The facility employs abusive practices in the recruitment process.	ZERO TOLERANCE
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

2.4.4 Is there evidence that the facility complies with the legal conditions for PCD worker (disabled people) quota?			
	YES	The facility complies with the minimum legal quota for PCD workers or complies with the conditions of TAC signed with MTE or MPT.	CONFORMITY
	NO	The facility does not comply with the minimum legal quota for PCD workers or does not comply with the conditions of TAC signed with MTE or MPT.	MINOR
	N/A	The facility has less than 100 (one hundred) workers and is not required to comply with the PCD workers quota.	N/A

2.4.5 Is there evidence that the facility has effective processes to avoid irregular hiring of under-16 workers, disregarding the conditions of the current law for hiring minor apprentice workers?			
	YES	The facility has consistent processes established to prevent irregular employment of under-16 workers.	CONFORMITY
	NO	The facility does not have consistent processes established to prevent irregular employment of under-16 workers.	MAJOR

2.4.6 Is there evidence that the facility uses employment agencies (outsourced labor agencies) to hire workers and is it in accordance with the legislation?			
	YES	The facility has a contract with an employment agency, all workers have a contract and the experience period is within the limit (up to 3 months). The agency's workers receive full legal benefits, salaries, allowances and social security, etc.	CONFORMITY
	PN	There are some isolated cases of violations.	MINOR
	NO	The facility does not comply with the law regarding the hiring of workers through an employment agency (outsourced labor). Systemic occurrence of violations.	MAJOR
	N/A	The facility does not use this type of employment or the facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

Thematic Block #2.5 – Working conditions/Housing

The Brazilian law allows the employers to provide housing to their workers. It may be “for the work” or “by the work”.

Housing granted “for the work” is that considered essential for the development of the work itself, for example, the caretaker, janitor, etc. In this case, it may not compose the calculation basis for the remuneration – it constitutes a work instrument, not having a salary nature.

Housing “by the work” is one in which the facility freely provides housing, as a benefit, and the corresponding amount may constitute remuneration for all legal purposes.

However, the facilities are not allowed to provide housing integrated with workshops and, if the employer chooses to offer this benefit, this should be formalized in the employment contract and the conditions should comply with the law, as established in the [General Regulation](#) of the **ABVTEX Program**.

NR-24, Regulatory Standard of the Ministry of Labor, establishes the main characteristics that housing should have, determining the minimum conditions for the environment to be considered adequate.

Required checks in this block

	Analyze the employment contract of the (Brazilian and foreign) workers to verify if there are clauses that include the availability of housing by the employer and the conditions offered.
	<p>Verify proofs of address/residence (transport vouchers, water, electricity, gas, fixed or cell phone bills, IPTU) for the worker or for someone with a kinship proven by documentation:</p> <ul style="list-style-type: none"> ✓ in the case of shared housing, the lease agreement should be accepted, with the declaration of the lessor containing the names of the tenants. ✓ in the case of Brazilian workers, the proof of residence in the worker record may also serve as a supporting document.
	Visit the facility to verify the existence, or not, of housing attached to the production areas. This condition is not allowed. For the facilities that are constituted only by partners, verify if the attached housing may characterize the existence of workers in any irregular situation.
	Interview the workers and verify if they are alone in the housing or with his or her family. If he or she is with his or her family, verify the housing and if it is exclusive for the family or has several families.
	In the case the employer leases a house for the worker, it is characterized as housing. Verify if the facility is complying with the form of housing offered, in accordance with the employment contract. Furthermore, determine if the facility complies with the requirements of NR-24.
	Pictures and documents proving evidence of nonconformities.
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

2.5.1 Is there evidence that the facility does not provide housing for its workers at the same workshop or industrial shed address?		
	YES The facility does not provide housing for its workers at the same workshop address.	CONFORMITY
	PN The facility provides housing only for the owner, with no workers residing, integrated into the work environment, such as: semi-detached house, back house on the same land, front house on the same land, house on the same divided land or house within the facility area.	MAJOR
	NO The facility provides housing for the employees integrated into the work environment, such as: semi-detached house, back housing on the same land, front housing on the same	CRITICAL

	land, house on the same divided land or house within the facility area.	
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2.5.2 Is there evidence that the facility provides housing in accordance with NR-24 and labor law?			
	YES	The facility provides housing for its workers in accordance with NR-24, and the housings are exclusive for each family.	CONFORMITY
	NO	The facility provides housings for its workers and the housings are not exclusive for each family (multifamily housing).	CRITICAL
	N/A	The facility does not provide housing for its workers.	N/A

Thematic Block #2.6 – Working conditions/Freedom of association

All workers and employers have the right to form organizations that they deem appropriate and to affiliate with them, with the aim of promoting and defending their respective interests and of entering into Collective Bargaining Agreements with the other party, freely and without interference of one over the other, nor interference by the State.

The freedom of union and freedom of association are a fundamental human right that, together with the right to Collective Bargaining Agreement, allows promoting the democracy, improvements in the facility governance and decent working conditions.

These guidelines are established in the ILO Convention No. 87 and in article 8 of the Brazilian Federal Constitution, which guarantees the right of association, but on the other hand, determines that no one should be required to join or remain affiliated to a union.

Articles 1 and 2 of ILO Convention No. 98 refer to “adequate protection against any act of discrimination that tends to diminish freedom of association relates to their employment” (§1, article 1); protection against the employer conduct of conditioning employment to union disaffiliation or non-affiliation (§2, article 1); the prohibition against dismissal because of union membership or affinity (§2, article 1); the guarantee that “workers and employers organizations should enjoy adequate protection against any act of interference by one against the other” (§1, article 2).

The facilities should also ensure that the union representatives, who are workers of the facility, are not discriminated against, harassed, intimidated and/or retaliated against by other workers, including the facility leadership.

Required checks in this block

	Interview the workers and verify if they are free to join the unions that represent their category. Find out if they suffered any kind of coercion to join or not. The workers should have freedom of choice and may not be persecuted or discriminated against within the facility, regardless of the position they have chosen.
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	Interview the union representative, who works in the facility (if any), and verify his or her working conditions and how is the way he or she is treated by his or her colleagues and leadership. Discrimination is prohibited.
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

2.6.1 Is there evidence that the facility does not intimidate its workers regarding the right of free association and Collective Bargaining Convention and/or Agreement?			
	YES	The facility does not intimidate its workers.	CONFORMITY
	NO	The facility intimidates in some form its workers.	CRITICAL
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

Thematic Block #2.7 – Working conditions/Discrimination

ILO Convention No. 111 (1958), ratified by Brazil in 1968, brings the concept of discrimination in labor relations in its article 1, understanding it as any “[...] distinction, exclusion or preference based on race, color, sex, religion, political opinion, national origin, social origin or other distinction, exclusion or preference specified by the Member State concerned, whatever its legal or practical origin and which has the purpose of nullifying or altering the equality of opportunity or treatment in the employment or profession”.

Therefore, discrimination is considered to be any distinction, exclusion or preference that has the effect of destroying or altering the equality of opportunity or treatment in terms of employment or profession. The equality of opportunities begins with the employment and fair remuneration, without the individual being doomed to marginality and exclusion.

The employer has the free will to stipulate the rules for hiring its workers; however, without imposing discriminatory situations. In compliance with the principle of equality, both the State and the individual may not adopt in their relations discriminatory, prejudiced or racist conducts, as provided for in article 7, XXX, of the Brazilian Federal Constitution.

Therefore, the facilities should not engage in or support discrimination in hiring, compensation, access to training, promotion, termination of the employment or retirement, based on race, social class, national origin, religion, disability, gender, sexual orientation, age, pregnancy, union membership or party affiliation.

Required checks in this block

	Verify the employment contracts of men and women, who hold the same position, analyzing if there is a distinction related to the value of remuneration, benefits, etc.
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	If possible, carry out this analysis also on contracts of people of different ages, who perform the same activities and/or have the same position.
	Verify the register of the workers, who are on maternity leave, or in the lactation phase. Verify the payment records of these women, since the beginning of their absence from the activities.
	For the facilities constituted only by partners, verify if there is annexed housing that may characterize workers in any irregular situation.
	Interview pregnant and lactating women and verify if there is any difference in treatment, especially by the leadership, and if the facility offers differentiated working conditions, including: <ul style="list-style-type: none"> ✓ pregnant women: they are entitled to exemption from working hours for examinations and at least 6 (six) consultations (article No. 392, § 4); ✓ lactating women: new mothers are entitled, during the workdays, to 2 (two) breaks to breastfeed their children; it is also possible to establish the form of breastfeeding leave by individual agreement (entry 1 (one) hour later or leaving 1 (one) hour earlier, for example) – see article No. 396 of CLT; ✓ pregnant women should not perform unhealthy activities, unless there is an express authorization to work through a medical certificate issued by a doctor trusted by the pregnant women in cases of maximum or minimum unhealthy level (article No. 394-A of CLT); ✓ lactating women should be removed from unhealthy work if a medical certificate is issued removing the lactating women from work.
	Interview the workers to verify if there are obvious discrimination situations related to race, social class, national origin, religion, disability, gender, sexual orientation, age, pregnancy, union membership or party affiliation. It is necessary to show that a pregnancy test was not requested for women during the recruitment process – this practice is prohibited.
	Interview the workers and verify if there is discrimination against people who return from leaves or who have an occupational accident or illnesses.
	Pictures and documents proving evidence of nonconformities.
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

2.7.1 Is there evidence that the facility does not discriminate its workers based on age, ethnicity, sex, sexual orientation, group, religion, politics or any other specific reason?		
YES	The facility does not discriminate in its workers.	CONFORMITY
NO	The facility discriminates in some form in its workers.	CRITICAL

	<p>N/A</p>	<p>The facility is exclusively composed by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.</p>	<p>N/A</p>
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<p>2.7.2 Is there evidence that the facility provides special treatment to pregnant women in accordance with their individual needs?</p>			
	<p>YES</p>	<p>The facility provides special treatment to pregnant women.</p>	<p>CONFORMITY</p>
	<p>NO</p>	<p>The facility does not provide special treatment to pregnant women.</p>	<p>CRITICAL</p>
	<p>N/A</p>	<p>The facility does not have pregnant or lactating women.</p>	<p>N/A</p>

Thematic Block #2.8 – Working conditions/Abuse and harassment

Harassment in the work environment is any abusive conduct (gesture, word, behavior, or attitude) that, through its repetition or systematization, threatens the dignity or psychological or physical integrity of a person, threatening his or her employment or degrading the work climate.

Sexual harassment is when there is an unwanted approach by another, with sexual intent or untimely insistence by someone in a privileged position, who uses this advantage to obtain sexual favors from subordinates or dependents. For its perfect characterization, the embarrassment should be caused by whoever takes advantage of his or her superior status or ancestry inherent to the exercise of a job, position or function. Sexual harassment is a crime (article 216-A of the Penal Code, as amended by the Law No. 10,224, of 05/15/1991).

Moral harassment is the exposure of someone to humiliating and embarrassing, repetitive and prolonged situations during the working day and in the exercise of his or her functions. The most common behaviors are: confusing and imprecise instructions to the worker, making him or her difficult to carry out his or her work; attribute imaginary errors to the worker; demanding, unnecessarily, urgent work, with an overload of tasks; ignoring the worker presence, or not greeting him or her, or deliberately not speaking to him or her in front of others; criticizing or making bad jokes to the worker in public; imposing unjustified schedules; remove, unjustifiably, the instruments of work; physical or verbal aggression, when the harasser and the victim are alone; vexatious magazine; restriction on the use of toilets; threats and insults; isolation of the worker from others.

The facilities approved in the **ABVTEX Program** are prohibited from carrying out acts of abuse and harassment, or even indirectly contributing to its performance, through knowledge of the situation, without taking steps to resolve them.

Required checks in this block

	<p>Verify the work contract and/or extra-contractual agreement in which the worker consents to possible discounts. Verify the worker payslips, checking for undue and/or abusive discounts.</p>
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	<p>Interview the workers verifying if there is evidence of coercion, moral or sexual harassment by the employer. Verify the CIPA minutes, whether there was a complaint and what procedures were taken by the CIPA.</p>
	<p>Interview the workers and verify if they are coerced into working overtime, except in situations provided for by article 61 of CLT, which determines that the employer may only oblige the worker to work overtime to attend to services that may not be postponed or whose non-execution may cause damage to the facility or the customer (such as, for example, a storm that brings down the network and needs immediate restoration) or in case of force majeure.</p> <p>CLT defines “force majeure” as any unavoidable event, relates to the employer’s will, and for which the employer did not contribute, directly or indirectly (such as, for example, fire, flood, etc.).</p>
	<p>Interview the workers and verify if the facility retaliates against an individual for filing a discrimination complaint, participating in an investigation, opposing discriminatory practices, or participating in related activities.</p>
	<p>Interview the workers and verify if they have the right to respond and/or appeal disciplinary decisions without negative repercussion.</p>
	<p>Pictures and documents proving evidence of nonconformities.</p>
	<p>Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.</p>

Checklist

<p>2.8.1 Is there evidence that the facility has no complaints or any type of harassment from workers, considering the hierarchy?</p>		
	<p>YES No harassment is identified and the facility has a CIPA and it was active and the workers held responsible with an administrative sanction.</p>	<p>CONFORMITY</p>
	<p>NO When there is evidence of harassment and, even though CIPA was implemented, it did not take any action.</p>	<p>CRITICAL</p>
	<p>N/A The facility is exclusively composed by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.</p>	<p>N/A</p>

2.8.2 Is there evidence that the facility asks the consent of the workers to overtime?			
	YES	Overtime is performed with the consent of the workers.	CONFORMITY
	NO	Overtime is performed without the consent of the workers.	CRITICAL
	N/A	The facility is exclusively composed by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

2.8.3 Is there evidence that the facility does not adopt abusive disciplinary practices?			
	YES	Abusive disciplinary practices are not identified.	CONFORMITY
	NO	Abusive disciplinary practices are identified.	MAJOR
	N/A	The facility is exclusively composed by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

2.8.4 Is there evidence that the facility adopts procedures to avoid or mitigate the risk of moral, sexual harassment or violence at work, in accordance with the measures provided for by the Federal Law 14,457/2022?			
	YES	The facility complies with the processes described in the Federal Law No. 14,457/2022.	CONFORMITY
	NO	The facility does not comply with, or is unaware of, the procedures described in the Federal Law No. 14,457/2022.	MAJOR
	N/A	The facility is exclusively composed by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

Thematic Block #2.9 – Working conditions/Salary and compensation

All workers should work in accordance with the provisions of the labor law and be registered in the CTPS (Work and Social Security Document). Salaries and worked hours should be paid in accordance with the national legal basis or as defined in the Collective Bargaining Agreement and/or Convention, with the highest prevailing, as a rule. If there is a discrepancy between the Collective Bargaining Agreement and Convention, the provisions of the Collective Bargaining Agreement should prevail.

If the facility does not have registered workers, only partners, the facility should be in good standing, constituted in accordance with the Articles of Association.

The workers should have access to a copy of their payslips, and the facility should clarify doubts related to overtime, deductions, benefits, etc.

The discounts should be expressly provided for in the contract, limited to 30% (thirty percent) of the value of the benefit or of the worker’s available remuneration, which is understood, in this case, as the net remuneration.

The overtime should be paid or compensated in accordance with the labor law and the Collective Bargaining Agreement and/or Convention.

All taxes and duties should be paid directly, as well as the payment of salaries. They should be made in currency (Real), upon receipt signed by the worker. In this case, illiterate workers may prove the receipt by a fingerprint.

Note: proof of deposit in a bank account, opened for this purpose for each worker, with their consent, should have the force of receipt.

The Collective Bargaining Convention is a normative agreement (generates obligations between the parties) signed between the Worker’s Union (workers) and the Economic Category Union (employers), obliging all the people who make up the territorial base of the respective unions. It is originated from a list of demands approved at the assembly.

The Collective Bargaining Agreement is also a normative agreement (generates obligations between the parties), signed between the Workers Union (workers) and one or more individual facilities. That is, it is characterized when the Workers Union and a facility, body or institution, by agreement, draw up a normative document (list of norms) without the intervention of any employer entity.

The facilities should follow the provisions of the Collective Bargaining Agreement and/or Collective Bargaining Convention.

Required checks in this block

	Verify the current Collective bargaining Agreement, analyzing if the facility complies with all mandatory requirements, as detailed throughout this Manual .
	Request the last 12 (twelve) payslips of the apprentice workers and verify 3 (three) of them: the most recent, the one in the period of the highest productivity (peak period) and the one in the period of the lowest productivity. Analyze if they are receiving their remuneration in accordance with the Employment Contract and if are formally registered (CTPS) – the documents should be updated with the current value. Verify if FGTS is being paid.
	For the facilities that update the data through e-Social, consult the month GRFGTS and termination GRFGTS by the events S-1200 and S-2299.
	Verify the benefits to which the workers are entitled to, in accordance with CLT and Collective Bargaining Agreement and/or Convention: <ul style="list-style-type: none"> ✓ transport vouchers: the facility should offer conditions for the workers to travel to work. The value of the transport voucher should correspond to the needs of the workers, being credited in accordance with the CLT and/or Collective Bargaining Agreement and/or Convention. All hired workers should choose whether to receive the transport voucher. The facility should keep a record, with a statement signed by each worker; ✓ meal: there is no law that obliges the facilities to provide meals to the workers; however, it is necessary to analyze what the Collective Bargaining Agreement

	<p>and/or Convention presents on the subject and verify if it is being complied with;</p> <ul style="list-style-type: none"> ✓ other benefits: health plan, basic food basket, etc. (in accordance with the Collective Bargaining Agreement and/or Convention); ✓ In case of divergence between the Collective Bargaining Agreement and Convention, the provisions of the Collective Bargaining Agreement should prevail;
	<p>Verify the payroll with the time record and other reports for the payment of salaries. Analyze if the data indicated in the time control is reflected in the payroll. For example:</p> <ul style="list-style-type: none"> ✓ number of days worked; ✓ number of absences; ✓ number of overtime with 50% and/or with 100%-additional; ✓ additional premiums guaranteed by law: night shift, unhealthy work, hazardous work, etc.; ✓ commissions: in the case of payment of commissions, a document from the commercial sector should be presented, authorizing the payment of the value; ✓ vacations and 13th salary: verify the months worked, analyzing if the vacations were computed and the proportional 13th salary was paid. <p>Note: for facilities with up to 20 workers, evaluate if the facility keeps a record by exception and guide the analysis of data, based on the existing records.</p>
	<p>Verify the salary payment date, which should be no later than the 5th working day of the following month, or as determined by the Category Union (whichever is more advantageous for the workers).</p>
	<p>Verify if the discounts are in accordance with the law, being:</p> <ul style="list-style-type: none"> ✓ discount of the transport voucher: the limit of 6% for discounting the transport voucher on the base salary and commissions should be observed (overtime, night shift, unhealthy work, DSR (paid week rest), and other additional items should not be discounted). The calculations should be made proportionally to the days worked in the month, based on admissions and dismissals; ✓ discount of the Imposto de Renda (IR - Income Tax): the IR discount should respect the values defined by the Receita Federal do Brasil (Federal Revenue Service) at http://idg.receita.fazenda.gov.br/aceso-rapido/tributos/irpf-imposto-de-renda-pessoa-fisica#calculo_mensal_IRPF. To verify if the worker's IR calculation is correct, it is necessary to add up all salary values (salary, overtime, night shift, hazardous work, etc.), decrease the INSS discount, alimony (if any) and dependents. Based on calculation, apply the progressive table (Salary - INSS - Pensão Alimentícia - Dependents = basis for IR calculation); ✓ discount of INSS: the discount should follow the month social security contribution table, published by Social Security (Previdência Social) at http://www.previdencia.gov.br/servicos-ao-cidadao/todos-os-servicos/gps/tabela-contribuicao-mensal/; ✓ discounts of pharmacy, market, association, etc.: verify if the worker employment contract contains a clause that allows such discounts. The facility may keep the receipt authorizing a specific discount, but if there is no clause in the employment contract with the authorization, the facility is breaking the contractual clauses, demanding from the worker what was not agreed, thus, harming the payroll deduction and in a possible labor claim, the reimbursement

	<p>of the value may be demanded;</p> <ul style="list-style-type: none"> ✓ discount of the Contribuição Sindical (Union Contribution): the worker’s Union Contribution should be collected in a single lump sum, corresponding to the remuneration of 1 (one) work day, regardless of the form of payment (normal daily working hours, not counting overtime), provided that there is authorization expressed by the worker to collect the contribution. Lacking express written authorization, the discount may not be made.
	<p>Verify if the additional items guaranteed by law and by the Collective Bargaining Agreement and/or Convention are paid:</p> <ul style="list-style-type: none"> ✓ hazardous work premium: value due to the worker exposed to hazardous activities, such as handling or excessive exposure to flammable or explosive materials, operations with ionizing radiation or radioactive substances, hazardous operations with electrical energy, activities using motorcycles, etc. NR-16 (Hazardous Activities and Operations) describes the prerogatives that should be considered for classifying hazardous activities and determining if they should be attested by a professional in Occupational Health and Safety (http://trabalho.gov.br/images/Documentos/SST/NR/NR16.pdf). The basis for calculating the hazardous work premium is 30% of the base salary; ✓ unhealthy work premium: financial compensation given to the workers, who are exposed to agents that are harmful to their health, during the exercise of their activities. This worker right is provided for in NR-15. Items that may be considered unhealthy are: continuous or intermittent noise or impact noise; exposure to heat, moisture and/or cold; ionizing and non-ionizing radiation; mineral dust; work under hyperbaric conditions; chemical and/or biological agents; vibrations; etc.; ✓ night shift premium: the article No. 7, item X of the Brazilian Federal Constitution, establishes the rights for night work, which is performed between 10:00 p.m. on one day and 05:00 a.m. on the following day, except for a more favorable situation provided for in the Collective Bargaining Agreement and/or Convention. The workers under these conditions should receive a night shift premium of at least 20% of their compensation, and a more favorable premium may be established in a Collective Bargaining Agreement and/or Convention. It is important to note that the regular time lasts for 60 (sixty) minutes and the nighttime, by legal provision, in urban activities, is computed as being 52 (fifty-two) minutes and 30 (thirty) seconds, that is, 12.5% over the daytime rate; ✓ family salary: benefit granted to the workers who have children, stepchildren and legal dependents, who are up to 14 years old, or disabled dependents at any age. To be entitled to the benefit, another mandatory requirement is that the worker income is less than the limit stipulated by the Previdência Social (Social Security) at http://www.previdencia.gov.br/servicos-ao-cidadao/todos-os-servicos/family-salary/limit-value-for-entitlement-to-family-salary/. The family salary is an obligation of the Brazilian Federal Government; however, the value should be paid by the employer and discounted in the INSS Guide.
	<p>Evaluate if the employer is correctly sending the data to the Ministério da Economia (Ministry of Economy), currently responsible for matters related to Labor and Employment, through e-Social (S-1200 event).</p>
	<p>Verify the payments made to the workers returning from maternity leave or termination of the social security benefits.</p>

	Evaluate if the probationary salaries comply with the legal requirements.
	Interview the workers (individual interviews) and verify if the mandatory labor requirements are being complied with, such as salary payment, premiums provided by law, legal benefits and/or provided for in the Collective Bargaining Agreement and/or Convention, overtime or time bank, etc. Verify if the facility withholds personal documents – this practice is prohibited by law. Find out how the facility discloses the work schedule on holidays.
	Visit the facility and verify the payroll to confirm if the people, who are working there, are hired as worker. Verify the documentation (contracts) of the “non-employed” workers. Request information on the activities carried out by these workers (form of service provision, if there is control of working hours, subordination, personality and onerousness) and the reasons why they were not hired as workers.
	Verify if there are workers in probationary regime. In this case, the workday should not exceed 4 (four) hours of work and the workers should be segregated from the production area. The facility should present documents that prove the time of entry and exit of the worker in the facility.
	Concerning foreign workers, verify if CTPS is limited to the city where there is a border with the city of residence (border stamp). Point out if there is irregularity, considering these as irregular workers.
	Concerning the verification of item 2.9.11, the correct termination of employment payment, when a worker is terminated without/with just cause, is IN ACCORDANCE when the facility made the payment late. However, NOTE THIS. Evaluate 3 dismissal processes if the facility has a greater number of workers terminated in the period or, evaluate all if there are up to 3. Sample from different months, if applicable.
	Verify if the facility has adhered to the “Employ +Woman Program” and adopts the payment of the Daycare Allowance benefit, in order to help defray this type of expense, as defined by the Law No. 14,457/2022, which establishes some rules for adopting this benefit.
	Documents proving evidence of nonconformities (in this case, also attach copies of documents exemplifying conformities).
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

2.9.1 Is there evidence that the facility pays salaries, overtime, DSR (paid week rest), 13 th salary, paid leave, vacations, additional premiums (night shift, unhealthy and hazardous work) in accordance with the labor law and Collective Bargaining Agreement?		
	YES	The facility pays the values in accordance with the labor law, and Collective Bargaining Agreement.
		CONFORMITY

	NO	The facility does not pay the values in accordance with the labor law, and Collective Bargaining Agreement, or the facility has irregular workers.	CRITICAL
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

2.9.2 Is there evidence that the facility complies with the other conditions provided for in the Collective Bargaining Agreement and/or Convention, except for the conditions set forth in item 2.9.1 of the ABVTEX Checklist?

	YES	The facility complies with the Collective Bargaining Agreement and/or Convention.	CONFORMITY
	NO	The facility does not comply with or does not present the Collective Bargaining Agreement and/or Convention.	MAJOR
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

2.9.3 Is there evidence that the facility delivers copies of payslips to its workers?

	YES	The facility delivers copies of the payslips to its workers.	CONFORMITY
	NO	The facility does not deliver copies of the payslips to its workers.	CRITICAL
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

2.9.4 Is there evidence that the facility makes the correct salary deductions, in accordance with the law, or the discounts not provided for by law are agreed with the worker?

	YES	The deductions are correct, in accordance with the law or the discounts not provided for by law are demonstrably agreed with the workers.	CONFORMITY
	NO	The deductions are not correct, in accordance with the law or the discounts not provided for by law are demonstrably not agreed with the workers.	CRITICAL
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

2.9.5 Is there evidence that the facility observes and applies salary equality to women who perform the same function, as per the provisions of the Federal Law No. 14,457/22 and other provisions of the CLT (art. 373-A and 461)?

YES	The facility complies with the conditions of salary equality.	CONFORMITY
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	NO	The facility does not comply with the conditions of salary equality.	MAJOR
	N/A	The facility does not use this type of employment or the facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

2.9.6 Is there evidence that the facility legally registers all of its workers (CTPS)? If the facility is already fully adapted to e-Social, does it present the reports regarding the respective events (S-2200, S-2205, S-2206, and S-2299)?

	YES	The workers are legally registered (CTPS) or, if all workers are facility partners, it is in accordance with the articles of association.	CONFORMITY
	NO	There are workers without legal registration (CTPS). In this case, the facility should be immediately suspended (on the same day of the audit), until the situation is corrected, and the necessary documentation is forwarded to the Audit Organization within 72 (seventy two) hours.	CRITICAL
	N/A	The facility does not use this type of employment or the facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

2.9.7 Is there evidence that the facility has a Certidão de Débitos (Debt Certificate) related to federal tax credits and Dívida Ativa da União (Active Federal Debt), as well as the last 6 (six) paid INSS bills? Or, if the facility does not have a Certidão de Débitos (Debt Certificate), does the facility present the last 12 (twelve) paid INSS bills? Or, if the facility is already fully adapted to e-Social, does it present the reports regarding the respective event (DCTFWeb)?

	YES	The facility is regular with the Debt Certificate relating to federal tax credits and the Active Federal Debt and the facility presents the last 6 (six) paid bills, or, the facility presented the last 12 (twelve) bills, or, through information from the e-Social. For the facilities opting for the Simples Nacional regime, only the CNP should be accepted as proof.	CONFORMITY
	PN	The facility presented a valid positive certificate, indicating renegotiation of possible debts and punctuality in payments.	MINOR
	NO	The facility did not present any supporting documentation regarding the regularity of the INSS payment.	CRITICAL

2.9.8 Is there evidence that the facility has a Regular Certificate of FGTS/CRF? Or, to prove its regularity, does the facility present the last 12 (twelve) paid FGTS bills? Or, if the facility is already fully adapted to e-Social, does it present the reports regarding the respective events (S-1200, and S-2299)?

	YES	The FGTS status is regular.	CONFORMITY
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	<p>NO</p>	<p>The FGTS status is not regular.</p>	<p>CRITICAL</p>
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<p>2.9.9 Is there evidence that the facility fully makes the payments, advances or loans through bank deposit in bank accounts held by the workers?</p>			
	<p>YES</p>	<p>The facility fully makes the payments through bank deposits in bank accounts held by the workers. Or, the facility does not pay through bank deposit, but there is evident lack of conditions for making a bank deposits (exceptional cases, for example, cities without bank agencies).</p>	<p>CONFORMITY</p>
	<p>PN</p>	<p>The workers receive their payments through bank account deposits. However, the values do not correspond to those of the payslip (for example, loans or advances are not deposited in bank accounts).</p>	<p>MAJOR</p>
	<p>NO</p>	<p>The facility does not pay its workers through bank account deposits (for example, payments made in cash).</p>	<p>CRITICAL</p>
	<p>N/A</p>	<p>The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.</p>	<p>N/A</p>

<p>2.9.10 Is there evidence that the facility does not hire workers as legal entities or natural persons (such as MEI, self-employed or otherwise) with employment characteristics as assiduity and subordination, as a form of precariousness of labor relations?</p>			
	<p>YES</p>	<p>There is no evidence of irregularity.</p>	<p>CONFORMITY</p>
	<p>PN</p>	<p>There is evidence of irregularity exclusively in positions of trust, such as Directors or Managers.</p>	<p>MINOR</p>
	<p>NO</p>	<p>There are workers hired as “non-workers”, where there is control of working hours, subordination, personhood and onerousness, in nonconformity with the formal labor relations.</p>	<p>CRITICAL</p>

<p>2.9.11 Is there evidence that the facility correctly makes the termination of employment payment?</p>			
	<p>YES</p>	<p>The termination of employment payment is correctly made.</p>	<p>CONFORMITY</p>
	<p>NO</p>	<p>Not all termination of employment payment is correctly made.</p>	<p>CRITICAL</p>

2.9.12 Is there evidence that the facility, when hiring workers under special conditions, such as probation regime, temporary contract, intermittent work, develops contracts in accordance with the law and the Collective Bargaining Agreement? Do the working day and the performance of the activities correspond to the hiring form?

	YES	All workers under special conditions are regularly hired, and their activities are consistent with the terms of the contracts in force.	CONFORMITY
	NO	Not all workers under special conditions are regularly hired and/or their activities are consistent with the terms of the contracts in force.	MAJOR
	N/A	The facility does not hire workers under special conditions.	N/A

2.9.13 Is there evidence that, when hiring workers on a trial period, the contracts are in accordance with the law and/or Collective Bargaining Agreement? Do the working hours and activities correspond to the contracting method?

	YES	All probationary workers are hired on a regular basis and their activity complies with the terms of the contracts in force.	CONFORMITY
	NO	Not all probationary workers are regularly hired and/or their activity complies with the terms of the contracts in force.	MAJOR
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

2.9.14 Is there evidence that, if the facility is a participant in the Citizen Facility Program (Programa Empresa Cidadã), provided for in the Law No. 11,770/2018, it adopts the possibility of replacing the extension period of the maternity leave with a reduction in the working hours by 50% for a period of 120 days, by individual agreement and full salary payment?

	YES	The facility is a participant in the Citizen Facility Program and adopts the established requirements.	CONFORMITY
	NO	The facility is a participant in the Citizen Facility Program and does not comply with the requirements established by the law regarding the maternity leave.	MAJOR
	N/A	The facility is not a participant in the Citizen Facility Program or the facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

2.9.15 Is there evidence that the facility did implement the +Women Employment Program (Emprega Mais Mulher) and offers a daycare reimbursement to the worker (man or woman) who has children up to 5 years and 11 months of age, in accordance with the Program, Law No. 14,457/2022?

	YES	The facility complies with the requirements of the +Women Employment Program (Emprega Mais Mulher) and offers a daycare reimbursement, without salary nature and without charges in accordance with the Law No. 14,457/2022; the facility divulges these benefits and the procedures for their use; and, the daycare reimbursement is formalized in an individual agreement, Collective Bargaining Convention or Agreement.	CONFORMITY
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	NO	The facility does not comply with the requirements of the +Women Employment Program (Emprega Mais Mulher).	MINOR
	N/A	The facility is in one of the following conditions: <ul style="list-style-type: none"> • it has a daycare center; • it has less than 30 workers (female) over 16 years of age; or • the facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist. 	N/A

Thematic Block #2.10 – Working conditions/Worked hours

The worked hours (including overtime) should be performed and paid in accordance with the Brazilian law as defined in the Collective Bargaining Agreement and/or Convention. In case of divergence between the Collective Bargaining Agreement and Convention, the provisions of the Collective Bargaining Agreement should prevail. The working day should be defined in the employment contract.

Considering the nature of the production chain activities under its monitoring, remote work for **operational functions** is an obstacle to maintaining control over the minimum working conditions and even the worker performance. The use of teleworking for operational functions makes it impossible to verify whether health and safety conditions are observed, the fulfillment of the working hours, overtime in accordance with legislation, and the possible use of other people as labor, other than the worker himself/herself whose contract is signed with the facility, among other requirements.

Required checks in this block

	<p>Verify the workers’ timecard. The facility with more than 10 (ten) workers should have records of entries and exits of their workers. This record may be manual, mechanical or electronic. Concerning the latter, the guidelines established in Ordinance 1015/2009 or 371/2011, both of the Ministry of Labor and Employment, should be followed. Timecards may not be erased; otherwise, they may be invalidated.</p> <p>Workday: verify that the workday performed and recorded on the timecard corresponds to that defined in the employment contract. It is necessary to verify if there is overtime recorded and if overtime does not exceed 2 (two) hours per day, in accordance with CLT, or the limit defined in the Collective Bargaining Agreement and/or Convention. Phone operators should have a daily workload of 6 (six) hours.</p> <p>Pursuant to article 66 of CLT, workers are entitled to an inter-day break of 11 (eleven) hours. For example, workers who finished their workday at 10:00 p.m. should only be able to resume work at 09:00 a.m. the following day. It is also important to verify that the DSR (paid week rest) period has at minimum 24 (twenty-four) consecutive hours, provided for in article 67 of CLT. It is also provided at least 1 (one) Sunday per month for rest.</p> <p>Holiday work: a month work schedule corresponding to the activities to be carried out on holidays should be presented.</p>
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	<p>Verify the Collective Bargaining Agreement and/or Convention, identifying the established working hours limit, including issues related to overtime and rest periods.</p>
	<p>Verify if the workers perform overtime and how the facility defines, plans and authorizes overtime. According to article 59 of CLT, the limit for overtime is 2 (two) hours per day. Therefore, the total working day may not exceed 10 (ten) hours per day. It is necessary to verify if the Collective Bargaining Agreement and/or Convention imposes a limit lower than 2 (two) hours. For registration in the ABVTEX Program System, overtime beyond what is permitted by law should be considered systemic nonconformity when they are registered for more than 1/3 (one third) of the sampled workers.</p> <p>The overtime should be paid with a 50% premium. It is necessary to verify the Collective Bargaining Agreement and/or Convention that may set higher percentages. Overtime on Sundays and holidays should be paid with a 100% premium</p> <p>The facility may adopt the time bank as a form of compensation for overtime. This practice consists of “storing” the hours worked in addition to the normal working day, without paying the additional overtime (at least 50%), and such excess should be compensated by its corresponding decrease on other working days. It should be allowed to consult an extract with the credits and debits in the time bank.</p> <p>It is necessary to analyze the Collective Bargaining Agreement and/or Convention and the employment contract and/or contractual amendments, since in the case of time bank, there is usually a maximum period for compensation for the journey. If this limit is exceeded, the hours should be paid. The Collective Bargaining Agreement and/or Convention may provide for a maximum compensation period of 1 (one) year. Employment contracts, amendments and individual agreements may provide for a maximum period of compensation of 6 (six) months.</p>
	<p>For the facility with less than 20 (twenty) workers, despite being optional, a time card or time record may be required, as determined by the ABVTEX Program.</p>
	<p>Verify for situations in which workers carry out work in the production area at home. ABVTEX will not consider the adoption of remote work as a possibility for workers in operational functions who work within the covered facilities.</p>
	<p>Verify if the workers may take a break for rest and meal. According to article 71 of CLT, when the working day exceeds 6 (six) hours per day, it is mandatory for the employer to grant a break of 1 (one) hour, which should not be computed as worked hours. Workdays that do not exceed 6 (six) hours per day should have a break of 15 (fifteen) minutes. The interval of 1 (one) hour may be reduced to up to 30 (thirty) minutes in case of permission in the Collective Bargaining Agreement and/or Convention. Night shift workers are also entitled to breaks, with the same duration periods.</p> <p>If it is found that breaks are not being taken, the facility should compensate the corresponding period with an increase of at least 50% on the value of the remuneration for the normal working hour.</p>

	Documents proving evidence of nonconformities (in this case, also attach copies of documents exemplifying conformities).
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

2.10.1 Is there evidence that the facility complies with the working hours in accordance with labor law and Collective Bargaining Agreement? Or, if the facility is already fully adapted to e-Social, does it present the reports regarding the respective events (S-1050, S-2200, and S-2206)?

	YES The worked hours always comply with the law and Collective Bargaining Agreement.	CONFORMITY
	NO The worked hours do not comply with the law and Collective Bargaining Agreement on a routine basis.	MAJOR
	N/A The facility is exclusively composed by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

2.10.2 Is there evidence that the facility gives the workers the right to verify overtime? Are overtime and regular worked hours recorded on the same timecard and presented in the payslip? Or, if the facility is already fully adapted to e-Social, does it present the reports regarding the respective events (S-1050, S-2200, and S-2206)?

	YES The worker is given the right to verify overtime.	CONFORMITY
	NO The worker is not given the right to verify overtime.	MAJOR
	N/A The facility is exclusively composed by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

2.10.3 Is there evidence that the facility prohibits and controls the workers of the production area to carry out production activities at their homes?

	YES There is consistent evidence that no workers carry out production activities at their homes.	CONFORMITY
	NO There is evidence that its workers carry out production activities at their homes.	CRITICAL

2.10.4 Is there evidence that the facility has a time bank program, in accordance with the labor law (established in an individual or collective agreement described in a Collective Bargaining Agreement)?

YES	The facility has a time bank program in accordance with labor law.	CONFORMITY
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	NO	The facility does not comply with the labor law regarding the establishment of a time bank program.	CRITICAL
	N/A	The facility does not adopt a time bank program or the facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

2.10.5 Is there evidence that the facility allows the workers to record their own working hours?			
	YES	The workers themselves record their entry and exit times, even if the facility is not required to maintain a formal control.	CONFORMITY
	PN	The facility is not required to maintain a formal control of timecards, and the workers do not register their entry and exit times or there is no formal timecard.	MAJOR
	NO	The facility is required to maintain a formal control of timecards and the workers do not register their own entry and exit times.	REQUIRED SILVER
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

Thematic Block #3.1 – Occupational health and safety/Working conditions and infrastructure

The Occupational Health and Safety Management System is a set of unified initiatives through policies, programs, procedures and processes, which aim to facilitate compliance with the legal requirements governed by CLT (Consolidation of Labor Laws) and NRs (Regulatory Standards) concerning occupational health and safety.

The facility should provide a safe and hygienic work environment, considering the prevailing industry knowledge, as well as any specific hazards. Practical measures should be taken to prevent accidents and damages to the health that may arise, associated with or caused by the inherent hazards in the work environment.

They should also provide a suitable work environment for the workers carrying out their activities, which do not pose risks to the health and safety of workers. The structures should not be temporary and should present a good state of conservation, hygiene and cleaning.

According to NR-8 the buildings should guarantee safety and comfort to those who work in them, including circulation areas and appropriate workstations, with adequate ventilation, exhaustion and/or air conditioning system for the performance of the tasks. Filtered drinking water should be available.

Required checks in this block

	<p>Verify the potability report of the available water (applied to facilities with more than 200 (two hundred) workers).</p>
	<p>Verify if the facility has a monthly record of the cleaning of the drinking fountains, as well as gallon exchange, if applicable, and purchase invoices.</p>
	<p>Visit the facility premises and verify the work conditions, including infrastructure, hygiene and cleaning of the premises, which should not be provisional. Verify if the environments have adequate air conditioning or ventilation systems.</p>
	<p>Verify the state of conservation, maintenance and cleanliness of the drinking fountains and if the filters are within their expiration date. Concerning changing filters, verify the frequency of change in accordance with the manufacturer recommendation.</p>
	<p>Interview the workers to confirm that the hygiene and cleanliness conditions of the facility are adequate.</p>
	<p>Analyze if the plan prepared by a qualified professional includes all the physical area and coincides with the Fire Department Permit (AVCB). Also, verify if the facility has the Municipal License.</p>
	<p>Verify if the occupied buildings are for collective use. Verify if there is sharing with markets, stores, homes or any other activity with a fluctuating flow of people.</p> <p>Note: for the item 3.1.8, the assessment should consider whether there are other occupants and/or other CNPJs. If it is a facility store with the same CNPJ, the building used is considered for exclusive use, without multiple occupants.</p>
	<p>For a better analysis of the potential risks, when in collective occupation (more than one CNPJ at the same address), check:</p> <ul style="list-style-type: none"> ✓ if the sharing is in a vertical building; ✓ if the sharing is horizontal, with several facilities in the same building, on the ground floor; ✓ if the sharing is horizontal and the facility is located in an industrial condominium.
	<p>Evaluate if the facility buildings are of mixed occupancy (industrial and family housing) and verify the integrated housing.</p>
	<p>Except in cases of horizontal sharing in an industrial condominium, when the facility shares the building with other facilities, it should be verified: if there is a license from the fire department that covers the entire building; if there is an operating license for all facilities located in the building; integrated fire alarm; and simulated evacuation drill.</p>
	<p>Verify if the facility has a daycare center and the safety conditions for the children relating to the production environment.</p>

	Register the characteristics of the building, with pictures of the main places that prove the auditor evaluation, both in the case of regularity and irregularity.
	Take a picture of the building facade, to identify the general characteristics of the facility, such as perception of the size of the building, characteristics of the neighborhood, etc.
	Attach copies of the water potability report (when applicable) and record of monthly cleaning.
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

3.1.1 Is there evidence that the facility building has no imminent structural risks (deep cracks, wide holes, accentuated infiltrations, beams and structures at risk of collapsing)?

	YES	There are no risks to the working conditions.	CONFORMITY
	PN	The problems encountered do not represent immediate risks, requiring corrective maintenance to avoid structural risks.	MAJOR
	NO	The problems encountered represent structural risks, which may present risks to the physical integrity of the workers and people who circulate around the facility.	CRITICAL

3.1.2 Is there evidence that the facility has its internal areas designed in such a way that the use of provisional installations is not observed?

	YES	There are no provisional installations, or they comply with the facility plan.	CONFORMITY
	NO	There are inadequate temporary installations, which are not included in the facility plan.	MINOR

3.1.3 Is there evidence that the facility maintains its areas in good conditions of hygiene and cleaning?

	YES	All facility areas are in good conditions of hygiene and cleaning.	CONFORMITY
	NO	All facility areas, or part of them, are not in good conditions of hygiene and cleaning.	MINOR

3.1.4 Is there evidence that the facility provides potable water for its workers?

	YES	The facility provides potable water and the maintenance of the system is properly carried out.	CONFORMITY
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	PN	The facility provides potable water; however, it does not present the quality assurance reports.	MINOR
	NO	The facility does not have maintenance records for the drinking fountains and/or the water supplied is inadequate.	MAJOR

3.1.5 Is there evidence that the facility has a ventilation, exhaustion and/or air conditioning system that are adequate for all tasks performed in each step of the process?

	YES	All areas have adequate ventilation, exhaustion and/or air conditioning system.	CONFORMITY
	PN	Most of the areas have adequate ventilation, exhaustion and/or air conditioning system.	MINOR
	NO	The facility does not have any ventilation, exhaustion and/or air conditioning system.	MAJOR

3.1.6 Is there evidence that the facility complies with the minimum requirements for building conservation and comfort in accordance with NR-08?

	YES	The facility complies with the minimum requirements of NR-08.	CONFORMITY
	NO	The facility does not comply with the minimum requirements of NR-08	MINOR

3.1.7 Is there evidence that the facility building structure and use are in accordance with the approved plan (for example, number of floors, number of buildings and roof)? And, does the building area match with the AVCB area (e.g. number of floors, number of buildings and roof)?

	YES	The facility has an approved plan (in accordance with the physical structure and area approved by the Fire Department (AVCB).	CONFORMITY
	NO	The facility does not have an approved plan, or it presents some nonconformities.	MAJOR

3.1.8 Is there evidence that the building is for single occupancy? Are there no other CNPJs at the same address in one of the following situations:

- sharing in a building or vertical structure; or
- sharing in a horizontal structure as long as there is interconnection between one facility and other; or
- if there is no physical separation between the facilities, with single access and exits?

	YES	The building used by the audited location is exclusive, without multiple occupants; or The facility shares horizontally with other CNPJs, the same land, as long as there is no interconnection between one facility and another; or There is a physical separation between the facilities, with single access and exits.	CONFORMITY
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	PN	The facility shares the building with other facilities, whether in the same segment or not, and these facilities comply with all the minimum requirements for joint occupancy, such as: a Fire Department license, which covers the entire building, operation of all facilities installed in the building, joint evacuation drill and integrated fire alarm.	MINOR
	NO	The facility shares the building with other facilities, whether in the same segment or not, and these facilities do not comply with all the minimum requirements for joint occupancy.	MAJOR

3.1.9 Is there evidence that, when the facility provides a daycare center, the location and access to the daycare center is far from the production area, to ensure that children are safe and not exposed to any risks relating to the production environment?

	YES	The daycare center is located far from the production area, ensuring that the children are not exposed to any risk.	CONFORMITY
	NO	The location of the daycare center brings risks to the children.	MAJOR
	N/A	The facility does not have a daycare center.	N/A

3.1.10 Is there evidence that the facility does not have a sandblasting process to clean or roughen surfaces?

	YES	The facility does not have a sandblasting process.	CONFORMITY
	NO	The facility has a sandblasting process.	REQUIRED SILVER

Thematic Block #3.2 – Occupational health and safety/Changing rooms and bathrooms

The changing rooms and bathrooms should be adequate and comply with the specifications of NR-24, which presents issues related to the design and structural features.

Required checks in this block

	During the visit to the facility premises, verify if the design of the changing rooms and bathrooms meet the requirements of NR-24 and are separated by gender – men and women should use separate bathrooms – 1 (one) bathroom for each group of 20 (twenty) workers (separated by sex).
	Verify if the changing rooms and bathrooms have adequate ventilation and are in good conditions and clean, and the toilets have lids and seats.
	Verify if the facility provides personal hygiene products (soap, toilet paper, paper towels, etc.) in the bathrooms and lockers for personal belongings in the changing rooms.

	When the facility does not have changing rooms, verify the condition of the lockers, drawers or structure that allows the individual storage of the workers' personal belongings.
	Pictures of the changing rooms and/or bathrooms to prove nonconformities, as to characterize conformity.
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

3.2.1 Is there evidence that the facility provides adequate ventilation to the changing rooms and bathrooms?

	YES All changing rooms and bathrooms have adequate ventilation.	CONFORMITY
	PN There is no ventilation in part of the changing rooms and bathrooms (occasional problem).	MINOR
	NO There is no ventilation in most of the changing rooms and bathrooms (systemic problem).	MAJOR

3.2.2 Is there evidence that the facility provides toilets with seats and lids?

	YES All toilets have seats and lids.	CONFORMITY
	PN Most (more than half) of the toilets has seats and lids.	MINOR
	NO Few toilets have seats and lids, or a latrine is used as toilet.	MAJOR

3.2.3 Is there evidence that the facility provides adequate number of toilets for its workers?

	YES The number of toilets is in accordance with NR-24.	CONFORMITY
	NO The number of toilets is not in accordance with NR-24.	MINOR

3.2.4 Is there evidence that the facility provides products intended to personal hygiene, such as toilet paper, liquid soap, paper towels for hands or other hygienic system for drying hands and a trash can with a lid?

	YES All or part of the toilets has products for personal hygiene.	CONFORMITY
	NO The toilets do not have products for personal hygiene.	MINOR

3.2.5 Is there evidence that the facility provides separated changing rooms with doors duly identified, in accordance with the requirements of NR-24?

	YES The changing rooms are separated by sex and duly identified, in accordance with the requirements of NR-24.	CONFORMITY
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	PN	The changing rooms are separated by sex, but without identification.	MINOR
	NO	The changing rooms are not separated by sex.	MAJOR
	N/A	The facility does not have changing rooms and is not required to have them.	N/A

3.2.6 Is there evidence that the facility provides separated bathrooms with doors duly identified, in accordance with the requirements of NR-24?

	YES	The bathrooms are separated by sex and duly identified, in accordance with the requirements of NR-24.	CONFORMITY
	PN	The bathrooms are separated by sex, but without identification.	MINOR
	NO	The bathrooms are not separated by sex.	MAJOR

3.2.7 Is there evidence that, in accordance with NR-24, for the facility that requires changing rooms, lockers are provided for the individual storage of belongings in adequate number? Are the lockers in good condition and clean? For the facility that are is required to have changing rooms, does the facility assure the provision of lockers, lockable drawer or similar that allows the individual storage of the workers' personal belongings or a luggage storage service?

	YES	The facility complies with the requirements of NR-24.	CONFORMITY
	NO	The facility does not comply with the requirements of NR-24.	MINOR
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

Thematic Block #3.3 – Occupational health and safety/Dining hall

The facility should provide its workers with a place to meal, in accordance with the guidelines of NR-24. The places destined to the workers meals should have sufficient conditions of comfort, complying with the requirements of cleaning, ventilation, lighting and supply of potable water.

Concerning food production within the facility, the guidelines of Anvisa Resolution RDC-216 should be complied with – these guidelines provide Technical Regulation of Good Food Service Practices.

The kitchens should be separated from the work area and the use of gas for food production should respect the technical standards of the area and local law, ensuring workers health and safety.

Required checks in this block

	<p>If the facility produces food on its premises, verify if the documents comply with Resolution RDC-216, including:</p> <ul style="list-style-type: none"> ✓ Health Permit: it certifies that the facility is working in accordance with the current sanitary law, guaranteeing adequate hygienic and sanitary conditions; ✓ Good Practices Manual: document that describes the activities and procedures that facilities that produce, handle, transport, store and/or market food, adapt to ensure that food produced have safety and sanitary quality to their consumers and comply with the current Brazilian health law.
	<p>Visit the facility and identify if the facility has a place for meal (dining hall or equivalent). If so, verify if it has adequate hygiene conditions and if it is ventilated and complies with the definitions established in NR-24 (items 24.5 and 24.6).</p>
	<p>In addition to the specifications presented in NR-04, verify:</p> <ul style="list-style-type: none"> ✓ if it is a guarantee that the workers do not have their meals at the workplace; ✓ if the place for meals is exclusive for this purpose, and there are no provisional conditions or improvisations in the isolation from the production area.
	<p>Verify if the facility has gas cylinders (LPG) on its premises and if it complies with the safety conditions necessary for handling and storage:</p> <ul style="list-style-type: none"> ✓ they may not be installed in closed and non-ventilated spaces, nor may be exposed to the sun or rain. The cylinders may not be placed inside the kitchens (ABNT NBR-15.514); ✓ the hose should be made of PVC plastic, with a visible expiration date; ✓ the clamps should be in good condition; ✓ the pressure regulator should have an INMETRO seal of approval.
	<p>Copies of the Health Permit and Good Practices Manual.</p>
	<p>Pictures of the dining area with examples of all aspects, proving the nonconformities and confirming the conformities.</p>
	<p>Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.</p>

Checklist

<p>3.3.1 Is there evidence that the facility has a place for meals, as recommended by NR-24?</p>			
	<p>YES</p>	<p>The facility has a place for meals, as defined by 24.5.2 (facilities with up to 30 (thirty) workers), or 24.5.3 (facilities with more than 30 (thirty) workers), or 24.5.4 (facility is not required to have a place for meals).</p>	<p>CONFORMITY</p>
	<p>NO</p>	<p>The facility does not have a place for meals, but it is required to have a place for meals.</p>	<p>MAJOR</p>

3.3.2 Is there evidence that the facility has a place for meals and that it is clean and free of food residues?

	YES	The place for meals is clean and free of food residues.	CONFORMITY
	NO	The place for meals is not clean and/or has food residues or the facility should, but does not, provide a place for meals, in accordance with item 24.5.4 of NR-24.	MINOR
	N/A	The facility does not have a place for meals and is not required to have it, in accordance with item 24.5.4 of NR-24.	N/A

3.3.3 Is there evidence that the facility has a place for meals and that the meals, foods, perishables, dishes and pans are properly stored?

	YES	Foods, perishables, dishes and pans are properly stored.	CONFORMITY
	NO	Foods, perishables, dishes and pans are not properly stored, or the facility should, but does not, provide a place for meals, in accordance with items 24.5.2 and 24.5.3 of NR-24.	MINOR
	N/A	The facility does not have a place for meals and is not required to have it, in accordance with item 24.5.4 of NR-24.	N/A

3.3.4 Is there evidence that the facility has a place for meals that is separated from the production area?

	YES	The place for meal is separated from the production area (as described in NR-24) without provisional conditions or improvisations.	CONFORMITY
	NO	When the place for meals has: <ul style="list-style-type: none"> any type of direct communication with the production area; provisional conditions or improvisations in the segregation from the production area; situation in which workers do their meals at the workplaces; any non-compliance with the specifications of items 24.5.2 and 24.5.3 of NR-24. 	MAJOR
	N/A	The facility does not have a place for meals and is not required to have it, in accordance with item 24.5.4 of NR-24.	N/A

3.3.5 Is there evidence that the facility has a kitchen for preparing meals, and that it complies with item 24.6 of NR-24?

	YES	The kitchen complies with all requirements of NR-24.	CONFORMITY
	NO	The kitchen does not comply with all requirements of NR-24.	MAJOR
	N/A	The facility does not have a kitchen for preparing meals.	N/A

3.3.6 Is there evidence that the facility has a gas cylinder system, such as LPG or other similar gas, installed in an external area, protected against the weather and having suitable fire extinguishers near the place?			
	YES	LPG or other gas system is installed in adequate way, in accordance with the Brazilian technical standards.	CONFORMITY
	NO	LPG or other gas system is not satisfactorily installed.	MAJOR
	N/A	The facility does not have a kitchen for preparing meals or the facility does not have LPG or other gas system.	N/A

Thematic Block #3.4 – Occupational health and safety/Regulatory standards

Occupational health and safety programs aim to establish methods that guarantee the preservation of the health and integrity of the workers, in the face of the environmental risks.

As a general rule, the facilities should establish a Programa de Gerenciamento de Riscos (PGR – Risk Management Program) for the occupational risk management to be implemented in each operational unit, sector or activity, in accordance with the provisions of NR-01. The program contemplates and is integrated with plans, programs and other documents provided for in the occupational health and safety law and, consequently, it manages the existing occupational risks or that may exist in the working environment, considering the protection of the environment and natural resources.

In accordance with item 1.8.1 of NR-01, Individual Micro-entrepreneur (MEI) is exempt from preparing a PGR. Micro-enterprises (ME) and Small Businesses (EPP), with risk levels 1 and 2 that in the preliminary hazard survey did not identify occupational exposures to physical, chemical and biological agents, in accordance with NR-09, and declare the digital information in accordance with NR-01, are also exempt from a preparation of PGR.

The actions of the PGR should be developed under the responsibility of the employer, with the workers’ participation. The base document should follow the structure defined in NR-01, being that the risk evaluation should be a continuous process and be reviewed every 2 (two) years or when, after implementing preventive measures, residual risks occur; after innovations or changes in technologies, environments, processes, conditions, procedures and work organization that imply new risks or modify the existing ones; when inadequacies, insufficiencies or inefficiencies of prevention measures were identified; when accidents or occupational diseases occur, or even when there are legislative changes. For the facilities that have OHS management system certifications, the deadline for review may be of up to 3 (three) years.

The Programa de Controle Médico e Saúde Ocupacional (PCMSO – Occupational Health and Medical Control Program) aims to promote and preserve the health of the workers with an early prevention, tracking and diagnosis character of work-related damage to health. It should be planned and implemented in accordance with PGR.

In order of observing and reporting risk conditions in the environments, the approved facilities should install a Comissão Interna de Prevenção de Acidentes (CIPA - Internal Commission for Accident Prevention) which, among other attributions, should investigate accidents, promoting and publicizing the zeal for the observance of the safety rules, as well as the promotion of the Semana Interna de Prevenção de Acidentes (SIPAT – Internal Accident Prevention Week). Its mission is, therefore, the preservation of the health and physical integrity of the workers and of all those who

interact with the facility (those who provide service to the facility).

The sizing of CIPA (number of members) should respect the established in Table I of NR-05. When the facility is not qualified to CIPA (not required installing CIPA), it should designate a responsible for fulfilling the objectives of NR-01, including participating in the meeting with unions.

Likewise, the equipment used by the facilities should be in good conditions of conservation, with preventive and corrective maintenance carried out within the deadline. That includes:

- ✓ boilers, pressure vessels and compressors: the facility should follow the guidelines established by NR-13, which establishes the technical and legal requirements relating to the installation, maintenance and operation of the equipment;
- ✓ elevators: the facility should have a valid maintenance report, with an ART (Technical Responsibility Report) and safety signaling, including the maximum capacity;
- ✓ other equipment for carrying out the activities: computers, work tables, production area equipment, etc.

In addition, issues related to ergonomics should be observed, with the primary objective of adapting the worker’s position, identifying critical points that may be harmful to their health and the parameters used for the execution of the work journey (its beginning, middle and end), thus contributing to the necessary improvements in the workplace.

NR-17 determines that all facilities that have workers, whose activities or procedures expose them to ergonomic risks, should carry out the ergonomics analysis of the work. This analysis determines the factors that contribute to a sub-load or overload of the analyzed population, seeking information on how this population suffers from this load.

Workload may be defined as a quantitative or qualitative measure of the level of activity (mental, sensory-motor, physiological, etc.) that a worker needs to perform a certain task.

Also, in accordance with NR-17, the facilities should provide workstations adequate to the activities, including adequate seating, tables and lighting. All equipment that makes up a workstation should be suitable for the psycho-physiological characteristics of the workers and the nature of the work to be performed.

Required checks in this block

	<p>If the facility has boilers and/or pressure vessels, verify the respective documents, which should be provided by the manufacturer, containing information such as project code and edition year, material specification, procedures used in manufacturing, assembly and final inspection, set of drawings and other necessary data for monitoring its useful life, functional features and safety device data, manufacturing year and vessel category.</p>
	<p>When applicable, verify the periodic maintenance of boilers and pressure vessels, including the inspection book and ART (professional technician).</p>

	<p>When the facility has elevators, analyze the annual inspection report of the elevators and ART (professional technician).</p>
	<p>When the facility has elevators, verify the signs indicating if it is intended for cargo or passengers (in the case of a cargo elevator, the use for passengers should be prohibited). Also, verify if there is closure to prevent falls and accidents.</p>
	<p>Verify if the facility machines and equipment have safety signs and if they are in an adequate state of conservation, without adaptations made by the facility.</p>
	<p>Analyze the facility PGR, verifying that all functions are covered and that occupational hazards associated with them are identified – physical, chemical, biological, ergonomic and accident/mechanical. Preventive and control measures for these risks should be presented.</p> <p>Verify the degree of risk presented in the document. To identify it, it is necessary to verify the CNAE (National Registry of Economic Activities) of the facility and consult http://www.guiatrabalhista.com.br/legislacao/nr/nr4_quadrol_1.htm, Table I, NR-04. The facility should keep a record of continuous global evaluation of PGR, which, if necessary, should be revised (change of occupational risks, inclusion of functions, etc.).</p>
	<p>Verify the current PCMSO and if it includes the same activities and level of risk of PGR and if it presents the preventive measures for carrying out the activities, such as, for example, admission and periodic exams, in addition to annual campaigns.</p>
	<p>Verify the periodic examinations of the workers, which should be carried out in accordance with PCMSO (type of examinations and frequency).</p>
	<p>If the facility is required to install CIPA, analyze the process of formation and maintenance of CIPA: minutes of installation of possession; training of the committee members; minutes of periodic meetings; and, evidence of SIPAT. Verify that, when the facility is not required to install CIPA, if it designated a responsible worker for compliance with NR-05.</p>
	<p>During the visit to the facility, analyze if all the risks inherent to the activities and occupational risks were identified in PGR.</p>
	<p>Interview the CIPA members, verifying how CIPA works in the prevention of work accidents.</p>
	<p>Evaluate if the risk situations in the activities carried out in the facility are not related to the physical structure risks, but from the operations.</p>
	<p>Verify the Ergonomic Work Analysis of the facility, analyzing if it includes all the ergonomic risks to which workers are exposed and the appropriate prevention, control and correction measures.</p>
	<p>Compare the conditions of the seats with the provisions of LTCAT, PGR or ergonomic report. If there is no ergonomic report, base it on the following items: adjustable height for the worker and nature of the function performed, characteristics of little</p>

	or no conformation at the seat base, rounded front edge and backrest with a shape slightly adapted to the body to protect the lumbar region.
	<p>During the visual inspection, determine if the facility provides seats and tables for all its workers who need them for carrying out their activities. The seats and tables should meet the minimum comfort requirements, such as:</p> <ul style="list-style-type: none"> ✓ seats: adjustable height for the worker and nature of the function performed; characteristics of little or no conformation at the seat base; rounded front edge; backrest with shape slightly adapted to the body to protect the lumbar region. ✓ tables: height and work surface characteristics compatible with the type of activity, required distance from the eyes to the work field and height of the seat; work area within easy reach and visualization by the worker; dimensional characteristics that allow proper positioning and movement of body segments.
	Verify if the lighting conditions are adequate for the execution of the activities, in accordance with the parameters defined in item 17.5.3 of NR-17. This item determines that all workplaces should have adequate lighting, if natural or artificial, and that should be appropriate to the nature of the activity. The lighting levels are established in NBR-5413. The results should be presented in the Ergonomic Report, PGR or LTCAT.
	Copy of PCMSO and PGR covers, where there is an indication of the validity date; Ergonomic Report cover; document to certify the CIPA regularity; Annual Elevator Inspection Report cover (if any).
	Pictures of the facility with examples proving the conformities and evidence of nonconformities.
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

3.4.1 Is there evidence that the facility establishes technical and legal requirements to install, maintain and operate boilers and pressure vessels in accordance with the requirements of NR-13?

	YES	The facility complies with the technical and legal requirements of NR-13.	CONFORMITY
	NO	The facility does not comply with the technical and legal requirements of NR-13 or fails in the equipment records.	MAJOR
	N/A	The facility does not have boilers or pressure vessels.	N/A

3.4.2 Is there evidence that the facility has machines, equipment, elevators and tables in satisfactory health and safety conditions, without adaptations or improvised structures?

	YES	There are no adaptations or improvised structures.	CONFORMITY
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	PN	Some machines, equipment and tables are in unsatisfactory health and safety conditions, without adaptations or improvised structures (except the elevators, which should be in satisfactory conditions).	MINOR
	NO	All machines, equipment, elevators and tables are in unsatisfactory health and safety conditions, or there are adaptations or improvised structures.	MAJOR

3.4.3 Is there evidence that the facility has and follows the PGR recommendations defined in accordance with all requirements of NR-01 and NR-09 and updated in continuous process continuous or every 2 (two) years or each 3 (three) years, if there is a certification? If the facility is ME or EPP and with risk 1 or risk 2 degree, does it comply with, in cumulative form, the requirements of NR-01 for exemption of a PGR?

	YES	<p>The facility is required to have a PGR and strictly follows its recommendations, or the facility is not required to have a PGR (ME or EPP) and complies with all requirements of item 1.8.4 of NR-01:</p> <ul style="list-style-type: none"> the facility declares digital information in accordance with item 1.6.1 of NR-01; the facility does not have chemical, physical and biological risks; and the declared digital information on occupational safety and health are disclosed to the workers. 	CONFORMITY
	NO	The facility does not have a PGR it is required to have it in accordance with NR-01; PGR is expired; the facility partially complies with the PGR and/or occupational hazards are not covered by the PGR; or the facility is not required to have a PGR (ME or EPP) and does not comply with all requirements of item 1.8.4 of NR-01.	MAJOR
	N/A	The facility is exclusively composed by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

3.4.4 Is there evidence that the facility has and follows the PCMSO recommendations defined in accordance with all occupational requirements and risks defined in NR-01 and NR-07 and updated in accordance with the analytical report? If the facility is ME or EPP and with risk 1 or risk 2 degree, does it comply with, in cumulative form, the requirements of NR-01 for exemption of a PCMSO?

	YES	<p>The facility is required to have a PCMSO and strictly follows its recommendations, or the facility is not required to have a PCMSO and complies with all requirements of item 1.8.6 of NR-01:</p> <ul style="list-style-type: none"> the facility declares digital information in accordance with item 1.6.1 of NR-01; and the facility does not have chemical, physical and biological risks and risks not related to ergonomic factors. 	CONFORMITY
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	NO	The facility does not have a PCMSO; PCMSO is expired; the facility partially complies with the PCMSO; or the facility is not required to have a PCMSO (ME or EPP) and does not comply with all requirements of item 1.8.6 of NR-01.	MAJOR
	N/A	The facility is legally composed only by partners.	N/A

3.4.5 Is there evidence that the facility, through a comparative analysis, has an updated ASO and includes all the exams provided for in the PCMSO for the functions considered?

	YES	All workers are included in the ASO in accordance with the PCMSO.	CONFORMITY
	NO	An ASO is not developed or part of the workers is included in the ASO in accordance with the PCMSO.	MAJOR
	N/A	The facility is legally composed only by partners.	N/A

3.4.6 Is there evidence that the facility establishes a CIPA (Internal Accident Prevention Commission) in accordance with NR-05? In the case where a CIPA is not required, is there a facility representative responsible for the health and safety issues?

	YES	When all criteria, meeting minutes and training are rigorously performed, in accordance with the Law No. 14,457/22.	CONFORMITY
	PN	A CIPA is established, but the criteria, meetings minutes and training are partially performed.	MINOR
	NO	A CIPA is not established in accordance with NR-05, or it is not established by the Law No. 14,457/22.	MAJOR
	N/A	When the facility is not required to have a CIPA.	N/A

3.4.7 Is there evidence that the facility provides seats for continuous work, where the worker may alternate between standing and sitting work (NR-17)? For activities in which work must be carried out standing up, are there seats with backrests for resting in places where they can be used by workers during breaks?

	YES	The facility provides sufficient number of seats for all workers, in accordance with NR-17.	CONFORMITY
	NO	The facility does not provide sufficient number of seats for all workers, in accordance with NR-17.	MINOR

3.4.8 Is there evidence that the facility provides seats at the workstations, and they comply with the minimum comfort and ergonomics requirements (NR-17)?

	YES	All seats comply with the requirements of NR-17.	CONFORMITY
	PN	Less than 50% of the seats used do not comply with the minimum requirements.	MINOR

	NO	50% or more of the seats used do not comply with the minimum requirements.	MAJOR
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3.4.9 Is there evidence that the facility provides adequate lighting for carrying out the activities?

	YES	All environments have adequate lighting.	CONFORMITY
	PN	When there is no adequacy in: <ul style="list-style-type: none"> • 50% or more of lighting in non-productive areas; or • 30% or more of lighting in environments in a production area. 	MINOR
	NO	When there is no adequacy in: <ul style="list-style-type: none"> • 50% or more of lighting in non-productive areas; and • 30% or more of lighting in environments in a production area. 	MAJOR

3.4.10 Is there evidence that the elevators are in satisfactory condition, in accordance with NR-11 and NBR 16,083/2012?

	YES	All elevators are in satisfactory condition, in accordance with NR-11 and NBR 16,083/2012.	CONFORMITY
	NO	Part or all of the elevators are not in satisfactory condition, not in accordance with NR-11 and NBR 16,083/2012.	CRITICAL
	N/A	The facility does not have elevators.	N/A

3.4.11 Is there evidence that the facility complies with the quota of professionals with updated MTE registration, in accordance with the SESMT sizing table and complies with the requirements of NR-04?

	YES	The facility complies with the quota of professionals and follows the requirements of NR-04.	CONFORMITY
	NO	The facility does not comply with the quota of professionals or does not follow the requirements of NR-04.	MAJOR
	N/A	The facility is not required to have professionals specialized in SESMT, in accordance with NR-04 or the facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

3.4.12 Is there evidence that the facility has workers involved in special tasks (such as: elevator load operator, forklift driver, boiler operator, electrician, loading platform operator, etc.) are duly licensed and trained?

	YES	The workers have a license and/or receive adequate training.	CONFORMITY
	NO	The workers do not have a license and/or receive training.	REQUIRED SILVER
	N/A	The facility does not have workers involved in special tasks.	N/A

3.4.13 Is there evidence that the facility has an AET (Ergonomic Work Analysis) in accordance with NR-17 and complies with all recommendations?			
	YES	The facility has an AET and complies with all recommendations.	CONFORMITY
	PN	The facility has an AET and does not comply with all recommendations.	MINOR
	NO	The facility does not have an AET.	MAJOR
	N/A	The facility is not required to have an AET.	N/A

Thematic Block #3.5 – Occupational health and safety/Personal protective equipment (PPE)

Personal Protective Equipment (PPE) is any personal device or product to be used by the worker, which is intended to protect him or her from possible risks that threaten his or her health and safety at work.

The facilities are required to provide their workers, free of charge, with PPE in perfect conditions, functioning and appropriate to the risk of each activity. PPE should have an indication of CA (Certificate of Approval), which certifies that it has been submitted and approved in resistance and quality tests.

All workers using PPE should receive training regarding its use, storage and conservation.

The facilities approved in the **ABVTEX Program** should provide the necessary PPE for their workers to perform their activities, such as:

- ✓ PVC (rubber) boots: indicated to protect the feet against risks considered light ones. Produced in PVC, a material of high resistance and durability, the PVC boots prevent the contact of the worker lower limbs with corrosive products, contaminating substances and sharp objects. In addition, the PVC boots have a rubber sole, a feature that makes them an PPE for environments with slippery surfaces and provides adequate protection against possible falls and injuries;
- ✓ safety glasses: prevent splashes of chemicals and biological materials released into the air from reaching the eyes;
- ✓ protective mask with filter against chemicals: should be used if the dosing system of chemicals for washing clothes is manual (applicable to laundries);
- ✓ PVC long sleeve gloves: avoid the contact with materials and biological residues;
- ✓ latex gloves: used for cleaning bathrooms;
- ✓ plug-type ear protectors: used in the external ear channel, protecting the worker ear from loud noises, water ingress, impurities, excessive wind or cold;
- ✓ waterproof apron: prevents body contact with moisture;

- ✓ thermal gloves: protect against the heat of dryers and irons;
- ✓ safety boots: protect the workers against falling materials, slips, contusions caused by “bumps”, perforations and various accidents.

Required checks in this block

	<p>Analyze the occupational risks (described in the PGR) and PPE (personal protective equipment) indicated for the protection of the workers.</p> <p>Verify the PPE delivery form for the workers; The record should contain the CA specification of each PPE.</p> <p>Verify the worker training record for the correct use, storage and conservation of PPE.</p>
	<p>Visit the facility and evaluate the compliance with NR-06 and PGR.</p>
	<p>Verify if the training for using PPE is really understood by the workers and is effective, and if the workers are aware of the issues related to NR-06.</p>
	<p>Copy of the PGR with indications of using PPE.</p> <p>Copy of other documents with examples, when conformity is identified and evidence when nonconformity is identified.</p> <p>Pictures with examples, when conformity is identified and evidence when nonconformity is identified.</p>
	<p>Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.</p>

Checklist

3.5.1 Is there evidence that the facility does not have situations in which the workers are at risk situations without proper protection? Does the company have a PGR and fully comply with the requirements?			
	YES	The facility complies with all requirements of the PGR for risk situations.	CONFORMITY
	NO	There is no PGR or the facility does not comply with the requirements for risk activities.	MAJOR
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

3.5.2 Is there evidence that the facility provides adequate PPE, with CA (Certificate of Approval) label, duly replaced when necessary (in case of damage or loss) in accordance with NR-06, for its workers, and it has a PPE delivery form duly signed by the workers?

	YES	The facility complies with all requirements of NR-06 related to PPE.	CONFORMITY
	PN	The facility provides PPE, but does not control it.	MINOR
	NO	The facility does not comply with all requirements of NR-06 related to PPE.	MAJOR
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

3.5.3 Is there evidence of the lack of use of Personal Protective Equipment (PPE), replacing the Collective Protection Equipment (EPC) necessary for greater employee protection, as defined by NR-12?

	YES	There is evidence of the lack of PPE replacing EPC.	CONFORMITY
	NO	There is evidence of the use of PPE replacing EPC, but not in accordance with NR-12.	MAJOR
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

Thematic Block #3.6 – Occupational health and safety/Handling of chemicals

The Chemicals Management is a dynamic process that uses methodologies and criteria applied to the control of direct and indirect chemical inputs used in the facility. It aims to evaluate and control their risks to acceptable levels and communicate them appropriately to all stakeholders.

ILO 170 Convention determines that all facilities that use chemicals and expose their workers to their risks should keep their chemicals identified and provided with a FISPQ (SDS/MSDS – material safety data sheet). The facilities should also inform their workers about the risks of using these chemicals and provide adequate PPE to preserve life.

FISPQ is a document standardized by ABNT (Brazilian Association of Technical Standards) in accordance with NBR-14725-4, used for the communication of hazards related to its use, handling and disposal. The facility should have FISPQs of their chemicals, making them available and communicating to everyone who handles them, as determined by Decree 2,657 of 1998.

Examples of chemicals that should have FISPQ:

- ✓ products in the production area: products for dyeing, printing and finishing;
- ✓ maintenance products: oil, grease, paint, solvent, etc.

The chemical storage locations should be signaled and appropriate, in accordance with the

FISPQs and Brazilian law.

Chemical Inventory is a control tool that allows the reduction of the risk of accidents caused by the incorrect use of chemicals by the workers, third parties, environment, properties and community.

For suppliers and subcontractors, a Chemical Inventory should be required for products that are used in the production area (products for dyeing, printing, finishing, and washing) and maintenance (oil, grease, paint, thinner, solvents, etc.).

The storage location should preferably be outside the place where the chemicals are used, with sufficient space, containing wide and safe shelves. The place should be well ventilated and have adequate lighting, preferably with exhaust ventilation and two exits. Explosion-proof electrical installations are also highly recommended.

To prevent and avoid leakages in the industrial sector, one of the main tools used are containment basins. These basins act as physical barriers, preserving the soil and the external environment. The coating of these is another important item to be considered, as it is the element that prevents the permeability of stored liquids and, consequently, prevents any type of leakage.

Chemicals should be properly labeled in accordance with ABNT NBR-14725.

ABNT NBR-14725 is part of the effort to apply the Globally Harmonized System (GHS) of safety information for hazardous chemicals.

GHS establishes harmonized criteria for classifying substances and compounds regarding physical, health and environmental hazards. It also includes harmonized elements to inform about hazards, with requirements on labeling, pictograms and safety data sheets.

Controlled Products are those hazardous products involved in the purchase, sale, storage and consumption control regime. The entire process, from leaving the facility to consumption, is monitored by the chemical control department of the responsible agency, to avoid illegal transactions for the final use of such products. Monthly or quarterly reports are required, in accordance with the law, for data comparisons.

Control may be carried out by the Federal Police, Army, Civil Police, Ibama and/or other environmental agencies, depending on the product (<http://www.pf.gov.br/servicos-pf/produtosquimicos/legislacao/PORTARIA1274.pdf>).

Required checks in this block

	<p>Verify the facility list of chemicals and if they have the respective FISPQs.</p> <p>For suppliers and subcontractors, FISPQs that are used in the production (dyeing, printing, finishing, and washing) and maintenance (oil, grease, paint, thinner, solvents, etc.) areas should be required.</p> <p>For products used in domestic cleaning, such as disinfectants, dishwashers, degreasers, multipurpose agent, etc., FISPQ should not be required; however, the auditor should guide the audited about the importance and objectives of the documents and how to obtain them (Internet search or manufacturer request).</p>
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	<p>Verify the worker training record regarding the use of chemicals – training based on FISPQs information. It is not necessary to request a training record for workers who handle only products used in domestic cleaning (disinfectants, dishwasher, degreasers, multipurpose agents, etc.).</p>
	<p>Verify if the workers manipulate correctly the products correct and use PPE, in accordance with the FISPQ specifications.</p>
	<p>Verify the Chemical Inventory and the last update date. The inventory should be updated monthly. Request the chemicals purchase invoices.</p> <p>The Chemical Inventory should contain: chemical name; supplier; approximate composition; CAS number; intended use; storage requirements; risk classification (in accordance with the FISPQ); number of the purchase invoice; and month and accumulated quantity (total, in stock and use).</p>
	<p>Verify the production area and storage location, record some chemicals found and information (in accordance with the Chemical Inventory).</p>
	<p>Request the Chemical Inventory and randomly verify if the chemicals and information are consistent with what was found during the audit and in the production and storage location.</p>
	<p>Visit the facility and verify if the chemicals are stored in appropriate location in accordance with the FISPQ and NBR-12235.</p>
	<p>Verify if the chemicals are properly labeled at the production and storage location.</p>
	<p>Visit the facility and verify if the chemicals are stored in adequate locations (in accordance with the FISPQ) and if they are placed in suitable containers duly signaled, as determined by NR-06 (Safety Signalizing).</p>
	<p>Interview the workers who handle chemicals (individual interviews) and verify if they received training for handling them correctly and if they have the knowledge about the adequate measures to be taken in case of leakages.</p>
	<p>Copy of documents and pictures as examples proving the conformity and evidence for nonconformity.</p>
	<p>Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.</p>

Checklist

3.6.1 Is there evidence that the facility provides FISPQs (SDSs/MSDSs) and that they are updated and available for all workers who handle chemicals, in the production areas, in accordance with Decree 10,088/2019? For the chemicals that already have FISPQs (SDSs/MSDSs), are these updated in accordance with NBR 14,725/2023?

	YES	The facility complies with all requirements.	CONFORMITY
	PN	The FISPQs are adequate, but they are not available for all workers who handle chemicals.	MINOR
	NO	The facility does not have FISPQs available anywhere.	MAJOR
	N/A	The FISPQs are not required, or they are required, but the facility is within the deadline for the adaptation to NBR 14,725/2023.	N/A

3.6.2 Is there evidence that the facility provides training to its workers to correctly respond to leakages or accidents with chemicals, and that the facility provides the necessary resources?

	YES	All workers are trained.	CONFORMITY
	NO	Part or no worker is trained.	MINOR
	N/A	The FISPQs are not required, or they are required, but the facility is within the deadline for the adaptation to NBR 14,725/2023.	N/A

3.6.3 Is there evidence that the facility properly stores hazardous and flammable substances in an adequate area?

	YES	All hazardous and flammable substances are stored and kept properly.	CONFORMITY
	PN	The facility stores hazardous and flammable substances in accordance with the minimum requirements, but they are not correctly labeled.	MINOR
	NO	All hazardous and flammable substances are not stored and kept properly.	MAJOR
	N/A	The facility does not handle hazardous and flammable substances, or the facility is classified as a facility with a low quantity of flammable substances, in accordance with NR-20.	N/A

3.6.4 Is there evidence that the facility keeps hazardous and flammable substances in suitable containers, expiration date and duly labeled?

	YES	All hazardous or flammable substances are valid and in adequate containers, duly labeled.	CONFORMITY
	PN	There are hazardous or flammable substances found just out of date.	MINOR
	NO	Some hazardous or flammable substances are expired and/or in inadequate containers and/or without adequate labeling.	MAJOR

	N/A	The facility does not handle hazardous and flammable substances, or the facility is classified as a facility with a low quantity of flammable substances, in accordance with NR-20.	N/A
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3.6.5 Is there evidence that the facility correctly handles chemicals in its production area?

	YES	The facility correctly handles chemicals in its production area.	CONFORMITY
	NO	The facility does not correctly handle chemicals in its production area.	MINOR
	N/A	The facility does not handle chemicals.	N/A

3.6.6 Is there evidence that the facility provides CPE (Collective Protective Equipment), such as eyewash fountains, emergency showers, flags, exhaust fans, first aid kit, etc., in the places recommended by the FISPQs?

	YES	The facility provides CPE in the places recommended by the FISPQs.	CONFORMITY
	NO	The facility does not provide CPE in the places recommended by the FISPQs.	MAJOR
	N/A	The facility does not have chemicals or the CPE is not required; or, the FISPQs are not required; or, the FISPQs are required, but the facility is within the deadline for the adaptation to NBR 14,725/2023.	N/A

3.6.7 Is there evidence that the facility stores chemicals (except hazardous flammable chemicals) in an adequate area and properly?

	YES	Chemicals are stored in an adequate area and properly, in accordance with the minimum requirements.	CONFORMITY
	NO	Chemicals are not stored in accordance with the minimum requirements.	MAJOR
	N/A	The facility does not handle chemicals.	N/A

3.6.8 Is there evidence that the facility performs and monthly updates the chemical inventory?

	YES	The facility has a chemical inventory with correct information, and it is duly updated.	CONFORMITY
	PN	The facility has a chemical inventory with inconsistent information - it is incomplete, it is not updated and may be improved.	MINOR
	NO	The facility does not have a chemical inventory.	MAJOR
	N/A	The facility does not handle chemicals requiring a chemical inventory.	N/A

3.6.9 Does the company use any products with chemical substances on the list of restricted substances in NBR 16787/2019?			
	YES	The facility does not use any substance listed in NBR 16,787/2019.	CONFORMITY
	NO	The facility uses a substance listed in NBR 16,787/2019.	MINOR

Thematic Block #4.1 - Emergency response/Electrical installations

NR-10 presents the set of procedures and requirements on electrical installations and electricity services, seeking to guarantee the safety and health of the workers, establishing the requirements and minimum conditions for implementing control measures and preventive systems.

Maintenance in electrical systems plays a key role in preventing damage and accidents resulting from the malfunction of one or more components. It serves to maintain the performance and preserve the functions and characteristics of the elements and components of the electrical systems, and also to prevent breakdowns in substations and power transformers.

The facilities should ensure that their electrical installations are adequate, documented and periodically inspected, in accordance with the provisions of the regulatory instrument.

Required checks in this block

	Verify the documents of the electrical installations, single-line diagram, which is the graphic representation of the electrical circuit. In accordance with item 10.2.3 of NR-10, "the facilities are required to keep updated single-line diagrams of their electrical installations with the specifications of the grounding system and other equipment and protection devices". Describe what should exist in the single-line diagram, electrical panels and complete schematic of the electrical installations, including evaluation of the installed load.
	When applicable (establishments with an installed load greater than 75 kVA) ⁶ , verify the records of the electrical installations to certify if they meet the necessary safety conditions, including inspections, measurements, test results, etc. (item 10.2.4 of NR-10).
	Visit the facility and verify the condition of the electrical installations, including wiring (which should not be exposed or spliced). Verify the presence of trapped and embedded wires, wrapped and seamless wires, visually inadequate connections, line filter or device approved by INMETRO, used correctly and circuit breakers and sockets protected and identified. Also verify the availability of power points, in addition to signaling and protection of electrical outlets and electrical panels.
	Copy of documents and pictures with examples proving the conformities and evidence of nonconformities.
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

4.1.1 Is there evidence that the facility has adequate electrical installations with no exposed or spliced wires, wrapped and seamless wires, visually inadequate connections, line filter or device approved by INMETRO, used correctly and circuit breakers and sockets protected and identified?

	YES	The electrical installations are adequate.	CONFORMITY
	NO	The electrical installations are inadequate.	MAJOR

4.1.2 Is there evidence that the facility has an updated single-line diagram of the electrical installations, in accordance with item 10.2.3 of NR-10?

	YES	The facility has a single-line diagram, in accordance with item 10.2.3 of NR-10.	CONFORMITY
	NO	The facility does not have a single-line diagram, or it has a single-line diagram that is not in accordance with item 10.2.3 of NR-10.	MAJOR

4.1.3 Is there evidence that the facility has a register of its electrical installations, which certifies that they meet the necessary safety conditions, including inspections, measurements, results of tests, etc., in accordance with item 10.2.4 of NR-10?

	YES	The facility has a register of its electrical installations in accordance with item 10.2.4 of NR-10.	CONFORMITY
	NO	The facility does not have a register of its electrical installations in accordance with item 10.2.4 of NR-10.	MAJOR
	N/A	The facility has an installed load of less than 75 kVA.	N/A

4.1.4 Is there evidence that the facility signalizes its areas presenting electrical hazards (high voltage) in accordance with NR-10?

	YES	The facility complies with the requirements of NR-10.	CONFORMITY
	NO	The facility does not comply with the requirements of NR-10.	MAJOR

Thematic Block #4.2 - Emergency response/Fire prevention and firefighting

NR-23 presents the provisions for fire protection and adequate preventive measures for the workplaces, which should have: sufficient exits for the rapid evacuation of the workers, in case of fire, duly signalized; sufficient equipment to fight the fire at its start; people trained in the correct use of this equipment; constitution of a fire emergency brigade; and permit from the local Fire Department (AVCB).

Periodically, emergency drills (simulations) should be carried out to verify the efficiency and effectiveness of the control measures, making the necessary adjustments.

Required checks in this block

	<p>Verify the Fire Department Permit (AVCB): the document should be valid. Verify the State law. Also verify if the facility activities are classified as 'Low Risk' (as described in Annex 2 of this Manual).</p>
	<p>Verify the training record for the emergency brigade (when applicable). The determination of a mandatory brigade formation, including the number of members, depends on the number of workers of the facility. It is necessary to verify the technical instructions of the Fire Department, since each Brazilian State has its specific law on the subject.</p>
	<p>Analyze the record of emergency evacuation drills (evacuation) performed (when applicable). Verify if correction and/or adequacy needs were identified and if the facility adopted the necessary measures.</p>
	<p>Visit the facilities and verify if the facility has signaled and unobstructed emergency exits. In addition, they should have visual and audible safety signs (boards, alarms, etc.). There is no need to require CNPJ identification from the signboard manufacturer.</p>
	<p>Determine if the facility has CPE (Collective Protective Equipment) available, such as fire extinguishers, hydrants, sprinklers, etc. The equipment should be within its expiration date, correctly positioned (in accordance with the prevention project) and unobstructed. The determination of the type of CPE depends on the size of the facility and activities and is established by the local Fire Department.</p>
	<p>Verify if the emergency exit doors open outwards (in the direction of the escape route) or if they remain open throughout the working hours (if applicable and in accordance with the law). Verify if the facility has emergency exits and if they are signaled, unobstructed, not locked and if they have manual opening.</p>
	<p>Verify the training of the emergency brigade and drills with all workers in case of emergencies. Verify if the emergency brigade members are individually identified and if the facility provides a board with the list of the emergency brigade members by floor, if applicable.</p>
	<p>Verify if the facility has illustrative maps with critical information, such as emergency evacuation routes, a "you are here" tag, the correct direction in the layout, the location of fire extinguishers and hydrants and instructions in the local language on what to do in case of an evacuation.</p>
	<p>Copy of documents and pictures as examples proving conformities and evidence for nonconformities.</p>
	<p>Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.</p>

Checklist

4.2.1 Is there evidence that the facility has a valid Fire Department Permit (AVCB)?			
	YES	The AVCB is valid and covers the entire area of the facility.	CONFORMITY
	PN1	The facility has an expired AVCB, but has a renewal protocol within the deadline or still has an initial protocol.	MINOR
	PN2	The facility has an expired AVCB, but has a renewal protocol after the deadline.	MAJOR
	NO	The AVCB is expired, the facility does not have a requesting renewal protocol, or the facility has never had an AVCB, or the facility has never had an AVCB but has a requesting renewal protocol.	CRITICAL
	N/A	The facility activities are classified as 'Low Risk' (as described in Annex 2 of this Manual).	N/A

4.2.2 Is there evidence that the facility has unobstructed and signalized exits, in accordance with the characteristics and definitions of the State law?			
	YES	The emergency exits are signalized, unobstructed and in accordance with the characteristics and definitions of the State law.	CONFORMITY
	NO	The exits are inadequate.	MAJOR
	N/A	The facility activities are classified as 'Low Risk' (as described in Annex 2 of this Manual).	N/A

4.2.3 Is there evidence that the facility has adequate escape routes in accordance with the applicable criteria (including signalization, emergency lighting, non-obstruction and adequate spacing)?			
	YES	All escape routes are duly signalized and with adequate lighting.	CONFORMITY
	NO	All or part of the escape routes are without adequate signaling or lighting.	MAJOR
	N/A	The facility activities are classified as 'Low Risk' (as described in Annex 2 of this Manual).	N/A

4.2.4 Is there evidence that the facility has firefighting equipment in a good state of conservation, validity, adequate quantity and signalization and unobstructed?			
	YES	All firefighting equipment is adequate.	CONFORMITY
	NO	Part or all of the firefighting equipment is inadequate.	MAJOR

4.2.5 Is there evidence that the facility has a trained fire emergency brigade and performs regular evacuation drills?			
	YES	The facility has a trained fire emergency brigade and evacuation drills carried out in accordance with the law.	CONFORMITY
	NO	The facility does not have a trained fire emergency brigade and/or evacuation drills in accordance with the law.	MAJOR
	N/A	The facility is not required to have a fire emergency brigade, in accordance with the law.	N/A

4.2.6 Is there evidence that the facility has an evacuation map, visible at the strategic points (considering its dimensions), so that all workers and visitors have access to this information?			
	YES	The facility has escape route maps and complies with requirements of this item.	CONFORMITY
	PN	The facility is classified as low risk (in accordance with the Annex 2 of this Manual) and does not have an evacuation map.	MINOR
	NO	The facility is classified as other than low risk (in accordance with Annex 2 of this Manual) and does not have an evacuation map.	MAJOR

4.2.7 Is there evidence that the facility has fire doors and that they are in accordance with ABNT NBR-11742:2003)?			
	YES	All fire doors are in accordance with the standard.	CONFORMITY
	NO	All fire doors are not in accordance with the standard.	MINOR
	N/A	The facility is not required to have a fire door.	N/A

Thematic Block #5.1 - Validation of the production chain/Invoices

The invoice (NF) is a document whose purpose is to register a transfer of ownership over a good or a commercial activity provided by a facility to natural persons or legal entities.

It is a receipt used to collect taxes. Failure to use invoices is considered tax evasion.

Required checks in this block

	Verify if the facility issues invoices (NFs) for sending and receiving materials from the facilities. For guidance on the types of invoices that may be issued, consult Annex 1 of this Manual .
	Verify if the invoices contain the retailer order number and if the number of parts is compatible.
	In this case, invoices containing commercial information from the signatory retailers, neither with facility identification nor commercial conditions (such as price, term, etc.) should be uploaded. When necessary, the auditor and the Audit Organization

	should keep copies of the verified documents (in a confidential manner) so that they may be retrieved in case there is a challenge to the results indicated in the audit.
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

5.1.1 Is there evidence that the facility uses invoices among the production stages?			
	YES	The facility uses invoices for all transactions and receives the products with invoices.	CONFORMITY
	NO	The facility does not use invoices or did not present the invoices; uses some invoices; issues exit invoices and does not receive return invoices (those issued by the supplier should not be accepted as return invoices).	CRITICAL

Thematic Block #5.2 - Validation of the production chain/Supply chain monitoring (only applicable to suppliers)

This block should only be applied to facilities classified as ‘Supplier’ or ‘Both’ (which is the identification that the Program gives to facilities that may be Suppliers, in some cases, and Subcontractors in others).

The supply chain is a set of consecutive steps, along which the various inputs undergo some type of transformation, until the constitution of the final product (good or service). It is, therefore, a succession of integrated operations (or technical stages of production and distribution), from the extraction and handling of raw materials to the distribution of products.

The supply chain management is a set of methods that are used to provide better integration and better management of all network parameters, such as transport, inventories, costs, etc. Proper management of the network allows for optimized production to offer the end customer the right product, in the right quantity, in compliance with the applicable legal requirements, thus improving the relation between buyer and supplier.

Its objectives, therefore, are to control and minimize the risks associated with the activities performed, including aspects related to the quality of products and/or services, in addition to issues that may generate labor and environmental liabilities.

The suppliers participating in the **ABVTEX Program** should keep updated their subcontractor base, in addition to implementing mechanisms for monitoring and managing them, ensuring that these facilities offer decent working conditions to their workers. They should also carry out a traceability control of the parts sent to them.

This monitoring should start in the subcontractor selection stage, which should ensure that the legal and ABVTEX provisions are met, providing a safe and healthy environment for its workers.

Required checks in this block

	<p>Verify if the list of subcontractors is updated and understand the main criteria for selecting these facilities by the suppliers. The register with the list of the facilities should contain at least the following information: registration data (corporate name, address and CNPJ); type of service performed; and, conditions of formalization of the work (formal workers registration – CLT).</p>
	<p>Verify if the suppliers keep a record that guarantees that their subcontractors are aware of and certify that they comply with the labor law, Collective Bargaining Agreement and/or Convention of the category and other working conditions.</p>
	<p>Verify if the facility carries out visits to its subcontractors and keeps a record of this process. In addition, semi-annual checks should be carried out on subcontractors regarding issues related to regular work, requesting a monthly copy of the INSS and FGTS bills.</p>
	<p>Copy of the control documents used by suppliers as examples proving the conformity and evidence for nonconformity.</p>
	<p>Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.</p>

Checklist

<p>5.2.1 Is there evidence that the facility has a process for selecting new subcontractors, regarding regular work?</p>			
	<p>YES</p>	<p>The facility requests basic documents to the candidates and visits them in advance to verify the work issues (visit report).</p>	<p>CONFORMITY</p>
	<p>NO</p>	<p>The facility does not have a selection process.</p>	<p>MINOR</p>
	<p>N/A</p>	<p>The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both').</p>	<p>N/A</p>

<p>5.2.2 Is there evidence that the facility has any formal document, such as Supply Contract, Commitment Term, or another document with the same degree of formality, signed by the subcontractors, considering the issues related to working conditions, as a condition for maintaining the commercial relations?</p>			
	<p>YES</p>	<p>The facility has formal documents with all subcontractors – verification of contracts, comparing them with the list of subcontractors (notarized signature).</p>	<p>CONFORMITY</p>
	<p>NO</p>	<p>The facility does not have formal documents with any, or only with a few, subcontractors.</p>	<p>MINOR</p>

	N/A	The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both').	N/A
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5.2.3 Is there evidence that the facility keeps an updated list, in electronic format, of all subcontractors with it maintains a commercial relation, with at least the following information: registration data (corporate name, address and CNPJ); type of service performed; and, conditions of formalization of the work (CLT)?

	YES	The facility controls all of its subcontractors.	CONFORMITY
	NO	The facility does not control its subcontractors.	MAJOR
	N/A	The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both').	N/A

5.2.4 Is there evidence that the facility carries out semi-annual monitoring of the activities of its current subcontractors related to regular work issues and requests a monthly copy of the INSS and FGTS bills? Or, if the facility is already fully to the e-Social, does it present the reports regarding the respective events (DCTFWeb, S-1200, and S-2299)?

	YES	The facility monitors its subcontractors.	CONFORMITY
	NO	The facility does not monitor or partially monitors (some subcontractors).	MINOR
	N/A	The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both').	N/A

5.2.5 Is there evidence that the facility has formal contracts proving the relation with its subcontractors?

	YES	The facility has formal signed contracts with all of its subcontractors.	CONFORMITY
	NO	The facility does not have, or partially has, formal signed contracts with its subcontractors.	MAJOR
	N/A	The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both').	N/A

5.2.6 Is there evidence that the facility has a selection process of subcontractors using the "Dirty List" during the process?

	YES	The facility uses the "Dirty List" for selecting all of its subcontractors.	CONFORMITY
	NO	The facility does not use, or partially uses, the "Dirty List" for selecting its subcontractors.	MAJOR

	N/A	The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both').	N/A
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Thematic Block #5.3 - Validation of the production chain/Validation of the list of subcontractors (only applied to suppliers)

The Validation of the List of Subcontractors within the **ABVTEX Program** seeks to verify the process of receiving and dispatching orders by the signatory retailers, as well as if the orders are being made in the places declared by the suppliers. In addition, the suppliers may only outsource their production processes to subcontractors (or facilities classified as 'Both'), declared and approved in the **ABVTEX Program**. That is, all subcontractors should be audited and approved by the program. Thus, to verify the alignment with this guideline, the suppliers should maintain records and control of the subcontractors to which they forward the services. In addition, the suppliers should have a record of all orders received, and all orders made to their subcontractors, including a return invoice, which should contain the nature of the operation, with the respective Fiscal Code of Operations and Services.

To verify the compliance with this requirement, the supplier should demonstrate that it has a traceability process on its products in the stages of the production process, except in situations of making "shelf" products (of regular stock), which do not need to undergo the validation process of the list of subcontractors.

Required checks in this block

	Verify if all subcontractors of the audited facility are approved in the ABVTEX Program and that they are all linked to the supplier in the <u>ABVTEX Program System</u> . If the supplier declares that it does not have a subcontractor, that is, that its full production is done internally, the auditor should be able to confirm this information.
	Verify the invoices issued for the subcontractors and sales invoices issued to ABVTEX signatory retailers, mainly confirming the registered CNPJ.
	Verify at least 2 orders still in production (if they are made available by retailers) and, together, the presentation of the technical sheet to evaluate the production process (laundry, printing, etc.).
	Verify the orders placed with supplier facilities that have been produced in the last 12 (twelve) months, analyzing if the official order number of the signatory retailer is present in all shipment or return invoices. For this sampling, the last 9 (nine) orders should be requested. It is important to analyze the invoice date invoices: shipment/return invoices should be dated after the day the sale is made to the signatory retailers.
	Verify return and shipment invoices of all subcontractors used in the production process in the last 12 (twelve) months, analyzing if the information presented in the documents complies with each other (information on the shipment invoice should correspond with the return invoice).

	Verify if the quantity of parts produced by the supplier is within the 10% margin regarding the order placed by the retailer. In addition, analyze if this quantity is equal to or greater than the quantity sold and/or delivered to the signatory retailer.
	Verify if the suppliers have control of their internal production (analyses the stages of the production process) to ensure that the orders placed by the retailers are fulfilled.
	<p>For the cases in which there is triangulation, or triangular industrialization, verify if the invoices have a corresponding tax code, not characterizing an outsourcing. This process occurs when a supplier orders/purchases inputs from a subcontractor "A", who sends the raw material directly to another subcontractor of the facility.</p> <p>For example: a shoe manufacturing supplier ("X") subcontracts one of the stages of its production process with facility "A" and buys raw material (soles, for example) from subcontractor "B". Then, facility "B" sends the inputs directly to facility "A", without going through supplier "X".</p>
	<p>For shoe suppliers, verify if they have purchase invoices of the components that are part of the final product, such as insoles, soles, decorations, etc.</p> <p>Verify the period of the last 12 (twelve) months.</p>
	Verify the fiscal book and/or system for issuing invoices for the last 2 (two) months, analyzing the sequence of issuance (Danfes in sequential PDF files).
	Verify if there are subcontractors inside the supplier plant. All subcontractors should also be approved in the ABVTEX Program .
	At the end of the audit, the auditor should print a report in the ABVTEX program System , with the declaration of fidelity of the list of subcontractors, which should be signed by the supplier at the time. This signed list should be attached (uploaded) to the audit report as further evidence for this block.
	At the end of the audit, the auditor should not be able to attach to the system report any order or invoice that contains identification of the signatory retailers, nor commercial information contained in documents collected in this chapter. In this situation, the Audit Organization should keep this document in its possession, in a confidential manner, for eventual situations of proof of post-audit evaluation.
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

5.3.1 Is there evidence that the facility, during the traceability process of the orders of the signatory retailers, only uses declared and approved subcontractors? That is, there is not undeclared subcontractor that is approved in the Program ABVTEX?		
	YES	The facility fully informs its subcontractors, or there are no subcontractors.
		CONFORMITY

	NO	The facility does not fully inform its subcontractors, or it does not inform in the system that there are no subcontractors in its chain, since the non-informed contractors are approved in the ABVTEX Program .	CRITICAL
	N/A	<p>The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both').</p> <p>If the supplier indicates that has full internal production, this information should be verified by the auditor and a comment in the observation field should be made.</p> <p>The facility exclusively supplies to a signatory retailer that is in an adaptation period, as defined in the General Regulation of the ABVTEX Program, or the facility does not supply to any of the signatory retailers.</p>	N/A

5.3.2 Is there evidence that the facility, during the traceability process of the orders of the signatory retailers, does not use subcontractors not approved in the **ABVTEX Program**? That is, there is not undeclared subcontractor that is not approved in the **ABVTEX Program**.

	YES	The facility fully informs its subcontractors, or there are no subcontractors.	CONFORMITY
	NO	The facility does not fully inform its subcontractors, or it does not inform in the system that there are no subcontractors in its chain, since the non-informed contractors are not approved in the ABVTEX Program .	CRITICAL
	N/A	<p>The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both').</p> <p>If the supplier indicates that has full internal production, this information should be verified by the auditor and a comment in the observation field should be made.</p> <p>The facility exclusively supplies to a signatory retailer that is in an adaptation period, as defined in the General Regulation of the ABVTEX Program, or the facility does not supply to any of the signatory retailers.</p>	N/A

5.3.3 Is there evidence that the facility has the order number of the signatory retailer in the shipment/return invoices? This number may to be the purchase order, model, internal reference, or supplier reference. For all orders, it should be verified if the official order number of the retailer (purchase order, part model, provider reference, etc.) is in all shipment/return invoices.

	YES	The supplier presents all requested orders. Also consider if the supplier did not deliver 9 (nine) orders to retailers in the requested period.	CONFORMITY
	NO	The supplier does not present all requested orders.	CRITICAL
	N/A	The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is	N/A

		<p>classified as 'Both').</p> <p>If the supplier indicates that has full internal production, this information should be verified by the auditor and a comment in the observation field should be made.</p> <p>The facility exclusively supplies to a signatory retailer that is in an adaptation period, as defined in the General Regulation of the ABVTEX Program, or when the facility does not supply for any of the signatory retailers.</p>	
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5.3.4 Is there evidence that the facility has the official order received from the signatory retailer with the part description?

	YES	The facility correctly presents the 9 (nine) requested orders.	CONFORMITY
	NO	The facility does not present correctly the 9 (nine) requested orders.	CRITICAL
	N/A	<p>The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both').</p> <p>If the supplier indicates that has full internal production, this information should be verified by the auditor and a comment in the observation field should be made.</p> <p>When the facility exclusively supplies to a signatory retailer that is in an adaptation period, as defined in the General Regulation of the ABVTEX Program, or when the facility does not supply to any of the signatory retailers.</p>	N/A

5.3.5 Is there evidence that the facility has return invoices (in chronological order) of all subcontractors used in its production process?

	YES	The facility presents the return invoices of all subcontractors used in its production process, and they coincide with the shipment invoices.	CONFORMITY
	NO	The facility does not present the return invoices of all subcontractors used in its production process, and they do not coincide with the shipment invoice. The product movement is not made with a return invoice.	CRITICAL
	N/A	<p>The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both').</p> <p>If the supplier indicates that has full internal production, this information should be verified by the auditor and a comment in the observation field should be made.</p>	N/A

5.3.6 Is there evidence that the facility has shipment invoices (in chronological order) for all steps of the production process (when subcontracted)?

	YES	The facility presents the shipment invoices for the subcontractors used in its production process, and they coincide with the return invoices.	CONFORMITY
	NO	The facility does not present the shipment invoices for the subcontractors used in its production process, and they do not coincide with the return invoice.	CRITICAL
	N/A	The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both'). If the supplier indicates that has full internal production, this information should be verified by the auditor and a comment in the observation field should be made.	N/A

5.3.7 Is there evidence that the facility has shipment/return invoices with dates before the sale date to the signatory retailer?

	YES	The shipment and/or return date is before the sale date to the signatory retailer.	CONFORMITY
	NO	The shipment and/or return date is posterior to the sale date to the signatory retailer.	CRITICAL
	N/A	The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both'). If the supplier indicates that has full internal production, this information should be verified by the auditor and a comment in the observation field should be made. The facility exclusively supplies to a signatory retailer that is in an adaptation period, as defined in the General Regulation of the ABVTEX Program , or the facility does not supply to any of the signatory retailers.	N/A

5.3.8 Is there evidence that the facility proves that the quantity of produced parts is within the 10% margin regarding the order made by the signatory retailer (shipment x return)?

	YES	The quantity of produced parts described in the return invoice is within the 10% margin regarding the quantity of parts in the shipment invoice.	CONFORMITY
	NO	The difference exceeds the 10% margin.	CRITICAL
	N/A	The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both'). If the supplier indicates that has full internal production, this information should be verified by the auditor and a comment in the observation field should be made.	N/A

		The facility exclusively supplies to a signatory retailer that is in an adaptation period, as defined in the General Regulation of the ABVTEX Program , or the facility does not supply to any of the signatory retailers.	
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5.3.9 Is there evidence that the facility proves that the quantity of produced parts is equal to or greater than the quantity sold/delivered to the signatory retailer?

	YES	The quantity of produced parts is equal to or greater than the quantity sold/delivered to the signatory retailer, in accordance with the sale invoice.	CONFORMITY
	NO	The quantity of produced parts is inferior to the quantity sold/delivered to the signatory retailer.	CRITICAL
	N/A	The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both'). If the supplier indicates that has full internal production, this information should be verified by the auditor and a comment in the observation field should be made. The facility exclusively supplies to a signatory retailer that is in an adaptation period, as defined in the General Regulation of the ABVTEX Program , or the facility does not supply to any of the signatory retailers.	N/A

5.3.10 Is there evidence that the facility controls its internal and/or external production?

	YES	The facility controls its internal and/or external production.	CONFORMITY
	NO	The facility does not control its internal and/or external production.	CRITICAL
	N/A	The facility is characterized exclusively as a subcontractor.	N/A

5.3.11 Is there evidence that the facility has, where there is triangulation, invoices with the corresponding tax code (CFOP 5924 OR 6924) and the mention "por conta e ordem do fornecedor", not characterizing an outsourcing?

	YES	The shipment invoices from subcontractor "A" to subcontractor "B" have the fiscal code "5924 or 6924" and the mention "por conta e ordem do fornecedor".	CONFORMITY
	NO	The facility does not control the shipment invoices or if the shipment invoices from subcontractor "A" to subcontractor "B" do not have the fiscal code "5924 or 6924" and the mention "por conta e ordem do fornecedor".	CRITICAL
	N/A	The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both').	N/A

		If the supplier indicates that has full internal production, this information should be verified by the auditor and a comment in the observation field should be made.	
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5.3.12 Is there evidence that the facility presents purchase invoices for the inputs that compose the final product (for example, insoles, soles, and ornaments), when the process is not internally performed or by subcontractors?

	YES	The facility presents the inputs invoices that compose the final product (for example, insole, soles, and ornaments).	CONFORMITY
	NO	The facility does not present the inputs invoices that compose the final product (for example, insoles, soles, and ornaments).	CRITICAL
	N/A	The facility is not a shoe supplier.	N/A

5.3.13 Is there evidence that the facility and other facilities (subcontractors) in the same building are approved?

	YES	All subcontractors that are in the same building of the facility are approved in the ABVTEX Program .	CONFORMITY
	NO	All subcontractors that are in the same building of the facility are not approved in the ABVTEX Program .	CRITICAL
	N/A	The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both'). If the supplier indicates that has full internal production, this information should be verified by the auditor and a comment in the observation field should be made.	N/A

5.3.14 Is there evidence that the facility has a fiscal book and/or system for issuing invoices (of the last 3 months) for carrying out the traceability process?

	YES	The facility presents the fiscal book.	CONFORMITY
	NO	The facility does not present the fiscal book.	CRITICAL
	N/A	The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both'). If the supplier indicates that has full internal production, this information should be verified by the auditor and a comment in the observation field should be made.	N/A

5.3.15 Is there evidence that the facility is not established and it does not operate only as a representative office (national or imported products), without internally having any production or product transformation process, with outsourcing of all production stages?

	YES	The facility has internal production or processes that characterize it is only as a representative office.	CONFORMITY
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	NO	The facility operates only as a representative office (national or imported product), without internally having any production or product transformation process, with outsourcing of all production stages.	REQUIRED GOLD
	N/A	The facility exclusively supplies imported finished products with internal logistics processes or it is a logistics operator.	N/A

Thematic Block #5.4 – Validation of the production chain/Subcontracting services (only applied to subcontractors)

The facilities subcontracted by the suppliers approved in the **ABVTEX Program** should not transfer works received from the signatory retailers to other facilities. This practice is known as “outsourcing”.

Entrusting the execution of part of the facility activities to third parties requires, in addition to the constant evaluation of economic and operational feasibility, monitoring of the compliance with the labor and social security obligations of these suppliers. This type of contract conditions the borrower to be subsidiary liable for the irregularities committed by its contractors, and in some cases this liability is even joint.

Required checks in this block

	Visit the subcontracted facilities, verifying how the production process is, and if there is no evidence of activities outsourcing.
	Interview the workers to verify that all activities are carried out by the facility, with no record of outsourcing.
	Copy of documents and pictures as examples proving conformities and evidence of nonconformities. In this situation, it is also forbidden to upload evidence containing the logo, name of the signatory retailers, as well as commercial information that allows the identification of these facilities.
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

5.4.1 Is there evidence that the facility does not outsource to another subcontractor approved in the ABVTEX Program ?			
	YES	The facility does not outsource services.	CONFORMITY
	NO	The facility outsources services to another subcontractor approved in the ABVTEX Program .	CRITICAL

	N/A	The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both').	N/A
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5.4.2 Is there evidence that the facility does not outsource to another subcontractor NOT approved in the **ABVTEX Program**?

	YES	The facility does not outsource services.	CONFORMITY
	NO	The facility outsources services to another subcontractor not approved in the ABVTEX Program .	CRITICAL
	N/A	The facility is exclusively characterized as subcontractor or the supplier does not have subcontractors (even if it is classified as 'Both').	N/A

Thematic Block #6 – Transparency and management practices

Required checks in this block

	Verify if the facility has written policies and if they cover the topics required by ABVTEX (documented procedures).
	Analyze the available supporting documents regarding the disclosure of policies and code of conduct (worker manual, bulletin board of messages, letters, regular meeting, etc.).
	Verify if the facility performs internal training of the <u>Code of Conduct</u> of the ABVTEX Program . Verify the attendance list of the training provided.
	Verify the existence of internal communication channels for the dissemination of the policies and Code of Conduct.
	Verify, through the induction process, worker manual (or other formal document) and policies, the way in which the complaints, grievances or denouncements are communicated to all workers.
	Verify the formal procedure with the description of the responsibilities of the managers, supervisors, and responsible workers in ensuring that there is no retaliation against the workers who present complaints, grievances or denouncements.
	During the interviews, verify if the workers are aware of the Code of Conduct. The facility should present some documentary evidence regarding the completion of the training (attendance list, for example).
	Verify if the workers are trained to know and comply with the criteria described in the <u>Code of Conduct</u> of the ABVTEX Program , in addition to knowing the communication channel to report related violations.

	Interview the workers to ensure that the workers really know the policies.
	Verify, during the interviews, the knowledge of the workers about the current systems to deal with complaints and grievances/denouncements.
	Copy of documents and pictures as examples proving the conformity and evidence for nonconformity (exception: record and evidence (picture) of applied disciplinary practices). Self-declaration of the facility, filled when requesting a proposal to the Audit Organization.
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

6.1 Is there evidence that the facility provides training for its workers on the Code of Conduct of the **Program ABVTEX**?

	YES	The facility provides training on the <u>Code of Conduct</u> of the ABVTEX Program .	CONFORMITY
	NO	The facility does not provide training on the <u>Code of Conduct</u> of the ABVTEX Program , or the facility does not present evidence, or it declared 'No' in the self-declaration form.	MAJOR

6.2 Is there evidence that the facility has a designated worker responsible for the facility management systems (HR, Health and Safety, Environment) and is he or she responsible for handing the improvements identified during the audit?

	YES	The facility has, at least, one worker responsible for the health, safety and environment issues.	CONFORMITY
	NO	The facility does not have a worker responsible for the health, safety and environment issues, or it declared 'No' in the self-declaration form.	MINOR
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

6.3 Is there evidence that the facility has its own policies covering, at least, the following topics: anti-corruption; anti-discrimination; child labor; forced labor; freedom of association; abuse and harassment; working hours; and, salaries and benefits?

	YES	The facility has written policies in accordance with the ABVTEX requirements.	CONFORMITY
	NO	The facility does not have written policies, or does not cover all ABVTEX requirements, or it declared 'No' in the self-declaration form.	MAJOR

6.4 Is there evidence that the facility has written policies, procedures and processes that are effectively communicated through the appropriate means of dissemination (for example, worker manual, board of messages, newsletter, regular meetings, etc.)?			
	YES	The facility communicates its policies.	CONFORMITY
	NO	The facility does not provide training to its workers, or it declared 'No' in the self-declaration form.	MAJOR
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

6.5 Is there evidence that the facility has a master list with all documents used in its management systems? Do the documents have a date of the last version consistent with the documents used during the audit?			
	YES	The facility has a master list and the documents are duly organized.	CONFORMITY
	NO	The facility does not have a master list and/or the documents are not duly organized and controlled, or it declared 'No' in the self-declaration form.	MINOR

6.6 Is there evidence that the facility adopts internal disciplinary practices for the leadership and workers when the internal policies are not complied with?			
	YES	The facility adopts disciplinary practices for its leadership and workers, when they do not comply with the internal policies.	CONFORMITY
	NO	The facility does not adopt disciplinary practices, or it declared 'No' in the self-declaration form.	MINOR
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

6.7 Is there evidence that the facility has a denouncement channel or complaint system that is effective, accessible, equitable, transparent and confidential to resolve industrial disputes and deal with the workers complaints?			
	YES	The facility has an accessible and confidential method for receiving suggestions and/or complaints from workers, and they are correctly treated.	CONFORMITY
	NO	The facility does not have an accessible and confidential method for receiving suggestions and/or complaints from workers, and they are not correctly treated, or it declared 'No' in the self-declaration form.	REQUIRED GOLD
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

6.8 Is there evidence that the facility conducts regular internal audits to evaluate its performance and results, identify the root causes of nonconformities or discrepancies and correct them accordingly (for example, updating policies and processes, providing training, etc.)?

	YES	The facility has an internal audit process and presents evidence (checklist, action plan and corrections).	CONFORMITY
	NO	The facility does not have an internal audit process, or it declared 'No' in the self-declaration form.	MINOR

6.9 Is there evidence that the facility provides occupational health and safety training before the worker starts working, refreshment when necessary, and documents to prove the conformity?

	YES	The facility develops induction and training.	CONFORMITY
	NO	The facility does not develop induction and training, or it declared 'No' in the self-declaration form.	MAJOR
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

6.10 Is there evidence that the facility has records to control its accidents? Are injury and incident records available and are all significant accidents and incidents duly investigated, reported and actions correctives adopted to minimize the repetition?

	YES	The facility has records to control accidents and complies with all provisions of this item.	CONFORMITY
	NO	The facility does not have records to control accidents or does not comply with the provisions of this item, or it declared 'No' in the self-declaration form.	MINOR
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist, or the facility did not have accidents in the last year.	N/A

6.11 Is there evidence that the facility has a communication channel to its workers (for example, hotline, board of messages, internal newspaper, etc.)?

	YES	The facility has, at least, one communication channel.	CONFORMITY
	NO	The facility does not have a communication channel, or it declared 'No' in the self-declaration form.	MINOR
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

6.12 Is there evidence that the facility has a plan to evaluate and handle the worker complaints?

YES	The facility has a plan to evaluate and handle the worker complaints.	CONFORMITY
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	NO	The facility does not have a complaint channel, or it does not have a plan to evaluate and handle the worker complaints, or it declared 'No' in the self-declaration form.	MINOR
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

6.13 Is there evidence that the facility provides an opportunity, when the solution of complaints/grievances fails, for a critical analysis by the senior management, and are the workers entitled to respond and/or appeal of the decision?

	YES	The facility provides an opportunity for a critical analysis by the senior management review, and the workers have the right to respond and/or appeal of the solution.	CONFORMITY
	NO	The facility does not provide an opportunity for a critical analysis by the senior management review, or the workers are entitled to respond and/or appeal of the solution.	MINOR
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

6.14 Is there evidence that the facility managers and supervisors are responsible for ensuring that there are no negative consequences for the workers who report complaints and/or denouncements?

	YES	The facility managers and supervisors are responsible for ensuring that there are no negative consequences for the workers who report complaints and/or denouncements.	CONFORMITY
	NO	The facility managers and supervisors are not responsible for ensuring that there are no negative consequences for the workers who report complaints and/or denouncements.	MINOR
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

6.15 Is there evidence that the facility does not retaliate when it receives complaints and denouncements?

	YES	The facility does not retaliate when it receives complaints and denouncements.	CONFORMITY
	NO	The facility retaliates when it receives complaints and denouncements.	MINOR
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

6.16 Is there evidence that the facility, when adopting a disciplinary action against a worker, informs and delivers a written document to him or her, and is this disciplinary action kept in the personal worker file?			
	YES	The worker is always informed and receives a written document of the disciplinary action.	CONFORMITY
	NO	There is no evidence that the worker is informed and receives a written document of the disciplinary action.	MINOR
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

6.17 Is there evidence that the facility publicizes and/or makes available to its workers' information regarding the category salary, minimum legal salary and other relevant information of the Collective Bargaining Agreement?			
	YES	The facility publicizes and/or makes available to its workers' information regarding the category salary.	CONFORMITY
	NO	The facility does not publicize and/or made available to its workers' information regarding the category salary.	MINOR
	N/A	The facility is constituted exclusively by partners, legally and in accordance with what is specified and evaluated in item 1.4 of this checklist.	N/A

Thematic Block #7.1 – Environment/Licenses

Environmental licensing is an important management tool for the Public Administration, which enables control over human activities that interfere with environmental conditions. It promotes the conciliation of economic development with the use of natural resources, to ensure the sustainability of the environment in its physical, sociocultural and economic aspects.

It is a legal requirement to which all facilities or activities that use natural resources or that may cause some type of pollution or degradation to the environment are subject. It is an administrative procedure by which the location, installation, expansion and operation of these facilities and/or activities are authorized.

The facility Environmental Policy is its formalized commitment to managing and reducing its impacts on the environment, to meet the legal requirements applicable to its activity in a responsible and transparent manner. Depending on the type of activity performed, some facilities are exempt from environmental licensing. It is necessary to verify the specific environmental law of each State.

As for water resources (surface and groundwater), they constitute public goods that every natural person or legal entity is entitled to access and use, and the Public Power is responsible for their administration and control.

If a person wants to use water from a river, lake or even groundwater, he or she should request an authorization, concession, permit or license (Grant) from the Public Power. The mentioned use refers, for example, to the capture of water for industrial processes or irrigation, the release of industrial or urban effluents, or the construction of hydraulic works such as dams, river canalization, deep wells, etc.

The granting of the right to use or interfere with water resources is an administrative act, authorization or concession, through which the Public Power allows the grantee to use water for a certain time, purpose and condition expressed in the respective act.

It constitutes an instrument of the State Policy of Water Resources, essential to the harmonious compatibility between the aspirations of society and the responsibilities and duties that should be exercised by the granting power.

Monitoring water and energy consumption, in addition to reduce the impact on the environment, by reducing the consumption of natural resources, generates a direct positive impact on the financial results of an activity. Therefore, the monitoring of water and energy consumption is considered of great importance, so that reduction potentials may be identified, and more efficient actions and processes may be implemented.

Required checks in this block

	Verify the licenses issued by the Federal Police, Civil Police and Army for controlled hazardous products (when applicable).
	Verify if the facility has an artesian well and if the facility has a grant for water collection, from the responsible state agency.
	Verify if the boiler is mentioned in the environmental operating license or has a specific license.
	Verify the mandatory environmental licenses for the facility, in accordance with State and/or Municipal environmental law. The licenses should be valid. If the facility is exempt from licensing, present a supporting document. Or, verify if the facility activities are classified as 'Low Risk' (according to Annex 2 of this Manual) and, thus, the facility is exempt from environmental licensing.
	Verify the mandatory Environmental License for the facility, in accordance with the state and/or municipal environmental law. The license should be valid. In case the facility is exempt from licensing, present a supporting document. Verify in the mandatory environmental license if the main activity that the facility carries out is included. Verify the main activity with the CNPJ card.
	Verify the environmental license or license waiver document for provisions, and if so, request evidence of compliance with all of them. Provisions related to atmospheric emissions, waste and effluents should be scored in the corresponding questions.

	Verify if the facility has an activity that requires the CTF-IBAMA and TCFA.
	Interview the people indicated as responsible for environmental issues, to identify if they are aware of the activities described above (in addition to the sampling of interviews included in the table of interviewees).
	Copy of all licenses. Copy of documents and pictures as examples proving conformities and evidence of nonconformities.
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

7.1.1 Is there evidence that the facility has an environmental license, or it is exempt?			
	YES	The facility presents the environmental license, or its exemption, or it presents a renewal protocol within the tolerance period provided for in state or municipal law.	CONFORMITY
	PN	The facility has a renewal protocol that is not within the tolerance period, and it does not comply with state or municipal law.	MINOR
	NO	The facility does not present an environmental license, or its exemption.	MAJOR
	N/A	The facility is not required to have an environmental license, or it does not carry out potentially pollutant activity in accordance with the applicable law.	N/A

7.1.2 Is there evidence that the facility complies with the conditions of the environmental license, or it complies with the conditions described in the exemption?			
	YES	The license is valid, or the license is expired, but the facility has a renewal protocol within the tolerance period, or the facility is not required to have a license and complies with the respective requirements.	CONFORMITY
	NO	When one of the following situations occurs: <ul style="list-style-type: none"> the facility does not have a license or exemption; the license has conditions, and the facility does not comply with the requirements; the facility has a renewal protocol, in accordance with the law, and does not comply with the conditions of the expired license; the facility presents a license exemption and does not comply with the conditions of the exemption; the license or exemption has conditions and the facility 	MAJOR

		does not comply with them.	
	N/A	The facility is not required to have an environmental license and presented a waiver without conditions.	N/A

7.1.3 Is there evidence that the facility has the necessary documents for acquisition, storage and use of controlled products (Federal Police and Civil Police)?

	YES	The facility uses controlled products in its process and presents the mandatory license for them.	CONFORMITY
	PN	The facility uses controlled products in its process and presents an expired mandatory license, but with a renewal protocol.	MINOR
	NO	The facility does not have licenses or the licenses are expired without a renewal protocol.	MAJOR
	N/A	The facility does not use hazardous or controlled products.	N/A

7.1.4 Is there evidence that the facility has an MTR (Manifest of Waste Transport), CADRI (for the state of São Paulo) and Certificate of Final Destination of the generated waste?

	YES	The facility has MTR, CADRI and Certificate of Final Destination.	CONFORMITY
	PN	The facility has a CADRI and MTR renewal protocol.	MINOR
	NO	The facility does not have an MTR, Certificate of Final Destination and CADRI, or CADRI is expired.	MAJOR
	N/A	The facility does not generate waste that requires CADRI, MTR and Certificate of Final Destination in accordance with state or municipal law, or the collection of non-hazardous waste is municipal.	N/A

7.1.5 Is there evidence that the facility has a grant to catch water?

	YES	The facility presents a valid grant, as required by law.	CONFORMITY
	PN	The facility is required to present a grant, but it is expired, and the facility has a renewal protocol.	MINOR
	NO	The facility is required to present a grant, but it does not have one, or it is expired without a renewal protocol.	MAJOR
	N/A	The facility does not capture water (artesian wells, rivers, lakes, seas, etc.).	N/A

7.1.6 Is there evidence that the facility has CTF-IBAMA when it has a potentially polluting activity (APP)?			
	YES	The facility presents a valid CTF-IBAMA and TCFA.	CONFORMITY
	NO	The facility carries out potentially polluting activities (APP) and/or is a user of environmental resources and does not present a valid CTF-IBAMA or, when presenting it, it does not present TCFA.	MINOR
	N/A	The facility is not required to have CTF-IBAMA.	N/A

7.1.7 Is there evidence that the facility has a boiler duly licensed by the competent environmental agency?			
	YES	The boiler is included in the environmental operating license or has a valid specific license.	CONFORMITY
	NO	The boiler is not included in the environmental operating license and does not have a valid specific license, or the boiler has an expired license without renewal protocol.	MAJOR
	N/A	The facility does not have a boiler.	N/A

Thematic Block #7.2 – Environment/Management and general aspects

It is important to designate a person responsible for the relevant environmental issues in the production unit. This professional does not necessarily need to be a specialist in the environmental area; however, it is necessary that he or she has in his or her attributions (in writing) the responsibility for activities related to the environmental area. It is allowed that more than one professional has responsibilities on environmental issues. In this case, it is expected that the facility has an organization chart of those responsible for each topic with the description of the activities, so that the information may be managed efficiently, and in full compliance with current law.

Required checks in this block

	When there is a person responsible for the environmental management system, verify the written assignments of the worker responsible for the following issues: control of the environmental licenses; updating of the chemical and waste inventory; compliance with the conditions of the environmental licenses; hiring of a specialized facility to carry out effluent and emissions reports, and correct waste disposal; recommendation for large facilities: when there is more than one person responsible for the environmental management, request an organizational chart of the areas that carry out environmental activities, including name, area, activity description, immediate superior hierarchy, etc.
	Verify if the facility has a policy related to environmental issues. The facility environmental policy may be included in the general facility policy.

	<p>The auditor should ask for the annual maintenance control of the extinguishers (if the facility has CO₂ extinguishers) and verify the quantity of CO₂ extinguishers recharged in the last maintenance. For the air conditioning system, an invoice or service order for maintenance should be requested and verify if there has been recharge and gas, if so, the invoice or service order should include the name of gas used in the replacement – when there is no replacement of gas put N/A, and, when available, describe the name of the gas used and quantity.</p>
	<p>Verify if the facility manages its water and energy consumption. The management may be made by monitoring worksheets (monthly and accumulated consumption); action plan for reduction; contingency actions and consumption reduction; and implementation of more efficient programs and processes.</p>
	<p>Interview the people indicated as responsible for the environmental issues, to identify if they are aware of the activities described above (in addition to the sampling of interviews included in the table of interviewees).</p>
	<p>Copy of all licenses. Copy of documents and pictures as examples proving conformities and evidence of nonconformities.</p>
	<p>Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.</p>

Checklist

7.2.1 Is there evidence that the facility has a person responsible for the facility environmental management?

	<p>YES</p>	<p>The facility has a person responsible for all environmental issues.</p>	<p>CONFORMITY</p>
	<p>PN</p>	<p>The facility does not have a responsible person for all relevant environmental areas, but has a focal point for the environmental issues.</p>	<p>MINOR</p>
	<p>NO</p>	<p>The facility does not have a responsible person for the environmental management.</p>	<p>MAJOR</p>

7.2.2 Is there evidence that the facility has formalized policies and procedures for environmental issues, and that the facility applies and disseminate them?

	<p>YES</p>	<p>The facility presents a policy related to environmental issues.</p>	<p>CONFORMITY</p>
	<p>NO</p>	<p>The facility does not present a policy related to environmental issues.</p>	<p>MINOR</p>

7.2.3 Is there evidence that the facility monitors its sources of fugitive emissions (air-conditioning system, CO₂ extinguishers, etc.) from its operations?

	YES	The facility monitors its fugitive emissions.	CONFORMITY
	NO	The facility does not monitor its fugitive emission.	MINOR
	N/A	The facility does not have air-conditioning system and CO ₂ extinguishers.	N/A

7.2.4 Is there evidence that the facility treats its domestic effluent, in accordance with the state law?

	YES	The facility treats its domestic effluent, in accordance with the state law.	CONFORMITY
	NO	The facility does not treat its domestic effluent, in accordance with the state law.	MAJOR

7.2.5 Is there evidence that the facility monthly monitors its water consumption and has targets for reducing it?

	YES	The facility monitors its water consumption and has targets for reducing it.	CONFORMITY
	NO	The facility does not monitor its water consumption or does not have targets for reducing it.	MINOR

7.2.6 Is there evidence that the facility monitors its energy consumption and has targets for reducing it?

	YES	The facility monitors its energy consumption and has targets for reducing it.	CONFORMITY
	NO	The facility does not monitor its energy consumption and does not have targets for reducing it.	MINOR

7.2.7 Is there evidence that the facility has environmental fines?

	YES	The facility does not have environmental fines.	CONFORMITY
	NO	The facility has environmental fines.	REQUIRED GOLD

Thematic Block #7.3 – Environment/Wastes

PGRS (solid waste management plan)

PGRS (solid waste management plan) is a set of documents with legal value, which contains actions and recommendations to control all stages of generation, collection, storage, treatment and disposal of waste generated in a facility, public agency or industry. In a nutshell, it is the manual that contains instructions on what to do with the solid waste generated in the facility. It demonstrates a facility ability to manage all the waste generated in an environmentally sound manner. It is a descriptive memorial of the procedures already implemented and operational, as

well as those to be adopted in the management of waste for the stages of segregation, storage, collection, transport, treatment and disposal or final disposal.

PGRS becomes mandatory for, among others, industrial waste generators and waste generators from commercial establishments providing services that generate hazardous waste or household-like waste by the municipal government.

The waste inventory is an important tool for the management of the waste generated in the facility. Through this inventory, the facility should quantify and diagnose information on the generation, characteristics, storage, transport, treatment, reuse, recycling, recovery and final disposal of generated waste.

CON/AMA Resolution No. 313 (2002) established in Brazil the National Inventory of Solid Waste to collect, through state environmental agencies, all this information from facilities that generate waste.

Hazardous waste

Hazardous waste is any substance or article that poses a risk to human health, public safety or the environment (for example, vehicle fuel, explosives, compressed nitrogen, etc.).

Hazardous waste is part of class 1 waste and is those types of materials that pose risks to public health and environment, requiring special treatment and disposal due to their characteristics of flammability, corrosivity, reactivity, toxicity, among others.

Required checks in this block

	Verify if the facility has a PGRS with the minimum content required in the Plano Nacional de Resíduos Sólidos (National Solid Waste Plan) signed by a responsible technician within the validity period.
	Verify if the facility, when applicable, has the Certificate to Waste Transport, issued by the competent environmental agency. The document should be valid.
	Verify if the facility has an updated and complete solid waste inventory, with at least information on volumes generated, characteristics, type of storage, transport, treatment and final disposal.
	<p>PGRS should be required for the facilities that participate in the ABVTEX Program, except those that meet all the following requirements:</p> <ul style="list-style-type: none"> ✓ the activity is characterized as “trade” or “provision of services”; ✓ it generates only non-hazardous waste; ✓ the non-hazardous waste generated is, due to its nature, composition or volume, equivalent to domestic waste by the municipal government; ✓ it is not required to have an environmental licensing. <p>It is possible to ask the environmental agency if the facility is exempted from PGRS. The sole paragraph of article 13 of PNRS (National Solid Waste Policy law 12,305/2010) details the classification of solid waste:</p> <p>II - Regarding the hazardousness:</p> <p>a) hazardous wastes: those that, due to their characteristics of flammability,</p>

	<p>corrosivity, reactivity, toxicity, pathogenicity, carcinogenicity, teratogenicity and mutagenicity, present a significant risk to public health or environmental quality, in accordance with the law, regulation or technical standard;</p> <p>b) non-hazardous waste: those not included in item “a”.</p> <p>Still, the sole paragraph of that article reinforces that waste characterized as non-hazardous may, due to its nature, composition or volume, be equated with domestic waste by the municipal government.</p>
	<p>Verify if the facility has proof of transport and disposal of hazardous waste from the last three months.</p> <p>Verify if the facility that carry out the transport and final destination of hazardous waste have a valid Operating License from the competent environmental agency for carrying out the activity.</p>
	<p>Interview the people indicated as responsible for the environmental issues, to identify if he or she is aware of the activities described above (in addition to the sampling of interviews included in the table of interviewees).</p>
	<p>Copy of all licenses.</p> <p>Copy of documents and pictures as examples proving conformities and evidence of nonconformities.</p>
	<p>Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.</p>

Checklist

7.3.1 Is there evidence that the facility has a PGRS (solid waste management plan)?			
	YES	The facility has a valid PGRS with the minimum content required in the Brazilian Policy of Solid Wastes signed by the responsible technician.	CONFORMITY
	NO	The facility does not have a valid PGRS with the minimum content required in the Brazilian Policy of Solid Wastes signed by the responsible technician.	MAJOR
	N/A	The facility does not develop industrial activity, only generates non-hazardous, domestic or equivalent to domestic waste.	N/A

7.3.2 Is there evidence that the facility carries out and (monthly) updates the solid waste inventory?			
	YES	The facility has a complete and updated solid waste inventory with at least information on generated volumes, characteristics, type of storage, transport, treatment, destination and/or final disposal.	CONFORMITY

	PN1	The facility has the inventory, but the facility does not update it monthly and the facility does not belong to or have processes of the “Wet Group”.	MINOR
	PN2	The facility does not comply with one of the following conditions: the facility presents the inventory, but the facility does not update it monthly and the facility belongs to or has processes of the “Wet Group”; the facility does not present the inventory and the facility does not belong to or have processes of the “Wet Group”.	MAJOR
	NO	The facility has the inventory and belongs to or has processes of the “Wet Group”.	REQUIRED SILVER
	N/A	The facility does not develop industrial activity, only generates non-hazardous, domestic or equivalent to domestic waste.	N/A

7.3.3 Is there evidence that the facility stores its wastes properly?			
	YES	The facility stores its wastes correctly, in accordance with NBR-11,174 and NBR-12,235.	CONFORMITY
	PN	The facility does not store its wastes correctly; however, the facility does not have hazardous wastes, in accordance with NBR-10,004.	MAJOR
	NO	The facility does not store its wastes correctly and has hazardous wastes, in accordance with NBR-10,004.	REQUIRED SILVER
	N/A	The facility generates only domestic waste.	N/A

7.3.4 Is there evidence that the facility has facilities that carry out transport and final destination of its hazardous wastes, with a valid Operating License from the competent environmental agency?			
	YES	The facility presents a valid operating license of the facilities that carry out transport and final destination of its hazardous wastes.	CONFORMITY
	PN	The facility does not have a license, but it presents a valid protocol.	MINOR
	NO	The facility does not have a license or valid protocol.	MAJOR
	N/A	The facility does not generate hazardous wastes.	N/A

7.3.5 Is there evidence that the facility burns waste in its boiler with authorization from the competent body?			
	YES	The facility burns waste in its boiler with authorization from the competent body.	CONFORMITY

	NO	The facility burns waste in its boiler without authorization from the competent body.	MAJOR
	N/A	The facility does not have a boiler or does not burn waste in its boiler.	N/A

7.3.6 Is there evidence that the facility does not burn waste in the open?			
	YES	The facility does not burn waste in the open.	CONFORMITY
	NO	The facility burns waste in the open.	MAJOR

7.3.7 Is there evidence that the facility carries out waste sorting (organic, industrial, paper, metals, etc.)?			
	YES	The facility carries out waste sorting.	CONFORMITY
	NO	The facility does not carry out waste sorting.	MINOR
	N/A	The facility is exempted by the state environmental agency, in accordance with the regulations of the environmental agency of each state and/or region.	N/A

Thematic Block #7.4 - Environment/Effluents

Conama Resolution No. 430 (05/13/2011) defines that the term 'effluent' is used to characterize liquid waste from various activities or processes.

Also, in the same law, it is established that the effluents should not be able to give the receiving body quality characteristics in disagreement with the goals of its provisions.

Therefore, it is necessary to evaluate, with due technical criteria, the effluent releases, in particular, from processes that use water during the production (laundry, dyeing, printing and others that add industrial chemicals to the effluent to be discarded).

The effluent release standard is defined by the competent environmental agency, and should be established in the facility Operating License. Generally, law and parameters are related to the effluent release site. The competent environmental agency also establishes, in the operating license conditions, the frequency of effluent monitoring, which should be respected. Failure to comply with the conditions of the Environmental License may impact the renewal of this License.

Required checks in this block

	Verify the type of process carried out in the production unit, as well as the possible generation and disposal of industrial effluent.
	Verify the place where the industrial effluent is discharged. The evaluation should be carried out through visual inspection, documentation and questioning the person who is accompanying the audit.

	<p>Verify if the facility has chemical washing tanks (stamping boards, paint packaging and chemicals) connected to the effluent treatment station or directly releases into the municipal collector.</p>
	<p>Concerning an effluent treatment plant, verify if the disposal is carried out in the water body or connected to a municipal and/or outsourced treatment plant.</p>
	<p>Concerning small treatment plants, verify the connection with the final disposal place, if there is no pipe connection, it is necessary to request documentation from the third-party facility that collects the effluent for final treatment.</p>
	<p>For on-site Treatment Station (launching into the water body after treatment): verify if the Treatment Station is covered by the Environmental License.</p> <p>For outsourced (municipal) Treatment Plant: verify the document that proves the link with the facility that collects and treats the effluent (for example, in São Paulo: K Factor on SABESP invoice/contract with the facility that regularly collects the effluent for final treatment).</p> <p>For outsourced (private) Treatment Station: verify the contract with the facility that collects and treats the effluent, operating license, and if the effluent is collected with tank trucks, the transport manifests.</p>
	<p>Before identifying the existence or not of an effluent treatment plant, it is important to evaluate the place where the effluent is released. This evaluation leads to the definition of the need for an on-site effluent treatment plant, as well as the necessary documentation for the disposal of the effluent.</p>
	<p>Verify the place where industrial effluent is discharged. The evaluation should be carried out through visual inspection, document and questioning the person who is accompanying the audit.</p>
	<p>Analyze if the facility has chemical washing tanks (stamping boards, paint and chemical packaging) connected to the effluent treatment station or direct releases into the municipal collector.</p> <p>Concerning an effluent treatment plant, verify if the disposal is carried out in the water body or connected to a municipal and/or outsourced treatment plant.</p> <p>Concerning small treatment plants, verify the connection with the final disposal site, if there is no pipe connection, it is necessary to request documentation from a third-party facility that collects the effluent for final treatment.</p>
	<p>Verify the type of process carried out in the Production Unit, as well as the possible generation and disposal of industrial effluent.</p>
	<p>Verify the conditions of the Operating License and if the final effluent analysis reports are within the established release standard.</p> <p>Verify the letter of consent from the third-party private facility that collects the effluent, as well as the standards established for collection and treatment. If the</p>

	<p>facility that carries out the collection does not establish a frequency for analyzing the effluent, the auditor should request a minimum annual frequency for the analysis (in accordance with the law established in the letter of consent).</p> <p>Concerning a facility that sends the effluent through a tank truck, CADRI (São Paulo) and Operating License of the collection and transport facility must be requested.</p>
	Interview the person responsible for environmental issues, to identify if he or she is aware of the activities described above (in addition to the sampling of interviews included in the table of interviewees).
	<p>Copy of all licenses.</p> <p>Copy of documents and pictures as examples proving conformities and evidence of nonconformities.</p>
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

7.4.1 Is there evidence that the facility has a permit for disposing of its effluent?			
	YES	The facility has a permit to dispose of its effluent.	CONFORMITY
	PN	The facility has a renewal protocol or permit request within the legal period.	MINOR
	NO	The facility does not have a permit, or does not have a protocol within the legal period.	MAJOR
	N/A	The facility does not generate industrial effluent or does not dispose of its treated effluent.	N/A

7.4.2 Is there evidence that the facility has an effluent treatment station (on site or outsourced, duly licensed)?			
	YES	The facility has an effluent treatment station and presents all respective documents. The effluent treatment station has a license.	CONFORMITY
	PN	The facility presents evidence that it performs previous treatment; however, it does not present all documents. The effluent treatment station does not have an environmental license.	MINOR
	NO	The facility generates industrial effluent and does not perform any type of treatment, or does not present any municipal contract, or a contract with an outsourced facility.	REQUIRED SILVER
	N/A	The facility does not generate industrial effluent.	N/A

7.4.3 Is there evidence that the facility complies with the effluent release standards as established in the operating license or by the outsourced facility?			
	YES	The facility presents all documents and develops analysis accordingly.	CONFORMITY
	PN	The facility presents the analysis, but does not comply with the law.	MINOR
	NO	The facility does not develop analysis.	REQUIRED SILVER
	N/A	The facility does not generate industrial effluents.	N/A

7.4.4 Is there evidence that the facility has, when the effluent treatment station fails, a backup option to avoid environmental damages?			
	YES	The facility has a backup option to avoid environmental damages, when the effluent treatment station fails.	CONFORMITY
	NO	The facility does not have a backup option to avoid environmental damages, when the effluent treatment station fails.	MINOR
	N/A	The facility does not generate industrial effluents or uses an outsourced treatment station (municipal or private).	N/A

7.4.5 Is there evidence that the facility ensures that there is no risk of contamination of soil or water bodies due to transshipment of solid waste removed from the effluent treatment station?			
	YES	There is no risk of contamination of soil or water bodies due to a bypass or overflow of the waste removed from the effluent treatment station.	CONFORMITY
	NO	There is a risk of contamination of soil or water bodies due to bypass or overflow of the waste removed from the effluent treatment station.	REQUIRED SILVER
	N/A	The facility does not generate industrial effluents.	N/A

7.4.6 Is there evidence that the facility has, when the analysis does not comply with the parameters, an action plan to investigate them?			
	YES	The facility has an action plan.	CONFORMITY
	NO	The facility does not have an action plan.	MINOR
	N/A	The facility does not generate industrial effluents or uses an outsourced treatment station (municipal or private).	N/A

Thematic Block #7.5 – Environment/Atmospheric releases

Atmospheric pollutants are gases and solid particles (dusts, powders and fumes) resulting from human activities and natural phenomena, which are dispersed in the air. In this way, gases and particles expelled by vehicles and industries and, also, those arising from the degradation of

organic matter, volcanism and other natural phenomena are classified in this category. Included in this list are substances formed by the reaction of certain pollutants with radiation from the sun.

Steam boilers are equipment designed to produce and accumulate steam under pressure above atmospheric pressure, using any source of energy, except reboilers and similar equipment used in process units. There are three different types of fuel for steam boilers: solid, liquid and gas, in different commercial forms.

Resolution No. 382/2006 establishes the maximum emission limits of atmospheric pollutants for fixed sources (such as boilers).

Required checks in this block

	Verify if the last report of atmospheric emissions meets the requirements of the license/authorization.
	Verify the type of fuel used for steam generation in the environmental license or in the specific license for the boiler, and verify if the authorized/licensed source matches the one identified in loco.
	Verify if the last report of atmospheric emissions meets the requirements of the license/authorization.
	Interview the worker indicated as responsible for the environmental issues, to identify if he or she is aware of the activities described above (in addition to the sampling of interviews included in the table of interviewees).
	Copy of all licenses. Copy of documents and pictures as examples proving conformities and evidence of nonconformities.
	Observe the security measures and best practices recommended, preserving the privacy and protection of personal data accessed throughout the audit process.

Checklist

7.5.1 Is there evidence that the facility uses an approved fuel in the boiler to generate steam?			
	YES	The facility uses an approved fuel in accordance with its license.	CONFORMITY
	NO	The facility does not use an approved fuel in accordance with its license (for example, the license authorizes the use of firewood, but the facility burns textile waste).	MAJOR
	N/A	The facility does not have a boiler.	N/A

7.5.2 Is there evidence that the facility has atmospheric releases complying with the standards and release limits approved in the operating license or specific authorization?

	YES	The facility complies with the standards and release limits, and it presents a technical report proving that.	CONFORMITY
	NO	The facility does not comply with the standards and release limits, and it does not present a technical report proving that.	REQUIRED SILVER
	N/A	The facility does not have a boiler, or the environmental license does not require standards and release limits for atmospheric releases.	N/A

7.5.3 Is there evidence that the facility monitors its greenhouse gases (GHGs) emissions?

	YES	The facility monitors its GHGs emissions.	CONFORMITY
	NO	The facility does not monitor its GHGs emissions.	MINOR
	N/A	The facility is exclusively characterized as a subcontractor.	N/A

ANNEX 1 - Table of CFOP codes for issuing invoices (traceability)

CFOP code	Description	
5,124	Industrialization carried out for another facility.	This code classifies the outputs of industrialized goods for third parties, including the values related to the services provided and goods from industrialist property employed in the industrial process.
5,125	Industrialization carried out for another facility when the goods received for use in the industrialization process do not pass through the facility acquiring the goods.	This code classifies the outputs of industrialized goods for other facilities, in which the goods received for use in the industrialization process have not passed through the facility of the purchaser of the goods, comprising the values referring to the services provided and those of the goods of industrialist property employed in the industrial process.
5,901	Shipment for industrialization by order.	This code classifies the shipments of inputs sent for industrialization by order, to be carried out in another facility or in another establishment of the same facility.
5,902	Return of goods used in the industrialization by order.	This code classifies the shipments, by the industrialist facility, of inputs received for industrialization and incorporated into the final product, by order of another facility or another establishment of the same facility. The value of the inputs in this operation should be equal to the value of the inputs received for industrialization.
5,949	Other exit of unspecified goods or service provision.	This code classifies the exit of goods or services that do not have their own code (internal operations).
6,949	Other exit of unspecified goods or service provision.	This code classifies the exit of goods or services that do not have their own code (interstates operations).

ANNEX 2 - Characterization of facilities with 'Low Risk' activities

The facilities classified as 'Low Risk' should be those defined as "low risk A" in accordance with Resolution No. 51 (06/11/2019)² of the Comitê para Gestão da Rede Nacional para a Simplificação do Registro e da Legalização de Empresas e Negócios (CGSIM – Management Committee of National Network for the Simplification of Registration and Legalization of Facilities and Businesses), subject to change if a new act of the Federal Executive Government on the subject, and observing any specific state, district or municipal laws.

Under the terms currently in force, the facility activities are classified as risk level I - low risk, "low risk A", light, irrelevant or non-existent risk, in accordance with the following parameters:

1. For the purposes of fire and panic prevention, including, among others, the provisions of this Manual that refer to approvals by the Fire Department, information regarding emergency exits, evacuation maps and escape routes, all activities:
 - a. be established at the owner housing, without receiving people; or
 - b. be established in buildings other than the owner housing, if the occupation of the activity has a total of up to 200 m² (two hundred square meters) and is carried out:
 - i. in a building that does not have more than 3 (three) floors;
 - ii. in public meeting places with capacity for up to 100 (one hundred) people;
 - iii. in a place without a basement, with separate use of parking;
 - iv. without flammable or combustible liquid above 1,000 l (one thousand liters); and
 - v. without having liquefied petroleum gas (LPG) above 190 kg (one hundred and ninety kilograms).
2. For the purposes of health and environmental safety, including, among others, the provisions of this Manual that refer to obtaining health permits and environmental licenses, when the activities carried out by the facility are within those included in Annex I of Resolution No. 51 (06/11/2019), by the Comitê para Gestão da Rede Nacional para a Simplificação do Registro e da Legalização de Empresas e Negócios (CGSIM).
3. Special attention should be paid to situations in which the audited facilities are exempt from public acts releasing economic activity, which will be the case when (i) the facility carries out economic activities that, regardless of their nature, are classified as risk I – low risk, "low risk A", light, irrelevant or non-existent risk, for the purposes of exemption from release acts, by the bodies responsible for issuing the respective public release act, or (ii) when they bring together the requirements for the same classification both in aspects relating to fire and panic prevention and in those relating to health and environmental safety.
4. The 'Low Risk' situations provided for in this Manual assume that the audited facility has exclusively activities with CNAE listed in Annex I of Resolution No. 51 (06/11/2019), of the Comitê para Gestão da Rede Nacional para a Simplificação do Registro e da Legalização de Empresas e Negócios (CGSIM). For the purposes of the ABVTEX Program, the facilities with more than one activity, at least one of which is not classified as 'Low Risk', should not be considered 'Low Risk' and are subject to all checks on public acts of release of its activities, as required by the applicable legislation, to the extent that they are required by the ABVTEX Program.

² Amended and updated by Resolutions No. 57 (05/21/2020), No. 59 (08/12/2020) and No. 68 (03/22/2022) of the Comitê para Gestão da Rede Nacional para a Simplificação do Registro e da Legalização de Empresas e Negócios (CGSIM).

The following table presents the list of CNAE with repercussions on the **ABVTEX Program**.

CNAE	DESCRIPTION
4641-9/02	Wholesalers of textile goods (bed, table and bath).
4642-7/01	Wholesalers of clothing and accessories, except for professional and occupational safety use.
4643-5/02	Wholesalers of bags, suitcases and travel items.
4643-5/01	Wholesalers of shoes.
4689-3/02	Wholesalers of processed yarns and fibers.
4649-4/10	Wholesalers of jewelry, watches and bijoux, including precious stones and polished semiprecious stones.
4642-7/02	Wholesalers of clothing and accessories for professional and occupational safety use.
4641-9/01	Wholesalers of fabrics.
4755-5/03	Retailers of textile goods (bed, table and bath).
4781-4/00	Retailers of clothing and accessories.
4763-6/02	Retailers of sporting articles.
4782-2/01	Retailers of shoes.
1412-6/01	Manufacture of clothing parts, except underwear and tailored parts.
1411-8/01	Manufacture of underwear.
1413-4/01	Manufacture of professional clothing, except tailored clothing.
1412-6/02	Manufacture of tailored clothing, except underwear.
1413-4/02	Manufacture of tailored professional clothing.
1414-2/00	Manufacture of clothing accessories, except for safety and protection.
1529-7/00	Manufacture of leather goods not previously specified.
1351-1/00	Manufacture of textile articles for domestic use.
1422-3/00	Manufacture of clothing articles, manufactured in knitting, except socks.
1521-1/00	Manufacture of bags, suitcases, travel items and similar articles of any material, provided that the facility built area does not exceed 2,500 m ² (two one thousand five hundred square meters).
1531-9/01	Manufacture of leather shoes, provided that the facility built area does not exceed 2,500 m ² (two thousand five hundred square meters).
1421-5/00	Manufacture of socks.
1359-6/00	Manufacture of other textile products not previously specified.
1354-5/00	Manufacture of special fabrics, including artifacts, provided that the facility built does not exceed 2,500 m ² (two thousand five hundred square meters).
1412-6/03	Cottage of clothing parts, except underwear.
1411-8/02	Cottage of underwear.
1413-4/03	Cottage of professional clothing.
9529-1/01	Repair of shoes, bags and travel items.
4616-8/00	Commercial representatives and business agents of textile articles, clothing, shoes and travel items.