



TCCC Workplace Assessment Report

(Version October 2016)

TCCC Group, Business Unit, Department: Pacific, ASEAN
TCCC Division Contact: Mr. Cong Van Toai

Facility Name: Key Trading & Communication Joint stock company
Report #: SPA0427
Contact Person/Title: Tran Thi Huong – Director.
Email: Vanphuong.nguyen@keycom.vn

Facility Address: 348 TBD41 Tan Hiep 4 street, Tan Hiep Town, Hoc Mon District, Ho Chi Minh city
City: Ho Chi Minh city
Country: Viet Nam
Phone: + 028 39483015
State/Province: Ho Chi Minh
Postal Zone: 700000
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Parent Company Name or Bottler Group Name, if applicable: NA
Broker Name (Promotional Suppliers Only , e.g. ADM, Create, Secant): NA

Audit Team: Cai Phuoc Hung – LA
Audit Date: 27 Oct 2017
Desk top review on 11 Dec 2017
Audit Firm: SGS Vietnam
Time In: 8:30 AM
Time Out: 17:30
Report Written by: Cai Phuoc Hung
Report Reviewed by: Venkatarao.

Noncompliance Analysis:

- Laws and Regulations*
- Child Labor*
- Forced Labor*
- Abuse of Labor*
- Collective Bargaining*
- Wages & Benefits*
- Working Hours & Overtime*
- Business Integrity*
- Work Environment*
- Discrimination*
- Health & Safety*
- Environment*
- Land Rights*
- Demonstration of Compliance*

Good Practices Observed:

- Laws and Regulations*
- Child Labor*
- Forced Labor*
- Abuse of Labor*
- Wages & Benefits*
- Working Hours & Overtime*
- Business Integrity*
- Work Environment*
- Health & Safety*
- Discrimination*
- Environment*
- Land Rights*
- Demonstration of Compliance*

Audit Type: Initial Onsite Re-Audit Follow-up
 SGP HRP

Overall Assessment: Green Yellow Orange Red

AUDIT SUMMARY

Findings: *List Findings and Recommendations separately as copied from CAP; include local laws as applicable*

Laws and Regulations:	Policies regarding working hour of employment have not been well communicated to workers.
Child Labor:	It is compliance
Forced Labor:	It is compliance
Abuse of Labor:	It is compliance
Collective Bargaining:	It is compliance
Wages and Benefits:	It is compliance
Working Hours & Overtime:	It is compliance
Business Integrity:	It is compliance
Work Environment:	It is compliance
Discrimination	It is compliance
Health and Safety:	It is compliance
Environment:	It is compliance
Land Rights	It is compliance
Demonstration of Compliance:	It is compliance

Good Practices Found:

The company has a few people so that they can control relationship between employees and employer well

Good Practices Improvement Opportunities (list 3-5 recommended opportunity areas)

LEGAL SUMMARY

Local Law	
Minimum work age:	18
Currency US Exchange Rate	1 USD = 22,222 VND
Standard work week (total hours):	48 hours/ week
Maximum allowed overtime hours (per day, week, month):	< 4 hours/ day < 30 hours/ month < 300 hours/ year
Minimum wage:	3.750,000 VND/ month (Decree 153/2016/ND-CP dated 14/11/2016 for Zone 1)
Overtime Premium:	150% for working day; 200% for rest day ;300% for holidays

FACILITY OVERVIEW

PREVIOUS FINDINGS: NA N/A

Previous Audit date: _____ Previous Audit Rating: _____
 Previous findings (list): _____

FACILITY SPECIALITY

Product(s) made (be as specific): Manufacture of promotional products
 Facility capabilities: 5 billions per month
 1. _____ 2. _____
 3. _____ 4. _____

SUBCONTRACTING N/A

Process & Key Parts Produced:
 Facility Name: _____ Address/Phone: _____
 Specialty: _____ Current WIP%: _____
 Facility Name: _____ Address/Phone: _____
 Specialty: _____ Current WIP%: _____
 Facility Name: _____ Address/Phone: _____
 Specialty: _____ Current WIP%: _____

Description of Subcontracting *(Confirm whether TCCC has approved use of subcontractors)*

FACILITY SECURITY

Facility guarded: Yes No If yes, hours guarded: _____

Description of Security Measures *(Include # of guards per shift, visitor procedures, any comments by employees about security guard treatment.)*

MANAGEMENT SYSTEMS N/A

Management System Certification Name	List of Relevant Processes/ Procedures available for review?	Date of last surveillance audit?	Does facility track Performance with evidence improvement?
	<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No

FACILITY WORKFORCE

WORKFORCE OVERVIEW

Total # of workers present on the day of the audit:

Worker Type	# Production Workers	# Sales & Distribution Workers (non-office only)	Other (e.g. cafeteria, security, janitorial)	Total	Total Interviewed
Direct Employees:					
Male	11	09	00	20	01
Female	04	03	00	07	02
Non-Employee Workers:					
Male					
Female					
Total	15	12		27	03

Migrant Workers	# of Workers	% worker population	# living on-site
Foreign			
Internal			

NON-EMPLOYEE WORKERS	N/A	<input checked="" type="checkbox"/>
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If the facility utilizes workers hired through a labor providers or third party please provide below information

Contract Agency # 1:			
Agency Name:	Contact(s):		
Address/Phone:	# of employees on-site:		
% of total workforce:	Records on-site for audit:	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Job Function:			
Fulltime/Part-time:			
Contract Agency # 2:			
Agency Name:	Contact(s):		
Address/Phone:	# of employees on-site:		
% of total workforce:	Records on-site for audit:	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Job Function:			
Fulltime/Part-time:			
Contract Agency # 3:			
Agency Name:	Contact(s):		
Address/Phone:	# of employees on-site:		
% of total workforce:	Records on-site for audit:	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Job Function:			
Fulltime/Part-time:			
Contract Agency # 4:			
Agency Name:	Contact(s):		
Address/Phone:	# of employees on-site:		
% of total workforce:	Records on-site for audit:	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Job Function:			
Fulltime/Part-time:			
Contract Agency # 5:			
Agency Name:	Contact(s):		
Address/Phone:	# of employees on-site:		
% of total workforce:	Records on-site for audit:	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Job Function:			
Fulltime/Part-time:			
Contract Agency # 6:			
Agency Name:	Contact(s):		
Address/Phone:	# of employees on-site:		
% of total workforce:	Records on-site for audit:	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Job Function:			
Fulltime/Part-time:			

MIGRANT WORKERS & RECRUITMENT PRACTICES: NA
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Originating Locations/Countries:	Languages Spoken
Were migrant workers recruited through an agency? <input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is there a contract with the agency? Provide details of agencies and contractual arrangements <input type="checkbox"/> Yes <input type="checkbox"/> No
Did workers pay any fees, taxes, deposits or bonds for the purpose of <input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, to whom? <input type="checkbox"/> Labor contractor
If yes, how much?	<input type="checkbox"/> Third Party
	<input type="checkbox"/> Labor Broker

recruitment/placement?

Employer

Any placement fees charged for worker hired on or after March 3rd, 2015 will result in a finding. Fees that were incurred and then reimbursed do not result in a finding. However, please note the occurrence in long report.

Are workers in debt due to recruitment or placement? Yes No

Were workers pressured, coerced, threatened in any way into accepting the job? Yes No

Were workers presented with terms of employment at the time of recruitment? Yes No

Are there any restrictions on workers' freedom to terminate employment? Yes No

If yes, what restrictions exist? Breach of contract penalties Passport retained by employer Cost of transportation back to home Other (please specify):

Description of Migrant Employee Workforce (working conditions, recruitment process, etc)

ASSESSMENT RESULTS

LAWS AND REGULATIONS

Employment contracts adequate:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Business licenses are valid:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Age documentation adequate:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Workers treated equally:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Minors are registered:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A	W-4s adequate (U.S. only):	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Minors given health exams:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A	I-9s adequate (U.S. only):	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Good Practices Observed	<input type="checkbox"/> Yes	<input type="checkbox"/> No				

Narrative Section (Describe how compliance was demonstrated and any good practices observed. For non-compliance issues explain in detail how the Finding was discovered, % of employees affected, frequency of occurrence, etc. Include relevant employee & management testimony. Cite local laws for all Findings.)

Business license No: 0312536752-002 on 22/09/2017

Certificate registration of stamp No: HA/30099 has been approved on 23/11/2013 by Ho Chi Minh city of Public Security.

Office working:

Morning 8:00 – 12:00

After noon 13:30 – 17-30

Working day from Monday - to Saturday

Company labor rules was approved by Tran Thi Huong – company Directors there are 07 Chapter with 24 articles

It was registered by local authorities – Tan Binh people Committee – letter: 117/TB-NQLD on 28/9/2017.

CBA was on 20 Sep 2017 Signed between Chairman of trade Union worker's representative Le Ngoc Bich Tram and Tran Thi Huong – employer company's director. The CBA was 17 article 03 Chapters. This registered with Section of Tan Binh (Phong LDTBXH Tan Binh District on 23/10/2017 receiver Hoang Thi Quynh NHu.

Legal minimum wage: 3.7500.000 VND per month (zone 1) according to Decree 153/2016/ND-CP date 14/11/2016

Company lowest paid: 4.200.000 VND per month. Average salary 6.800.000 VND per month

Salary paid date: 10th at following month.

CHILD LABOR

Youngest age at factory:

Below legal age: Yes No N/A Historic child labor detected: Yes No

Good Practices Observed: Yes No

Narrative Section (Describe how compliance was demonstrated and any good practices observed. For non-compliance issues explain in detail how the Finding was discovered, % of employees affected, frequency of occurrence, etc. Include relevant employee & management testimony. Cite local laws for all Findings.)

There are no young workers or child workers have been identified during audit. Factory checks the age before recruitment and maintains age related documents in the workers personnel files. The factory checks and compares the original ID of workers when interviewing of recruitment. Each employee file includes a bio-data sheet, a recent photo and the age documentation, which is in the form of photocopied national identification card. The list of employment with birth day and the date joining to the company was checked and verified. No child labor at the facility. Personnel files checked: worker record checks

FORCED LABOR / HUMAN TRAFFICKING

Employees allowed to leave after their shift: Yes No Original documents held by facility: Yes No

Compulsory production quota: Yes No Deposit upon hire: Yes No

Mandatory overtime: Yes No Unrestricted water & toilet breaks: Yes No

What action is taken if employees refuse overtime:

How often does this occur? NA

Good Practices Observed: Yes No

Narrative Section (Describe how compliance was demonstrated and any good practices observed. For non-compliance issues explain in detail how the Finding was discovered, % of employees affected, frequency of occurrence, etc. Include relevant employee & management testimony. Cite local laws for all Findings.)

There is no forced and compulsory labor. The workers are not required to pay deposit or any property, or identification documents. The factory does not engage any forced or bonded labor. The factory also does not keep any original document from the workers, confirmed by the interviewed workers. Workers are free to leave their employer with their notice according to the Vietnam labor code. The workers are not required to lodge "deposits" or their identity paper or their ID. Checked some records and found that there are a lot of people, who worked for the company with long time. The employees are free to leave after reasonable notice.

ABUSE OF LABOR

Physical abuse: Yes No Verbal threats of physical abuse: Yes No

Good Practices Observed: Yes No

Narrative Section (Describe how compliance was demonstrated and any good practices observed. For non-compliance issues explain in detail how the Finding was discovered, % of employees affected, frequency of occurrence, etc. Include relevant employee & management testimony. Cite local laws for all Findings.)

The company did not use any abusive language or attitude. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation be prohibited.

FREEDOM OF ASSOCIATION/COLLECTIVE BARGAINING

Employees are free to join unions or other work organizations: Yes No

If no, why not? It is free

The facility is associated with a Union or Trade Association: Yes No

If yes, name of Organization: Trade of union

If freedom of association is restricted by law does management facilitate other means of organizing and bargaining: Yes No

Narrative Section (Describe how compliance was demonstrated and any good practices observed. For non-compliance issues explain in detail how the Finding was discovered, % of employees affected, frequency of occurrence, etc. Include relevant employee & management testimony. Cite local laws for all Findings.)

Company labor rules was approved by Tran Thi Huong – company Directors there are 07 Chapter with 24 articles It was registered by local authorities – Tan Binh people Committee – letter: 117/TB-NQLD on 28/9/2017. CBA was on 20 Sep 2017 Signed between Chairman of trade Union worker's representative Le Ngoc Bich Tram and Tran Thi Huong – employer company's director. The CBA was 17 article 03 Chapters

WAGES and BENEFITS

Viewed payroll dates: 10th on following month

Method of payment: Bank Transfer or by cash Frequency of pay:

Employees issued pay: All

Average Hours Worked on Pay Period:

Regular: 208 per month
Overtime: 30 hours per month
Total: 60 hour per week

Average Rate of Pay for Pay Period:

Regular:
Overtime:
Total (local currency):

Indicate how Wages are Set:

Employees	Collective Bargaining Agreement <input checked="" type="checkbox"/>	Min Wage +Incentive <input type="checkbox"/>	Industry Wage <input type="checkbox"/>	Other (specify)
NEWs	Collective Bargaining Agreement <input type="checkbox"/>	Min Wage +Incentive <input type="checkbox"/>	Industry Wage <input type="checkbox"/>	Other (specify)

Minimum wage guaranteed:	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Overtime paid adequately:	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Social insurance / Legal benefits provided:	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Piece rate production completed:	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
No. of piece rate employees:				
Average piece rate wages earned:				

Wage Calculation: monthly wage + allowance

Legal minimum wage: 3.7500.000 VND per month (zone 1) according to Decree 153/2016/ND-CP date 14/11/2016
Company lowest paid: 4.200.000 VND per month. Average salary 6.800.000 VND per month

Salary paid date: 10th at following month.

Monthly wage including following information.

Basic salary:
Overtime if Yes
Working days:
Productivity allowance
Night allowance:
Legal deduction:
Social insurance: 8%
Health insurance: 1,5%
Unemployment insurance: 1%

Good Practices Observed: Yes No

Narrative Section (Describe how compliance was demonstrated and any good practices observed. For non-compliance issues explain in detail how the Finding was discovered, % of employees affected, frequency of occurrence, etc. Include relevant employee & management testimony. Cite local laws for all Findings.)

Legal minimum wage: 3.750.000 VND zone 1
Company average paid:6.800.000 VND
Overtime 150% working day; 200% for rest day; 300% for holidays
Wage payment is 01 times on 10th following month
Payment by bank transfer OR by cash
Wage including
Basic salary + Allowance + Benefits
Check salary record checked of months as May and June Sep of 2017
Legal deduction:
Social insurance: 8%
Medical insurance: 1,5%
Unemployment insurance:1%

WORKING HOURS & OVERTIME

Standard hours of operation, incl. all shifts: 08 hours working day: 01shift
 # of breaks during workday: 1 times
 Time & length of breaks: 90 minutes
 Variance of hours between departments: No.
 Weekly hours are within legal limit: Yes No
 Time records show overtime work: Yes No
 Overtime waiver used: Yes No
 Overtime hours approved by local government: Yes No
 Seventh day of rest is guaranteed: Yes No

Good Practices Observed: Yes No

Narrative Section (Describe how compliance was demonstrated and any good practices observed. For non-compliance issues explain in detail how the Finding was discovered, % of employees affected, frequency of occurrence, etc. Include relevant employee & management testimony. Cite local laws for all Findings.)

Working hour:
 Morning 8:00 – 12:00
 After noon 13:30 – 17:30
 Working day from Monday - to Saturday
 Working day from Monday to Saturday, Sunday is off day.
 Annual leave is 12 days, Holidays is 10 days
 Overtime is compliant with local law requirement.
 Record of working hours checked of May, June, Sep of 2017
 Overtime in maximum:
 04hour per days
 12hours per week
 30hours per month.

HEALTH & SAFETY (include dormitory, if applicable)

Fire-fighting equipment is adequate:	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Control panels labeled:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Pulley guards maintained:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Aisles are clear and marked:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Exits marked:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Adequate ventilation:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Adequate first aid supplies:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	MSDS maintained:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sanitary restrooms:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Secondary containment:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Electrical hazards:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Emergency lights installed:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Evacuation plot plan posted:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Safety training provided:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Canteen available:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Dormitory reviewed:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
No clear structural integrity issues observed:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No			

Number of accidents in the last year: Zero
 Type of accidents in the last year: NA

Good Practices Observed: Yes No

Narrative Section (Describe how compliance was demonstrated and any good practices observed. Include all H&S areas of non-compliance even those not listed above. Describe where non-compliance issues were found and level of severity. Cite local laws for all Findings.)

Provide an overview of health and safety observed practices, including locations viewed, personal protection equipment used, chemical storage practices and emergency preparedness.
 The company has demonstrated good awareness to legal requirements related to OHS. Company did not meet the legal requirements. The company has a safety and health policy appropriate with the nature of its activities. Workers are provided with suitable PPE, which includes safety shoes, gloves, face mask and ear protection. The health check has been checked and verified. The toilet facilities are separate for female and male. The health check was done yearly for all of staff. Its charge is at company.
 Firefighting training: 28-29 Sep 2017 by fire local police – participant 15 people.
 Preventive fire projects 29 Sep 2017 approved by Phong CS PC & CC District 12, Ho Chi Minh.
 Health and safety training was on 23 Sep 2017 – 25 Sep 2017 (10 participants) by Cong Ty TNHH Huan Luyen & Dich Vu Ky Thuat An Toan.
 First aid was 17/10/2017 – (26 participants) by Benh Vien Da Khoa Hoc Mon.
 Health checkup was done in Oct 2017 by Ben Vien Da Khoa Hoc Mon.

The support health care contracts: on 01/10/2017 with Benh Vien Da Khoa Khu Vuc Hoc Mon

Labor contracts: Check 05 contracts –

Mai Huu Tien / Chu Duc Thien / Nguyen Huu Thao / Huynh Thi Thuan / Duong Minh Tuan.

The maintenance contract for elevator the contract number: 03-092017 – Key – Thanh Loi. On 03 Sep 2017.

ENVIRONMENTAL

Illegal direct discharge to environment:	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	Waste management documentation adequate:	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Outlawed chemicals are used:	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No					
Good Practices Observed:	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No					

Narrative Section (Describe how compliance was demonstrated and any good practices observed. Include all environment areas of non-compliance even those not listed above. Describe where non-compliance issues were found and level of severity. Cite local laws for all Findings.)

Hazardous waste contract for treatment – the contract number 271/2017/HD-TDX on 25/10/2017 until 25/10/2018 with cong ty CP Cong Nghe Moi Truong Trai Dat Xanh

Environmental monitoring report was done On 01 Oct 2017 it was conducted by Cong Ty TNHH Huan Luyen va Dich Vu Ky Thuat An Toan Elements temperature / Humidity / wind speed / Lighting / NO2 / CO2 / SO2 .All of them are meet the requirement of local law.

Giay Xac Nhan Dang Ky ke Hoach Bao Ve Moi Truong approved by People committee of Hoc Mon District on 16 Oct 2017.

WORK ENVIRONMENT

Procedure for workers to file grievances:	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	Mgmt representative designated to respond to grievances:	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Good Practices Observed:	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No					

Narrative Section (Describe how compliance was demonstrated and any good practices observed. Include all areas of non-compliance even those not listed above. Describe where non-compliance issues were found and level of severity. Cite local laws for all Findings.)

Labor contract check:

The labor contract content

- Condition of labor contract
- Working hour and rest hour
- Salary policy, and benefit - allowance, promotion
- Disciplinary
- Health and safety condition
- And other working condition in the facility

DISCRIMINATION

HIV, Pregnancy other non-job related medical testing	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	Discriminatory Practices	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
Good Practices Observed	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No					

Narrative Section (Describe how compliance was demonstrated and any good practices observed. For non-compliance issues explain in detail how the Finding was discovered, % of employees affected, frequency of occurrence, etc. Include relevant employee & management testimony. Cite local laws for all Findings.)

Through employee interview, management interview and documents review, there is no discrimination in hiring, compensation, access to training, promotion, termination or retirement.

The factory provides the same pay to male/female employees.

Workers interviewed were generally understood the terms and conditions of the employments. The toilet is separated for male and female. Workers interviewed were generally satisfied with the terms and conditions of the employments. All the requirements stipulated in labor contract and to have implemented and executed satisfactory. There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. Both female and male workers were distributed in all types of work.

BUSINESS INTEGRITY

Conflicting or manipulated payroll records:	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	Nondisclosure of labor providers	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
Falsified worker identification	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	Off-clock work:	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
Good Practices Observed	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No					

Narrative Section (Describe how compliance was demonstrated and any good practices observed. For non-compliance issues explain in detail how the Finding was discovered, % of employees affected, frequency of occurrence, etc. Include relevant employee & management testimony. Cite local laws for all Findings.)

The company provides workers with a mechanism to express grievances without fear of reprisal and ensure concerns are appropriately addressed in a timely manner.

Land Rights

Ownership or lease documents available:	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	Planned acquisition of land:	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Community grievance mechanism available:	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No					
Good Practices Observed	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No					

Narrative Section (Describe how compliance was demonstrated and any good practices observed. For non-compliance issues explain in detail how the Finding was discovered, % of employees affected, frequency of occurrence, etc. Include relevant employee & management testimony. Cite local laws for all Findings.)

This company located at 01 sites:

348 TBD41 Tan Hiep 4 street, Tan Hiep Town, Hoc Mon District, Ho Chi Minh city.

There is about 852 square meters of GCN on CH 00047 on 24/1/2011 & GCN CH 00195 on 02 /4/2010

DEMONSTRATION OF COMPLIANCE

Complete access was denied:	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	All requested documents were provided for review:	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Access was granted to facility walkthrough:	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	Access was granted to employee interviews:	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Good Practices Observed	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No					

Narrative Section (Describe how compliance was demonstrated and any good practices observed. If facility could not demonstrate compliance with local law, provide information such as why an inability existed, what areas of compliance could not be verified, if and when facility will be able to grant access to denied process.)

Potentially sensitive areas (e.g. production areas, utility services) within the establishment shall be identified, mapped and subject to access control. Where feasible, access should be physically restricted by use of locks. Cameras have been established inside and outside factory for security control.

The supplier has developed and implemented appropriate internal business processes to ensure compliance with the Supplier Guiding Principles.

AUDIT BACKGROUND (Include OPENING and CLOSING meeting notes, names & titles of facility management that participated in audit and any special situations and/or audit background.)

Opening and Closing Meeting Attendees:

1. Tran Thi Huong – Director
2. Do Dong Trieu – Production Manager
3. Le Thi Bich Tram – worker's representative
4. Chu Duc Thien – Production staff

Guiding Principles for Suppliers to The Coca-Cola Company

Suppliers to The Coca-Cola Company and suppliers authorized by The Coca-Cola Company are required to meet the following standards, at a minimum, with respect to their operations as a whole:

Laws and Regulations

Supplier will comply with all applicable local and national laws, rules, regulations and requirements in the manufacturing and distribution of our products and supplies and in the provision of services.

Child Labor

Supplier will comply with all applicable local and national child labor laws.

Forced Labor and Human Trafficking

Supplier will not use forced, bonded, prison, military or compulsory labor and any form of human trafficking.

Abuse of Labor

Supplier will comply with all applicable local and national laws on abuse of employees and will not physically abuse employees.

Freedom of Association and Collective Bargaining

Supplier will comply with all applicable local and national laws on freedom of association and collective bargaining.

Discrimination

Supplier will comply with all applicable local and national discrimination laws.

Wages and Benefits

Supplier will comply with all applicable local and national wages and benefits laws.

Work Hours & Overtime

Supplier will comply with all applicable local and national work hours and overtime laws.

Health & Safety

Supplier will comply with all applicable local and national health and safety laws.

Environment

Supplier will comply with all applicable local and national environmental laws.

Land Rights

Supplier will comply with all applicable laws and obtain community support through Free, Prior, Informed Consent, in acquiring the right to use land for its business.

Business Integrity

Supplier will comply with all applicable local and national laws and will not use bribes or fraudulent practices

Demonstration of Compliance

Supplier must be able to demonstrate compliance with the Supplier Guiding Principles at the request and satisfaction of The Coca-Cola Company

If the eight Fundamental Conventions of the International Labor Organization establish higher standards than local law, the ILO standards need to be met by the supplier. These minimum requirements are a part of all agreements between The Coca-Cola Company and its direct and authorized suppliers. We expect our suppliers to develop and implement appropriate internal business processes to ensure compliance with the Supplier Guiding Principles.