



THE WIETA AUDIT PROCESS AND METHODOLOGY

Version 5
2025

1. INTRODUCTION

1.1. WIETA

The South African wine and related industries have adopted ethical and social assurance parameters by which it measures the impact in tackling many of the widespread development challenges affecting those employed in wine and other agricultural commodity production.

The Wine and Agricultural Ethical Trade Association, trading as WIETA, is a Social Assurance Scheme, not for profit, established in 2002 as a voluntary association and private standard consisting of different stakeholders in the South African wine industry. WIETA strives to ensure fair treatment, respectful relationships and dignified lives toward achieving a transformed agricultural sector. This is achieved through the:

- Establishment of an Ethical Code of Conduct governing labour and social standards for the wine and agricultural industry.
- Promotion and adoption of the adherence to the Ethical Code of Conduct and Standards set amongst producers and growers.
- To implement relevant independent monitoring mechanisms, such as third-party audit assurance to ensure the members of the Association observe and implement the Ethical Code of Conduct and related standards.
- To determine ways of encouraging implementation of and compliance with the Code, including (but not limited to) identifying support mechanisms for members to attain best practice and identify recommended steps to be taken towards sustained ethical practices and human rights due diligence.
- To determine measures to be taken in the case of non-adherence to and violations of the Ethical Code of Conduct and its standard.
- To secure and maintain recognition and endorsement of this Ethical Code of Conduct and Standard.

1.2 Scope of the WIETA Audit Process and Methodology

This document serves to outline the required best practice guidelines for the implementation of the WIETA approved audit process and methodology. The document and supporting annexures cover all steps to be taken prior, during and after an audit towards obtaining and maintaining social assurance. The Audit Process and Methodology has been benchmarked against various international standards including, the European Consumer Goods Forum Sustainable Social Compliance Initiative (SSCI) based in Paris.

1.3 Involvement of WIETA registered participants and their suppliers in the audit process

Participants to WIETA, who are responsible for producing wine and wine grapes as well as agricultural products, are required to participate in the third-party audit process, as per WIETA's assurance and standards' requirements. To qualify for product assurance, through the Fair Labour Certification Seal, participants also need to involve their wine, grape and/or related agricultural suppliers in the audit process.

This is done by:

- » briefing the supply chain explaining: the background, process, applicable WIETA Standard and Audit Methodology and Process;
- » attending WIETA Ethical Trade and Compliance Training workshops annually on how to implement best practice ethical business systems on site,
- » developing Best Practice Policies and Practices on each performance area of the WIETA Standard;
- » by encouraging suppliers in the wine and agricultural supply chain to register with WIETA and undertaking WIETA third party ethical audits. This requirement further serves to ensure that wine supply chains are demonstrating ethical due diligence and social assurance within their own supply chain and throughout the value chain.

The responsibilities of suppliers include the following:

- Producers and their sites or farms are registered with SAWIS before their registration is completed on the WIETA Online system.
- All wine farms belonging to the WIETA registered business are registered with SAWIS and accurately reflected on the WIETA system after online registration is complete.
- Non wine farms such as fruit farms must also be registered as non-SAWIS sites on the WIETA online system.
- All participants, with their sites need to be registered on the WIETA platform at www.ethicaltrade.co.za.
- Participants need to show progress towards their ethical performance within 12 months of registration by at least completing their Self-Assessment Questionnaires online and the scheduling of an Audit Request.
- All wholesaler, cellar, estate, bottling, traders and primary agriculture participating sites need to have completed an audit within 18 months of registration on the WIETA Online platform.
- Failure to schedule an Audit Request within 12 months of registration on the system will result in the participant member being suspended as a member and will automatically be informed of their suspension status.
- Should members wish to reregister once deactivated on the system, they will need to complete a new registration form for participation in the Scheme and renew their online registration.
- Once registration has been affected, participants need to declare all agricultural operations to ensure the audit covers all ethical risk.

- The number of sites, grape tonnage harvested, received and or processed per year as well as litres produced and/or stored must be accurately recorded.
- Producers ensure that total tonnage and/or litres recorded on the WIETA online system within a harvest year coincides with that reported into SAWIS and verified as per SAWIS inspection in a vintage year.
- By using the WIETA online system, registered producers, cellars, bottlers, exporters and traders consent that WIETA can verify these records with SAWIS, aligned to POPIA requirements.
- Separate payroll and management system must be linked to separate profiles. However, these profiles can be linked to or under holding company profiles.
- Third Party auditors will be required to audit both the head offices as well as all satellite sites.
- Audits must take place during periods of peak operational activities as it is a requirement that two thirds of both permanent and seasonal staff are on site at the time of the audit. To inspect Occupational Health and Safety compliance, the site has to be fully operational at the time of the audit. Failure to audit in this period will result in a follow audit at additional expense to the site.
- Company Management is required to be present at the audit on the day of the audit and may not be replaced by an external party or external representative.
- Auditees have a maximum of 6 months to complete their corrective actions on the WIETA online platform.
- Should the audit corrective actions not be signed off by the auditing firm within 12 months of the audit date, the audit will lapse and auditees will be suspended from the system and their status as WIETA members changed to suspended.
- Auditees will then need to re-register with WIETA and reload all information onto a new profile. They will need to begin the audit process from the start.

1.4 Change of Ownership of a business

WIETA Social Assurance documents **cannot** be transferred from one owner to another.

- In the event, that businesses are sold, the new business owner will need to register their site/s with SAWIS. Once registered with SAWIS, the business must then register with WIETA under the new SAWIS producer number.
- New Owners will then need to start the WIETA assurance process from SAQ to Audit again.
- The profile of the previous owner shall be suspended.
- The Assurance document of the previous owner will then only be valid for prior years' traceability requirements and the details of this will remain on the WIETA system.
- To ensure that Audit Assurance document remain valid for the harvest year, all WIETA fees must be paid up for the year.

1.5 Acquisition of additional sites

- Any purchase of additional sites needs to be registered with SAWIS before any changes can be made on the WIETA online profile.
- For these sites to obtain WIETA Social Assurance, the sites must undertake a partial audit.
- Companies can undertake a separate SAQ for the site and link their old profile to the new acquisition.
- An audit request to undertake a partial audit must be requested online.
- The partial audit report will then be linked to the previous audit results.
- The WIETA Audit Assurance document will reflect the lesser risk of the two audit results.

1.7 The WIETA Online System

All wine and agricultural participants at primary agricultural level as well as the production levels, i.e. cellars, bottlers, wholesalers, exporters, retailers and traders are required to be registered on the WIETA online system at www.ethicaltrade.co.za.

Participants registered on the WIETA online system commit themselves to undertake an independent participative and multi-disciplinary third party assessment of their ethical trade and labour practice by undertaking an ethical audit against the WIETA Standard Version 5 (2025). The WIETA Standard is available on the WIETA online platform at www.ethicaltrade.co.za under MY RESOURCES / WIETA STANDARD.

1.7.1 User Rights and Responsibilities

Access to the WIETA Online System is managed through a tiered subscription system. This system will determine the number of users permitted access to the system per level of subscription as well as the number of organisational profiles each user is allowed access to.

Access to the WIETA Online System is granted only to authorised users and is based on the specific roles, responsibilities, and permissions assigned by the organisation. User access rights determine the information, functions, and organisational profiles that a user may view, edit, approve, or manage within the system.

All users are responsible for ensuring that their login credentials remain secure and are not shared with any other person. Users must utilise the system only for legitimate business purposes and within the scope of their assigned permissions. Any unauthorised access, misuse of information, or attempts to exceed allocated permissions may result in the suspension or termination of access rights and may be subject to further disciplinary or legal action.

WIETA reserves the right to review, amend, suspend, or revoke user access rights at any time to ensure the security, integrity, and appropriate use of the system.

1.7.2 Registration of Additional users on the WIETA Online Profile

Businesses can choose to give third party users access to their online profile on the ethical trade site, including but not limited to the audit report, findings and corrective actions. for greater transparency. This permission and access to additional users is requested in writing to WIETA. The access levels will need to comply with WIETA's tiered subscription levels.

WIETA reserves the right to review its user management framework and concomitant fee structure on an annual basis.

1.8 Roles and Responsibilities of third parties and consultants acting on behalf of suppliers

- » As from 2027, third parties and consultants who want access to their clients' online profiles, will need to be registered on the WIETA system as separate companies and users
- » The third party business profile will then be validated and linked to the WIETA registered business
- » Online fees will be charged according to the number of business profiles linked to the individual consulting business and its users
- » The role of the third party business acting on behalf of suppliers should be communicated by the client to the consultant before the audit.
- » Third parties acting as advisory business or consultants may assist and advise the client before the audit with policy development, implementation of processes, procedures and best practices, documentation and recording, training, capacity building and pre audit assessment and after the audit with the interpretation, advise and implementation of corrective actions and support with ongoing continuous improvement.
- » However, on the day of the audit, the third party may not interfere with the audit process, the auditors' duties, or attempt to change the scope for the audit. Any attempt to interfere with the appointment of a specific Lead Auditor or Auditor more favourable to the client, integrity of the audit scope, the audit process, or outcome of the audit results will be deemed to be in contravention of the WIETA Standard requirements for good Business Ethics and will be cited as a critical under the WIETA Standard Performance area of *Management Systems – Ethics, Anti-corruption and Bribery*.
- » The third party or consultant may not represent the client and/or management in their absence on the day of the audit. Management is required to be present at the audit. Third party business or consultants can, however, be a resource to provide evidence to the audit process and business and risk management systems.

2. THE AUDIT SCOPE

2.1 Audit Scope

2.1.1 The Purpose

The purpose of audit scoping is to ensure that the social audit covers the full extent of the business's responsibility and influence, and that no workers, operations, or facilities are excluded in a way that could undermine the credibility or integrity of the audit.

In line with the WIETA APM guidance, social audits must reflect the true and complete picture of working conditions across the business.

2.1.2 The Principle of "Whole Business Coverage"

Audited business entities must scope their audits to include all areas under the company's control or management, whether directly owned, leased, operated, or managed on behalf of the business.

Audits must cover the entire site and workforce, and not just selected departments, designated physical ground, areas, vineyards, building sites, activities, or groups of workers.

2.1.3 Scope of Operations

2.1.3.1 Business Activities

The audit scope must include all activities conducted under the business, including but not limited to:

- ✓ Primary production (e.g. farming, harvesting, processing)
- ✓ Secondary Production (e.g. cellars and cellar activity)
- ✓ Packaging, storage, and dispatch (e.g. Bottling / Packhouse / Canning activity)
- ✓ On-site workshops or maintenance operations
- ✓ Administration and management offices
- ✓ Seasonal or campaign-based operations

Partial audits of selected activities are not acceptable unless formally approved by the audit scheme and clearly justified.

Any business adjacent to or within the same perimeter of the audited site that shares workers or employs workers on the same payroll.

Any business under the same ownership, business licence or management system and payroll which is adjacent to or within the same perimeter of the audited facility / site / operations and supplies to it or deals with the input or output operations of that business or subcontracts any part of that agri- or wine business, is part of scope.

2.1.3.2 Physical Site Coverage

2.1.3.2.1 Buildings and Infrastructure

The audit must include all buildings and infrastructure within the business remit, including:

- ✓ Production and processing / bottling facilities
- ✓ Packhouses, warehousing and storage areas
- ✓ Workshops, sheds, stores and utility areas
- ✓ Offices and staff facilities (toilets, canteens, rest areas)
- ✓ Sales areas
- ✓ Security and access control points'

2.1.3.2.2 Land and Agricultural Areas

For agricultural producers, the audit scope includes:

- All land farmed or managed by the business
- Fields, orchards, vineyards, and harvesting areas
- Areas where workers are transported, gather, or take breaks

2.1.3.2.3 Workforce Coverage

2.1.3.2.3.1 Total Workforce

The audit must include all workers engaged by the business, regardless of:

- Employment status (permanent, temporary, seasonal, casual)
- Contract type (direct employees, labour broker workers, TES workers, Agri Services workers, subcontracted workers)
- Nationality or migration status
- Job role or seniority

2.1.3.2.3.2 Labour Providers, Contractors, Temporary Employment Services and Agricultural Services

In alignment with most human rights due diligence frameworks, WIETA does not aim to physically audit every worker on every audit day. Rather, the purpose is to obtain sufficient evidence that vulnerable workers, including TES workers, are adequately represented in the audit sample and that labour risks are effectively assessed.

In adopting a risk-based approach, the audit must obtain sufficient evidence to assess the working conditions of all categories of workers engaged by the site, including temporary employment service workers, even where such workers are not physically present on the day of audit.

2.1.3.2.3.2.1 Peak Season Auditing and TES Sampling

WIETA requires that audits occur during peak workforce periods where at least 66% of the total workforce is employed.

Where multiple Temporary Employment Service providers are utilised, the audit shall include workers from the TES providers present during the audit and representing the majority of TES workers employed during the peak season. All other TES providers utilised within the previous 12 months shall be assessed through documentation review and risk assessment. Additional worker interviews or follow-up verification shall only be required where significant labour risks are identified or where available evidence is insufficient to assess compliance.

WIETA requires that Producers are required to maintain an annual register of all TES providers and details of the workers they contract to undertake work on the audited site.

For each TES provider the producer must demonstrate:

- ✓ registration status;
- ✓ service level agreements;
- ✓ Recruitment practices;
- ✓ employment contracts;
- ✓ wage compliance;
- ✓ UIF and statutory compliance;
- ✓ disciplinary procedures;
- ✓ grievance mechanisms
- ✓ Relevant Health and safety training, PPE and related OHS risks impacted the contracted workers.

Auditors review this documentation regardless of whether workers are present.

2.1.3.2.3.2.2 TES Sampling

The largest TES providers representing at least 66% of all TES workers supplied during the previous year must be included in worker sampling during the audit period.

The rest of the appointed TES undertake a document assessment. This ensures every TES is assessed at least at a management systems level with the largest risk being audited.

2.1.3.2.3.2.3 Recognition of Approved TES Audits

Where a TES has undergone a valid audit with signed off valid assurance under WIETA or SIZA, the WIETA audit may rely upon that assurance as valid compliance in addition to the internal due diligence checks undertaken by the auditee on the TES.

2.1.3.2.3.2.4 Trigger-Based Follow-Up Audits on TES's

A follow-up assessment is will be triggered where

- ❖ high-risk critical findings exist;
- ❖ excessive dependence on TES labour exists;
- ❖ recruitment fees are suspected;
- ❖ wage discrepancies are identified;
- ❖ undocumented workers are identified;
- ❖ vulnerable migrant workers are present.

Otherwise, the audit can be closed.

The emphasis on this approach is on whether auditors can reasonably conclude that

- vulnerable workers were included;
- labour providers have been assessed;
- worker voice was obtained;
- the site's management systems adequately manage labour provider risks.

2.1.3.2.4 Worker Accommodation Scope

2.1.3.2.4.1 Scope of Accommodation Audits

Any accommodation arranged for workers under contract by the audited site, whether directly arranged or arranged via a third party, regardless of whether the accommodation sits under the same ownership or business licence, or a separate legal entity or trust, is in the scope of the WIETA audit.

Where such accommodation is within the site perimeter or adjacent to it, This forms part of the WIETA scope of audit.

Accommodations on the premises that do not fall under worker contract but are inhabited under the provisions of ESTA will be inspected against the provisions of the Environmental Regulations for Workplaces and the Construction Regulations of the Occupational Health and Safety Act.

Where the accommodation for workers is off site, this shall be noted at the audit request and scheduling and shall be recorded under the Performance area of Housing description.

Such off-site accommodation must be recorded accounted for as additional audit time.

Accommodation audits must cover:

- ✓ Accommodation management systems and policy and agreements
- ✓ Living conditions and space
- ✓ Health, safety, and hygiene
- ✓ Access to water, sanitation, electricity
- ✓ Security of tenure and rules governing occupancy
- ✓ Deductions or charges linked to accommodation

In summary, if accommodation is provided “as part of the employment contract”, it falls within audit scope regardless of location or under which legal entity that accommodation is ringfenced.

Where accommodations are prevalent and fall with the scope of ESTA and / or PIE provisions, such housing must be assessed for health and safety risks and ESTA compliance.

2.1.4 Limitations on scope

The scope of audits and assurance cannot be widened to include

- A site or business name that is registered under another profile on the WIETA online system.
- Facilities that are registered under a different owner on a different site.
- Facilities that are registered under a different management system.
- Facilities that are further than 1 hour from the main site, without prior arrangements being made in advance for additional time for the audit (Refer to Clause 5.2.2)

2.2 The Audit Methodology Approach

The approach used by WIETA to auditing is a holistic approach where all the principles of the WIETA standard relevant to the site/s are evaluated against the working and living conditions within the primary and secondary agricultural, food and wine production, processing, bottling and packaging space. Related hospitality risks are also included as these often pose a significant safety risk if not managed.

WIETA contracts with independent, registered third party auditing firms to undertake the audits. Their auditors are trained to meet international standards set and individually assessed by the Association for Professional Social Compliance Auditors (APSCA). The auditor will use their professional judgement and expertise to determine whether,

- The Business has a robust Management system to ensure full adherence to and compliance with required and measured standards as laid out in the WIETA Standard and in South African Legislation;
- Relevant policies, systems and procedures are in place;
- These policies are effectively communicated, implemented, practiced, monitored and reviewed;
- These policies, systems and procedures effectively protect workers' rights, safety and working conditions
- In accordance with the South Africa legislation and the WIETA Standard V5 (2025)

2.3 The Audit Process



2.4 Audit Types

2.4.1 One site Audit

One site audits are audits conducted at secondary production sites such as cellar, storage or bottling sites or primary agricultural farms where the business has a total worker component of more than 20 workers, employed directly including permanent and seasonal staff and do not make use of any contracted workers employed under a different management system, for example by agri-services or temporary employment services or by a business partner.

2.4.2 One site audit with multiple management systems

These audit types are appropriate where a singular site has multiple management systems in place, such as:

- a cellar and one or more agricultural operations on the same site, or
- multiple agricultural operations under different management systems on the same site.
- Cellar, Bottling, storage or production facility that employs permanent and/or temporary workers under one management system and makes use of a temporary employment services or contract labourer with their own management system
- An agricultural farm that employs permanent and/or temporary workers under one management system and makes use of a temporary employment services or labour contractor with their own management system

It is recommended that each management system register under a different profile but that the profiles are then linked together under a central Producer Registration on the WIETA platform.

2.4.3 Multi Site Audits

These audit types are appropriate where a business has multiple sites all under one management system. This type of audit is appropriate for:

- multiple farms operating under one management system.
- Cellars with multiple farms i.e. estate with multiple vineyard holdings.
- Cellars with bottling and storage facilities.
- Wholesalers with a centralised management system into which multiple cellars, bottling and storage facilities report.

2.4.4 Small producer sites

A small producer or small holding is typically defined by the following characteristics:

- May produce relatively small volumes and/or tonnage
- May have small plots of land
- May produce for export despite their size
- Is generally less well-resourced than commercial scale farmers

- May be dependent upon a small supply of farm workers that live on farm or hire seasonal workers through a temporary employment service, agri-services; a business partner arrangement or share workers with neighbouring farms
- May be vulnerable within supply chains

A small producer site is a farm who operates with a total worker component of less than 20 workers (total including permanent, seasonal and contracted) and has an agricultural site of less than 20 hectares; the site can claim to be deemed a small producer and apply for such membership.

Requirements that do not apply to small producers are set out in the WIETA Standard Version 5 (2025)

The following would still apply to small producers:

- The assurance process as set out on the WIETA online system will still apply
- SAWIS registration is needed
- Completing the SAQ, Audit request, auditing requirements and completing Corrective Actions for sign off, Audit Rating System and Audit Cycle still apply
- All the WIETA Standard performance areas will apply
- The Non-Compliance Classifications of Criticals, Majors and Minors apply as set out in the Ethical Performance Risk Matrix apply
- Desk top review follow ups are allowed where there is sufficient documentary or photographic evidence to support signing off the finding. This provision is made to ensure affordability for small producers.
- The Incidents Reporting and Violations Procedures will apply

The following should be noted :

- The claims to be a small producer under the definition, as given above, can be challenged by an auditor and cited on an audit under Management Systems as a critical finding, should there be sufficient evidence to support that the Business does not meet the requirement and has wilfully or inadvertently through misunderstanding these requirements, misrepresented their WIETA member status.
- Should the status of the producer change during the life cycle of the audit, the business will need to immediately inform WIETA of said changes.
- The SAQ must accurately reflect the status and size of the operation at the date of audit.
- Inconsistencies in scope and status of the small producer arising between the information on the member profile, the SAQ and the observations of the auditor on the day of the audit will result in a critical finding under Management Systems

2.4.5 Traders

A trader is typically defined as an operation that buys in wine, stores, bottles and or packages, brands and sells onto markets.

A trader

- Does not own any facilities but may lease facilities for storage, packaging and bottling
- Does not employ a workforce to undertake the operations of storage, packaging or bottling
- Does not source product from any owned agricultural operations but rather buys in processed product
- Would buy directly from producer operations that are WIETA assured and these operations in turn buy from WIETA assured producers and growers

A Business meeting these requirements may be deemed a trader and apply for such membership.

Requirements that do not apply to traders are set out in the WIETA standard Version 5 (2025).

The following would still apply to traders:

- The assurance process as set out on the WIETA online system will still apply
- SAWIS registration is needed
- Completing the SAQ, Audit request, Auditing requirements and completing Corrective Actions for sign off, Audit Rating System and Audit Cycle still apply
- The Non-Compliance Classifications of Criticals, Majors and Minors apply as set out in the Ethical Performance Risk Matrix apply
- Desk top review follow ups are allowed where there is sufficient documentary or photographic evidence to support signing off the finding. This provision is made to ensure affordability for small producers.
- ***The Grievance and Standards' Violations Process Annexure I*** will apply

The following WIETA Standard Performance Areas apply for Traders

- **Management Systems**
Management Systems are assessed and take into account the business commitment to social responsibility and ethical sourcing within its supply chain. Policies that address commitment to the WIETA standard and that practically evidence the efficacy of such commitment is assessed. These policies would be communicated to any business partners, managements, employees and/or family members.
- **Ethical Sourcing Policies and Practices**
The Business requires an ethical sourcing policy which is communicated to all suppliers. The efficacy of this policy will be evaluated against how the relationship with suppliers is managed and monitored for risk. The Business needs to demonstrate that they effectively source from other ethical and WIETA socially assured sites and businesses.
- **Supply Chain Monitoring Systems**
Business partners and suppliers of wine and grapes to the trader would need to be monitored against any and all ethical risk. Monitoring can take the form of informal checklist, copies of ethical certification obtained from the source, requirements for audit

and reports obtained, or social traceability undertaken against the production facilities and product.

- Health and Safety risk undertakings between the trader and owner of leased properties
- Traceability Requirements
- To receive social assurance as a trader, the business must demonstrate the following during the audit:
 - The wine grapes are sourced from WIETA assured suppliers and farms
 - The wine components are sourced from WIETA Assured production cellars and the wine tanks are WIETA assured
 - The blended components are produced at a WIETA assured cellar
 - The bottling site is WIETA Assured

The following should be noted :

- The claims to be a trader under the definition, as given above, can be challenged by an auditor and cited on an audit under Management Systems as a critical finding, should there be sufficient evidence to support that the Business does not meet the requirement and has wilfully or inadvertently through misunderstanding these requirements, misrepresented their WIETA member status.
- Should the status of the trader change during the life cycle of the audit, the business will need to immediately inform WIETA of said changes.
- The SAQ must accurately reflect the status and size of the operation at the date of audit.

Inconsistencies in scope and status of the business arising between the information on the member profile, the SAQ and the observations of the auditor on the day of the audit will result in a critical finding under Management Systems

2.5 Factors that impact the duration and length of audit

- Direct recruitment and employment of permanent and seasonal staff
- The number of sites
- The distance between sites
- The size of the site/s
- The size and number of operations on the site/s
- The number of worker housing structures and farm dweller accommodation
- The number of connected management systems linked to site and /or agricultural operations
- The size of the workforce
- The complexity of the management system
- The thoroughness and transparency of the Management system

2.6 The Fair Labour Certification Seal

It is a requirement that all suppliers that supply to a cellar, brand or wholesaler must have a valid WIETA audit and assurance as at 30 April of a particular vintage year in order to qualify to carry the seal on the packaging.

3. RISK EVALUATION SYSTEM

3.1 Developing a culture of ethical business practice and mature management systems

Implementing the WIETA Ethical Standards enables a business to develop the relevant ethical and legal competence and best practice knowledge, to engage their workforce, suppliers and stakeholders and to monitor critical risks amongst wine suppliers.

Adherence to the WIETA Standard requires knowledge of all relevant South African legislation, an understanding of how the WIETA Standard is aligned with international ethical and sustainability regulations, human rights due diligence practices and labour UN and ILO conventions, as well as the ability and willingness to practically implement socially responsible business best practices within the business and its supply chain.

Businesses and their suppliers are encouraged to attend training workshops on the WIETA Standards' requirements, its implementation and the development of sustainable ethical business practices, on an annual and regular basis. The training dates will be communicated on mailchimp and on WIETA's social media platforms. Training sessions will also be promoted on the WIETA Online System at www.ethicaltrade.co.za on the **Training TAB**. Businesses can also contact the WIETA office for dates.

3.2 The development of risk evaluation systems

Businesses should implement an efficient process to measure social compliance systems and practices and identify risks on site, with temporary employment services and in their supply chains. This will enable the business to focus on key areas of potential risk and direct its audit resources to developing mature management systems and ethical best practices.

3.3 Systems Risk Analysis Approach to Audits and Assurance

As part of strengthening its audit and assurance methodology, WIETA adopts a Systems Risk Analysis framework. This approach shifts audit focus beyond individual non-compliances to evaluating the effectiveness and maturity of management systems underpinning each performance area.

3.3.1 Purpose

The Systems Risk Analysis aims to:

- ✓ Assess the sustainability and root causes of ethical & compliance performance
- ✓ Identify systemic risks and recurring issues
- ✓ Support continuous improvement, not only point-in-time compliance
- ✓ Enable more risk-based audit decisions and follow-up actions

3.3.2 Scope of Application

Auditors will apply this framework across all relevant WIETA performance areas, including (but not limited to):

- Management Systems
- Regular Work and employment practices
- Wages
- Decent working hours
- Health and safety
- Freedom of association
- Housing & Accommodation
- Fair Treatment

3.3.3. Systems Rating Categories

For each performance area, auditors will assign one of the following four system maturity ratings:

3.3.3.1. Robust Management System

- Comprehensive policies and procedures in place
- Effective implementation and worker awareness
- Regular monitoring, internal audits, and management review
- Evidence of continuous improvement and
- Proactive risk prevention and risk management

3.3.3.2 Established Management system

- Core systems and procedures are in place
- Systems generally functioning, but targeted technical, procedural, or monitoring improvements are required to strengthen effectiveness and consistency.

3.3.3.3 Basic Management System

- Policies and procedures exist but may be partially implemented
- Some gaps in communication, training, or monitoring
- Issues are generally isolated rather than systemic
- Management responds to issues as they occur

3.3.3.4 Weak Management System with Systemic Problems (Needs Fundamental Improvement)

- Weak or inconsistent implementation of systems
- Repeated or widespread non-compliances
- Limited management oversight or ineffective controls
- Root causes not adequately addressed

3.3.3.5 No Management System

- Absence of formal policies or procedures
- Ad hoc or reactive approach to compliance
- High risk of serious and recurring violations

3.3.4. Link to Audit Findings and Corrective Actions

The systems rating will complement, not replace, traditional non-compliance findings
It will inform the severity, prioritisation, and timelines of corrective actions

Sites with weak or absent systems may be subject to:

- Enhanced monitoring or follow-up audits
- Capacity-building interventions
- Increased scrutiny in future audit cycles

Systems ratings will be documented in audit reports and used to:

- Provide deeper insight to producers and buyers
- Support risk profiling at sector level
- Inform WIETA assurance decisions

3.3.5. Reporting and Use of Data

The auditor will also be required to gather, verify, record and report on additional data points. These data points serve to provide additional context and clarity on the scope of and risk identified at the audited site. These data points occur at various points within the Self-Assessment questionnaire, sections within the WIETA audit report.

The Auditor is required to populate these data points either through pre audit data sources, verification of the Self-Assessment questionnaire or during the audit process.

Attention should be paid to obtain gender aggregated information. This information can be recorded as part of the

- ✓ overall description of current status,
- ✓ description of findings and in
- ✓ designated section requiring specific reporting on these data points.

Various sections of the WIETA Standard require conformance with gender related requirements. These sections should be clearly recorded and reported on.

Auditors should demonstrate sensitivity to gender fluid classifications.

3.3.6. Auditor Responsibility

Auditors must:

- Apply professional judgement and evidence-based evaluation
- Consider both documented systems and actual practice
- Engage workers and management to assess effectiveness, not only existence

3.3.7. Continuous Improvement

WIETA will periodically review this framework to ensure alignment with international good practice and evolving due diligence expectations.

This Systems Risk Analysis reinforces WIETA's commitment to credible assurance, risk-based auditing, and meaningful impact on working conditions.

3.4 Self-Assessment Module

The Self-Assessment Questionnaire (“SAQ”) enables the business or employment site to assess itself against local and international labour standards and how it manages social compliance. This is done by requesting the business to complete a series of questions aligned to the WIETA Standard requirements and providing supporting documents. This information can be used as the basis of a risk evaluation system. The auditor will use the information obtained from the Self-Assessment module on the WIETA online system at [WIETA \(www.ethicaltrade.co.za\)](http://www.ethicaltrade.co.za) to plan for the audit and verify potential high-risk areas.

Businesses have **twelve months from date of registration on the online system to complete the SAQ online**. Should the SAQ and audit not be completed within 12 months of registration, the business’ status will be automatically changed to suspended, and the members will need to re-apply for registration thereafter.

Businesses are further required to **annually review their SAQ**. The information provided in the SAQ will be measured against the audit to ensure the veracity of the answers provided in the SAQ.

A Self-Assessment Questionnaire consist of two parts:

- I. Pre-Audit Employment Site Profile: Preliminary information required for arranging a social audit at your workplace.
 - a. Organisation Details;
 - b. Sites to be Audited;
 - c. Workforce;
 - d. Temporary Employment Service, if applicable.
- II. Self-Assessment Questionnaire
 - a. Training details;
 - b. Other Assurance or Certification;
 - c. SEDEX requirements - For UK markets as per their request only;
 - d. Information in relation to components of the WIETA Standard
 - e. Number of litres produced per annum
 - f. Tonnage produced at the previous harvest
 - g. Community Impacts (E.g. Wages, Creche, Cultural Activities, Social and Health Workers)
 - h. Climate Resilience and Environmental Stewardship – Add on at request of Buyers

4. AUDIT REQUEST

4.1 Launching the Audit request

Audits are requested online (on the WIETA ethical trade website found at www.ethicaltrade.co.za) following the completion and approval of the member's SAQ. No audit requests can be approved without an SAQ having been completed and approved.

Audits may be requested by:

- » The registered participant;
- » The participants designated employment site;
- » Suppliers to the registered participant;
- » The buying company;
- » Any other party with an interest in the commercial relationship and social performance of the employment site. For example, industry or monitoring bodies.

Any business /organisation requesting an audit is termed an “audit requestor”. Only active paid-up businesses and programme participants can access the online system and submit an audit request. Businesses are requested to ensure that their annual subscription fees are up to date. Any subscriptions that are in arrears by 30 days will be blocked from the WIETA online system and businesses and their linked users will not be able to access their SAQ, an audit request, any past reports or current valid assurance completion documents of audit completion and sign off.

All audit requests must be completed on the WIETA platform within 12 months of initial registration.

Any audit requests that are undertaken by arrangement with the individual audit body and not put through on the WIETA platform as a formal audit request will not be accepted within the system and therefore no audit report can be issued online.

4.2 Information for the Audit Request

The following information must be provided to submit the audit request and is used to determine the scope of the audit:

- » The main site as registered with SAWIS will appear as the main site on the audit request
- » All additional sites/farms/cellars registered under SAWIS will appear as additional sites on the audit request
- » Ensure that all sites that need to be included on your Social Assurance Completion Document are included in the Audit Request
- » All sites to be audited;
- » State on the Audit Request whether the audit needs to include recognition of other standards, i.e. SIZA (Sustainability Initiative South Africa); SMETA; BSCI etc.
- » Year in which audit to take place;
- » Preferable months for audit;

- » Identifying months when all the workforce is available; (percentage of workers to be present – at least 66% - at least two thirds or the audit will be deemed a partial audit and result in a major finding)
- » Identifying if a translator is required.

Abovementioned information together with that obtained from the Self-Assessment Questionnaire further allows audit bodies:

- ✓ Prepare relevant briefing materials (industry specific).
- ✓ Plan the assessment,
- ✓ for example;
 - the number of workers on site on the day (at least 66% of the total workforce),
 - gender and language capabilities of the audit team members and the required number of auditor days (*see audit length*).

Once the audit request has been submitted, the request is automatically diverted to the particular audit body selected. The audit scheduler at the audit body will allocate a Lead Auditor and where required by size and type of audit, an associate auditor. A reviewer is also selected to review the final report for quality assessment purposes. The reviewer must also be a WIETA recognised Lead Auditor.

4.3 Initial Audits Scheduling

Audits need to be undertaken within 18 months of acceptance into the WIETA Online profile.

Failure to undertake an audit will result in the online profile being suspended. Subscribing sites will then be required to re-register with WIETA and undertaken the process from the initial step.

Audits need to be scheduled during peak operational season. Where businesses engage in multi commodity production, the season in which the highest number of workers are employed (permanent and seasonal combined) should be scheduled for an audit date. ***At least 66 % of the total number of workforce employed during the year need to be present on the date of the audit.*** Audits that are completed during low season with less than 60% of the workforce will require a follow up audit during the following peak season at cost to the site.

4.4 Audit Waivers

All audit participants are required to adhere to their audit cycle to ensure internal due diligence in implementing the WIETA Standard.

Audit participants that **delay** their audit for **beyond 30 days from its audit cycle**, will be penalised with a major non-compliance under the Principle of the Standard that *a Business shall be Ethically Managed*. There will be no penalty for audits that have been brought forward and that have taken place 30 days earlier than the audit cycle date.

4.4.1 Application for Waiver

It is recognised that there are instances where an application for waiver is warranted due to circumstances beyond the control of the auditee. Application for a Waiver of this requirement must be made to the WIETA Standard and Assurance Department by email to adrian@wieta.org.za and all application will be reviewed and evaluated on an individual basis.

4.4.2 Applications for a Waiver will only be considered in one of the following instances

- a) Where an audit can only take place at a date later than the audit due date when the business is in full operation as per buyer requirements and the audit cycle is required to be
- b) revised. In this instance WIETA would advise that the audit cycle be brought forward, rather than delayed ensuring assurance is not impacted during the proceeding harvest period.
- c) Where a Combined WIETA SIZA audit is scheduled for both fruit and wine and the audit can only take place at a later date when the business is in full operation and the audit cycle is to be revised. In this instance WIETA would advise that the audit cycle be brought forward, rather than delayed to ensure assurance is not impacted during the proceeding harvest period.
- d) Where an Auditee has applied at least 30 days prior to the audit due date on the WIETA online system for an audit (completed date of Audit Request), but an audit could not be scheduled due to non-availability on an auditor(s) of the Audit Body. This will be confirmed with the Audit Firm. Please note that failure on part of the Auditee to complete the necessary requirements of the Audit Firm to schedule the audit (e.g. accepting the quote) will result in the application not be approved.

Importantly,

- Waiver Applications outside of 90 days of the Next Full Audit Due Date will not be accepted.
- Waiver Applications will only be evaluated if there is a valid Audit Request on the WIETA Platform and an Audit Date has been confirmed with the Auditing Firm.
- Confirmed and approved Waiver Applications are only valid for the period, indicated by WIETA, on application form.

4.4.3. Impact on the Fair Labour Practice Seal

The waiver of the audit date does not result in the waiver and/or extension of the Assurance Expiry date. Any wine and wine grapes that form part of a product seeking to carry the Fair Labour Practice Seal must have a valid assurance letter by at least 30 April of the specific harvest and valid to at least 30 April of the specific harvest.

5. PREPARATION FOR AN AUDIT

5.1 Background and Context Review

All WIETA recognised Social Auditors must comply with the WIETA Training and Competency Requirements. The requirements are outlined in the WIETA Audit Competency Policy V5 (2025) Annexure B.

All WIETA recognised Social Auditors must be an Association for Professional Social Compliance Association (APSCA) recognised, trained and paid up Certified Social Compliance Auditor (CSCA).

Social Auditors must be fully aware of the conditions, challenges and issues prevailing in the country, region and industry where the audit is to be conducted. Auditors will be in regular contact with local, relevant civil society organisations (CSOs) which are well-informed about the issues which affect workers. CSOs may be NGOs, trade unions, academic institutions, industry bodies, or any other relevant organisations. Auditors will also regularly gather information on broader social, economic and political issues affecting workers and the local community from a broad range of sources including governments and CSOs.

An in-depth knowledge of both international and South African labour laws and health and safety regulations as well as pending amendments to such laws and relevant case law, the latter pertaining to the implications for the implementation of the WIETA Standard Version 5 (2025) are pre-requisites for understanding and interpreting the broader context and particular audit conditions within the wine industry and agricultural sector as a whole.

5.2 Audit Organisation

5.2.1 Audit type

The WIETA audit provides assurance that the entire site and all agricultural risks on the entire site needs to be audited. Audits must take place during a period when the entire (this includes the employment site, including cellars and/or packhouses, is in full operation (peak production or harvest). In the event that the audit is arranged at any other time, temporary workers and/ workers from a temporary employment service used during production or harvest must be present on site.

Failure to involve the permanent and temporary workers will result in the audit being declared only as a partial audit, requiring a follow up audit during peak season to complete the interviews - at the cost of the member.

Assurance Completion Documents will not be issued before the follow up audit has been concluded, the corrective actions have been approved and all outstanding fees settled.

Failure to have workers on site during operations will result in the audit not being valid.

The following types of audits are available

➤ Full Initial Audit

This audit is the first initial audit that is undertaken by a newly registered site on the WIETA Platform. 12 months of documentation will be reviewed by the auditor.

Where the company is newly established, this registration be verified and at least 3 months documentation will be assessed during the audit.

➤ Periodic audit

The auditor may check records from the intervals between the previous audit and the current assessment. At least 3 months records after the previous audit is assessed. 12 months records will be assessed from the current audits to the previous audit

➤ Follow up Audit

At least 2 full months records from the previous audits must be assessed to verify any corrective actions.

➤ Partial Audit

Where additional new entities or operations are acquired into existing site profiles at least 3 months records must be assessed.

Audits are usually

- » **Announced** (at a mutually convenient date agreed with employment site).

However, from time to time **the buyer may require the supplier** to undertake an unannounced or semi announced audit

- » **Unannounced** (the employment site has no prior warning of the audit);
- » **Semi-announced** (the employment site is aware that an audit will take place during a given time period, but the actual date of audit is not communicated); as per audit assurance requirement.

Buyers will need to make their requirements very clear to the suppliers ahead of the audit and communicate these announced / semi / unannounced requirements to WIETA and to the audit body at the time of the audit request so that suitable arrangements can be made ahead of the scheduling of the audit.

In the case of semi announced audit, the buyer may have particular requirements and could request an audit be announced within a window period of anywhere from two weeks up to three months. This information must be made clear to the audit body and WIETA in order to comply with the buyer requirement.

The performance of the Business on the **WIETA Risk Matrix and Audit Frequency (Annexure A)** at the time of the assurance of the site can be used to influence the type of audit selected.

5.2.1.1. Unannounced audits

It is a requirement for global equivalence recognition that standards schemes undertake randomly selected unannounced audits to sites. These may be conducted at the discretion of WIETA.

Unannounced audits allow auditors to assess the conditions at an employment site in their unprepared state.

However, there is a risk that the member may perceive unannounced audits as an ambush, the auditor will not be able to gain access to the facility, the necessary information and personnel may not be available on the day of audit.

To minimise these risks, WIETA and the audit firm will communicate its policy on unannounced audits to suppliers and employment sites. The policy will state that:

- » Audits may occur at any time on an unannounced basis.
- » WIETA may arranged unannounced visits to the site to verify continuous improvement.
- » All employment sites are required to provide both pre-audit and self- assessment information on the WIETA ethical trade site at www.ethicaltrade.co.za and this information must be accurate.
- » Auditors presenting their credentials will be allowed full access to the employment site.
- » The necessary records will always be kept on employment site or be readily available.
- » Permanent and temporary workers are to be made available for interview.
- » Information pertaining to labour contractors and their contract workers are also available.

5.2.1.2 Semi-announced audits

Semi-announced audits can reduce the risks to the member and increase the ability of the company to remediate. The audit windows could range between 3 weeks and 2 months' notice.

5.2.1.3 Announced audits

The right to perform an announced audit is part of WIETA's requirement for all registered sites.

Given the risk that sites will take extraordinary steps in preparation for the audit, it is best practice to use mix of announced, semi-announced and un-announced audits to mitigate this risk.

Registered sites are requested to

- » agree on an audit date with the audit company conducting the audit in advance;
- » to provide up-to-date and accurate pre-audit and self-assessment information in advance of the audit;
- » allow auditors, presenting the correct identity documentation credentials as identified on the online allocation during scheduling, , full access to the employment site;

- » make available, the necessary records and the concerned personnel, permanent and temporary workers, at the employment site on the day of the audit.
- » ensure that the required minimum number of workers (66% of the total workforce) will be accessible on the day of the audit

Note that all POPIA requirements of the Audit Body and WIETA will be observed and strictly adhered to.

5.2.2 Audit length and Quotations Guidance

The number of auditor days at the employment site is based on the scope of the audit, size of the workforce as well as the extent, and size of site operations.

This will allow sufficient time to interview a representative sample of the workforce and to check documents relating to the sample. The sample will at a minimum include the following:

- » The gender balance of the workforce. Where either men or women workers form a minority, it is important that the audit team includes the minority in the sample. Bearing in mind the following ethnic, national, linguistic, migrant or religious groups.
- » Different contract types, for example permanent, temporary and agency workers.
- » Different departments, including technical, administration, security, garden, domestic and canteen workers as well as production workers.
- » Different designations, for example workers and supervisors and management.
- » Different shift schedules.

Workers will be interviewed individually, in groups and in formal/ informal settings without management present. Workers will be interviewed preferably in their own language. Management or their representatives may not act as interpreters. The audit company conducting the audit will provide auditors and/or worker interviewers that are able to communicate in the language spoken by workers

Individual Interview will last at least between 30 minutes and 40 minutes. Longer interviews may be required in some circumstances such as group and or focus group interviews.

The challenges in identifying an audit sample makes it difficult to set down any hard and fast rule regarding the length of the audit. The minimum number of auditor days required for an audit is shown in the table below, however, a longer audit may be used if this guidance does not allow time for meaningful and useful interviews to be carried out with the representative sample outlined above or in the case of

- » Particularly large facilities;
- » Multi estate sites;
- » Multiple languages;
- » Off-site interviews (in the case of contractor workers);
- » Issues requiring special investigation (e.g. discrimination);

- » Size and geographical spread of the business;
- » Other unexpected issues.

Additional auditor days to be allocated in the following scenarios:	
Temporary Employment Service/Labour Contractor on site, no assurance	+ 0.5 day
Additional Cellar or another production site	+ 0.5 days per site
Multi sites 1-2 additional sites more than 50km from main site	+ 0.5 day – 1 day
Multi sites 3-4 additional sites more than 50km from main site	+ 1.5 days
Report Writing	+0.5 day
For language groups other than Afrikaans or English which make up 50% or more of the workforce:	Interpreter that speaks the language of the language group must be provided by the audit company
Follow up Audits	0,5 to 1 day depending on number of findings and size of site

The auditor will interview a proportion of the workers in each category of contract type, i.e. permanent, temporary, seasonal and contract (workers from a temporary employment service) workers (stratified sample). The number of workers interviewed will, **as a minimum**, be no less than the square root of the **total number of workers in each work type and gender category**. This will help to ensure that a more representative sample is picked.

An example of the minimum number of workers to be interviewed per category as set out in the sample size table below –

Contract Type	Number of workers	Interview Sample Size
<i>Permanent</i>	<i>100</i>	<i>10</i>
<i>Temporary</i>	<i>81</i>	<i>9</i>
<i>Contract</i>	<i>25</i>	<i>5</i>

When selecting the worker interview sample for each category of workers, it is essential to ensure that it is representative of the make-up of the workforce of the site. This includes ensuring that samples are representative of the gender, ethnic, national and linguistic balance of the workforce as well as being representative of migrant or religious groups, different department types and different designations. In the demonstration above, 10 permanent workers will be interviewed and the 10 workers that are selected will be representative of all permanent workers. For example; if the permanent workforce is largely made up of males and workers who speak a particular language then the sample needs to reflect this.

Minimum worker interview sample size auditor days on-site for audits is set out in the table below

No of employees excluding management	Auditor days	Workers interviews	Individual interviews	Group interviews	Time spent on worker interviews, individually and in a group
0 – 5	0.5	2	2	0	1 hour
6 – 99	1	10	5	1 group of 5	2,5 hours
100 – 199	1,5	15	2	2 groups of 5	3,5 hours
200 – 299	2	18	8	2 groups of 5	4 hours
300 – 399	2,5	20	5	3 groups of 5	5 hours
400 – 499	3	23	8	3 groups of 5	5,5 hours
500 – 1000	3,5 to 4	Minimum of 32	12	4 groups of 5	8,5 hours

- Individual interviews should take between 15 minutes and 30 minutes
- Group interviews are recommended for between 30 and 40 minutes

*Note that the time allocated does not include preparation for the audit, travel or report writing time.

With smaller suppliers with less than 5 employees, consideration must be given to the size of the operations and site. Small holdings and small vineyards (20 hectares or less in total production) with minimum staff numbers are deemed small enough for a half day audit.

Additional Travel Time between sites

- 1 to 2 hours extra travel time between sites may equal half a day
- 3 to 4 hours extra travel time between sites may equal a full day

Where possible, cellars are encouraged to arrange block audits for their suppliers to arrange better prices and avoid additional daily travel time to distant audit regions.

5.2.3 Audit team

The audit is conducted by a competent and APSCA certified lead social auditor, who is employed by a third-party audit body.

Auditors and auditing bodies are chosen based on

- » Audit training and skills;
- » Audit experience;
- » Local and industry operational knowledge;

- » Language skills;
- » Gender and demographic background reflecting that of the workforce;
- » Reputation;
- » Integrity;
- » Commitment to improving social compliance.
- » Iso accreditation
- » APSCA certification

To prevent any conflict of interest, the auditor or third-party audit body must not have any advisory, training or consultative connection with the employment site.

Criteria

- » The auditor is only permitted to audit the site every second audit cycle.
- » The auditor must have no relation to the site or any consultant being used on site.
- » The auditor must disclose any information material to the knowledge or familiarity of the farm or cellar.
- » Failure on the part of the auditor or audit firm to disclose a conflict of interest may result in severe penalties for both parties.

The requirements for auditor competence are contained in the **Auditor Competencies and Requirements** policy document Annexure B.

5.3 Communicating the Audit Arrangements

5.3.1 Information for the Employment Site

The audit company conducting the audit will communicate the following information at least 2 weeks prior to the audit. This will be communicated in writing

- » Confirmation of receipt of the SAQ and any further information required from the employment site.
- » Identity of audit requestor.
- » Date of the audit.
- » Information about the audit process and approach towards social compliance and the code of conduct against which the employment site is being audited.
- » Introduction of the audit team.
- » The audit agenda including:
 - Timetable
 - Topics to be covered
- » Key personnel invited to participate in the audit, including but not limited to:
 - Management
 - HR and Payroll personnel
 - Health & Safety personnel

- Workers’ representatives
- » Information which the employment site must communicate to workers before the audit includes covering workers’ rights and entitlements, the audit process, purpose, ground-rules for worker interviews, confidentiality of worker interviews.
- » List of documents that the employment site will need to make available to the audit team on the day of the audit, including:
 - Employment site layout / floor plan
 - Company policies (including but not limited to human rights, modern slavery and forced labour, child labour, discipline, discrimination and harassment, Health & Safety etc.)
 - Department of Labour Inspection / Integrated Production of Wine Reports, e.g. sanitation, fire safety, structural safety, environmental compliance, etc.
 - Procedures (e.g. grievance/complaints and disciplinary procedures)
 - Evidence that procedures are followed
 - Collective Bargaining Agreements (CBA)
 - Employment Equity Reports
 - Skills Development Plans
 - Employment contracts
 - Recruitment procedure
 - Personnel records
 - Employee handbook
 - Training records
- » *Health and safety documents:*
 - Hazardous chemicals list
 - Accident book
 - Poison records
 - Machinery inspection/service logs
 - Accident and injury log
 - Emergency action procedures
 - Evacuation plan
 - Fire drill log
 - COID registration
 - Minutes of joint committees on health and safety
 - Contractor Agreements – Section 37
 - Legal Appointments
- *HR Documents*
 - Payroll records for past 12 months:
 - Pay records for high and low points of the season
 - Hours and/or attendance records
 - Evidence that payments have been made
 - Piece rate records for the past 12 months (if applicable)
 - Time records for the past 12 months
- *Production records*

- Minutes of meeting with workers representatives/unions
- Minutes of meetings on disciplinary matters
- Unemployment Insurance, tax and other required receipts
- Training certificates
- Permits, operating licences, Certificates of Operations, etc.
- Previous social audit reports/Corrective Action Plan Report
- Process for Alert notifications.

Concept Audit Day Agenda

Time	Agenda item
09:00	Opening meeting with management & workers
09:30 - 12:30	Interviews & site inspection
12:30 - 13:00	Documentation audit
13:00 - 13:30	Lunch break (auditors provide their own lunch)
13:30 - 14:30	Documentation audit/management interviews
14:30 - 15:00	Auditor's meeting
15:00 - 15:30	Verification of findings & Agreement on Corrective Actions with management
15:30 - 16:00	Feedback meeting with management & workers

5.3.2 Registered Company Audit Preparation

Employment site management will ensure that:

- » All documentation is available on the day of the audit. This includes information and documents that are usually stored at another location (e.g. a central office where payroll data is processed).
- » Relevant personnel are at the employment site.
- » Supervisors and managers are instructed to allow unobstructed access of the employment site to auditors

5.3.3 Information for Workers

Clear information about the audit will be communicated by the employment site to workers explaining the purpose of the visit and the process. This information will be available in the languages spoken by workers and will include

- » The role of WIETA and the WIETA Standard 5 (2025);
- » The WIETA poster and WhatsApp hotline number;
- » Purpose and scope of the audit;

- » Introduction to auditors and their role (emphasising they are independent and external);
- » Process including confidentiality of worker interviews;
- » Contact details for the auditor and for any additional whistle-blowing facility supported by the audit requestor.

5.4 Audit Team

The audit will be conducted by a team of auditors that have been approved by WIETA. These are auditors that are directly appointed by the Audit Bodies. These Audit Bodies will conform to a set of WIETA Ethical Assurance Requirements, set out in a service level agreement with the audit body.

The approval criteria for recognition of WIETA recognised auditors are as follows:

- The auditor meets the requirements as set out by the Association for Professional Social Compliance Auditors (APSCA);
- The auditors is registered as a certified social auditor with APSCA with a valid APSCA number;
- The auditor has met the APSCA examination requirements;
- The auditor has met WIETA requirements for both recognised qualifications, total number of social audits conducted, number of WIETA audits participated in, number of WIETA training sessions attended, and knowledge of the WIETA standard Version 4 (2021);
- Industry knowledge;
- Language requirements of site;
- Language, gender and demographic background reflected of workforce;
- Integrity and Professionalism;
- Commitment to improving social compliance and auditing standards;

6. AUDIT EXECUTION

6.1 Outline of the Audit Execution Process

The audit will include the following

- » Opening meeting;
- » Employment site tour (and optional perimeter survey);
- » Management and worker interviews;
- » Document review;
- » Audit team pre-closing meeting;
- » Closing meeting, including summary of findings;
- » Agreement of findings;
- » Off-site visits when necessary (e.g. to interview contract workers; in case a site has part of its operation carried on by a subcontractor or if there is no guarantee of anonymity for workers interviewed).

As a general principle the conduct of the audit team at all times must be in the best interest of the workers.

6.2 Opening Meeting

The opening meeting is conducted in the language understood by all. It must be attended by relevant people including –

- » Senior management;
- » Managers responsible for key functions;
- » Trade union or worker representatives.

This will be formally presented in a format agreed with the audit requestor to ensure the audit requestor's perspective is clearly communicated in an appropriate tone.

In the opening meeting, the audit team will:

- » Introduce the audit team.
- » Explain the purpose and scope of the audit, including –
 - Potential benefits to the employment site (opportunity for management to identify and manage risk, opportunity to engage in continuous improvement);
 - Clarify that the purpose of an audit is continuous improvement;
 - The standard against which the audit will be conducted (WIETA Standard, applicable law, international labour standards).
- » Explain that the minimum requirement is transparency.
- » Outline the audit process.

- » Review the information provided in the pre-audit employment site profile (including previous corrective action report and follow-up actions).
- » Request a list of workers who are scheduled to work that day together with any details that may be required to ensure a representative sample can be chosen for interview (such as gender, nationality, contract type).
- » Confirm the structure of the worker interviews and the availability of an appropriate space where they will be conducted.
- » Confirm any special arrangements/ precautions required for the employment site tour.
- » Confirm permission to take photographs which exclude workers faces and Identity documents.
- » All Identity Document information or images shall be obscured before photographs are shared.
- » Explaining the process of raising a critical finding and the process of alert notifications;
- » Agree process for communicating issues as they arise during the audit. It is best practice to communicate issues as they arise to build consensus around findings and corrective actions and allow management to:
 - Provide additional evidence where necessary;
 - Address issues immediately;
- » Confirm the importance of attendance at the closing meeting and ensure that all key personnel can attend.
- » Provide an opportunity for questions and to address concerns.

Where both worker representations and union representatives are present in the workplace, the auditor should strongly encourage the respective representative to be present in the opening meeting.

Note: If employment site management does not agree to the participation of worker representatives, auditors will note this and arrange a separate meeting with worker representatives.

6.3 Employment Site Tour and Inspection

6.3.1 Process

The purpose of the employment site tour is to enable the audit team to observe the physical conditions and current practices in all areas of the employment site and to form a view of how physical conditions measure up to the WIETA code of conduct, legal and regulatory requirements. The findings from the tour are triangulated with evidence from management, worker interviews and document review.

As a general principle, the auditor will be able to visit all the areas of the employment site and will set the pace of the tour. However, in some cases, employment sites may prohibit visitors from walking unaccompanied through employment site production areas or forbid photography for reasons of safety or commercial confidentiality. Photographs are taken as visual verification of a finding and will be used within the audit report. Photographs will exclude workers faces and Identity documents. The

auditor will note restrictions on access or photography in the audit report, and if restrictions seem unreasonable, these can be escalated in accordance with the requirements stated in the **WIETA Standard V5 (2025) under Management Systems**. Where the employment site prohibits photographs from being taken, a site verification will need to be conducted at a later stage to verify the corrective actions at cost to the site.

Auditors will make every effort to ensure production is not disrupted during the employment site tour, whilst ensuring that they are able to view the production area during busy production periods.

Audits must move around the site without delaying/halting production. The ability of management to continue production at the site during a visit is crucial to gaining an accurate idea of working conditions and to secure management's co-operation for the remainder of the visit. Auditors must keep this in mind during the site tour.

In order to achieve this, the auditor will for example –

- » Ask that they be accompanied by only one or two people; usually the site or OH&S manager.
- » Be aware of site traffic.
- » Avoid walking where workers are trying to move or transport product from one area to another.

The audit team will walk around the employment site, production areas, storage rooms, despatch areas, workers' canteen, kitchen, and if present: housing, crèche and medical facilities and all other areas with managers in order to

- » Understand the work done at the employment site.
- » Evaluate health and safety practice.
- » Identify potentially vulnerable groups of workers.
- » Note the observations or concerns
- » Note other evidence that relate to other areas of the Code and Standards-
- » Cross-check whether all processes necessary for the production of finished produce are carried out in-house, at the employment site or whether there are indications that some operations may be sub-contracted to other units.
- » Observe management systems and practices, including atmosphere between management and workers.

The team will raise issues as they arise during the employment site tour, giving managers the opportunity to seek clarification, respond, and provide explanations or further evidence.

The auditor will focus on

- » Work environment (space, temperature, tidiness, etc.);
- » Workstations (space provided, chairs for pregnant workers, etc.);
- » Fire equipment and emergency equipment;

- » Machine protection and maintenance;
- » Emergency procedures;
- » Personal protective equipment;
- » First aid equipment;
- » Hazardous substances storage, handling and disposal;
- » Waste management;
- » Toilets and sanitation;
- » Potable water;
- » Canteen hygiene and safety when applicable;
- » Dormitory hygiene and safety when applicable;
- » Young-looking workers;
- » Indications of restrictions of workers' freedom of movement;
- » Indications of infringements of workers' dignity;
- » Selection of individual workers for interviews on the spot, at the production location or close by, or for subsequent interview sessions;
- » Quality records;
- » Production records;
- » Time records;
- » Display of WIETA Code of conduct or labour law;
- » Display of information relating to trade union or workers committee meetings;
- » Any indications of discrepancies between employment site operations and the protection of workers' rights.

6.3.2 Perimeter survey

A perimeter survey is encouraged to provide supplementary information about the employment, its local context and any community impacts to identify specific risk issues.

The perimeter survey will focus on

- » The surrounding environment (e.g. industrial park, neighbourhood, business district, dams, rivers, etc.) and its advantages/constraints.
- » Neighbouring facilities (e.g. hospitals, clinics, restaurants, shops, recreation, fire protection, police, waste disposal, etc.)
- » Local perceptions of the employment site (e.g. work hours, labour issues, support for local community, etc.)
- » Other facilities located on the employment site property (e.g. worker family and single unit accommodation, farm dweller accommodation, seasonal hostel/communal accommodation, crèches, canteen, stores, workshops, clinic, sanitation etc.)
- » Adjacent or non-adjacent worker accommodation, if part of employment contract.
- » The physical construction and layout of the employment site (e.g. structures on the property, access to employment site via fences or gates, worker transport, exits off the grounds, etc.)

- » Other production units within the employment site property which are not part of the scope of the audit.
- » Impacted communities on farm and adjacent to it.

6.4 Where access is denied

There may be instances where an auditor is denied access to conduct a full audit against the scope of the audit. Such access may include but not be limited to

- Workers interviews
- Assessment of work areas on the premises
- Access to worker housing
- Access to documentation
- Access to a responsible person employed by the site to assist with the audit

Where an auditor has full access denied, the auditor will raise an alert and record a critical non-conformance against Management Systems.

Where an auditor is given partial access, the auditor shall continue with the audit but record a major finding against Management Systems.

6.5 Interviews

Interviews with managers, trade union representatives (and/or other workers' representatives) and workers will take place on-site. However, it may be appropriate to carry out additional worker interviews off-site.

6.5.1 Worker Interviews

Points raised by workers will be relayed as soon as circumstances permit to the team carrying out management interviews or document review to facilitate verification.

Audit team members carrying out worker interviews must have the skills to make workers feel at ease. It is best practice to use interviewing techniques that encourage interviewees to identify the issues of most importance to them whilst also uncovering hidden issues such as discrimination and intimidation. In any case, the interviewer must be aware of his/her body language (make regular eye contact, smile, etc.) and should avoid placing any physical barriers (such as chairs, tables etc. between them and the workers

Selection:

- » The worker interview sample size will be based on the different numbers of permanent, temporary and contract workers, on the site on the audit day as outlined above.

- » Workers will be randomly selected by the audit team and must be from various locations around the employment site and, if possible, during various shifts.
- » Management may under no circumstances selected the workers for interview
- » The audit team must keep control of the selection of workers, using a variety of selection techniques throughout the audit.
- » The selection of workers will be done as just before the interviews are scheduled to avoid workers being coached.
- » The interviewer will aim to talk to a wide range of workers including potentially vulnerable workers and those in less skilled positions, considering:
 - The gender balance of the workforce.
 - The spectrum of ethnic, national, linguistic, migrant or religious groups
 - Youngest and oldest workers
 - Different designations, for example rank and file workers and supervisors such as
 - Worker representatives
 - Health and safety committee representative(s);
 - New employees / trainees (to evaluate training quality);
 - Workers in all pay grades (i.e. lowest pay grades, highest pay grades) in order to evaluate wages and working hours
 - Pregnant women
 - Employees from different shifts
 - Workers not wearing uniform
 - Workers who have taken leave recently
 - Temporary workers and workers employed by a Temporary Employment Service.

Location:

- » Formal interviews will take place in a quiet, private area away from management offices with no representatives of management present.
- » Informal interviews may also take place during the physical tour of the employment site. Workers will be interviewed individually.
- » Other suitable locations, e.g. in workers homes or the vineyards and orchards.

Interview approach and language:

- » Interview approaches will be appropriate for the local situation, ideally semi-structured interviews, focus groups, ranking and/or other participatory tools will be used.
- » In cases where there is a multi-lingual workforce, worker interviewers may work through an independent translator to access the views of workers from minority groups. These views will remain confidential in the context of the audit.
- » All Translators used need to receive appropriate audit methodology and WIETA Standards training and need to be sent through to the scheme for approval.
- » Where Translators are not be used to support interviews with language groups which make up 25% or more of the workforce, the auditor / worker interviewer must be proficient in the language concerned.

- » Translators from the employment site may not be used. Translators must be independently appointed as part of the audit team by the audit company conducting the audit.

Worker protection – Prioritisation of workers:

- » Auditors and Translators must prioritise the protection of the workers interviewed
- » The auditors will not take any photographs that infringe on any privacy or data protection requirements, and if any photos have workers' faces, full names or other ID information visible, all ID information shall be obscured before the photographs are shared.
- » Auditors will ensure that problems raised by workers are discussed with management in a non-attributable way. Auditors must ensure that the comments they report cannot be traced back to an individual worker.
- » Auditors/worker interviewers will leave a contact telephone number, preferably the WIETA WhatsApp number so that workers can alert the WIETA Labour helpdesk if there are reprisals or intimidation. This should be highlighted during the interview
- » The auditor will keep a confidential note of who is being interviewed.
- » When workers raise issues which could be directly attributable to one particular worker and/or could result in reprisals against workers, these will be reported directly to the audit requestor (where this is not the employment site itself) for advice on how best to handle the issue at the closing meeting. If the audit requestor is not able to give guidance before the closing meeting, the issue will not be raised at the closing meeting and the auditor will raise it by sending through an **Alert Notification to the audit company and WIETA (Annexure C)**.
- » In order to protect workers from retaliation, the names of workers involved in identifying an issue must never be divulged to the employment site, supplier or audit requestor. However, in circumstances where the best interests of the worker cannot be met without disclosure of information (for example, names of child workers who need to be removed from hazardous employment) the auditor must ensure that such details as may be required to identify workers who require immediate remediation are provided to relevant parties (this could include customers). In cases like this the best interest of the child worker takes precedence

Interview Structure:

- » Introduction: The audit team will introduce themselves and communicate the purpose of the audit. They will assure workers that all information shared during the interview will remain unattributed
- » Confidentiality: No manager or representative of the employment site, apart from the workers concerned, will be present during any worker interview.

6.5.1.1 Individual Interviews

Individual interviews are the most effective method for gathering specific details about the work environment and for discussing issues such as pay rates, management style, discrimination, harassment, etc. Some workers feel more comfortable talking about these issues one-to-one.

Auditors need to be aware of any verbal and non-verbal indications from workers and may choose to convert an individual interview to a group interview or vice versa in order to accommodate workers' needs.

6.5.1.2 Focus Group Interviews

Group interviews enable more rapid consultation with a larger number of people. Some workers may be encouraged to talk more freely in the presence of colleagues. Group interviews can be useful at the beginning of an audit to gather information quickly to inform the audit process. Group interviews are also effective for gathering data on specific issues and exploring the nature or scope of a finding in greater depth. Auditors should never use group interviews to discuss personal issues such as an individual's wages.

6.5.2 Management Interviews

The audit team will work through the WIETA Standard talking in depth to the managers concerned on each principle performance area. The audit team will work through the WIETA Standard talking in depth to the managers concerned on each Standards principle performance area. Open questions and conversational interview techniques will be used. It is important to talk to the senior managers, but also junior managers who may have a different perspective.

6.5.3. Administrative/Clerical Staff Interviews

The audit team will work with administration staff (such as payroll clerks, human resources and compliance/quality officers) combining interviews with document review. Management will not be present.

6.5.4 Union and Workers Representative Interviews

The audit team will discuss with union and/or worker representatives their role at the employment site. Specific attention will be paid to any training and support given by the trade union, as well as the union representatives' knowledge of collective bargaining agreements and union procedures for worker participation. The auditor will gain an understanding how the trade union is organised at a local level, its relationships with workers and management.

6.5.5 Workers employed by the Temporary Employment Service (TES)

Where an audit SAQ or an Audit Body pre-audit employment site profile has indicated that production processes are undertaken by workers employed by the Temporary Employment Services (TES), then the auditor will aim to ensure that these workers are included in the audit process. In cases where this is not possible, for example due to location or seasonal constraints, this should be noted in the audit report.

Failure to include TES workers in the audit will result in a finding or require that a follow up audit at a later point is conducted at the additional cost to the site.

However, where multiple TES are used throughout the year to work on different commodities; the site should ensure that the largest grouping is involved in the audit. The site will also be assessed against its own management systems for the oversight of TES' who are not present on the day. The site will need to provide sufficient due diligence undertaken to manage the risk for those unassured TES not present on the day. Failure to provide this can result in a severe finding or follow up audit.

Where a socially assured TES is used, this must be cited in the report and the management system used by the site to oversee the conditions of work for those TES workers must be inspected by the auditor for any potential risk to site.

It will be noted that where contract or temporary seasonal workers labour status cannot be determined and/or assessed, a major non-compliance will be cited on the report.

The WIETA Audit Process and Methodology for Temporary Employment Services is contained in a separate WIETA policy called the WIETA Audit Process for Temporary Employment Services **Annexure D**.

6.6 Document Review

6.6.1 Document Sampling

Documentation must be available on the day of the audit these include, but not limited to: policies and procedures, contracts, legal appointments, agreements, payroll and records of time, training, safety training, machinery maintenance, fire equipment and hazardous materials handling records.

Auditors will request time and payroll records for 12 consecutive months. If records for the previous 12 months are not available, the employment site will explain why this is the case. For example, the employment site has been operational for less than twelve months. From the 12-month set of data, auditors will review at least three months' worth of consecutive records and will include records for the low season, the peak season, holiday periods and the most recent period available.

If the audit is not an initial audit, but a subsequent audit the auditor may look at all records up to the previous audit.

The auditor will go through a comprehensive document trail including the following (this is not an exhaustive list) –

- » Employment site layout / floor plan.
- » Company policies (including but not limited to child labour, discipline, discrimination and harassment, Health & Safety etc.).
- » Department of Labour inspection Reports, e.g. sanitation, fire safety, structural safety, environmental compliance, etc.
- » Procedures (e.g. grievance/complaints and disciplinary procedures).
- » Evidence that procedures are followed.
- » Collective Bargaining Agreements (CBA).
- » Employment contracts.
- » Personnel records.
- » Employee handbook.
- » Training records.
- » Health and safety documents:
 - Hazardous chemicals list;
 - Accident book;
 - Chemical log;
 - Machinery inspection/service logs;
 - Accident and injury log;
 - Emergency action procedures;
 - Evacuation plan;
 - Fire log drill;
 - Minutes of committees on health and safety;
 - PPE register.
- » HR Documents
 - Payroll records;
 - Overtime records and exemption for overtime hours granted by the Department of Labour;
 - Leave records;
 - Pay records for high and low points of the season;
 - Hours and/or attendance records;
 - Evidence that payments have been made;
 - Piece rate records (if applicable);
 - Time records;
 - Production records;
 - Minutes and records of proceedings on disciplinary matters;
 - Minutes and records of proceedings on follow up investigation on grievances lodged;
 - Minutes of meeting with workers representatives/unions;
 - UIF, COID, Tax and other required receipts;
 - Permits, operating licences, Certificates of Operations, etc.;
 - Previous ethical trade audit reports/Corrective Action logs;
 - Employment Equity Reports submitted;

Particular emphasis will be placed on evidence that there is a systematic approach to managing all aspects of the WIETA Standard.

This means that ideally the management systems must be an integrated part of managing an ethical business (Robust Management System), rather than just a set of documents contained in one file (Basic Management System).

6.6.2 Document Inconsistencies

Management will be encouraged to provide accurate records which present the full picture of the employment site's operations for review prior to the closing meeting. Inconsistencies between different types of documents and worker testimony that amount to fraud will be considered a **critical non-compliance** and raised with the employment site management as early as possible during the audit.

The auditor should determine the nature and root cause of the inconsistency to determine whether the inconsistency is an incidental occurrence, a more systemic or a deliberate wilful act to undermine the audit. Such details should be recorded in the audit report against the specific principle or in cases where documentation reflects a more systemic issue, then against Management Systems.

If a non-compliance related to working hours or compensation requirements is identified, the audit team will identify the context of the issue, and its frequency, the number of people impacted and the department(s) concerned both at the closing meeting and in the audit report.

6.7 Taking Photographs

The auditor will request that photographs are taken on the day of the audit. These are used within the report to provide context to and provides further evidence for the recorded findings. Audited sites are requested to make provision for the taking of photographs. All visual evidence is treated with the outmost confidence. Auditors are aware not be infringe on the sites' data protection rights or individual's privacy. Identities will be protected.

6.8 Alert Notifications for Critical Findings and Zero Tolerance issues

Where a critical non-compliance is identified and it is therefore a zero-tolerance issue, the auditor and/or audit company will, if circumstances permit, inform WIETA within 48 hours, or as soon thereafter as possible. This will enable WIETA and the employment site to immediately work together to plan an appropriate and timely remedial action. See **Annexure C, WIETA Alert Notifications**.

If an auditor believes they might be at risk as a result of communicating a critical non-compliance, the audit team will wait until it is removed from that situation before issuing the alert notification.

Auditors will always prioritise the welfare of workers when deciding how to inform employment site management of any critical non-compliance. Auditors will follow the escalation policies of the audit requestor to minimise any risk to workers.

Refer to the WIETA policy on **WIETA Classification Guidance on Best Practice, Observations, Major, Minor and Critical Non-Compliances, Annexure E**.

6.9 Audit Team Pre-Closing Meeting & Agreement on Corrective Actions

The audit team will meet before the closing meeting to discuss the findings of the audit (interviews, document checks, employment site tour), identify inconsistencies, non-compliances, observations, and good practice and agree on the corrective action to be undertaken by the site. The analysis of evidence gathered is a pre-requisite to the closing meeting. It must be completed even if the auditor is alone at the employment site.

The audit team will prepare for the closing meeting by identifying and agreeing:

- » Non-compliances found including:
 - Their status
 - New finding
 - Closed finding
 - Carry over finding
 - The severity of the finding (critical, major, minor);
 - Note that carry over findings will be recorded with an escalating severity across audit cycles – minor to major; major to critical depending on the systemic root cause of the non-compliance.
 - Specific evidence found;
 - Recommended corrective actions, how these can be verified, and a suggested timeframe for completion.
 - Systematic problems and issues from one-off, isolated, non-systematic issues.
 - The root cause of problems, where possible.
 - Good practice examples.
 - A prioritisation of issues.
 - Any requests for additional information or evidence
 - Corrective actions of the site.

The **Summary of Findings and Corrective Actions Plan (CAP) Report (Annexure F)** provides structure to the audit team's findings and help the audit team develop a corrective action report and structure a closing meeting. The submissions to that report will be completed using the Auditor Offline auditing tool.

The Summary of Findings and Corrective actions includes

- » Audit findings – Summary of non-compliances; good practice and evidence found;
- » Classification of non-compliances;
- » Reference to the applicable code and conduct and/or law which has been contravened;
- » Recommended corrective actions: Auditors suggestion on how the audit findings can be resolved;
- » Person/party responsible for corrective actions;
- » Verification mechanism: The Ethical performance risk classification mechanism will be used to determine whether the corrective actions will be verified through desktop verification (i.e. through photos, copies of certificates, invoices etc. submitted by the employment site). A desktop review is usually undertaken for minor findings of a lesser ethical risk. Desktop reviews cannot be undertaken where worker testimony is required to verify a corrective action undertaken
- » Or through a follow-up audit (i.e. the corrective actions will be verified through interviews and extensive documentation review on site at a follow up visit by the auditor). Follow up audits usually require the sign off of systemic major or critical findings or where verification through a worker interview is required.
- » Timing of the corrective actions needs to be evaluated by the auditor based on risk and realistic and appropriate implementation requirements.

The CAP report needs to be:

- A clear and accurate recording of findings observed.
- Completed in English.
- Distributed to the site and signed off, preferably on the day or at least within 48 hours of audit day completion.
- A copy kept by the auditor for online record keeping.

A draft copy of the Corrective Action Plan (CAP) Report will be given to the site at the closing meeting. Once the audit report is published online, a copy of the Corrective Action Report will also be available on the WIETA online platform.

6.10 Root Cause usage in Audit Findings

The following is the procedure for root cause analysis on non-compliances:

6.10.1 Identification of Root Cause

The auditor conducts a root cause analysis to identify the underlying cause of the non-compliance. The auditor can use methods such as 5-why analysis, fault-tree analysis, cause-and-effect diagrams, or other appropriate methods.

The root cause, where identified, must be cited in the audit report under each Standards Performance Area.

Root Cause options offered in the Audit Checklist under each are as follows:

- Oversight & Management Performance
- System
- Unclear roles and responsibilities
- Skills Training & Competence
- Lack of Resources
- Weak Implementation
- Other
- N/A – no findings

6.10.2 Corrective Action Plan

Based on the root cause analysis, a finding can be made which addresses the appropriate performance area of the standard, linked to a corrective action plan is developed with specific and measurable steps to address the issue. The corrective action plan should specify who is responsible, what actions are required, when they should be implemented, and how they will be verified for effectiveness.

6.10.3 Verification

The effectiveness of the corrective action taken is verified using either desktop or site verification to determine objective evidence of its effectiveness.

6.10.4 Review

The effectiveness of the corrective action taken is reviewed periodically to ensure the non-compliance does not recur. If a similar non-compliance occurs again, the process is repeated, the finding severity is escalated to a major or critical finding and the corrective action plan is adjusted accordingly.

Overall, the root cause analysis procedure is aimed at addressing non-compliances effectively and permanently. The involvement of the audit team and review by the reviewer ensures a comprehensive and unbiased approach, leading to effective corrective action, is obtained. The documented procedure, to be recorded on the descriptive sections of the audit report, helps in identifying the systemic, actual cause of the non-compliance and not just the incidental symptom. ensuring compliance with regulatory requirements and the WIETA standard.

6.11 Non-compliances, Observations and Good Practice Classifications

Auditors will classify non-compliances, observations and good practice examples to indicate the relative importance of each.

Follow-up audits are recommended for critical or major non-compliances or when corrective actions can be evaluated only through interviews and extensive documentation reviews

6.11.1 Categorisation

- » Non-compliance can be categorised as:
 - Minor non-compliance.
 - Major Non-compliance.
 - Critical non-compliance.
- » Auditors can also note Observations and instances of Good Practice.

6.11.2 Classification

Non-compliances and observations will be classified according to:

- » The frequency of the problem and whether the issue is an isolated occurrence.
- » The potential severity of the problem.
- » The probability of recurrence.
- » The management system in place.
- » The response of the management.

Classification		
<i>The auditor must be able to justify his/her classification with detailed evidence.</i>		
A critical non-compliance is:	» An issue which presents imminent risk to workers' safety/risk to life and limb or constitutes a significant breach of workers' human rights which is regarded as a zero-tolerance issue and/or; » A major non-compliance that has not been addressed or for which no significant improvement has been made by the time of a follow up audit, in spite of supplier commitment to resolve the issue. » An attempt to pervert the course of the audit through fraud, coercion, deception or interference.	Critical non-compliances include: – Inconsistencies between different types of documents and worker testimony. – Employment of Child labour (reported or confirmed through documentation). – Involuntary, indentured, or involuntary prison labour (including forced overtime and absence of payment). – Practices of bonded labour, including during the recruitment phase, observed on site where workers are forced to work and unable to leave the workplace. – Workers subjected to physical abuse. – Workers subjected to systemic sexual harassment, abuse or systemic disrespect. – Workers in immediate danger. – Workers not being paid at all or systemically paid under the legal compliance. – Workers subjected to discriminatory practices (e.g. during recruitment, workers are tested for medical

		conditions not required by law or product safety requirements, e.g. pregnancy, HIV/AIDS, hepatitis etc.). – Union members, union or worker representatives are actively harassed, penalised or discriminated (directly or indirectly) against. – Attempted bribery. – Occupational Health and Safety non compliances that pose immediate and serious harm to workers' health and or safety. – Auditors denied access or obstructed from conducted from conducting a proper audit. – Evidence of the deliberate provision of false information to auditors so as to disguise unfair labour conditions. – Housing: Unsafe structural defects posing imminent harm to occupants or unhygienic environmental conditions posing imminent and serious threat to health; or unsafe conditions posing an urgent safety threat, i.e. potential fire hazard, overcrowding etc. Critical non-compliances will trigger an alert notification. Auditors are to notify WIETA should an alert notification of a critical non-compliance be issued within 24 hours of the audit. WIETA will then be in contact with the site to arrange for any appropriate remedial action to be undertaken by the site to immediate remedy the critical non-compliance.
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A major non-compliance is:	A breach which represents a danger to workers/ those on-site. » A material breach of the WIETA/ law. » A systematic violation of WIETA code requirement/ law.	
A minor non-compliance is:	» An occasional or isolated problem. » An issue which presents a low risk to workers/ those on-site. » A policy issue or misunderstanding where there is no evidence of a material breach.	
An observation is:	» The identification of an opportunity for improvement. » A possible issue which may develop into a non-compliance without further action. » An issue which the auditor has some evidence to indicate may be present but is not confirmed by more than one data point.	Observations should be kept to a minimum and referred to in exceptional cases only
A good practice example is:	» An issue that the auditor regards as over and above the standard against which the employment Site was audited.	

6.11.2.1 Categorisation examples

WIETA Classification Guidance on Best Practice, Observations, Major, Minor and Critical Non-Compliances (Annexure E) provides guidance on how to categorise different issues as good practice or minor, major or critical non-compliances.

This list is not exhaustive on how to categorise different issues as good practice, observations or minor, major or critical non-compliances and should be read with the WIETA Benchmark which identifies zero tolerance issues. These examples are for illustration only. Auditors should still use their discretion when classifying non-compliances.

6.12 Closing Meeting

The Audit team will meet with management to go through the findings, agree them and agree to the corrective action plan which sets out areas for improvement, actions and timeframes. Corrective actions will focus on long term sustainable solutions which take account of the root cause of any problem. Once corrective actions are agreed upon, the timing and the person involved, a closing session will be convened with all those attending the opening meeting to:

This meeting will involve all those attending the opening meeting and will:

- » Reconfirm the purpose of the assessment.
- » Recognise good practices.
- » Report on agreed non-compliances and their status.
- » Report on suggested corrective actions, timing, and responsibility (with management).
- » Record non compliances which can be corrected immediately.
- » Clarify any questions that management or workers have at the closing meeting.
- » Explain when the full report will be completed and who it will be sent to.
- » Get sign-off on the Findings and Corrective Actions Plan by both auditor and site.
- » Where the CAP report is not agreed upon, the auditor should leave a copy at the site and report disputed issues to Audit Management.
- » Auditors are cautioned not to sway from their initial findings after the CAP report has been discussed and agreed to. In some instances, reviewers may recommend a different findings outcome. This must be communicated to the auditee once the CAP report has been approved and audit report published.

7. AUDIT OUTPUT

7.1 Audit Reporting

Site reports are to be completed on the WIETA online platform within 15 calendar days.

All documentation, supplementary notes, alerts and reports are deemed confidential and should not be circulated. These documents remain the intellectual property of WIETA.

The report is available in English to ensure that it can be shared with various stakeholders upon request by the employment site. The Audit report will be submitted online within 15 calendar days of the audit after review has taken place.

For each provision of the WIETA audit standard, the report will set out:

- » Description of the current situation, including how specific requirements are managed by the employment site;
- » Provide evidence and information to substantiate the findings.

For each non-compliance or observation, the report will provide a:

- » An indication of whether the finding is a new finding or a carry over finding
- » Descriptions of the context, systems, operations, evidence examined and findings identified.
- » Description of the findings include non-conformances, or observation, the severity, its frequency and the number of people concerned;
- » Evidence found to substantiate it;
- » Severity of non-conformance by critical , major, minor conformance level;
- » Classification to applicable law, WIETA Standard V5 (2025) , etc.;
- » Recommended corrective action with a timeframe for completion, responsibility and verification method required.
- » Observations require acknowledgement by comment only.

The quality of the final audit report is of critical importance as these documents are often requested by international buyers and may reside on global audit platforms.

The report will not include any information that could be used to identify specific workers – such as names, ID numbers, job descriptions and/or work location. However, the exception to this requirement is where the best interests of affected workers (i.e. working children) are served through disclosing their identities.

Where it is imperative to pass on the identity of a worker in order to guarantee their welfare, this will be done using the **Supplementary Audit Information (Annexure G)**.

The Audit report will include photos of the employment site such as:

- » Outside general overview

- » Inside general overview
- » Various stages of the production / agricultural process
- » Safety equipment
- » Machines guards
- » Drinking water
- » First aid equipment
- » Break room / staff room
- » Toilets and showers as applicable
- » Housing / Accommodation where applicable
- » Canteen where applicable
- » Kitchen where applicable
- » Best practices which can be photographed
- » Non-compliances which can be photographed.

Unless agreed by all parties in writing, WIETA will not distribute the report to any entities except the audit requestor and/or the party paying for the audit. However, the audit requestor will share the report with the employment site/customer/supplier as soon as possible to facilitate co-operation on continuous improvement. The audit requestor can provide access to all information that forms part of the audit process through the on line system.

The employment site can raise a dispute of audit findings on the Summary of Findings and Corrective Action or following receipt of the Audit Report in terms of the procedure set out in **WIETA Audit Appeals Process (Annexure H)**.

7.2 Use of Artificial intelligence (AI) in Audit Reports

The use of AI tools when recording, describing and reporting on audit findings are discouraged. The integrity and credibility of the social audit depends on the auditor's independent professional judgement, direct observations, recording of worker and management interviews documentation reviews, and objective evaluation and triangulation of evidence collected during the audit process.

To preserve the authenticity, accuracy and reliability of audit findings, auditors should not use Artificial Intelligence (AI) tools to generate, interpret, analyse or draft audit findings, conclusions, risk ratings or corrective actions.

Audit reports must reflect the auditor's own assessment of evidence obtained during the audit and must accurately represent conditions observed on-site.

7.3 Supplementary Audit Information

WIETA's approach to Supplementary audit reports aligns with the key principles upheld in the United Nations Due Diligence Guidelines which supports the key principles of

- Protection of rights-holders

- Non-retaliation
- Effective remedy
- Responsible disclosure

Auditors may feel the need to produce such a separate, supplementary report for WIETA containing:

- » Information too sensitive for the audit report;
- » Concerns which cannot be substantiated through evidence and/or interviews;
- » Attitude of management towards the non-compliances or the audit process as a whole.

Supplementary reports may be appropriate:

- » If workers appear to be under undue pressure from management on the day of audit;
- » If workers appear to have been coached;
- » If management was obstructive or reluctant to accept findings and the need for remediation;
- » Where the auditor has concerns about the possibility of double books or falsified records;
- » Where sensitive issues could not be discussed during the closing meeting because of a potential risk to workers' wellbeing.

Supplementary reports are not made available to the audit site, audit client or online users. Access to these reports is restricted exclusively to the audit firm and to WIETA.

Supplementary report should be submitted by email to the WIETA Senior Advisor : Audit Assurance.

Once the report has been received, the WIETA will conduct a confidential risk assessment looking at factors such as severity, credibility of evidence recorded, immediacy of harm and any legal implications. This assessment will be summarised and together with the report escalated to the CEO for review.

Following this review, the following actions may be taken

- Discussion with Senior Site Management with care not to implicate any operational employees to protect workers
- A targeted investigation
- Escalation to the Assurance Committee

If serious violations are detected, the following may be required

- Immediate remedial action
- Worker protection measures
- Suspension of certain practices – i.e. termination of TES agreements

In extreme cases

- Suspension of current assurance,
- Notification to authorities and

- Notification to buyers may be needed

An unannounced audit may be triggered.

7.4 Information Management

Within 15 calendar days of the completion of each audit, the auditor will upload the following documents to the WIETA online platform:

- » The completed audit report upload on the on line, including photos;
- » Summary of findings and corrective actions uploaded on the on line;

Copies of the following reports are to be uploaded onto the WIETA online platform and must also be emailed to the WIETA Senior Advisor : Audit Assurance:

- » Supplementary audit information and report ;
- » Copies of any alert notification that were issued during the audit.

The auditor will:

- » Be available after the audit to further clarify or explain decisions and ratings to the employment site as needed.
- » Will the employment site dispute any of the audit findings, or have a complaint against the auditor, the **WIETA Audit Appeals Process (Annexure H)** can be followed.

7.5 Audit Records

Where any documents, handwritten notes, signed Summary of Findings and Corrective Actions are retained by the auditor, these must be safely filed by the audit body for at least five years. Where photographic evidence is made, this may be available within the electronic report. All Audit Bodies and their auditors are to confirm strictly to the requirements of the POPI Act.

Auditor may retain with permission from the auditee the following documents:

- » Blank Employment contracts (at least in blank format);
- » Payroll sample (at least in blank format);
- » Risk assessments employment site;
- » Collective bargaining agreement;
- » Evidence relating to non-compliances, wherever possible.

If copying facilities are not available, auditors may photograph these documents.

7.6 Long Term Improvement Plans

The WIETA online system makes provision for longer term corrective actions to be loaded up on the system only in exceptional cases. It should be noted that a long-term corrective action can automatically raise a C rating requiring a follow up audit within 1 year of the previous audit.

Long term corrective actions would typically be corrective actions linked to housing or infrastructure refurbishment plans that take place over several years. Long term plans are also subject to review when annual assurance is due for release. It is the responsibility of the site to ensure that the requirements for updating improvements did not interfere with assurance requirements. WIETA retains the right to withhold any assurance documents where the sign off of evidence of long-term improvement plans have not adhered to.

7.7 Audit Follow-up Procedure

The audit follow-up focuses on the corrective actions agreed during the audit and closing meeting.

The audit company conducting the audit will be responsible for verifying whether actions have been taken and recording verification of actions. WIETA requires that all corrective actions be placed into a corrective action plan with attached evidence of improvements uploaded online. Time frames for corrective actions would have been agreed upon at the closing meeting and will range from 0 days through to 30, 60, 90 and 120 days depending on severity of non-compliances. Plans and evidence will be submitted no later than within 6 months of audit.

Where desktop verification of evidence submitted is not adequate, follow up audits or site verification visits are required depending on the severity of and/or nature of the non-compliance and as regulated by the ethical performance risk matrix.

7.7.1 Follow-up Audits

Follow-up audits are recommended for:

- Critical or major non-compliances where physical verification is required to sign off the corrective actions
- Corrective actions which can only be evaluated only through on-site interviews, visual inspections and physical verification not captured photographically and extensive on-site documentation reviews.
- Audits that need to be closed due to their partially completed status.
- Follow-up audits are to be conducted when the required 66% of workers are not on site during the audit and must be conducted during peak production times when the required work force is available

Follow-up audits are at the cost of the registered company.

A full follow-up audit will include a full review of all areas of the standard audit process, including the complete re-sampling of documents, conducting interviews and the employment site tour. The

auditor will focus on identifying changes which would address issues raised in the initial report but also investigate potential additional issues.

A partial follow-up audit does not include a full review but only focuses on the issues identified in the corrective action or improvement plan.

7.7.2 Follow up Audits when receiving a D rating

In the event that a site receives a D rating, no assurance letter can be issued. The site is required to undertake the following steps:

- Complete any corrective actions on the WIETA Online Platform, emanating from the audit
- Complete a further SAQ on the Online platform
- Complete a further Audit Request on the Online platform for a “Follow Up” Audit with the same audit firm within 6 months of the previous audit
- Prepare for the follow up Audit which will focus on a physical verification of all non-conformances recorded in the previous audit.
- Undertake any further corrective actions submitted by the auditor
- Following the sign-off of the corrective actions, the system will then release an assurance completion document with a C rating. This signifies a 1 year only assurance cycle.
- The site must then undertake another SAQ and Audit request within 12 months of the initial audit that raised the D rating.

7.7.3 Follow-up Audit Guidance

- » The audit will be carried out once the deadline for addressing all of the issues has passed.
- » Follow-up audits generally take place within six months of the date of the initial audit.
- » During scheduling, the scheduler must link the follow up audit to the previous audit report on the online platform.
- » The scheduler / auditor will identify only the sections of the report needing completion where non-conformances were recorded.
- » A follow-up report is issued with all new issues and updates to previous issues clearly highlighted –
 - For all sections where non-compliances have previously been raised there should be a clear explanation of the evidence reviewed, comments on applicability and effectiveness and whether the issue is now considered closed or remains open; Improvements should be mentioned even if the non-compliances are not fully corrected;
 - If new non-compliances are found these should be recorded and marked as “new” and should be reported in as much detail as they would have been in the initial report;

- A desktop verification may be used to verify corrective actions for minor non-compliances but provide less assurance than a follow-up audit. Desk-based verification should check corrective actions through photos, copies of certificates, invoices submitted by the employment site. Desktop verification cannot be used where actions need to be verified through workers testimony.

8. AUDIT DISPUTE PROCESS

The Audit Dispute & Appeals Process is covered under Annexure H of this Document.

9. AUDIT SIGN OFF AND AUDIT COMPLETION LETTER

Once desktop and site verification evidence have been assessed by the Lead auditor, the corrective actions are then accepted or rejected by auditors on the online system.

Any rejected corrective actions will need to be reviewed by the auditee and evidence resubmitted for review.

Once completed accepted, the audit will be signed off, and the audit managers will sign off the assurance completion letter for release on the WIETA online system.

The WIETA Audit Assurance Lead will then release the assurance completion letter for publication.

The Social Assurance Completion Letter is released on an annual basis, dependent upon any long-term improvements requiring submission.

Audit bodies retain the right not to approve the Audit Assurance Completion Letters, should any audit fees be outstanding.

WIETA retains the right not to release Audit Assurance Completion Letters, should any WIETA annual registration fees be outstanding.

The audit sign-off Audit Assurance Completion Letter will confirm the following:

- Producer and site name
- SAWIS numbers
- The Risk rating A, B, C etc.
- Date of audit;
- Date of the next audit cycle;
- Date of issue of certificate
- Frequency of audit cycle.

10. EXTENSION OF CORRECTIVE ACTIONS

All evidence of corrective actions must be submitted on the system within 6 months from date of audit. The auditee may request an extension for the completion of corrective actions. This must be done in writing to WIETA and the involved audit body.

Any delays in posting corrective actions beyond 6 months be dealt with on a case-by-case basis, pending the long-term context of the improvement.

11. EXPIRY OF CORRECTIVE ACTIONS

No corrective actions may be further undertaken beyond 6 months of the audit date. Failure to load corrective actions up within a 6-month period from audit date will result in a delay in getting the audit findings signed off by the audit body and will cause the audit to lapse.

Should the auditee require longer than 6 months to complete their corrective action plan, they need to submit a request for ***extension of corrective actions***.

Once the corrective actions have expired, the auditee will need to undertake a renewed audit and commence the audit process again.

The history of the previous audits will remain visible on the system.

12. GRIEVANCE AND STANDARDS VIOLATION PROCESS

WIETA ***Grievance and Standards Violation Process Annexure I*** sets out the procedures for ensuring that human rights due diligence is upheld in WIETA member businesses. The process also provides for a framework that supports the UN principles on Business and Human Rights and therefore believes that all businesses in the wine supply chain undertake due diligence in support of the promotion, protection and enforcement of human and labour rights of agricultural workers employed in businesses, cellars, bottling facilities and on farms.

WIETA also supports the international approach taken on human rights due diligence. An approach which holds that business need to take responsibility for ensuring that people's rights are protected, both in the workplace and on their business premises and property and that businesses be held accountable for any negative impact on human and labour rights, taking the responsibility to ensure that appropriate remedies are put in place to restore the rights of their employees and general citizens impacted by rights infringements within the business.

The guiding principles can therefore be summarised in three words

PROTECT – RESPECT – REMEDY

Where worker rights violations are reported, WIETA would have a commitment to evoke the WIETA Grievance and Standards Violations Process to investigate, access against the WIETA Standard, and identify restorative solutions. These solutions would require that the necessary remedial actions are followed and a more responsible ethical business practice is adopted.

Effective communication, a co-operative and collaborative approach is critical to building good working relationships and restoring trust.

To assist such a co-operative approach, WIETA has prepared a set of guidelines to follow when human and labour rights infringement and/or Standards' violations are reported either via the media or through a complaint from within or outside of WIETA's participants.

The guidelines are intended to maintain common understanding and cooperation through-out the investigation and resolution of the alleged human and labour right infringement and/or Standards violation. The aim is to reach a conclusion that all parties accept as final, i.e. a position where the parties agree that as much as can be done has been done, bearing in mind the limitations inherent in any situation. These guidelines are outline in Annexure I.

13. WIETA RISK MATRIX AND AUDIT FREQUENCY

The requirements for the WIETA Risk Matrix and Audit Frequency is contained in the policy on Risk Matrix and Audit Frequency. Please refer to the risk matrix tool contained in the policy in Annexure A.

The WIETA Ethical Performance Risk Matrix has been developed to provide robust assurances of the management of risk in respect of the ethical performance at cellar and farm level with a wine supply chain. The programme subscribes to the following which can be used to mitigate and manage risk

- Visibility of a supplier on the WIETA online system
- Transparency allowing the supplier to share information on compliance status at the request of buyers
- Commitment to improvement – the supplier must demonstrate a commitment to improve on their conditions of work and the sustained fair treatment of workers. This includes the attendance to Producer Code Compliance and Worker Rights Training programmes.
- Of legal compliance levels and respect for the WIETA Code and continually provide information that supports this.

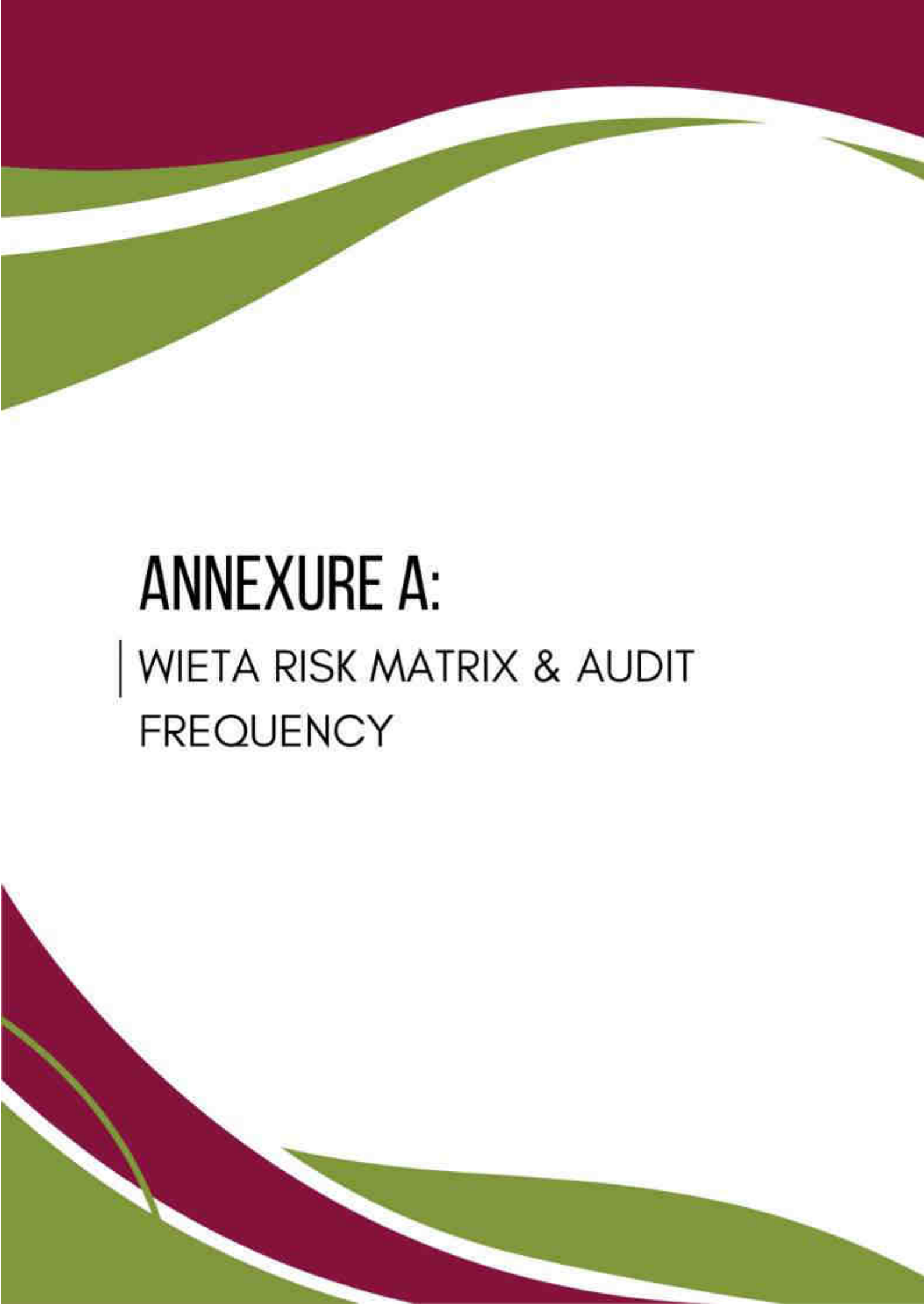
The programme subscribes to being improvement-led rather than audit-led and uses the WIETA Ethical Performance Risk Matrix to support this position. It creates four categories of risk - A, B, C and D where Category A the most stringent qualifying criteria. A WIETA member will be rated according to these risk categories.

Risk Indicator	Systems Risk Category	Audit Cycle
Premium A	Robust Management System	3 years
A	Maturing Management System with improvement	3 years

	opportunities identified	
B	Basic Management system	2 years
C	Management System need systemic improvement	1 year
D	No system	Re-Audit within 1 year of audit in high season

14. ANNEXURES

Annexure A	WIETA Risk Matrix and Audit Frequency
Annexure B	Auditor Competencies and Requirements
Annexure C	WIETA Alert Notifications
Annexure D	WIETA Audit Policy for Temporary Employment Services
Annexure E	WIETA Classification Guidelines on Best Practice, Observations, Major, Minor and Critical Non-Compliances
Annexure F	Summary of Findings and Corrective Actions Plan
Annexure G	Supplementary Audit Information
Annexure H	WIETA Audit Dispute & Appeals Process
Annexure I	Grievance and Standards Violations Reporting Process



ANNEXURE A:

| WIETA RISK MATRIX & AUDIT
FREQUENCY

1. WIETA Ethical Performance Risk Matrix

Previous versions

The WIETA Ethical Performance Risk Matrix was first introduced on 1 August 2017 (V2) and was amended on 1 November 2018 (V2.1) and again in Sept 2019 with version 3. This version, version 5 (V5) will be applicable from 1 July 2026. Changes in requirements will not be implemented retrospectively

Introduction

The WIETA Ethical Performance Risk Matrix has been developed to provide robust assurances of the management of risk in respect of the ethical performance at cellar and farm level, as well as where temporary employment services are audited independently. The programme subscribes to the following which can be used to mitigate and manage risk:

- Visibility of a supplier on the WIETA on-line system
- Transparency allowing the supplier to share information on compliance status at the request of buyers
- Commitment to improvement – the supplier must demonstrate a commitment to improve on their conditions of work and the sustained fair treatment of workers. This includes the attendance to Producer Code Compliance and Worker Rights Training programmes.
- Of legal compliance levels and respect for the WIETA Code and continually provide information that supports this.

The programme subscribes to being improvement-led rather than audit-led and uses the WIETA Ethical Performance Risk Matrix to support this position. It creates four categories of risk - A, B, C and D based on audit results and corrective action implementation, where Category A the most stringent qualifying criteria. A WIETA member will be rated according to these risk categories and can earn the right to move to a higher category where the reward for this is a less frequent audit. See Section 6 of this Annexure for Category definitions.

The Programme also builds into the system a range of tools beyond the audit that if used in combination rather than isolation, will provide more extensive cover and management of risk between audits making the programme more robust. For example, the programme will involve various verification activities such as site visits and desk-top assessments that will take place between audits. In addition, all sites will be required to up-date and renew their SAQ on the WIETA On-Line system (www.ethicaltrade.co.za) on **an annual basis**. Annual renewal functionality on the online system will be announced at a later stage. While audits may not take place annually or every two years for some members, the measurement of compliance between the audits remains robust and in place.

1. Awareness-raising and Training

An informed supply base helps to manage risk through suppliers being made more aware of potential risks and means of mitigating this. Awareness- raising activities and training

programmes should be in place and ongoing. WIETA provides funded, partially funded and low cost opportunities to involve site management and workers in ongoing training and refresher courses. Participation in these activities are deemed important and will be measured and included in a site's risk-rating.

Tools

These include participation in the WIETA programme Producer Compliance, Refresher Training & Worker training workshops; Worker Labour and Health and Safety Toolkits, online training, the WIETA Benchmark with attached tools and resources (available on our website www.wieta.org.za at WIETA : Wine & Agricultural Ethical Trade Association – We change lives for the better, forever.), the WIETA Housing Guidelines, WIETA capacity-building and support programmes and materials; going on-line at www.ethicaltrade.co.za and hard copy publications.

Employee Awareness

WIETA views worker involvement to be of high importance to ensure integration of ethical processes in the business. To ensure that all stakeholders are aware of WIETA's requirements, use is made of onsite and online training, various posters and social media. These resources assist in providing an understanding of a safe, dignified and ethics-based workplace.

2. Assessment (Measurement of risk)

Tools

- Self-assessment will be managed by the WIETA online system. Members are required to renew the SAQ on an annual basis. Annual renewal functionality on the online system will be announced at a later stage. Once available, failure to renew the SAQ on the on-line system will result in the system classifying the member as inactive and therefore the system will not be able to issue assurance on an annual basis. Once the SAQ has been completed and or verified annually, results of the SAQ will be measured against audits to ensure accuracy of the SAQ. Significant discrepancies between the information contained on the SAQ and the findings made during the audit will be taken into consideration when determining the overall risk rating for the site which could, in turn, affect the audit frequency.
- Third Party Assessment – All WIETA audits will be conducted by approved third party audit bodies from 1 September 2019. Approved audit bodies are available on the WIETA online system under audit request. Only approved audit bodies can conduct an audit against the WIETA code and standard V5 (2026) .
- WIETA audit information: Audit reports are available on the on-line platform since November 2016 and provides visibility and transparency to retailers, exporters, importers and the industry where the member gives access to the information on the platform. The audit will enable the site to reflect on its own ethical performance against the WIETA Code and the effectiveness of its own systems.

- Risk Classification – The on-line system will automatically generate a risk rating on the audit report and assurance, if granted, based on the number and severity of non-compliances and findings raised during the audit and completion of corrective actions. This will in turn generate an automatic cycle of audit frequency of between one to three years.
- Verification assessment of corrective actions
 - Desktop – review of corrective action plans submitted and sign-off of corrective actions will be conducted by the lead auditor that conducted the audit.
 - Site visits – can take place to confirm visual verification of corrective actions that cannot be reviewed by desktop.

3. Follow up action

There are various tools that enable appropriate responses to risk:

- Corrective action plan (CAP) reports – the member is required to submit evidence and a description of corrective actions undertaken against all non-compliances in the audit report. All corrective actions must be submitted on-line at www.ethicaltrade.co.za. The WIETA on-line platform will monitor progress in the completion of corrective actions.
 - All Corrective Actions need to be undertaken within the agreed time frames of between 0 and 120 days and completed on the on-line system within the required period.
 - The completed Corrective Action Report must be uploaded online within 4 months of audit.
 - All evidence of corrective actions need to be submitted online no later than 6 months following the audit.
 - If the Corrective Action Report is not approved in its entirety within one year of date of audit, the CAP report will lapse automatically and no assurance will be issued.
 - Assurance therefore needs to be approved within one (1) year of audit date to ensure that audits do not lapse.
 - Producers who do not agree to this policy will have their registration reviewed.
- Continuous Improvement monitoring through the Continuous Improvement Plan –
 - Improvement Plans and commitments in relation to longer term improvements will be monitored on the on-line system.
 - Prior to 1 August 2019 employment sites could demonstrate continuous improvement where corrective actions could not be closed and show 'improvement' on the on-line system through uploading further evidence on

their Continuous Improvement Plan. Known as Conditional Assurance, the conditions did not have any impact on the assurance risk rating.

- From 1 August 2019, where producers are unable to finalise a corrective action and it is conditionally approved due to longer term corrective actions, evidence must be uploaded linked to annual improvement in areas such as housing or seasonal changes in working conditions. If the initial evidence of said finding can be evaluated and closed off, Assurance risk ratings with C grading will be issued.
- Zero Tolerances, Critical and Alert notifications – Where Zero Tolerances are detected on farm and a Critical non-compliance was raised, alert notifications must be sent by the auditor to the audit body and WIETA. Critical non-compliances are defined in the WIETA Audit Process and Methodology Policy, Alert Notification Policy document and Classification on Best Practice, Observation, Major, Minor and Critical Non-Compliances.
- WIETA Incidents and Violations Reporting Mechanism - A formal violations mechanism which is in place to receive complaints and deal with these in an appropriate and restorative manner. Any stakeholder, including workers can use the WIETA WhatsApp line, call the hotline or submit an email to WIETA with queries or complaints.
- WIETA Fair Labour Seal
The WIETA Fair Labour Seal provide product assurances that wine within a specific vintage year has been fully traced to ensure that all the suppliers, the production cellar and bottling facilities have undertaken the WIETA audit and has committed to the WIETA assurance process.

4. Audit Cycle

- All audit participants are encouraged to keep with their audit cycle to ensure internal due diligence in implementing the ethical code of conduct. Assurance Letters for audits that took place after 1 August 2017 indicate the audit date on the certificate.
- The audit cycle for all audits that took place before 1 August 2017, is 3 years from original audit date.
- The audit cycle for all audits that took place after 1 August 2017 is indicated on the certificate, if assurance was approved.
- Audit participants that delay their audit for beyond 30 days from its audit cycle, will be penalised with a major non-compliance under management systems. There will be no penalty for audits that have been brought forward and that have taken place 30 days earlier than the audit cycle date.

5. Suspension of Assurance

- The WIETA Grievance and Standards Violations Process sets out the process should WIETA receive a complaint that alleges a violation of the WIETA Standard or Human Rights. If the site under investigation does not allow WIETA access to investigate the incident or where access is allowed to investigate and the site is found to have violated the Standard, but fails to undertake any remedial action, WIETA assurance will be suspended.

6. Risk Matrix Table, Assurance Risk & Audit Frequency

Summary of the Risk Matrix and Audit Frequency Table

Risk Classification	Audit Risk Category	Audit Results	Assurance Risk Category*	Audit Cycle
*Assurance risk category is dependent on closure of non-compliances. Where longer term corrective actions are required and evidence must be uploaded linked to annual improvement in areas such as housing or seasonal changes in working conditions, the initial evidence of said finding can be evaluated and once all corrective actions are closed-off, final assurance with a C grading will be issued.				
NO RISK	A	0-9 Minor non-compliances	A	3 year
LOW RISK	B	1-3 Major non-compliances AND/OR 10-14 Minor non-compliances	B	2 year
MEDIUM RISK	C	4-6 Major non-compliances AND/OR 15-19 Minor non-compliances	C	1 year
HIGH RISK	D	1 Critical non-compliance AND/OR +7 Major non-compliances AND/OR +20 Minor non-compliances	C	1 year, including a follow up audit within 1 year of audit to verify all corrective actions

WIETA Risk Matrix Determining Assurance & Audit Frequency

Audit Report Category	Audit Risk Category	Critical	Major	Minor	Action required	Approval of action taken	Assurance Risk Category and audit cycle
A	NO RISK	0	0	0-9	Submission of all corrective actions within timescales of 6 months after audit	All Non-compliances completed and CAP signed off, a A rating will be granted.	A 3 year audit cycle
					CAP is approved with one or more corrective actions approved conditionally	Where short term evidence was provided for addressing a corrective action, but the correction action could not fully be completed and could only be approved conditionally, a C rating will be granted.	C 1 year audit cycle
					CAP cannot be approved.	No sign off of CAP until CAs are signed off as per requirements set out for recognition of sign off of CAs. CAP must be approved within one year of audit date.	No Assurance
					If no submission of CAP, audit lapse	Audit lapse and full re-audit required within 1 year	No Assurance
B	LOW Risk	0	1- 3	AND/ OR 10 - 14	Submission of all corrective actions within timescales of 6 months after audit	All Non-compliances completed and CAP signed off, a B rating will be granted.	B 2 year audit cycle

					CAP is approved with one or more corrective actions approved conditionally	Where short term evidence was provided for addressing a corrective action, but the correction action could not fully be completed and could only be approved conditionally, a C rating will be granted.	C 1 year audit cycle
					CAP cannot be approved.	No sign off of CAP until CAs are signed off as per requirements set out for recognition of sign off of CAs. CAP must be approved within one year of audit date.	No Assurance
					If no submission of CAP, audit lapse	Audit lapse and full re-audit required within 1 year	No Assurance
C	MEDIUM RISK	0	4-6	AND/ OR 15-19	Submission of all corrective actions within timescales of 6 months after audit	All Non-compliances completed and CAP signed off, a C rating will be granted.	C 1 year audit cycle

					CAP is approved with one or more corrective actions approved conditionally	Where short term evidence was provided for addressing a corrective action, but the correction action could not fully be completed and could only be approved conditionally, a C rating will be granted.	C 1 year audit cycle
					CAP cannot be approved.	No sign off of CAP until CAs are signed off as per requirements set out for recognition of sign off of CAs. CAP must be approved within one year of audit date.	No Assurance
					If no submission of CAP, audit lapse	Audit lapse and full re-audit required within 1 year	No Assurance

D	HIGH RISK	1 or more AND/OR	=>7	AND/ OR =>20	Submission of CAP with evidence within timescales of 6 months after audit. All corrective actions will be verified through desktop verification and signed-off by a follow up audit on all of the non-compliances identified. A follow up audit to be conducted within 12 months of audit whereby all corrective actions to be verified and signed off. New non-compliances can be raised during the follow up audit.	If all corrective actions identified in the full audit are signed off at the follow up audit, assurance with a C Rating will be granted.	C 1 year audit cycle
						If all corrective actions identified in the full audit are not signed off at the follow up audit, no assurance will be issued and a full re-audit to be conducted.	No Assurance
					CAP cannot be approved.	No sign off of CAP until CAs are signed off as per requirements set out for recognition of sign off of CAs. CAP must be approved within one year of audit date.	No Assurance
					If no submission of CAP, audit lapse	Audit lapse and full re-audit required within 1 year	No Assurance

The WIETA Fair Labour Seal

From 2018 harvest and the 2018 intake, any wine containing grape from sites who were audited after 1 August 2017 and whose audit report reflects a risk category D, will not be approved for the seal. For 2019 harvest only certificates with a rating A – C will be approved.

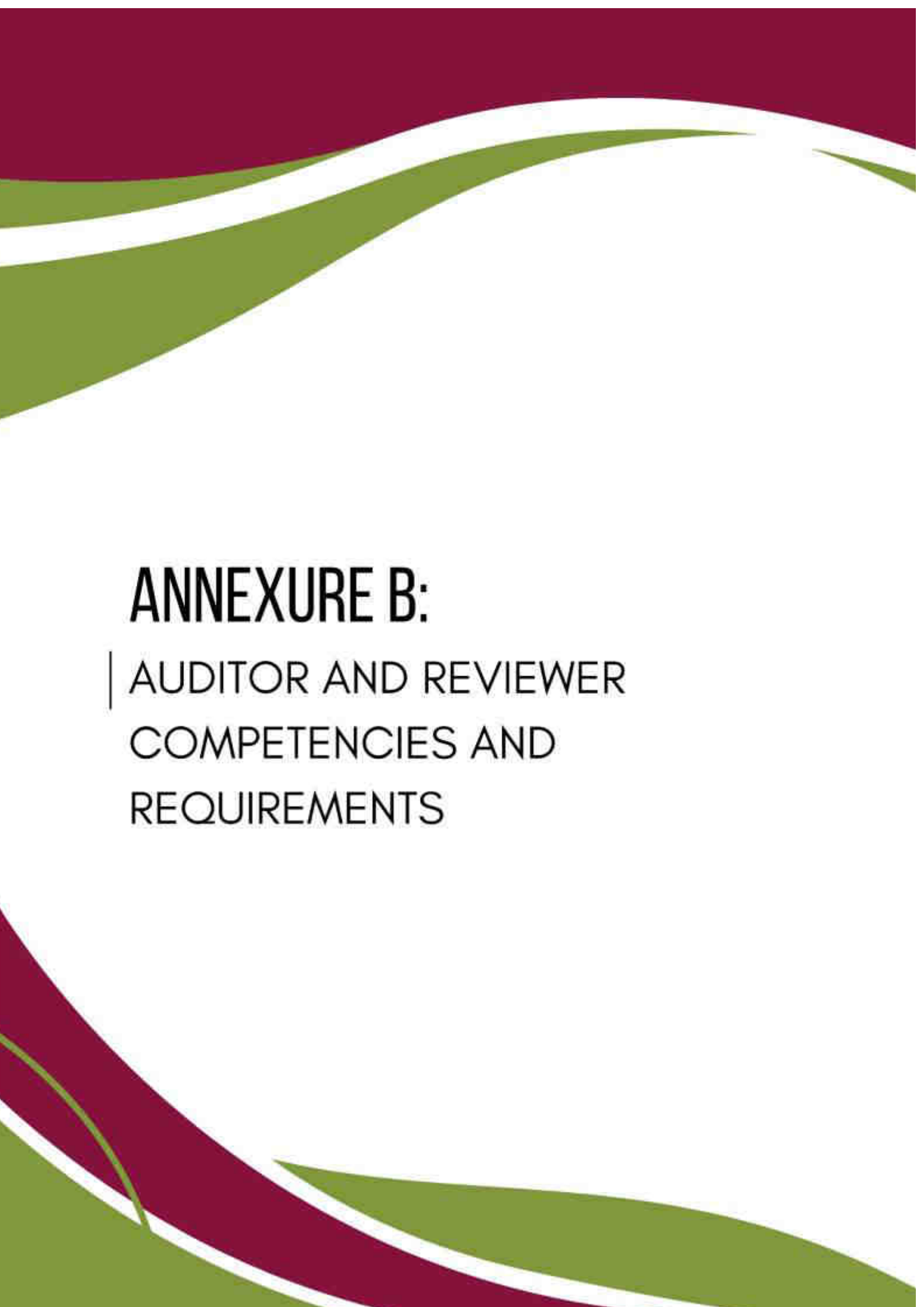
The Fair Labour Seal will not be approved for producer/s or supplier/s who demonstrate any of the following risks:

- High Ethical Risk Assurance Category D
- Audit lapse due to non-submission of evidence within required timeframes
- Any audit participant under investigation in terms of the Incidents Reporting & Violation Process
- Suspension of assurance

Sites on the WS and WSB numbers for individual wine applications are now traced back to the point of **intake of the grapes** into the tank. Implementation is effective retrospectively and traceability can be done back to 2015 harvest. From 2018, bottling facilities who appear on the SAWIS trace also have to meet the criteria.

Wines will also have to meet the following criteria for approval:

ETHICAL STATUS TRACED BACK TO GRAPE INTAKE YEAR	SEAL CRITERIA FOR ASSESSING STATUS OF WIETA SITES ON WS or WSBs	EXCEPTIONS
2015	60% WIETA assured sites (assured by April of the intake year) – 40% audited on WS / WSB SAWIS trace	Assurance needs to be issued by and valid until 30 April 2015 to qualify for 60% Audits done must be valid (done from 1 October 2014 onwards)
2016	60% WIETA assured sites (assured by April of the intake year) – 40% audited on WS / WSB SAWIS trace	Assurance needs to be issued by and valid until 30 April 2016 to qualify for 60% Audits done must be valid (done from 1 October 2015 onwards)
2017	60% WIETA assured sites (assured by April of the intake year) – 40% audited on WS / WSB SAWIS trace	Assurance needs to be issued by and valid until 30 April 2017 to qualify for 60% Any critical NCs in audit at time of intake not accepted for approval. Audits done must be valid (done from 1 October 2016 onwards)
2018	80% WIETA assured sites – 20% audited on WS / WSB SAWIS trace	For 2018 intake Assurance need to be issued by and valid until 30 April 2018 to qualify for 80% For the 20%, no audits with a D or E rating will be excepted for the seal Audits done must be valid (done from 1 October 2017 onwards)
2019	100% WIETA assured sites from WS / WSB SAWIS trace	2019 intake Assured need to be issued by and valid until 30 April 2019 to qualify for 100% Audits done must be valid (done from 1 October 2018 onwards)
From 2020 Onwards	100% WIETA assured sites from WS/ WSB SAWIS trace	2020 intake and harvest years thereafter Assurance need to be issued by and valid until 30 April of that vintage year to qualify for 100%



ANNEXURE B:

| AUDITOR AND REVIEWER
COMPETENCIES AND
REQUIREMENTS

1. INTRODUCTION

WIETA is established as a multi-stakeholder structure and is administered for the sole purpose of promoting ethical trade through the wine and agricultural value chain towards a transformed sector. As a Scheme Owner the association seeks to promote the adoption of and adherence to the WIETA Ethical Code of Good Conduct amongst employers in the wine and agricultural value chain. Relevant independent monitoring mechanisms such as third-party auditing is used to ensure that audit participants observe and implement the WIETA Standard as set by WIETA as the Scheme Owner.

Whilst social auditing is not the only mechanism being used to measure adherence to the Standard, it plays an important role in assessing the extent to which businesses are socially responsible and ethically sustainable and thereby, impacting positive improvements in the working and living conditions of agricultural workers within the sector.

The professional competence, delivery, quality, efficiency and effectivity of the audits and everyone involved in being responsible for executing the audit process is a crucial component of maintaining the WIETA Standard. WIETA recognises the competency framework set by the Association for Professional Social Compliance Auditors (APSCA).

This version constitutes a third amended version applicable from 2026 as Version 5. However, where reference is made to APSCA requirements, all social compliance auditors are required as a minimum to meet the APSCA Certified Social Compliance Auditor (APSCA CSCA) by 30 October 2023. Lead Auditors who do not meet these requirements will have their status as Lead Auditor reviewed by WIETA. New auditors have two years to complete APSCA status to CSCA.

2. AUDITOR REQUIREMENTS:



2.1. LEVEL 1 – ENTRY LEVEL SOCIAL COMPLIANCE AUDITORS

2.1.1. Qualification

The individual will have successfully completed a tertiary level qualification with preference for a specialisation in either law, social sciences or human resource management or any other relevant qualification as per APSCA level competencies.

To operate at this level, the incumbent should have excellent reading, writing and verbal proficiency in English and Afrikaans.

Should the candidate not meet the required qualifications as stated above, but demonstrate recognition of prior learning, submissions along with the individual's CV will need to be made to WIETA for approval by the scheme.

2.1.2. Work experience

The individual will have industry and sector exposure. A minimum of 5 years post qualification operational/ work experience.

Should the candidate demonstrate equivalent experience other than stated above, submissions along with the individual's CV will need to be made to WIETA for approval by the scheme.

2.1.3. APSCA Auditor Membership

The entry level auditor must apply for APSCA Auditor Membership as an Associate Social Compliance Auditor (ASCA) with required APSCA membership registration number and must progress to a Certified Social compliance Auditor Level within 2 years.

2.1.4. Audit Experience

The individual will have shadowed a minimum of 3 auditor days of social audits against the WIETA Standard. The individual will have completed a further minimum of 7 auditor days of social audits against the WIETA Standard as an associate auditor under supervision of and with in-field training by a Lead Auditor.

Following the above minimum requirement of 10 auditor days, the Lead Auditor must provide a competency report based on both foundational skills as set out in the APSCA competency overview, including and not limited to relevant South African laws and regulations and functional knowledge areas contained in the WIETA Standard.

The competency report will be made available to the Scheme Owner along with an audit log, training plans of the auditor, curriculum vitae of the auditor and APSCA Registration number for approval by the Scheme Owner as Associate Auditor.

2.1.5. Training Requirements

2.1.5.1. Basic Social Auditor Training Course

Associate Auditors will be required to complete a 3-day Basic Social Auditor Training Course approved by WIETA.

This course should cover the following aspects:

- Introduction to Social Responsibility & Accountability
- Audit principles, procedures & techniques
- Management Systems & Reference Documents
- Organisational Situations
- Situational Awareness

- Introduction to applicable Labour Laws and Occupational Health & Safety Regulations
- Audit planning; approach & methodology
- Sampling
- Basic Interviewing skills
- Detection; evidence gathering & triangulation
- Capturing findings

A training assessment must be conducted.

2.1.5.2. Introduction to Auditing against the WIETA Standard

Associate Auditors will be required to complete a 3 day Training Course presented by WIETA including but not limiting:

- The WIETA Standard and interpretation;
- The WIETA online system;
- The WIETA Audit Process and Methodology.

A training assessment must be conducted.

2.2. LEVEL 3 – LEAD SOCIAL AUDITOR

2.2.1. Qualification

The individual will have successfully completed a tertiary level qualification with preference for a specialisation in either law, social sciences or human resource management or any other relevant qualification as per APSCA level competencies.

To operate at this level, the incumbent should have excellent reading, writing and verbal proficiency in English and Afrikaans.

Should the candidate not meet the required qualifications as stated above, but demonstrate recognition of prior learning, submissions along with the individual's CV will need to be made to WIETA for approval by the scheme.

2.2.2. Work experience

The individual will have industry and sector exposure. A minimum of 5 years post qualification operational/ work experience.

Should the candidate demonstrate equivalent experience other than stated above, submissions along with the individual's CV will need to be made to WIETA for approval by the scheme.

2.2.3. APSCA Auditor Membership

The Lead auditor must hold APSCA Auditor Membership as a Certified Social Compliance Auditor (CSCA) with required APSCA membership registration number. This includes sign off by the audit body of required competencies at the CSCA level; passing all elements and level of the CSCA examination process and meeting the audit experience requirements as per 2.2.4.

2.2.4. Audit Experience

The Lead auditor must have:

- Minimum 1 years' experience in social compliance auditing, and
- Minimum 100 social compliance audit days, provided via audit log signed off by audit firm(s), of which,
- a minimum of 25 audit days are audits conducted against the WIETA Standard.

OR

- Minimum 2 years' experience in any other type of auditing, and
- 150 audit days, of which a minimum of 50 are social compliance audit days, provided via audit log signed off by audit firm(s), of which,
- a minimum of the social compliance audit days are 25 audit days conducted against the WIETA Standard,
- Other audit days may include management system, health and safety, labour inspections, investigations, audit components.

OR

- Minimum of 5 years in the social compliance or related industry with a minimum of 35 social compliance audit days and additional experience which may include training, supervision, managerial and/or parallel experience in implementing social compliance programmes and / or audit review.;
- 10 of the above audits should be done against the WIETA standard;
- The following is also required:
 - Letter stating which additional experience has been obtained
 - Part 1 of the APSCA CSCA exam passed and level RA obtained

The audit body is required to provide competency reports for Lead Auditor recognition by the Scheme Owner based on an assessment of auditor's understanding and proficiency in both foundational and functional skills as set out in the APSCA competency overview, including and not limited to relevant South African laws and regulations and functional knowledge areas contained in the WIETA Standard.

The competency report will be made available to the Scheme Owner along with an audit log; professional development plans for the auditor, curriculum vitae of the auditor and APSCA registration number for approval by the Scheme Owner as Lead Auditor.

Upon approval, the Scheme Owner will register the Lead Auditor on the WIETA online platform. The Audit Body will also be required to send to the Scheme annual progress reports on the Auditors APSCA progress.

2.2.5. Training requirements

2.2.5.1. Advanced Auditor Training Course in foundational competencies

The Lead Auditor is required to complete a recognised Advanced Auditor Training Course in foundational competencies, approved by WIETA, that could include but is not limiting to:

- Strategic and Systems Thinking
- Professional and Ethical Behaviour
- Observation and Investigation
- Data Collection and Analysis
- Problem Solving and Analytical Decision Making
- Management Systems
- Documentation Review
- Interview Skills
- Communication, Relationship Management and Conflict Resolution
- Self-Management
- Standards, Laws and Regulations

A training assessment must be conducted.

2.2.5.2. Advanced Auditor Training Course in functional competencies

The Lead Auditor is required to complete a recognised Advanced Auditor Training Course in functional competencies, approved by WIETA, that could include but is not limiting to:

- Business Legitimacy and Integrity of Records
- Underage Labour
- Discrimination and Disciplinary Practices
- Forced Labour
- Working Hours and Overtime
- Freedom of Association and Effective Recognition of the Right to Collective Bargaining
- Harassment and Abuse Practices
- Wages, Benefits and Terms of Employment
- Subcontracting
- Occupational Health and Safety Regulations
- Labour Legislation
- Basic conditions of Employment Legislation
- Extended Security of Tenure Legislation
- All other South African Laws
- International Regulations on Labour, Human rights, Safety and Environment where relevant.

A training assessment must be conducted.

2.5.2.3. Advanced Calibration against the WIETA Standard

Lead Auditors will be required to attend at least one Training Course per year, presented by WIETA on Audit Calibration against the WIETA Standard applicable respectively to farms, cellars and temporary employment services.

A training assessment must be conducted.

3. REQUIREMENTS FOR AUDIT REPORT AND CORRECTIVE ACTION PLAN REVIEWERS

3.1. Role of the Reviewer

The role of the reviewer is to make an objective evaluation of the audit reports, corrective action plans and verification details, identified risks and non-compliance judgements made against the prescribed standard.

The reviewer should consider Standards compliance matter, legal and regulatory frameworks and appropriateness of the report.

The reviewer should also consider quality against the professional standards.

To maintain the objectivity of the reviewer, the reviewer must also remain impartial to the site whose report is being moderated.

An auditor is not allowed to act as a reviewer on the same audit they conducted as an auditor. Audit reports are also not to be compiled by the Reviewer, but by an auditor in their capacity as Lead auditor. Where concerns around the audit credibility or integrity of data come to the attention of the Reviewer, the reviewer will engage with the auditor to have the auditor rectify the report.

Once the corrective action plan has been signed off by the Lead auditor, the Reviewer is required to review the corrective actions approved and evidence submitted, before final approval in the Assurance Evaluation module on the WIETA online platform of the Corrective Action Plan

3.1.1. Requirements

The Reviewer must meet all the requirements of Lead Auditor as set out in 2.2 and be approved as a Lead Auditor and be a Certified Social Compliance Auditor with APSCA.

3.1.2. Training Requirements

Reviewers will be required to attend at least one Training Course per year, presented by WIETA on Reviewing against the WIETA Standard, including but not limiting:

- Report Calibration and Quality; and
- Corrective Action Plans.

3.1.3. Approval

Audit Bodies to submit Reviewers to the Scheme Owner for approval. Upon approval the Scheme Owner will register the Reviewer on the WIETA online platform.

4. APPROVAL, ONGOING RECOGNITION AND EVALUATION OF AUDITORS BY WIETA

All auditors meeting the competency requirements and approved by WIETA will be registered on the WIETA platform. Their online profile will be reviewed on an annual basis.

4.1. Maintaining Auditor Recognition

It is the responsibility of the audit bodies auditing against the WIETA Standard to maintain the profiles of their auditors and to ensure that auditors undergo ongoing training and development.

Where auditors do not fulfil the requirements as a result of extended periods away from auditing i.e. maternity leave, study leave or alternative work obligations, or resignation or transfer to other audit bodies, registration could be removed or suspended.

4.2. Auditor Calibration

Auditors will be required to participate in an annual programme of calibration as presented by WIETA.

4.3. Minimum number of audits conducted within a year

Each auditor shall undertake a minimum of 8 audits per year against the WIETA standard or 3 audit reviews in the capacity as reviewer within a twelve (12) month period.

Auditors who return to audit under the WIETA standard after a one (1) year or more gap will be required to undertake two (2) shadow audits as well as participate in a refresher course in the WIETA standard.

4.4. Methodology for oversight

4.4.1. Performance review by the Audit Body

The Audit Body needs to implement a performance review system and these reports must be made available to the Scheme Owner on an annual basis.

Any competency concerns should be addressed by the audit body and remediated.

4.4.2. Performance review by the Scheme Owner

The Scheme Owner will execute performance reviews in respect of the execution, quality and integrity of the audit and assurance process.

Performance reviews for auditors will take place a continuous basis and will include the following performance areas, but is not limiting to:

- Auditor communication;
- Auditor conduct;
- Execution of the audit;
- Audit Quality, including the Audit Report;
- Compliance with the Audit Process and Methodology;
- Appropriate interpretation of the Standard;
- Quality of the Audit Report.

The performance review by the Scheme Owner can include, but is not limiting to:

- Documentary review, including the Audit Report;
- Post-audit questionnaire;
- Onsite visit to auditees to verify the audit report without the auditor being present;
- Review of the efforts spent on audits against the cost and time;
- Onsite witness of auditor performance.

5. Audit shadow procedure

6.11 Purpose

To define the procedure by which Shadow Audits will be conducted as part of the Audit Assurance Management System and auditor training, development & calibration program.

6.12 Scope

This procedure applies to all shadow audits undertaken as part of the WIETA Audit Assurance requirements and Auditor training & calibration program.

5.3 Responsibilities

The appointed person / Advisor : Audit Assurance within WIETA is responsible for ensuring that this procedure is maintained; reviewed & updated as part of WIETA's Audit Assurance Management System review.

The recognized Shadow Auditor is responsible for ensuring that this procedure is correctly applied; that all relevant records & supporting documentation are completed and returned to the WIETA Office & that he/she participates in the review process.

The WIETA CEO is responsible for ensuring that this procedure is authorized and integrated into the WIETA Audit Assurance Management System; that appropriate controls are established to managed its' effective use & that sufficient resources are allocated to enable this process to be applied.

The recognized Lead Auditor / Associate Auditor is responsible for providing any and all information to WIETA & the appointed Shadow Auditor timeously & in the agreed format to enable proper planning and execution of this process.

The Approved Audit Body is responsible for ensuring that access is provided to any and all information necessary to facilitate the shadow audit process; that the nominated Lead / Associate Auditor are made available & that they have signed an agreement with WIETA to engage & participate in this process & that they are committed to ensuring that auditor quality; competence & consistency is of the highest standard possible. Furthermore, they agree to implement & follow any findings made &/or recommendations for improvement.

5.4 Procedure

5.4.1 Schedule

WIETA will develop an annual schedule for shadow audits. This schedule should consider the following:

- i) Risk indicators identified
- ii) Experience of Auditor to be shadowed – auditors with less experience should be prioritized.
- iii) Trends in Auditor performance
- iv) Trends in Auditee performance
- v) Previous Shadow Audit reports – where there have been findings made or recommendations for improvement, these should be used to assist with planning & allocation.
- vi) Budget allocation – the ideal would be to observe every auditor annually however, given resource limitations this may not be possible. In this event, each auditor should be scheduled to be observed at least once in a 3 year cycle. N.B. This is in addition to & not instead of existing auditor quality controls applied by each Approved Audit Body.

5.4.2 Allocation

Once the audits have been scheduled, each audit should be allocated to an Approved / Recognized Shadow Auditor. This should be done as far in advance as possible but no later than 10 working days before the scheduled audit date.

5.4.3 Communication

The appointed person / Advisor : Audit Assurance from WIETA will send through a notification to the auditor / approved audit body informing them of the need to conduct a Shadow Audit. Alternatively, the Approved Audit Body may also commission a Shadow Audit through the WIETA Office.

The Approved Audit body must complete and return the Shadow Audit Appointment form at least 5 working days before the confirmed audit date. Any deviations must be agreed in writing.

5.4.4 Shadow Audit Process

5.4.4.1 Site Profile

The Approved Audit body must provide all information necessary in order for the Shadow Auditor to adequately prepare for the audit. The Shadow Auditor shall complete the Site Profile & Audit Planner to be submitted together with the final shadow audit report.

5.4.4.2 Site Assessment

The Shadow auditor shall complete the Shadow Audit Site Assessment checklist & submit together with the final shadow audit report no later than 5 working days after the completion of the shadow audit.

The Shadow Auditor shall be required to evaluate & provide feedback on at least the following aspects of the audit process:

- The opening Meeting
- The Site Tour (N.B. Not Applicable where the person being shadowed is NOT an OHS auditor)
- Documentation Review
- Worker Interviews
- Management Interviews
- Process of establishing findings
- Closing Meeting
- CAP Report

5.4.4.3 Final Report

The Shadow Auditor shall be required to complete and return a final report. The Shadow Auditor shall provide specific feedback and commentary as well as make recommendations for improvement around the following:

- Approach & Methodology
- Pre-Audit Preparation
- The Site Audit – this data should come directly from the shadow audit checklist
- Specific Auditor Feedback – the Shadow Auditor must use the rating scale provided to evaluate the following:
 - o Core Competence
 - o Audit Principles; Procedures & Techniques
 - o Management Systems & Use of Reference Documents
 - o Methodology and triangulation
 - o Interpretation of the WIETA standard
 - o Root Cause Analysis
 - o Communication Skills
 - o Knowledge; Understanding & Ability to apply this with regards to Applicable Laws; Regulations & other applicable requirements.

5.4.5. Feedback

The Appointed person / Advisor: Audit Assurance will complete the Shadow Audit Feedback form & forward this to the Approved Audit Body. If there are any findings raised, the Approved Audit Body will be required to complete and return a Corrective Action plan with 5 working days of receipt of the Shadow Audit feedback report. This should include details of:

- The actions to be taken
- The date by which these will be completed
- The evidence that will be provided to demonstrate completion
- The person responsible for submitting the evidence.

6. CONFLICT OF INTEREST, IMPARTIALITY AND BRIBERY

6.1. Conflict of Interest and Impartiality

Audit bodies are required to put in place the necessary due diligence to ensure that risks related to impartiality and conflict of interest are managed and remediated.

To maintain independence by the auditor –

- No personal connection with the site is permitted.
- No professional connection with the site is permitted;
 - no services may be provided directly at a site by the auditor which he/she has been contracted to and/or
 - no services may be provided by an organisation/company at a site that the auditor has been contracted to and he/she has a connection to the organisation/company through employment and/or ownership.

6.2. Bribery and corruption

Audit bodies need to put the necessary due diligence in place to ensure that risks related to anti-bribery and corruption are managed and remediated.

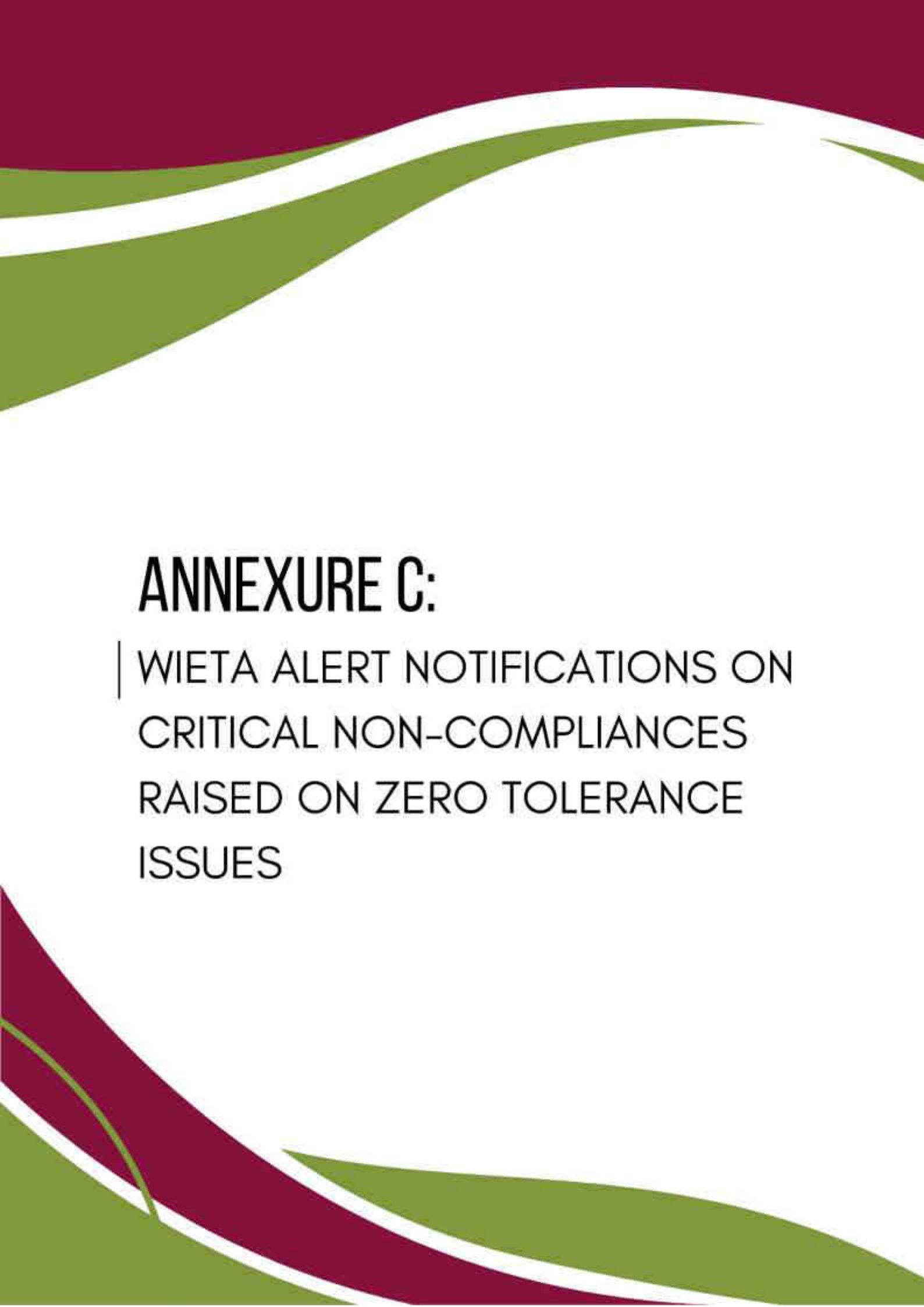
No auditor may be seen to be guilty of any acts of bribery or corruption that could include, but is not limiting to:

- Accepting gifts from an auditee;
- Colluding with the auditee or its representative on audit date fixtures;
- Colluding with the auditee or its representative of the auditee on audit outcomes;
- Accepting or discussing any monetary payments from an auditee; and/or

Engage the auditing client in any additional consultative work or otherwise related.

6.3 Misconduct

Any misconduct must be investigated by the Assurance Body under their Disciplinary Requirements. Any auditor in breach of the WIETA, Audit Body and APSCA Codes of Conduct, will be reported to said bodies for further investigation and possible suspension.



ANNEXURE C:

| WIETA ALERT NOTIFICATIONS ON
CRITICAL NON-COMPLIANCES
RAISED ON ZERO TOLERANCE
ISSUES

1. Introduction

1.1 Alert Notifications on Zero Tolerance issues

Where a 'critical' non-compliance is identified on zero tolerance issues, the auditor should, wherever possible, inform their Audit Body Audit Manager immediately or at least within 24 hours. The Audit Body Audit Manager is then responsible to alert the WIETA office telephonically within 24 hours of the audit, preferably before the closing meeting on the day of the audit. Following the telephonic communication, an alert notification must be submitted to the Audit Body within 24 hours of the audit or as soon as possible. This will enable the WIETA office, audit requestor and the employment site to work together to plan an appropriate and timely resolution to the issue.

Please note, that if an auditor believes they might be at risk as a result of communicating a critical non-compliance, the audit team should wait until it is removed from that situation before issuing the alert notification.

Auditors must always prioritise the welfare of workers when deciding how to inform employment site management of any critical non-compliance. Auditors should follow the escalation policies of the audit requestor to minimise any risk to workers.

1.2 Definition of a critical non-compliance:

- » A zero-tolerance issue which presents imminent risk to workers' safety/risk to life and limb or constitutes a significant breach of workers' human rights which is regarded as a zero-tolerance issue and/or;
- » A major non-compliance that has not been addressed or for which no significant improvement has been made by the time of a follow up audit, in spite of supplier commitment to resolve the issue.
- » An attempt to pervert the course of the audit through fraud, coercion, deception or interference.

2. Critical non-compliances include

- » Inconsistencies between different types of documents and worker testimony.
- » Employment of Child labour (reported or confirmed through documentation).
- » Involuntary, indentured, or involuntary prison labour (including forced overtime and absence of payment).
- » Practices of bonded labour, including during the recruitment phase, observed on site where workers are forced to work and unable to leave the workplace.
- » Workers subjected to physical abuse.
- » Workers subjected to systemic sexual harassment, abuse or systemic disrespect.
- » Workers in immediate danger.

- » Workers not being paid at all or systemically paid under the legal compliance.
- » Workers subjected to discriminatory practices (e.g. during recruitment, workers are tested for medical conditions not required by law or product safety requirements, e.g. pregnancy, HIV/AIDS, hepatitis etc.).
- » Union members, union or worker representatives are actively harassed, penalised or discriminated (directly or indirectly) against.
- » Attempted bribery.
- » Occupational Health and Safety non compliances that pose immediate and serious harm to workers' health and or safety.
- » Auditors denied access or obstructed from conducted from conducting a proper audit.
- » Evidence of the deliberate provision of false information to auditors so as to disguise unfair labour conditions.
- » Housing: Unsafe structural defects posing imminent harm to occupants or unhygienic environmental conditions posing imminent and serious threat to health; or unsafe conditions posing an urgent safety threat, i.e. potential fire hazard, overcrowding etc.

3. Actions following the Alert Notification on zero tolerance issues

Upon receiving notification from the auditor within 24 hours following the auditor, the Audit Body together with the WIETA office will alert and make contact with the site within 72 hours and jointly agree on immediate corrective steps to be taken to mitigate the harm caused. Further agreement to be reached with the site on a full corrective action which guarantees that the non-compliance had been rectified and that sufficient steps have been taken to ensure that further critical non compliances on zero tolerance issues do not occur. The corrective steps taken will be monitored on the WIETA on line Corrective Action Plan and Continuous Corrective Action Plan. All parties who have access to the audit results will be informed of the alert notification and steps agreed upon following the audit.

A member where a critical non-compliance had been identified will receive an D rating as stipulated in the **Ethical Performance Risk Matrix (Annexure A)** and no assurance will be issued.

4. Reference Alert Notification

4.1 Key Information

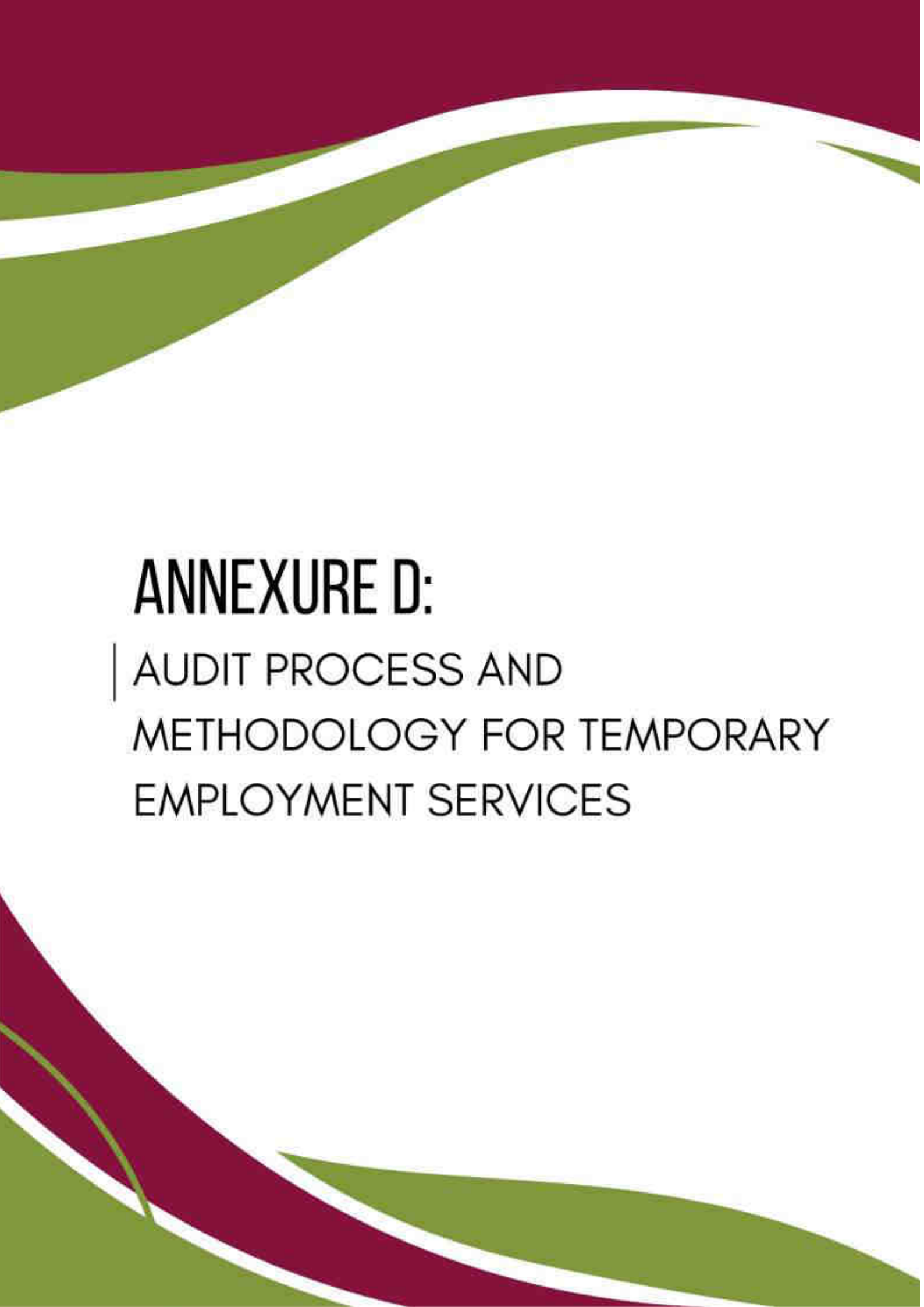
Member/Supplier name:
Site town:
Site name:
Audit date:
Alert date:
Lead Auditor Name:
Audit Body :

4.2 Details of critical non-compliance(s)

Critical non-compliances should be presented in a consistent format, with sufficient detail concerning the issue(s) and its context to enable useful remediation discussions to begin. A table should be completed for each issue found.

Critical Non Compliance	
Code or Labour Law provision in breach	
Description of critical non compliance	
Auditor Findings (description, extent of issue, etc.)	
Documentary, interview and other evidence found	

*Management response	
Proposed corrective action	



ANNEXURE D:

| AUDIT PROCESS AND
METHODOLOGY FOR TEMPORARY
EMPLOYMENT SERVICES

SECTION 1

BACKGROUND

1. Introduction

This better practice audit guidance document has been developed to supplement the WIETA APM guidelines when assessing conditions for workers providing services at a company's site, but who are not directly employed by the company.

It is not intended to be used as a stand-alone document and should be read in conjunction with the full WIETA APM guidelines.

Examples of these would be:

- Companies providing service staff for installation and servicing of equipment.
- Transport and personnel services
- Temporary staff provided, for example, to WIETA or SIZA members' cellars, farms or packhouses.

Some these businesses, called Temporary Employment Services (TES), may have a central head office with management structures to administer the provision of staff but more often they operate more informally without a central office or business location.

Their employees then work at a variety of locations, many of the locations often owned by WIETA members. In some cases, the TES or contractor may be providing a full service including managing the farm activities being undertaken, in others they may just be providing individuals who are then functionally managed/ controlled by the site where they are employed.

2. Contents

The guidelines seek to highlight the areas which may need to differ from the Auditor Methodology and it should therefore be used in conjunction with these APM Guidelines.

These guidelines are not intended as a stand-alone document to conduct an audit, but rather as a common set of criteria to supplement the audit process and audit systems facility, a central audit location will need to be agreed upon.

3. Usage

It is recommended that the current WIETA and CAP Report are used for reporting this type of ethical audit.

Where additional assessment standards are relevant, these will be referenced in this guidance supplement, not on the report format blanks.

It will be the responsibility of the auditor/audit company to state all appropriate governing standards within the Audit report and CAP Report.

4. Review

The supplement will be reviewed on an ongoing basis in line with local and international audit guidelines and standards.

SECTION 2

AUDIT PLANNING

2.1.1 RISK ASSESSMENT

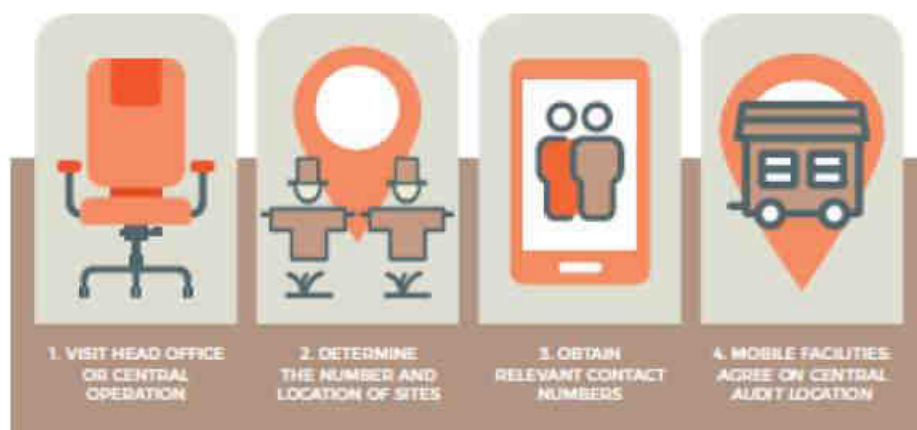
2.1.2 SELF-ASSESSMENT QUESTIONNAIRE AND SITE PROFILE

Unlike other ethical audits which are typically undertaken at a single location to fully evaluate the conditions of employment, the auditor will need to visit both the head office or central operation and a sample of sites to which the contractor's workers are allocated.

It is therefore important to obtain information prior to the audit on the number and nature of locations at which workers are employed. This will permit the auditor to agree a sampling plan and to select sites to visit. Contact numbers should also be obtained for the sites, any relevant operatives if working remotely and any regional managers or supervisors.

Much of this would be contained in the self-assessment questionnaire but it may be necessary for the auditors to obtain additional information in order to be able to plan the audit appropriately.

If the TES operates out of a mobile facility, a central audit location will need to be agreed upon.



2.2 TYPES OF AUDIT

These types of TES audits are generally not provided at the contractors' own sites, and it is unlikely that they would be in control of environmental issues at the sites of their clients.

The sequence of audits is the same as for standard ethical audits, with full and partial audits undertaken as needed to assess performance and verify corrective actions taken.



SECTION 3

AUDIT EXECUTION

3.1. PRE-AUDIT COMMUNICATION

3.1.1 BASIC AUDIT INFORMATION

The aim of the audit is to evaluate the performance of the organisation against the WIETA or SIZA Code, local law and any other additional requirements.

This will involve visits to a number of sites which may be at different geographical locations. Since the audit will be checking policies and procedures against actual practice, the auditor needs to consider the order of visit.

3.2 SITE VISITS

3.2.1 SITE VISITS TO HEAD OFFICE

The auditor's site visits should start with a visit to the location where the TES is operating from. Typically this could be an office in town, or based on a farm or family home where the HR management is located and documentation is held.

The aim of the day is to obtain understanding of the TES's business organisation and practices and to review policies, procedures and documentation relating to the audit scope.

There should also be an initial review of business documentation, registration and workers' files and records (see box alongside). There is also a review of the occupational health and safety records, depending on the size and scope of the services and company involved. These would include, but are not limited to:

- Legal appointments where applicable (if more than 20 permanent and temporary workers are employed).
- First aid appointment (more than 10 employees).
- Fire Marshall appointment and training (informal).
- Training certificates.
- OHS representative (more than 20 employees).
- First Aider (formal accredited training).
- Fork Lift (where applicable).
- Available first aid kit.

The review should include (but is not be limited to):

- Company registration details (where applicable), SARS registration and letter of good standing, registration with the Department of Labour for UIF, SDL (where applicable) and COID.
- Recruitment and employment practices, workplace policies, employment contracts and leave records.
- Wages and payslip records, records of hours worked.
- Grievance and disciplinary policies and procedures.
- Training records.

3.2.2 SITE VISITS TO PLACES OF WORK

The auditor should then visit work sites where the workers would be working. The number of these will depend on the total number and level of variation of sites of employment.

The aim of the visits is to interview workers to investigate the issues reviewed at the TES office site, especially to:

- Explain the audit process, to confirm employment practices and to reassure individuals involved that the process is confidential.
- Review terms and conditions of work at the site.
- Determine how policies and procedures are carried out in practice.
- Highlight any areas of potential cross-over (or gaps) between the responsibilities of the contractor and the management at the site of employment.
- See how supervisors and/or intermediaries manage their teams' terms and conditions.
- Review the relationship and communication channels.

IMPORTANT!





1. SUPERVISORS & MANAGERS

Supervisors and managers who cover multiple locations may not be available at any given moment.

2. FULL SITE INSPECTIONS

It is not necessary to conduct a full site inspection at each location visited, as these sites should have their separate audits done. The auditor should restrict the assessment to ensuring that the employees of the TES:

- Are afforded the rights granted them under the Sectoral Determination 13 of the Labour Relations Act and other relevant labour legislation and ethical code requirements.
- Have been appropriately trained and are aware of all important points regarding health and safety as it applies to their own job.

The purpose of the audit is to review the procedure of the contractor and the protection of workers, rather than to audit the health and safety conditions at the site where they are working.

3. PHOTOGRAPHS

It may not always be appropriate for photos to be taken. Permission to do so has to be authorised, as the photos could identify the location/company unfairly if they had not been given the right to reply at the time of the audit. However, photos identifying specific points of non-compliance should be included.

2.2.3 REVISIT HEAD OFFICE

After gathering information from the employment sites the auditor will need to revisit the TES office or other location where the HR management is located and documentation is held.

The aim is to cross-reference information gathered from the workers and work sites, and to gather further specific evidence necessary to:

- Either clear a potential nonconformance or discuss and agree on a corrective action.
- Conduct a thorough closing meeting to discuss all findings and agree on corrective actions.

SECTION 3

THE AUDIT PROCESS

The on-site audit will usually follow the same number of steps as a standard ethical audit:

- Opening meeting.
- Management interviews and documentary reviews.
- Announced/semi announced site visits to conduct worker interviews.
- Auditor pre-closing meeting.
- Closing meeting.

There are some specific additions.

3.1 OPENING MEETING

The following additional areas of clarification/preparation are required.

- Confirm the scope in terms of activities and clients to be covered, and any groups of workers to be excluded.
- Confirm that all necessary clients and workers have been communicated with.
- In the case of unannounced/ semi-announced audits, explain the reasons for conducting these and confirm that as much communication as possible
- Confirm the owner of the report and explain the confidentiality of the audit as well as agree who will receive the report copy.
- Explain the sampling process for employees for interview and that these interviews are confidential.
- Confirm that workers have been advised that any time taken for interviews will be paid.
- Agree date and time of closing meeting. Ensure that enough time is allowed to re-investigate non-compliances as required.



3.2 WORKER INTERVIEWS (INCLUDING GROUP INTERVIEWS)

Worker interviews will be undertaken at the location where the workers are deployed.

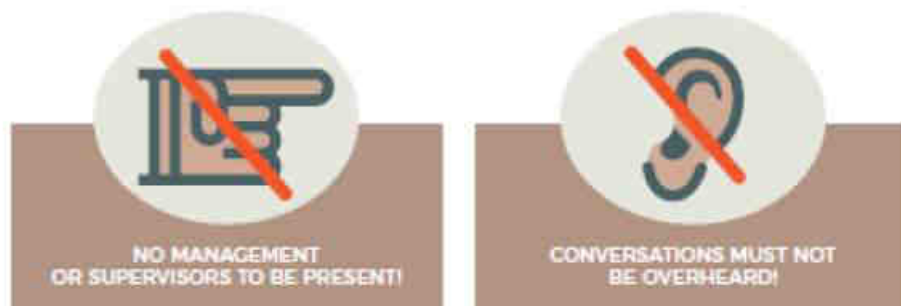
Selection and sampling of workers will only be undertaken by the audit team. The selection of workers will be determined by the sites selected and the working patterns at those sites. The auditor will ensure a fair representation of sites is visited.

The sites will be visited after the TES office visit or other location where HR and associated records are located. Interviews will be undertaken in such a way as to limit the disruption to operations.

It may be more difficult to find private areas where interviews can be undertaken, and the auditor must remain flexible on this point.

However, no management or supervisors should be present in interviews and care should be taken to ensure that conversations cannot be overheard.

The auditor should communicate to interviewees that all information will be managed with discretion and the interviewee's identity will remain confidential. Reassurance should also be given about the fact that workers will be paid for their time, and a contact number left for workers to feedback if this does not occur or if there are any negative repercussions after the visit.



3.3 MANAGER/ SUPERVISOR INTERVIEWS

Arrangements should be made to meet with a sample of managers or supervisors appropriate to the size of the TES.

The aim is to:

- Review their role in the implementation of any office policies and procedures.
- Look at the day-to-day running and decision-making, as this affects working conditions.
- Review any documentation that may exist at this level.
- Discuss communications systems in place for workers to raise concerns and grievances or to make other suggestions.

3.4 DOCUMENTARY REVIEW VERIFICATION

After the site visit a further visit will be undertaken at the office or location where documentation is held.

The aim of this visit is to:

- Cross-check any points raised through the site visits and interviews.
- Review any information that required specific permission from workers before access could be given.

3.5 CLOSING MEETING

The closing meeting will normally be held at the office or location where documentation is held and managers are present.

The aim of the closing meeting is to:

- Inform and agree with the management the findings of the audit.
- Verify their confirmation of the findings through signing off the CAP.
- Discuss and agree any corrective actions suggested by the TES company.
- Agree on timeframes for corrective actions.

The scope and names of locations to be mentioned on the report (see, 4.4.1 Report Writing) should also be agreed at this meeting, particularly with reference to any client names as well as the dissemination of the report.

IMPORTANT!

Additional time should be planned for this element, as the management is less likely to be familiar with the issues and may have more questions about approaches to drive compliance.

SECTION 4

OUTPUT AND FOLLOW-UP

4.1 REPORT WRITING

In view of the complexity of these types of supply chain, it is important that the scope of records reviewed and sites visited are clearly detailed in the report so that readers can see whether the findings relate to all activities undertaken by the TES company, or only those provided to certain clients.

However, care should be taken to ensure that specific client names are not mentioned and that references are made in such a way that confidentiality is protected.

It is also possible that issues will be discovered that are not in the direct control of the auditee (TES/labour contractor), but relate rather to responsibilities of the member companies or TES client whose sites are visited.

In such cases it is recommended that:

- ❖ This not be raised as a nonconformance on the audit performed on the contractor, as corrective actions will be outside of his control.
- ❖ It may be raised as an observation on the report, but should clearly highlight the action (if any) that can be expected from the auditee.

4.2 UPLOADING THE AUDIT TO WIETA

Should the TES be a registered member of WIETA the audit should be uploaded to the WIETA online system.

4.3 RECOGNITION OF TES AUDITS UNDERTAKEN BY SIZA

Should the TES be a registered and assured member of SIZA, the auditor can recognise this status and cite this in the WIETA audit report of the auditee (in tis case the producer) using that particular TES.

FOLLOW UP VISITS

At least one follow-up visit is required during an assurance cycle. This can be conducted when the client sites (farms/ cellars/packhouses) hold their audit inspections where the TES / contractor documentation and contract worker interviews would be required as part of the scope of audit at the client site or can be conducted at the TES premises as arranged.

Relevant verification can be done at the client site or TES locations to obtain sufficient evidence to enable a decision to be made regarding the efficacy of the corrective actions undertaken by the TES.

APPENDIX A1

GUIDANCE BY CLAUSE

For guidance on this section consult the APM. Detailed below are some additional requirements and points to note, specific to this type of supply chain.

This may not be a definitive list for all areas. It is essential that the auditor/audit company is aware of local laws and regulations covering this type of employment.

Where issues are found it is the responsibility of the audit company to record the relevant law/regulation/code detail on the WIETA report and the CAP Report.

1. MANAGEMENT SYSTEMS

Check whether the TES has kept to the audit cycle.

Check whether the TES meets the requirements for having all human rights and labour rights policies and procedures in place.

Check whether workers and external parties have access to a grievance and communication system.

All other Standards requirements other than supply chain operational due diligence need to be met.

2. FORCED & BONDED LABOUR

Check whether workers who have been recruited from other regions or provinces - and transported to the Western Cape - have been appraised of the conditions of work and prospective remuneration and have agreed to their contracts of employment before they were brought to the province.

Check that no debts in the form of transportation costs from outside of the province have been incurred prior to their appointment.

3. FREEDOM OF ASSOCIATION

At sites where only a few contracted workers may be employed it is unlikely that traditional unions or workers' committees will have a presence. This emphasises the need for effective communication mechanisms. The auditor should investigate the:

Attitude of the TES in relation to unions and their acceptance of union representation.

- Ability of workers to join trade unions or worker groups of their own choosing.
- Methods of communication between workers and their remote employer.

- Views of workers on the effectiveness of any worker representation present.
- Views of workers on the effectiveness of communication methods.
- Ability of workers to bargain collectively.

4. HEALTH AND SAFETY

This will be reviewed in a number of ways:

- Health and Safety policies and procedures at head office or as part of the TES management system.
- Health and Safety practices at the remote work sites and whether they match the policies and procedures detailed at head office.
- Induction & Training procedures for new starters and workers operating on clients' premises.
- Arrangements between the TES/ contractor and clients to ensure that all responsibilities are covered.
- Availability of Workman's Compensation Insurance and COID to cover company (contractor) workers while in clients' premises.

The health and safety at the head office itself should form only a small element of the audit, as the primary focus is on the welfare of employees working at remote sites.

5. CHILD LABOUR AND YOUNG WORKERS

No additional requirements.

6. WAGES

The checks as per the normal WIETA standard is required

7. WORKING HOURS

Records of working hours should be checked at head office against any local records held at the site at which workers are located - with the regional manager (or supervisor, if applicable) and with the workers themselves.

8. DISCRIMINATION

Although there are no additional requirements, the auditor should discuss and determine whether any unacceptable practices are occurring at the site, and whether there are systems in place for the worker to raise these and have them dealt with through the company's structure.

9. REGULAR EMPLOYMENT

No additional requirements.

10. FAIR DISCIPLINARY PROCEDURES & FAIR TREATMENT

No additional requirements are required. However, in the interviews the auditor should discuss and understand whether any unacceptable practices are to be found at the site at which the worker is located and whether there are systems in place for the worker to raise these and have them dealt with through their own company's structure.

11. HOUSING

Applicable as per WIETA Standard.

12. COMMUNITY IMPACT

Applicable as per WIETA Standard.

IMPORTANT!

MANAGEMENT SYSTEMS AND IMPLEMENTATION OF CODE

Since the aim of the audit is to check systems of the employees of contractors working at a site, the following additional checks are important:

The auditor should check that:

- The TES/contractor company is named and registered with SARS and the Department of Labour.
- Income tax, UIF and COID are collected and paid to the relevant authorities, with records kept for the legally required number of years, and that there are letters of good standing from SARS.

The above requirements are specific to South Africa.

APPENDIX A2

A2.1 AUDIT LENGTH, SAMPLE SIZE & TIMETABLE

The audit length is defined by the number and variation in type of activity undertaken at the various TES sites of employment. Below is a sampling plan table for a good practice approach based on the number of sites. The table excludes audit preparation, travel, report uploading time and report writing, but includes production and detailed discussion of a CAP (Corrective Action Plan) on site. For good practice ethical trade audits, worker interviews must include a representative sample

Auditors use their discretion and consider type of activity, location, and individual site and operations knowledge when defining the number of sites to visit and employees to interview. 15% sample or no less than 5 workers at each site

EXPECTATIONS

- Head office visits may be conducted on an announced, or semi-announced basis.
- Site visits may be conducted on an announced, or semi-announced basis.
- A semi-announced site visit retains the good practice established in the standard sampling of the workers undertaken by the audit team.

NOTES

- ❖ Owing to the nature of the distance of work sites from the central TES Office, any site visits will need careful planning. This is especially true where visits are semi-announced.
- ❖ For site visits it is necessary to communicate with the TES office employer management team as well as any managers and supervisors.
- ❖ In addition, it is important to consider what communication is required with any site managers who are in charge of the client site but not necessarily in charge of the targeted workers.
- ❖ Where sites are visited on a semi-announced basis, it is necessary to inform the TES office of the time frame during which visits may be expected but they may not be given details of the exact locations and/or dates.
- ❖ Where a management/ supervisory layer exists, a number of individuals at this level should be included in the interview cycle.
- ❖ The number of interviews will depend on number of workers available at each location.

A2.1 TABLE OF SAMPLE SIZE, SAMPLING PLAN AND AUDIT DAYS

TOTAL AUDITOR DAYS	NO. OF WORK SITES	AUDITOR DAYS AT HEAD OFFICE	AUDITOR DAYS AT SITES	WORKSITE VISITS BETWEEN AUDITS	DOCUMENT SAMPLES	INTERVIEW NUMBERS
1	<100	1/2	1/2	1	20 or 100% if fewer employees	20 or 100% if fewer employees
2	101-200	½	1	1	26	26 or 100% if fewer employees
3	201-300	½	2	1	35	35 or 100% if fewer employees
4	301-500	1	2	1	42	42 or 100% if fewer employees
5	>500	2	2	1	42	42 or 100% if fewer employees

A2.2 AUDIT PLANS: EXAMPLE PROGRAMME FOR AN AUDIT

As detailed above:

“Unlike other ethical audits, which are typically undertaken at a single location, to fully evaluate the conditions of employment, the auditor will need to visit both the head office operation and a sample of sites to which the contractor’s workers are allocated”.

Audits should be planned to take place at a time that is truly representative of the TES’s employee’s activities. This will require knowledge of e.g. shift patterns, and the auditor will be required to visit several sites possibly at various and different locations. The audit execution stages are described in Section 2.

A2.3 CLEAR AND PLANNED COMMUNICATION

- ✓ Prior to the audit additional information should be sought.
- ✓ From the TES company concerning the number of sites,
- ✓ The number of different activities at the sites,
- ✓ The details of specific clients serviced by this company,
- ✓ The contractor’s permission to speak to these clients.

N.B. The objective is to gain permission from a number of clients to visit TES/contract workers at their sites as part of the audit.

A2.4 CONSIDER ALL PARTIES

It is important to note that:

The auditor must be diplomatic and ensure that the TES company and client sites understand that the audit represents a wish by the TES company to verify and potentially improve their employment practices.

Some of the TES company’s clients may not permit visits to their sites to interview workers employed there. Therefore, the final scope of the audit in terms of clients covered and the sites visited must be clearly detailed in the final report.

A2.5 FOLLOW-UP VISITS

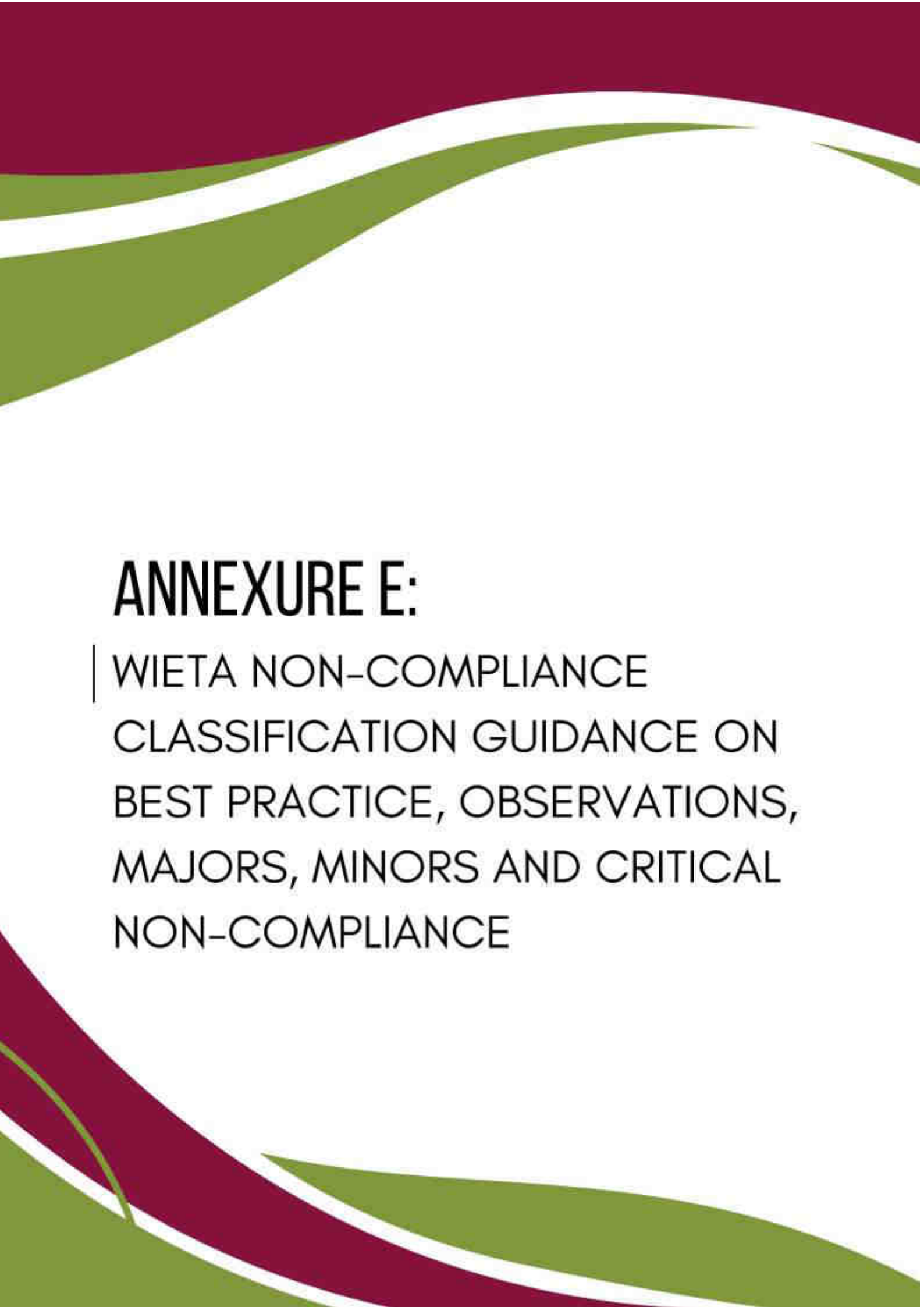
The number of sites to visit and samples of documents will to a large extent depend on previous findings and the nature of checks that need to be made.

For example, if the non-compliances were discovered through documentary reviews the need for interviews with individual employees would be lower than if the noncompliance arose out of individual interview and allegations. Equally, where findings were consistent across all sites

interviews a lower sampling could be taken at follow-up than where significant variances in performance was found across the sites visited.

As a general rule, however, it would be reasonable to expect that the overall length of a follow-up visit would be less of the time and sampling of the initial audit.

It is also best practice to ensure that sites visited include some from the initial audit, especially where specific findings were raised, as well as some taken at random from the broader pool so as to ensure that performance is consistent.



ANNEXURE E:

| WIETA NON-COMPLIANCE
CLASSIFICATION GUIDANCE ON
BEST PRACTICE, OBSERVATIONS,
MAJORS, MINORS AND CRITICAL
NON-COMPLIANCE

Auditors will classify non-compliances, observations and good practice examples to indicate the relative importance of each.

Follow-up audits are recommended for critical or major non-compliances or when corrective actions can be evaluated only through interviews and extensive documentation reviews.

Categorisation

- » Non-compliance can be categorised as:
 - Minor non-compliance.
 - Major Non-compliance.
 - Critical non-compliance.
- » Auditors can also note Observations and instances of Good Practice.

Classification

Non-compliances and observations will be classified according to:

- » The frequency of the problem and whether the issue is an isolated occurrence.
- » The potential severity of the problem.
- » The probability of recurrence.
- » The management system in place.
- » The response of the management.

Classification		
<i>The auditor must be able to justify his/her classification with detailed evidence</i>		
A critical non-compliance is:	» An issue which presents imminent risk to workers' safety/risk to life and limb or constitutes a significant breach of workers' human rights which is regarded as a zero-tolerance issue and/or. » A major non-compliance that has not been addressed or for which no significant improvement has been made by the time of a follow up audit, despite supplier commitment to resolve the issue. » An attempt to pervert the course of the audit through fraud, coercion, deception or interference.	Critical non-compliances include: – Inconsistencies between different types of documents and worker testimony. – Employment of Child labour (reported or confirmed through documentation). – Involuntary, indentured, or involuntary prison labour (including forced overtime and absence of payment). – Practices of bonded labour, including during the recruitment phase, observed on site where workers are forced to work and unable to leave the workplace. – Workers subjected to physical abuse. – Workers subjected to systemic sexual harassment, abuse or systemic disrespect. – Workers in immediate danger. – Workers not being paid at all or systemically paid under the legal compliance.

		– Workers subjected to discriminatory practices (e.g., during recruitment, workers are tested for medical conditions not required by law or product safety requirements, e.g., pregnancy, HIV/AIDS, hepatitis etc.). – Union members, union or worker representatives are actively harassed, penalised or discriminated (directly or indirectly) against. – Attempted bribery. – Occupational Health and Safety non compliances that pose immediate and serious harm to workers' health and or safety. – Auditors denied access or obstructed from conducting a proper audit. – Evidence of the deliberate provision of false information to auditors to disguise unfair labour conditions. – Housing: Unsafe structural defects posing imminent harm to occupants or unhygienic environmental conditions posing imminent and serious threat to health; or unsafe conditions posing an urgent safety threat, i.e., potential fire hazard, overcrowding etc. Critical non-compliances will trigger an alert notification. Auditors are to notify WIETA should an alert notification of a critical non-compliance be issued within 24 hours of the audit. WIETA will then be in contact with the site to arrange for any appropriate remedial action to be undertaken by the site to immediate remedy the critical non-compliance.
A major non-compliance is:	A breach which represents a danger to workers/ those on-site. » A material breach of the WIETA/ law. » A systematic violation of WIETA code requirement/ law.	

A minor non-compliance is:	» An occasional or isolated problem. » An issue which presents a low risk to workers/ those on-site. » A policy issue or misunderstanding where there is no evidence of a material breach.	
An observation is:	» The identification of an opportunity for improvement. » A possible issue which may develop into a non-compliance without further action. » An issue which the auditor has some evidence to indicate may be present but is not confirmed by more than one data point.	
A good practice example is:	» An issue that the auditor regards as over and above the standard against which the employment Site was audited.	

The WIETA Classification Guidance on Best Practice, Observations, Major, Minor and Critical Non-Compliances provides guidance on how to categorise different issues a good practice or minor, major or critical non-compliances.

This list is not exhaustive on how to categorise different issues as good practice, observations or minor, major or critical non-compliances and should be read with the WIETA Benchmark which identifies zero tolerance issues. These examples are for illustration only; auditors should still use their discretion when classifying non-compliances.

Ethical Management Systems

No.	Category	Subcategory	Issue	WIETA Compliance Risk Rating
1	Management Systems	Site's Management Systems	Employment site policies and procedures are regularly reviewed, in consultation with internal and external stakeholders, to ensure that they meet WIETA Code and fair labour standards.	Good Practice
2	Management Systems	Site's Management systems & Monitoring	Presence of internal audits to support site's ethical performance and continual improvement	Good Practice
3	Management Systems	Site's Management systems & Monitoring	Good HR policies / practices in place and good implementation	Good Practice
4	Management Systems	Site's Systems to Manage Supplier Compliance	Management conducts ethical risks assessments, awareness and / or and follow-up with all suppliers	Good Practice
5	Management Systems	Site's Management systems & Monitoring	Elected workers discuss with management any implementation of the standards the company upholds at the workplace	Good Practice
6	Management Systems	Site's Management systems & Monitoring	Employee of the month award / other types of incentives	Good Practice
7	Management Systems	Site's Management systems & Monitoring	Detailed staff / HR manual available concerning personnel policies, grievance, equal opportunities etc.	Good Practice
8	Management Systems	Site's Management systems & Monitoring	Good systems to arrange work in low periods	Good Practice
9	Management Systems	Site's Management systems & Monitoring	Site has a positive approach to worker training, development and good personnel relations and has related awards e.g., investors in people	Good Practice
10	Management Systems	Site's Management systems & Monitoring	Workforce appear happy and feel free to express concerns	Good Practice
11	Management Systems	Site's Management systems & Monitoring	Assurance in place with sub-suppliers / TES / labour brokers e.g., WIETA, SIZA, IPW, ISO 9000, ISA 8000, ISO 14001, etc.	Good Practice

12	Management Systems	Site's Management systems & Monitoring	Evidence of positive NGO / union / government collaboration	Good Practice
13	Management Systems	Audit process	Auditor refused access for audit	Business Critical
14	Management Systems	Business Ethics	Management attempts to bribe auditor	Critical
15	Management Systems	Audit process	Auditor not allowed to interview workers	Critical
16	Management Systems	Audit process	Management actively hinders audit process	Critical
17	Management Systems	Business Ethics	False records were provided to the auditors or management refuse to give true records to auditors which amounts to audit fraud	Critical
18	Management Systems	Site Management Systems	Management openly flouts the law despite knowledge of their responsibilities.	Critical
19	Management Systems	Site's Management systems & Monitoring	Systemic failure to provide generally accurate records	Critical
20	Management Systems	Site's Management systems & Monitoring	Failure to provide accurate wages and hours records (verified double books)	Critical
21	Management Systems	Audit process	Indication of workers being coached	Major
22	Management Systems	Audit process	Management is not present for audit	Major
23	Management Systems	Audit Frequency	Management has not kept to the required audit cycle and frequency	Major
24	Management Systems	Audit process	Audit findings not reviewed with management at the end of the audit day	Major
25	Management Systems	Audit process	SAQ not completed at the time of audit	Major
26	Management Systems	Site's Awareness of Code/Legal Requirements	No communication / training of workers on WIETA ethical standard	Major
27	Management Systems	Site's Awareness of Code/Legal Requirements	No management awareness of the WIETA social and ethical standards required	Major
28	Management Systems	TES monitoring	Management has no records of TES or sub-contractors and their compliance status	Major
29	Management Systems	Site's Awareness of Code/Legal Requirements	No system in place or way to keep up to date with South African legislation resulting in inadequate management awareness	Major

30	Management Systems	Site's Awareness of Code/Legal Requirements	No management awareness of South African legislation	Major
31	Management Systems	Site's Management systems & Monitoring	No person responsible for communicating, implementing and checking compliance against WIETA code requirements	Major
32	Management Systems	Site's Management systems & Monitoring	Inadequate management systems e.g., not appropriate for size of site, not effective etc.	Major
33	Management Systems	Site's Management systems & Monitoring	No staff policies and HR rules / manual / handbook issued where required	Major
34	Management Systems	Site's Management systems & Monitoring	Evidence of prosecutions / fines to site by Depts of Employment and Labour, for example, for breaking labour laws / OHS regulations and no actions have been taken to correct	Major
35	Management Systems	Audit process	Auditor refused access to some areas of site	Major
36	Management Systems	Site's Management systems & Monitoring	No management systems in place	Major
37	Management Systems	Human Rights	Evidence of serious violations of human rights	Major
38	Management Systems	Audit process	SAQ was completed but was not shared with the auditor	Minor
39	Management Systems	Site's Awareness of Code	Inadequate training / communication of workers on WIETA ethical code and standard as employees are not aware of the social and ethical standards the company upholds	Minor
40	Management Systems	Supplier Awareness	Inadequate training / communication of suppliers on WIETA ethical code and standard and/ or suppliers are not aware of the social and ethical standards the company upholds	Minor
41	Management Systems	Supplier Monitoring	Inadequate or no monitoring of supplier's ethical status	Minor
42	Management Systems	Policies and Procedures	Formal written policies and procedures are not in place but there is good practice in place as evidenced by worker testimony	Minor

43	Management Systems	Policies and Procedures	Policies and procedures have not been communicated to workers but are however, in place	Minor
44	Management Systems	Site's Management systems	Evidence of prosecutions / fines to site for breaking laws / regulations and corrective actions have been implemented to address	Minor
45	Management Systems	Audit process	Auditor refused access for audit, but allowed in when requested / verified	Minor
46	Management Systems	Management Responsible for Ethical implementation	Person in place to manage compliance, but does not have the necessary experience or understanding	Minor
47	Management Systems	Site's Management systems & Monitoring	No system to check the site's performance against compliance requirements e.g., internal audits	Minor
48	Management Systems	Site Performance	Inadequate systems to check the site's performance against compliance requirements e.g., internal audits not conducted regularly or missing crucial elements	Minor
49	Management Systems	Policies and Procedures	Inadequate staff policies and HR rules / manual / handbook issued where required	Minor
50	Management Systems	TES monitoring	Management have not kept adequate up to date records of TES or contractors and their current compliance status i.e., records are outdated or only for the previous harvest year	Minor
51	Management Systems	Human rights	No policy in place to respect international human rights standards	Minor
52	Management Systems	Human rights	Inadequate policy in place to respect international human rights standards	Minor
53	Management Systems	Human rights	No training for appropriate personnel on international human rights standards	Minor
54	Management Systems	Human Rights	No training for grape and wine suppliers on international human rights standards	Minor
55	Management systems	Human Rights	Evidence of minor violations of human rights	Minor

56	Management Systems	Human rights	No / inadequate process to assess impacts of the key human rights aspects of the site	Observation
57	Management Systems	Human rights	No / inadequate system to minimise the impacts of the key human rights aspects of the site	Observation
58	Management Systems	Human rights	No / inadequate process to identify the key human rights impacts of the sub suppliers and to minimise those impacts	Observation
59	Management Systems	Site's Management systems & Monitoring	Good management systems in place but some isolated failures	Observation

Child labour

No.	Category	Subcategory	Issue	WIETA Compliance Risk Rating
1	Child Labour & Young Workers	Child Labour Policy & Record Keeping	Well documented and well communicated policy on Child Labour and Young Workers	Good Practice
2	Child Labour & Young Workers	Child Labour Policy & Record Keeping	The Child Labour / Young workers policy is communicated to all workers and subcontractors	Good Practice
3	Child Labour & Young Workers	Child Labour Policy & Record Keeping	Well documented policy and procedures for recruitment	Good Practice
4	Child Labour & Young Workers	Minimum Age of Employment	Well documented procedures for checking ages of all workers	Good Practice
5	Child Labour & Young Workers	Minimum Age of Employment	Company has a specified minimum age for recruitment, in line with legislation	Good Practice
6	Child Labour & Young Workers	Child Labour - Remediation programmes	A well-documented Child Labour / Young Workers remediation policy and written procedures in place	Good Practice
7	Child Labour & Young Workers	Child Labour - Remediation programmes	There are good transition policies and written procedures in place to ensure that if any Child Labour is found they are released from work and seen through school until such time as they are no longer a child	Good Practice
8	Child Labour & Young Workers	Young Workers - Policy & records	An internal record is kept of young workers to ensure their terms and conditions of work are controlled and within the law	Good Practice

9	Child Labour & Young Workers	Young Workers - Hazardous Work	Good system in place to ensure that young workers are not engaged in hazardous situations	Good Practice
10	Child Labour & Young Workers	Young Workers - Hours of Work	Good system in place to ensure that young workers are not engaged in night work	Good Practice
11	Child Labour & Young Workers	Young Workers - Hours of Work	Good system in place to ensure that young workers cannot exceed legally allowed working hours	Good Practice
12	Child Labour & Young Workers	Minimum Age of Employment	Child Labour found on site currently	Business Critical
13	Child Labour & Young Workers	Minimum Age of Employment	Child Labour working on site for Temporary Employment Services	Business Critical
14	Child Labour & Young Workers	Minimum Age of Employment	Young workers given false ID cards and is underage	Business Critical
15	Child Labour & Young Workers	Child Labour - Remediation programmes	Evidence found of the practice of dismissing child workers without remediation	Critical
16	Child Labour & Young Workers	Child Labour Policy & Record Keeping	No records to verify age e.g., in personnel files	Critical
17	Child Labour & Young Workers	Child Labour Policy & Record Keeping	Systemic incidents of missing records that verify workers' age e.g., in personnel files	Critical
18	Child Labour & Young Workers	Minimum Age of Employment	Unsubstantiated evidence of Child Labour on site e.g., child worker fleeing the site	Critical
19	Child Labour & Young Workers	Minimum Age of Employment	No management system in place to check and manage age of all employees	Critical
20	Child Labour & Young Workers	Child Labour - Remediation programmes	Childcare facilities compromise children's safety at a severe level including inadequate fire or building safety, exposure to persons not designated for childcare and / or exposure to abuse	Critical
21	Child Labour & Young Workers	Young Workers - Hazardous Work	Majority of young workers engaged in hazardous situations	Critical
22	Child Labour & Young Workers	Young Workers - Hours of Work	Majority of young workers engaged in night work	Critical
23	Child Labour & Young Workers	Young Workers - Hours of Work	Majority of young workers' overtime hours are contrary to law	Critical
24	Child Labour & Young Workers	Young Workers - Hours of Work	Apprentices / trainees / vocational workers are employed under terms and conditions contrary to law i.e. Under 18s in alcohol production facilities	Critical
25	Child Labour & Young Workers	Child Labour Policy & Record Keeping	Isolated incidents of missing records that verify workers' age e.g., in personnel files	Major

26	Child Labour & Young Workers	Minimum Age of Employment	Evidence of children on production site but not working	Major
27	Child Labour & Young Workers	Minimum Age of Employment	Inadequate process in place as part of recruitment to verify age of employees	Major
28	Child Labour & Young Workers	Minimum Age of Employment	Management unaware of the laws on minimum age of employment	Major
29	Child Labour & Young Workers	Minimum Age of Employment	No / inadequate management system in place to check and manage age of certain types of workers e.g., temporary / agency	Major
30	Child Labour & Young Workers	Young Workers - Policy & records	Children allowed in production facilities outside of childcare facility or workers housing area	Major
31	Child Labour & Young Workers	Young Workers - Policy & records	Inadequacy of risk assessments for young workers	Major
32	Child Labour & Young Workers	Young Workers - Policy & records	Contracts for young workers not signed by parent or legal guardian if it is a legal requirement	Major
33	Child Labour & Young Workers	Young Workers - Policy & records	Contracts for young workers not registered / approved by relevant authority if it is a legal requirement	Major
34	Child Labour & Young Workers	Young Workers - Hazardous Work	Isolated instances of young workers engaged in hazardous situations	Major
35	Child Labour & Young Workers	Young Workers - Hours of Work	Isolated instances of young workers engaged in night work	Major
36	Child Labour & Young Workers	Young Workers - Hours of Work	Isolated instances of young workers' overtime hours are contrary to law	Major
37	Child Labour & Young Workers	Child Labour Policy & Record Keeping	No formal policy on Child Labour / minimum age in place but no Child Labour present	Minor
38	Child Labour & Young Workers	Child Labour - Remediation programmes	No Child Labour remediation policy established, but no Child / Underage Labour found	Minor
39	Child Labour & Young Workers	Young Workers - Policy & records	No recruitment policy for young workers	Minor
40	Child Labour & Young Workers	Minimum Age of Employment	Incidents of historical Child Labour	Observation

Forced and Bonded labour and Modern Slavery

No.	Category	Subcategory	Issue	WIETA Compliance Risk Rating
1	Forced Labour	Management Systems	Flexible working hours available for workers	Good Practice
2	Forced Labour	Management Systems	Workers are well informed about policy on forced, bonded or involuntary prison labour	Good Practice

3	Forced Labour	Management Systems	Facility has a programme and materials to train relevant individuals responsible for the hiring process on the facility policies and procedures prohibiting Forced and Bonded Labour	Good Practice
4	Forced Labour	Management Systems	Good systems in place to allow worker to take emergency leave	Good Practice
5	Forced Labour	Bonded Labour	Where workers have access to no-interest loans, workers have agreed loan amounts and repayment terms in writing, have a copy of their agreement, and workers clearly understand the repayment terms and conditions.	Good Practice
6	Forced Labour	Bonded Labour	Systemic evidence of bonded / indentured labour	Business Critical
7	Forced Labour	Bonded Labour	Substantial loans held by workers, with excessive interest rates and/or onerous financing schemes and/or unreasonable terms and conditions of repayment	Business Critical
8	Forced Labour	Forced Labour/ Slave Labour	Passports / ID papers of all workers kept by employer	Critical
9	Forced Labour	Forced Labour/ Slave Labour	Passports / ID papers of foreign migrant workers kept by employer and not a legal requirement	Critical
10	Forced Labour	Forced Labour/ Slave Labour	Workers are led to believe that if they do not comply with what is being asked of them, they or their family will be subject to physical, social or financial retribution	Business Critical
11	Forced Labour	Forced Labour/ Slave Labour	Workers are controlled through religion / faith, violence, threats, etc. either to self or others	Business Critical
12	Forced Labour	Forced Labour/ Slave Labour	Substantiated evidence of forced labour	Business Critical
13	Forced Labour	Prison Labour	Evidence of involuntary prison labour on site or in the supply chain	Business Critical
14	Forced Labour	Trafficked Labour	Substantiated evidence of trafficked labour	Business Critical
15	Forced Labour	Trafficked Labour	Undocumented migrant workers have been subjected to threats of being returned to their home country and/or reported to authorities if they leave employment	Business Critical
16	Forced Labour	Recruitment/termination	All workers are required to pay fees upon termination of employment including security deposits are not returned etc.	Critical

17	Forced Labour	Debt or wage entrapment	Workers are being fraudulently charged fees for food, clothing, transportation, health checks, work documentation and/or supplies as part of their recruitment	Critical
18	Forced Labour	Debt or wage entrapment	Workers are required to sign up for an excessively long period of accommodation rental or lodge excessive deposits with financial penalties for early leaving employment or accommodation	Critical
19	Forced Labour	Debt or wage entrapment	Workers have wages paid into someone else's accounts or workers are not in control of own bank accounts	Critical
20	Forced Labour	Debt or wage entrapment	Workers not paid at all for work done	Critical
21	Forced Labour	Bonded Labour	Worker is in debt to employer and unable to pay it off	Critical
22	Forced Labour	Bonded Labour	Systemic / regular occurrence of deductions e.g., deposits for staying in employment taken from workers' wages including bonds etc.	Critical
23	Forced Labour	Bonded Labour	Financial penalties for permanent workers who do not complete a stipulated length of service e.g., 1-3 years.	Critical
24	Forced Labour	Bonded Labour	Proportion of wages are unreasonably withheld and paid at the end of the year / at end of contract	Critical
25	Forced Labour	Bonded Labour	Workers cannot leave employment until they have worked to pay off debts owed to the employer	Critical
26	Forced Labour	Bonded Labour	Workers cannot leave employment until they have worked to pay off debts owed to the labour broker or other intermediary who has facilitated the work	Critical
27	Forced Labour	Bonded Labour	Employer inflates workers indebtedness or ensures they have minimal or no income	Critical
28	Forced Labour	Bonded Labour	Workers must work to pay off unreasonable debts owed to an employment/work finding agent	Critical
29	Forced Labour	Freedom of Movement	Workers are not able to leave at the end of shift	Critical
30	Forced Labour	Freedom of Movement	Security guards restrict workforce compromising their health, safety or rights	Critical

31	Forced Labour	Freedom of Movement	Workers' movements are controlled outside the workplace by representatives of or their employers	Critical
32	Forced Labour	Freedom of Movement	Workers are required to stay in company or broker-controlled housing and are unable to enter or leave the premises freely	Critical
33	Forced Labour	Forced Labour/ Slave Labour	Practice of compulsory overtime not agreed to or written into contract	Critical
34	Forced Labour	Forced Labour/ Slave Labour	Worker has multiple dependencies on the employer that go beyond the job	Critical
35	Forced Labour	Forced Labour/ Slave Labour	Workers are coerced to fraudulently claim for social security benefits and/or to take out loans/credit arrangements	Critical
36	Forced Labour	Recruitment/termination	Recruiter or employer employs coercive recruitment practices, which physically or psychologically control the worker during recruitment	Critical
37	Forced Labour	Forced Labour/ Slave Labour	Workers are subject to disciplinary hearings for refusal to work overtime	Critical
38	Forced Labour	Trafficked Labour	Suspicion (unsubstantiated) of trafficked labour	Critical
39	Forced Labour	Retention of ID Papers	Workers are required to pay to access their ID papers / passports with no consent forms etc.	Critical
40	Forced Labour	Management Systems	No policy on employment is freely chosen / bonded / prison labour	Major
41	Forced Labour	Management Systems	No evaluation systems in place to ensure compliance with laws on modern slavery and human trafficking including no monitoring of foreign migrant, temporary / casual / contractor labour	Major
42	Forced Labour	Management Systems	No systems in place to identify and prevent forced labour in wage and termination practices	Major
43	Forced Labour	Management Systems	Overtime is compulsory as per contract e.g., 'opt-out' agreement and targets achieved to leave but no evidence that this is enforced.	Major
44	Forced Labour	Recruitment/termination	Some workers (e.g., foreign workers / migrant workers etc.) are required to pay excessive fees upon termination of employment including security deposits that are not returned etc.	Major

45	Forced Labour	Recruitment/termination	Unreasonable delay in payments due to workers when they leave - systemic occurrence	Major
46	Forced Labour	Recruitment/termination	Employment is linked to the employment of another individual e.g., family member or spouse	Major
47	Forced Labour	Recruitment/termination	Probation periods are excessive and contrary to law	Major
48	Forced Labour	Recruitment/termination	No standard notice period is defined and notice is varied per worker	Major
49	Forced Labour	Recruitment/termination	Notice period required from the worker is more than the pay period / contract terms or contrary to law	Major
50	Forced Labour	Recruitment/termination	Workers cannot terminate their labour contract until after a specified period has passed after training or other benefit has been paid by the employer	Major
51	Forced Labour	Debt or wage entrapment	Workers paying excessive fees / deposits to recruiter / employer when commencing employment	Major
52	Forced Labour	Debt or wage entrapment	Workers are charged deposits for work tools and work clothing e.g., PPE and safety equipment.	Major
53	Forced Labour	Debt or wage entrapment	Workers receive payment in kind (accommodation, tokens, vouchers etc.) which exceeds an unreasonable percentage of wage	Major
54	Forced Labour	Debt or wage entrapment	Deductions made from worker pay by the employer without worker consent and which are not provided for by legislation	Major
55	Forced Labour	Debt or wage entrapment	Forced savings schemes are in place and workers do not have access until term of work is complete	Major
56	Forced Labour	Debt or wage entrapment	Monetary deposits required and/or wage deductions made for work-related items that employer should pay and takes wages below minimum	Major
57	Forced Labour	Bonded Labour	Some workers (e.g., foreign / migrant workers) must pay their own costs to return to country of origin if they do not complete contract terms	Major
58	Forced Labour	Bonded Labour	Workers lose attendance bonus if they refuse to do overtime	Major
59	Forced Labour	Bonded Labour	Suspicion/ indication of bonded / indentured labour	Major

60	Forced Labour	Bonded Labour	Workers believe they are obliged to work without or for low pay to repay a favour/service	Major
61	Forced Labour	Freedom of Movement	Some workers are not allowed to leave at end of shift e.g., agency / temporary workers etc.	Major
62	Forced Labour	Freedom of Movement	Restrictions on movements of communal / hostel residents which exceed what they consider is reasonable for safety or consideration for other residents	Major
63	Forced Labour	Freedom of Movement	Systemic occurrence of restricted toilet and rest breaks	Major
64	Forced Labour	Freedom of Movement	Workers are uninformed or misinformed about terms of employment	Major
65	Forced Labour	Freedom of Movement	Nature of the work, working conditions, employment terms, living costs or wages are worse than those indicated to workers at the point of recruitment	Major
66	Forced Labour	Freedom of Movement	Job adverts (particularly for jobs requiring migration) are misleading about the job, job location, employer, working conditions, contract terms or earnings	Major
67	Forced Labour	Forced Labour	Original papers / passport retained by employer but workers not able to retrieve freely e.g., with consent forms / with payment	Major
68	Forced Labour	Recruitment/termination	Employer punishes or threatens to remove privileges or extra work for workers who do not cooperate	Major
69	Forced Labour	Management Systems	Policy on forced, bonded or involuntary prison labour in place but not communicated to workers or otherwise inadequate	Minor
70	Forced Labour	Recruitment/termination	Unreasonable delay in payments due to workers when they leave - isolated occurrence	Minor
71	Forced Labour	Recruitment/termination	Resignations are subject to management approval	Minor
72	Forced Labour	Recruitment/termination	The process for workers to give notice is not effectively communicated in a language workers understand or a mechanism they can access.	Minor
73	Forced Labour	Debt or wage entrapment	Isolated occurrence of deductions taken from workers' wages e.g., deposits for staying in employment etc.	Minor

74	Forced Labour	Debt or wage entrapment	A handful of personnel files do not contain evidence of workers' written consent to deductions.	Minor
75	Forced Labour	Debt or wage entrapment	Pay / benefits are dependent on working a set period e.g., holiday pay or other pay	Minor
76	Forced Labour	Debt or wage entrapment	Monetary deposits are taken from workers (e.g., for accommodation or PPE).	Minor
77	Forced Labour	Freedom of Movement	Lack of agreed transport leading to long waits before leaving	Minor
78	Forced Labour	Freedom of Movement	Isolated incidents of restricted toilet and rest breaks	Minor
79	Forced Labour	Freedom of Movement	Job advertisements and / or application documents are written at a level or different language than workers understand	Minor

Freedom of association and the effective recognition of the right to collective bargaining

No.	Category	Subcategory	Issue	WIETA Compliance Risk Rating
1	Freedom of Association and Collective Bargaining	Management Systems	Evidence of an open attitude to Freedom of Association and a right to collective bargaining and an effective implementation	Good Practice
2	Freedom of Association and Collective Bargaining	Management Systems	Excellent worker management communication on site	Good Practice
3	Freedom of Association and Collective Bargaining	Management Systems	Workers feel there is a strong level of social dialogue between management & workers and feel their concerns are heard	Good Practice
4	Freedom of Association and Collective Bargaining	Management Systems	Management actively engages in day-to-day conversations with workers to understand their needs and suggestions.	Good Practice

5	Freedom of Association and Collective Bargaining	Worker committee / parallel organisation	There is a worker structure, union or representative committee in place which regularly meets with management to address grievances etc.	Good Practice
6	Freedom of Association and Collective Bargaining	Worker committee / parallel organisation	There is a functioning union and / or workers' committee which meets regularly with management, produces minutes and effectively represents workers	Good Practice
7	Freedom of Association and Collective Bargaining	Worker committee / parallel organisation	Evidence of fair elections for workers representatives, held on a regular basis	Good Practice
8	Freedom of Association and Collective Bargaining	Trade Union	Employer has an open attitude towards unions and facilitates the access of unions and functioning of a union/s on site	Good Practice
9	Freedom of Association and Collective Bargaining	Trade Union	There is a union on site with freely elected union representatives who have a good relationship with management	Good Practice
10	Freedom of Association and Collective Bargaining	Trade Union	Unions involved throughout the audit	Good Practice
11	Freedom of Association and Collective Bargaining	Trade Union	Agreement with workers on rights, protocol and procedures of access with local unions	Good Practice
12	Freedom of Association and Collective Bargaining	Effectiveness of Representation Body	Evidence that meeting minutes are produced and communicated e.g., by posting on the notice board	Good Practice
13	Freedom of Association and Collective Bargaining	Effectiveness of Representation Body	There is good worker representation with training for worker reps and adequate time off for representative duties.	Good Practice
14	Freedom of Association and Collective Bargaining	Effectiveness of Representation Body	There is a well-functioning trade union present which negotiates with management	Good Practice

15	Freedom of Association and Collective Bargaining	Effectiveness of Representation Body	The union (or parallel means) has been effective in defusing disagreement between workers and management. They have successfully negotiated conditions that are over and above legal and industry norms.	Good Practice
16	Freedom of Association and Collective Bargaining	Collective Bargaining Agreements	There is a collective agreement in place, freely negotiated between worker reps and management, which meets the law, and which is honoured by management	Good Practice
17	Freedom of Association and Collective Bargaining	Management Systems	Evidence of strikes which have not been appropriately resolved in line with legislation	Critical
18	Freedom of Association and Collective Bargaining	Trade Union	Evidence of an employer's refusal to allow presence of a union	Critical
19	Freedom of Association and Collective Bargaining	Trade Union	Employer does not recognise the trade union present, contrary to the LRA	Critical
20	Freedom of Association and Collective Bargaining	Trade Union	Union fees not being submitted / used for union activities	Critical
21	Freedom of Association and Collective Bargaining	Trade Union	There is direct discrimination against worker reps / union members / worker committee	Critical
22	Freedom of Association and Collective Bargaining	Attitude of Employer Towards representation body	Evidence of a critical communication breakdown between workers and employers which may lead to serious conflict or abuse	Critical
23	Freedom of Association and Collective Bargaining	Attitude of Employer Towards representation body	Evidence of an employer's refusal to allow presence of a union	Critical
24	Freedom of Association and Collective Bargaining	Attitude of Employer Towards representation body	Right for workers to join or form trade unions is proactively discouraged by management through contracts / handbooks / internal rules etc.	Critical

25	Freedom of Association and Collective Bargaining	Attitude of Employer Towards representation body	Evidence that worker reps or union members have been dismissed because of union membership	Critical
26	Freedom of Association and Collective Bargaining	Management Systems	Workers not aware of their right to join or form any worker committee, trade union or bargain collectively	Major
27	Freedom of Association and Collective Bargaining	Worker committee / parallel organisation	There is no worker / union representative structure or committee or equivalent on site i.e., there is no effective communication channel between management and workers	Major
28	Freedom of Association and Collective Bargaining	Worker committee / parallel organisation	Worker structures or committee in place, but no action / management response to workers' concerns	Major
29	Freedom of Association and Collective Bargaining	Worker committee / parallel organisation	There is no worker committee or equivalent on site and there is no effective communication channel between management and workers	Major
30	Freedom of Association and Collective Bargaining	Worker committee / parallel organisation	Worker representatives are not democratically elected, they are assigned by the management.	Major
31	Freedom of Association and Collective Bargaining	Worker committee / parallel organisation	Worker representatives are not allowed time to conduct their role within working hours	Major
32	Freedom of Association and Collective Bargaining	Trade Union	Employer prevents workers from freely associating, and joining independent organisations of their own choice e.g., through contracts / handbooks / rules etc.	Major
33	Freedom of Association and Collective Bargaining	Trade Union	Employer does not recognise the trade union present	Major
34	Freedom of Association and Collective Bargaining	Trade Union	There is a union on site, but representatives are not freely elected by workers	Major
35	Freedom of Association and Collective Bargaining	Trade Union	Union fees deducted from workers do not meet legal requirements	Major

36	Freedom of Association and Collective Bargaining	Trade Union	Union fees deducted from workers' pay is excessive	Major
37	Freedom of Association and Collective Bargaining	Trade Union	Union not registered with appropriate authorities as per law	Major
38	Freedom of Association and Collective Bargaining	Effectiveness of Representation Body	The union / worker committee is not effective in representing and addressing workers' concerns e.g., misunderstanding workers' concerns, only raising their own concerns etc.	Major
39	Freedom of Association and Collective Bargaining	Effectiveness of Representation Body	There is a worker structure/ committee but elections with workforce are not conducted consistently	Major
40	Freedom of Association and Collective Bargaining	Effectiveness of Representation Body	Systemic incidents of worker committee / equivalent not given time off to meet and fulfil their activities e.g., working schedule does not allow / management refuses time-off	Major
41	Freedom of Association and Collective Bargaining	Attitude of Employer Towards representation body	Worker committee / trade union / equivalent not meeting regularly	Major
42	Freedom of Association and Collective Bargaining	Attitude of Employer Towards representation body	Management refused union / worker representative involvement in the audit	Major
43	Freedom of Association and Collective Bargaining	Attitude of Employer Towards representation body	Consistent refusal of facilities for trade union activities.	Major
44	Freedom of Association and Collective Bargaining	Attitude of Employer Towards representation body	Employer obstructing union recruitment activities or denying unions reasonable access for recruitment	Major
45	Freedom of Association and Collective Bargaining	Attitude of Employer Towards representation body	Preferential treatment given to union / worker committee reps	Major

46	Freedom of Association and Collective Bargaining	Attitude of Employer Towards representation body	Penalising workers in any way for seeking to join, being members of or seeking to establish or be represented by a trade union	Major
47	Freedom of Association and Collective Bargaining	Collective Bargaining Agreements	No evidence of a collective bargaining agreement (CBA) contrary to law	Major
48	Freedom of Association and Collective Bargaining	Collective Bargaining Agreements	Company does not comply with collective bargaining agreement (CBA)	Major
49	Freedom of Association and Collective Bargaining	Management Systems	No policy on Freedom of Association and Right to Collective Bargaining	Minor
50	Freedom of Association and Collective Bargaining	Management Systems	No policy / procedures covering effective worker management communications	Minor
51	Freedom of Association and Collective Bargaining	Worker representative structure / parallel organisation	Worker's representatives are not from production workers e.g., they are admin or supervisory staff but are elected	Minor
52	Freedom of Association and Collective Bargaining	Worker representative structure / parallel organisation	Worker committee on site, but meetings not recorded / no documentary evidence	Minor
53	Freedom of Association and Collective Bargaining	Worker representative structure / parallel organisation	There is no training for worker representatives	Minor
54	Freedom of Association and Collective Bargaining	Trade Union	Union fees not deducted from workers' pay contrary to negotiated agreement	Minor
55	Freedom of Association and Collective Bargaining	Effectiveness of Representation Body	A committee exists but workers do not know about the worker committee / its function and / or who their representatives are	Minor
56	Freedom of Association and Collective Bargaining	Effectiveness of Representation Body	Workers' committees / unions do not reflect the gender balance of workforce, e.g., all male workers committee in a majority female workforce	Minor
57	Freedom of Association and Collective Bargaining	Effectiveness of Representation Body	Insufficient meetings between management and worker representatives for the meetings to be effective	Minor

58	Freedom of Association and Collective Bargaining	Effectiveness of Representation Body	Isolated incidents of worker committee / equivalent not given time off to meet and fulfil their activities e.g., working schedule does not allow / management refuses time-off	Minor
59	Freedom of Association and Collective Bargaining	Effectiveness of Representation Body	Lack of documentary evidence of management action on issues raised	Minor
60	Freedom of Association and Collective Bargaining	Effectiveness of Representation Body	Meeting minutes are kept but are not shared with the workers and / or management	Minor
61	Freedom of Association and Collective Bargaining	Attitude of Employer Towards representation body	Inadequate space / equipment provided for union or worker committee to meet	Minor
62	Freedom of Association and Collective Bargaining	Collective Bargaining Agreements	No evidence of a collective bargaining agreement (CBA) where one is required	Minor
63	Freedom of Association and Collective Bargaining	Collective Bargaining Agreements	Agreements made by collective bargaining group is not communicated to remainder of workforce	Minor
64	Freedom of Association and Collective Bargaining	Collective Bargaining Agreements	CBA not updated in line with new local law requirements or otherwise out of date CBA	Minor

Health and Safety

1	Health, safety & hygiene	Health and Safety Systems	No systems and processes in place to detect, assess, avoid or respond to health and safety threats, hazards or risks	Critical
2	Health, safety & hygiene	Health and Safety Risks	No risk assessments have been undertaken to reduce and / or eliminate risks on site	Critical
3	Health, safety & hygiene	Chemical Storage and Handling	No system in place to prevent possible exposure to hazardous substances	critical
4	Health, safety & hygiene	Fire safety	No firefighting equipment	Critical

5	Health, safety & hygiene	Fire safety	No / inadequate means of summoning emergency services	Critical
6	Health, safety & hygiene	Fire safety	No fire exits at site including only one exit	Critical
7	Health, safety & hygiene	Fire safety	Some fire exits, but not enough for size of site / number of employees e.g., only one feasible and usable exit	Critical
8	Health, safety & hygiene	Fire safety	No emergency exit signs	Critical
9	Health, safety & hygiene	Fire safety	No fire alarms	Critical
10	Health, safety & hygiene	Building Equipment and Accommodation	Serious structural issues at workers' accommodation (immediate risk of serious injury or death)	Critical
11	Health, safety & hygiene	Building Equipment and Accommodation	Accommodation used to store hazardous materials	Critical
12	Health, safety & hygiene	Buildings, Equipment and Accommodation	Accommodation not adequately separated from production areas	Critical
13	Health, safety & hygiene	Sanitation facilities	No sanitation on site	Critical
14	Health, safety & hygiene	Clean drinking water	No water provision on site	Critical
15	Health, safety & hygiene	Health and Safety Systems	Inadequate or ineffective systems and processes in place to detect, address, avoid or health and safety threats, hazards or risks on site	Major
16	Health, safety & hygiene	Health and Safety Systems	Senior persons responsible for health and safety have no training in safety matters and therefore does not understand or implement role effectively	Major
17	Health, safety & hygiene	Health and Safety Systems	No Health and Safety representatives, where legally required, have been appointed to monitor health and safety matters on site	Major
18	Health, safety & hygiene	Health and Safety Systems	No Health and Safety representatives, where legally required, have been trained in health and safety matters on site	Major
19	Health, safety & hygiene	Health and Safety Systems	No formal inspections are undertaken to monitor health and safety risks	Major
20	Health, safety & hygiene	Health and Safety Systems	No health and safety committee in place to undertake functions, as prescribed by law	Major
21	Health, safety & hygiene	Health and Safety Systems	Health and safety committee not trained to undertake functions, as prescribed by law	Major

22	Health, safety & hygiene	Health and Safety Training	All General workers not trained in health and safety awareness	Major
23	Health, safety & hygiene	Health and Safety Risks	Risk assessments undertaken but is inadequate to identify all risk and no measures in place to protect vulnerable groups on site i.e., young workers; women, chemical handlers; physically disadvantage	Major
24	Health, safety & hygiene	Health and Safety risks	Asbestos risk identification, management, maintenance and removal not done as per legislative requirements	Major
25	Health, safety & hygiene	Chemical Storage and Handling	Safety Data Sheets not accessible to workers	Major
26	Health, safety & hygiene	Chemical Storage and Handling	No risk assessment done on the appropriate measures to be put in place to manage contaminated waste and water spillage	Major
27	Health, safety & hygiene	Chemical Storage and Handling	No Management system in place for disposal of contaminated waste or contaminated water	Major
28	Health, safety & hygiene	Chemical Storage and Handling	No system or measures in place to manage contamination from spraying in neighbouring communities and housing	Major
29	Health, safety & hygiene	Chemical Storage and Handling	System in place but no effective to check on storage, record keeping or good housekeeping	Major
30	Health, safety & hygiene	Chemical Storage and Handling	No Training undertaken in handling hazardous substances	Major
31	Health, safety & hygiene	Chemical Storage and Handling	Control measures for use of restrictive remedies such as Paraquat and glyphosates not in place	Major
32	Health, safety & hygiene	Chemical Storage and Handling	Control measures for use of PPE protecting against exposure to red label chemicals such as Paraquat and glyphosates not in place	Major
33	Health, safety & hygiene	Chemical Storage and Handling	Control measures for the disposal of contaminated water in place but not adhered to systematically	Major
34	Health, safety & hygiene	Chemical Storage and Handling	First Aid station inaccessible	Major
35	Health, safety & hygiene	Chemical Storage and Handling	Emergency shower not in place	Major
36	Health, safety & hygiene	Risk Control	No PPE issued linked to risk assessed on PPE use where exposure to hazards may occur at the workplace	Major
37	Health, safety & hygiene	Risk Control	No System in place to manage and prevent risk from working in confined spaces	Major

38	Health, safety & hygiene	Risk Control	PPE issued but not worn systemically	Major
39	Health, safety & hygiene	Risk Control	PPE issued at cost to workers	Major
40	Health, safety & hygiene	Risk Control	PPE washed off site systemically	Major
41	Health, safety & hygiene	Risk Control	No washing facilities for PPE on site	Major
42	Health, safety & hygiene	Fire Safety	No / inadequate emergency lighting	Major
43	Health, safety & hygiene	Fire Safety	No / inadequate fire exits due to building design / construction e.g., width, fire doors opening inwards / incorrect direction of evacuation flow / sliding doors	Major
44	Health, safety & hygiene	Fire Safety	No training in use of firefighting equipment	Major
45	Health, safety & hygiene	Fire Safety	Inadequate emergency exit signs	Major
46	Health, safety & hygiene	Fire Safety	Inadequate fire alarms	Major
47	Health, safety & hygiene	Fire Safety	No / inadequate fire drill training conducted (e.g., not conducted outside of daylight hours, not all workers had taken part)	Major
48	Health, safety & hygiene	Disease, Injury and Emergency Management	First aid box not properly stocked	Major
49	Health, safety & hygiene	Disease, Injury and Emergency Management	No or unsafe transportation in case of emergency	Major
50	Health, safety & hygiene	Disease, Injury and Emergency Management	Fatalities and accidents not recorded and / or reported	Major
51	Health, safety & hygiene	Disease, Injury and Emergency Management	No medical examinations conducted for those exposed to ergonomic, biological, chemical, psychological or physical risks	Major
52	Health, safety & hygiene	Buildings, Equipment and Accommodation	The facility lacks the permits and certificates required by local law	Major
53	Health, safety & hygiene	Buildings, Equipment and Accommodation	Buildings are structurally safe	Major
54	Health, safety & hygiene	Buildings, Equipment and Accommodation	No / inadequate normal lighting	Major
55	Health, safety & hygiene	Buildings, Equipment and Accommodation	Unsafe electrical wiring and other electrical equipment	Major
56	Health, safety & hygiene	Buildings, Equipment and Accommodation	No Control measures against extreme temperatures both internally and externally	Major
57	Health, safety & hygiene	Buildings, Equipment and Accommodation	Health Hygiene surveys such as ventilation, silica and noise surveys undertaken to determine risks,	Major

			control measures and training to be put in place	
58	Health, safety & hygiene	Buildings, Equipment and Accommodation	Worker Accommodation is not a permanent structure e.g., tents, caravans, shacks	Major
59	Health, safety & hygiene	Buildings, Equipment and Accommodation	Worker accommodation is not structurally stable	Major
60	Health, safety & hygiene	Buildings, Equipment and Accommodation	Accommodation building not weatherproof	Major
61	Health, safety & hygiene	Buildings, Equipment and Accommodation	Building does not have access to electricity, water or other basic amenities	Major
62	Health, safety & hygiene	Buildings, Equipment and Accommodation	Building presents a risk to worker health e.g., Severe mould / broken asbestos etc.	Major
63	Health, safety & hygiene	Buildings, Equipment and Accommodation	Building presents a risk to worker health e.g., major mould on walls and ceiling - more than 30% coverage is deemed major	Major
64	Health, safety & hygiene	Buildings, Equipment and Accommodation	Unsafe means of travelling between accommodation and sites of work	Major
65	Health, safety & hygiene	Buildings, Equipment and Accommodation	Communal Accommodation (Hostels) has no canteen facility / eating area or no basic appliances for cooking	Major
66	Health, safety & hygiene	Buildings, Equipment and Accommodation	Communal Accommodation (Hostels) have inadequate canteen facility / eating area or inadequate appliances for cooking	Major
67	Health, safety & hygiene	Buildings, Equipment and Accommodation	Worker Accommodation has inadequate kitchen facilities or inadequate appliances for cooking	Major
68	Health, safety & hygiene	Buildings, Equipment and Accommodation	Communal Living has no / inadequate beds or mattresses	Major
69	Health, safety & hygiene	Buildings, Equipment and Accommodation	No washing facilities (e.g., showers or baths)	Major
70	Health, safety & hygiene	Buildings, Equipment and Accommodation	No gender segregation in washing and toilet facilities in communal living quarters	Major
71	Health, safety & hygiene	Buildings, Equipment and Accommodation	Communal Accommodations have no privacy in washing and toilet facilities	Major
72	Health, safety & hygiene	Buildings, Equipment and Accommodation	Unsanitary and unhygienic conditions in sleeping areas / hostels	Major
73	Health, safety & hygiene	Buildings, Equipment and Accommodation	Unsanitary storage / handling of waste / rubbish / wastewater	Major
74	Health, safety & hygiene	Buildings, Equipment and Accommodation	Pest control problems	Major

75	Health, safety & hygiene	Buildings, Equipment and Accommodation	No / inadequate access to drinking water	Major
76	Health, safety & hygiene	Buildings, Equipment and Accommodation	No / inadequate cleaning of communal living accommodation	Major
77	Health, safety & hygiene	Buildings, Equipment and Accommodation	Overcrowding in hostels	Major
78	Health, safety & hygiene	Buildings, Equipment and Accommodation	No / inadequate security in workers' accommodation	Major
79	Health, safety & hygiene	Buildings, Equipment and Accommodation	Unfair / excessive rents for accommodation contrary to SA legislation and SD 13	Major
80	Health, safety & hygiene	Buildings, Equipment and Accommodation	Accommodation is located in an unsafe environment / area (e.g., exposed manhole etc.)	Major
81	Health, safety & hygiene	Buildings, Equipment and Accommodation	No appropriate gender segregation in sleeping facilities at communal living quarters	Major
82	Health, safety & hygiene	Buildings, Equipment and Accommodation	Unsanitary and unhygienic conditions in accommodation washing / toilet areas and / or kitchen / dining area	Major
83	Health, safety & hygiene	Buildings, Equipment and Accommodation	Where accommodation is deducted, structural requirements of building do not meet any of the SD 13 standards - No less than 30 m² - Unmetered electricity is not charged - No more than 10% charged - The premises is structurally sound, in good repair, - Safe to OHS requirements - Waterproof, weatherproof and windproof	Major
84	Health, safety & hygiene	Sanitation facilities	No sanitation provision in vineyards and fields during peak seasons	Major
85	Health, safety & hygiene	Clean drinking water	Water provided but not tested for consumption	Major
86	Health, safety & hygiene	Health and Safety Systems	No senior person appointed to be responsible for health and safety on site	Minor
87	Health, safety & hygiene	Health and Safety Systems	Senior persons responsible for health and safety does not understand or implement role effectively	Minor

88	Health, safety & hygiene	Health and Safety Systems	Training undertaken but not effectively implemented as it does not address a) How to identify health and safety risks. b) Measures used to prevent risks. c) How to report risks via appropriate channels. or e) How to monitor that risks have been dealt with.	Minor
89	Health, safety & hygiene	Health and Safety Systems	Appropriate appointments not in place to implement the necessary OHS system at the workplace i.e., 16.1; 16.2; Competent person Machinery; OHS / SHE representatives	Minor
90	Health, safety & hygiene	Health and Safety Systems	OHS Committees, where appointed, as per legislation, do not meet, no documentation is in place and no process is followed to ensure effective monitoring reporting and feedback on risk management	Minor
91	Health, safety & hygiene	Health and Safety Systems	Quarterly Health and safety meetings not held and / or documented in minutes	Minor
92	Health, safety & hygiene	Health and Safety Training	As an incidental, some general workers not trained in health and safety awareness	Minor
93	Health, safety & hygiene	Health and Safety Training	General workers not trained in health and safety awareness during peak periods	Minor
94	Health, safety & hygiene	Health and Safety Training	TES and contract workers not trained in health and safety awareness during peak periods	Minor
95	Health, safety & hygiene	Health and Safety Training	General workers not trained in health and safety awareness in a language that workers have understood	Minor
96	Health, safety & hygiene	Health and Safety Training	No qualified trained First Aider for more than 10 employees and 1 per 50 employers as per legislation	Minor
97	Health, safety & hygiene	Health and Safety Training	Machine operators not trained in use of machinery	Minor
98	Health, safety & hygiene	Health and Safety risks	Risk assessments not adequate to reduce and / or eliminate risks on site	Minor
99	Health, safety & hygiene	Health and Safety risks	Safe operating procedures are not in place	Minor
100	Health, safety & hygiene	Health and Safety risks	Safe operating procedures are not implemented	Minor
101	Health, safety & hygiene	Health and Safety risks	OHS risk assessment does not include pregnant and breast-	Minor

			feeding women as a vulnerable group	
102	Health, safety & hygiene	Health and Safety risks	OHS risk assessment does not include young workers as a vulnerable group	Minor
103	Health, safety & hygiene	Health and Safety risks	Measures to protect pregnant and breast-feeding women not implemented	Minor
104	Health, safety & hygiene	Health and Safety risks	Measures to protect young workers not implemented	Minor
105	Health, safety & hygiene	Chemical Storage and Handling	Emergency shower inaccessible to workers	Minor
106	Health, safety & hygiene	Chemical Storage and Handling	No control measures for the disposal of contaminated water	Minor
107	Health, safety & hygiene	Chemical Storage and Handling	Control measures for the disposal of contaminated water in place but not adhered to in an incidental case	Minor
108	Health, safety & hygiene	Chemical Storage and Handling	Structure of chemical stores do not meet standards requirements	Minor
109	Health, safety & hygiene	Chemical Storage and Handling	Poor housekeeping in chemical stores	Minor
110	Health, safety & hygiene	Chemical Storage and Handling	Warning signs and emergency procedures not displayed at storage facilities	Minor
111	Health, safety & hygiene	Chemical Storage and Handling	First Aid station not displayed	Minor
112	Health, safety & hygiene	Chemical Storage and Handling	Poor management of contaminated waste and water resulted in seepage due to lack of any effective measures in place	Minor
113	Health, safety & hygiene	Chemical Storage and Handling	No system in place for the removal or disposal of contaminated waste or chemical containers	Minor
114	Health, safety & hygiene	Risk Control	PPE washed off site incidentally in one case	Minor
115	Health, safety & hygiene	Risk Control	PPE issued but not worn incidentally in a singular case	Minor
116	Health, safety & hygiene	Risk Control	PPE issued but no training given on effective protection linked to assessed risk	Minor
117	Health, safety & hygiene	Risk Control	Contaminated PPE not disposed of	Minor
118	Health, safety & hygiene	Risk Control	All Workers not trained in working in confined spaces	Minor
119	Health, safety & hygiene	Risk Control	Incidentally, some workers not trained in working in confined spaces	Minor

120	Health, safety & hygiene	Risk Control	Procedures for working in confined spaces not monitored and supervised	Minor
121	Health, safety & hygiene	Risk Control	Signage not displayed	Minor
122	Health, safety & hygiene	Risk Control	Signage not understood	Minor
123	Health, safety & hygiene	Risk Control	No measures in place to prevent drownings in dams	Minor
124	Health, safety & hygiene	Disease, Injury and Emergency Management	First Aid Box not accessible	Minor
125	Health, safety & hygiene	Disease, Injury and Emergency Management	No system in place to manage injuries and emergencies	Minor
126	Health, safety & hygiene	Disease, Injury and Emergency Management	Minor incidences nor recorded	Minor
127	Health, safety & hygiene	Disease, Injury and Emergency Management	Examinations conducted but no records kept	Minor
128	Health, safety & hygiene	Buildings and Accommodation	Where accommodation is deducted, structural requirements of building do not meet some of the SD 13 standards	Minor
129	Health, safety & hygiene	Fire Safety	No / inadequate records of fire drill training	Minor
130	Health, safety & hygiene	Fire Safety	No / inadequate communication of fire plans (e.g., not displayed properly)	Minor
131	Health, safety & hygiene	Fire Safety	No testing and monitoring of fire alarms at regular intervals	Minor
132	Health, safety & hygiene	Buildings and Accommodation	Minor issues with state of repair (e.g., broken windows, small cracks, peeling paint etc.)	Minor
133	Health, safety & hygiene	Buildings and Accommodation	No / inadequate temperature control in accommodation (e.g., air-conditioning, fans)	Minor
134	Health, safety & hygiene	Buildings and Accommodation	No / inadequate accommodation for families (including couples without children)	Minor
135	Health, safety & hygiene	Buildings and Accommodation	No / inadequate access to hot water	Minor
136	Health, safety & hygiene	Buildings and Accommodation	First aid kits not available in workers' accommodation	Minor
137	Health, safety & hygiene	Buildings and Accommodation	No / inadequate records of who lives in workers' accommodation	Minor
138	Health, safety & hygiene	Buildings and Accommodation	Each individual does not have adequate and secure storage for personal possessions	Minor
139	Health, safety & hygiene	Buildings and Accommodation	Recreational facilities in poor condition e.g., no equipment, no cleaning, unhygienic	Minor

140	Health, safety & hygiene	Buildings and Accommodation	Minor structural issue at workers' accommodation (e.g., broken windows, small cracks, peeling paint etc.)	Minor
141	Health, safety & hygiene	Buildings and Accommodation	Inappropriate gender segregation in washing and toilet facilities	Minor
142	Health, safety & hygiene	Buildings and Accommodation	Well-equipped first aid kits not available in workers' accommodation	Minor
143	Health, safety & hygiene	Alcohol dependence risks	No Alcohol harms policy in place	Minor
144	Health, safety & hygiene	Alcohol dependence risks	No awareness raising / training on alcohol risks in the workplace	Minor

Discrimination, harassment and abuse

1	Discrimination	General Discrimination, Systems & Policy	Diverse representation of employees in supervisory & management roles e.g., foreign / migrant / female / disabled etc.	Best practice
2	Discrimination	General Discrimination, Systems & Policy	Regular audits of wage levels to ensure equal pay for equal work	Best practice
3	Discrimination	General Discrimination, Systems & Policy	Clear and well publicised process for reporting any discrimination	Best practice
4	Discrimination	Race, Caste, National Origin, Ethnic Group, Religion	Regular multicultural celebrations	Best practice
5	Discrimination	Sex, Gender	Male and female employees in senior management positions	Best practice
6	Discrimination	Marital Status, Sexual Orientation & Pregnancy	Pregnant women given more than legally required conditions and benefits e.g., extra rest breaks & controlled work conditions, no night work or hazardous work	Best practice

7	Discrimination	Marital Status, Sexual Orientation & Pregnancy	Excellent maternity policy or good management and support for pregnant women	Best practice
8	Discrimination	Disability	Proactive employment of workers with learning difficulties and disabilities	Best practice
9	Discrimination	Age	Positive attitude to employees at or near retirement age	Best practice
10	Discrimination	Marital Status, Sexual Orientation & Pregnancy	Workers can be dismissed if found to be pregnant including if stated in contract	Business Critical
11	Discrimination	General Discrimination, Systems & Policy	No evidence of discriminatory systems in termination process	Critical
12	Discrimination	Race, Caste, National Origin, Ethnic Group, Religion	Evidence of terminations based on race, caste, origin, ethnic group or religion	Critical
13	Discrimination	Sex, Gender	Evidence of terminations based on gender	Critical
14	Discrimination	Marital Status, Sexual Orientation & Pregnancy	Discrimination against married/pregnant workers in contract and/or treatment of workers	Critical
15	Discrimination	Marital Status, Sexual Orientation & Pregnancy	Pregnancy testing as part of recruitment and not required by law	Critical
16	Discrimination	Disability	Recruitment / employment policy unnecessarily discriminates against individuals with disabilities	Critical
17	Discrimination	Disability	Terminations for workers with disability contrary to law	Critical

18	Discrimination	Union Membership or Political Affiliation	Evidence of termination based on union membership / political affiliation	Critical
19	Discrimination	General Discrimination, Systems & Policy	No evidence of discriminatory systems in hiring practices	Major
20	Discrimination	General Discrimination, Systems & Policy	No evidence of discriminatory systems in training and promotion	Major
21	Discrimination	General Discrimination, Systems & Policy	No policy on wages and transparency in remuneration as required by law.	Major
22	Discrimination	Race, Caste, National Origin, Ethnic Group, Religion	Evidence of discrimination based on race, caste, origin, ethnic group or religion in hiring practices	Major
23	Discrimination	Race, Caste, National Origin, Ethnic Group, Religion	Evidence of discrimination based on race, caste, origin, ethnic group or religion for training / promotion / remuneration	Major
24	Discrimination	Sex, Gender	Evidence of gender discrimination in hiring/ recruitment practices	Major
25	Discrimination	Sex, Gender	Evidence of gender discrimination for promotions / remuneration	Major
26	Discrimination	Marital Status, Sexual Orientation & Pregnancy	Evidence of discrimination towards workers based on their sexual orientation	Major
27	Discrimination	Marital Status, Sexual Orientation & Pregnancy	Evidence of discrimination towards workers based on their marital status	Major
28	Discrimination	Marital Status, Sexual Orientation & Pregnancy	Evidence of discrimination in hiring / recruitment practices based on sexual orientation / marital status	Major

29	Discrimination	Marital Status, Sexual Orientation & Pregnancy	Evidence of discrimination in training / promotion / pay opportunities based on sexual orientation / marital status	Major
30	Discrimination	Marital Status, Sexual Orientation & Pregnancy	Evidence of terminations based on sexual orientation / marital status	Major
31	Discrimination	Marital Status, Sexual Orientation & Pregnancy	Evidence of discrimination against married / pregnant workers in contract or treatment including for training / remuneration / promotions	Major
32	Discrimination	Disability	Evidence of discrimination in training / promotion / pay opportunities based on disabilities	Major
33	Discrimination	Sickness	Site requires medical tests for all workers, and it is not a legal requirement	Major
34	Discrimination	Sickness	Evidence of discrimination against workers with HIV / AIDS	Major
35	Discrimination	Age	Evidence of age discrimination (post recruitment stage) at workplace in training / promotion / pay etc.	Major
36	Discrimination	Union Membership or Political Affiliation	Evidence of discrimination against union members when hiring	Major
37	Discrimination	Union Membership or Political Affiliation	Evidence of discrimination action against union members or worker representatives in e.g., wages and benefits including training / promotion / remuneration	Major

38	Discrimination	Union Membership or Political Affiliation	Evidence of other discriminatory actions against worker representatives / union members	Major
39	Discrimination	Worker types e.g., Agency / Temporary labour etc.	Different rates of pay and benefits based on arbitrary differences between workers e.g., migrant, casual, younger workers, contrary to law	Major
40	Discrimination	Worker types e.g., Agency / Temporary labour etc.	Discrimination not based on merit or performance in the choice of becoming permanent / pay / bonus and promotion opportunities	Major
41	Discrimination	Worker types e.g., Contract / seasonal labour etc.	Evidence of discrimination against agency / temporary workers with regards to breaks / PPE / etc.	Major
42	Discrimination	Worker types e.g., Contract / Seasonal labour etc.	Evidence of discrimination against agency workers with regards to benefits and sick leave etc.	Major
43	Discrimination	Worker types e.g., Contract / seasonal labour etc.	Evidence of discrimination against agency workers with regards to collective bargaining rights	Major
44	Discrimination	Worker types e.g., Contract / seasonal labour etc.	Terms and conditions for agency workers differ from other workers, contrary to law	Major
45	Discrimination	General Discrimination, Systems & Policy	There is no discrimination policy in place	Minor
46	Discrimination	General Discrimination, Systems & Policy	There is a discrimination policy in place, but it is not communicated to employees	Minor

47	Discrimination	General Discrimination, Systems & Policy	No clear wage grading system leading to different wage rates for the same work	Minor
48	Discrimination	General Discrimination, Systems & Policy	Information on opportunities for training not clearly communicated to workforce	Minor
49	Discrimination	General Discrimination, Systems & Policy	Worker promotion scheme complicated not clearly communicated to workforce	Minor
50	Discrimination	General Discrimination, Systems & Policy	No Performance appraisal documentation in place to assist promotion opportunities	Minor
51	Discrimination	General Discrimination, Systems & Policy	No Training conducted for all managers and workers on anti-discrimination and equal opportunities	Minor
52	Discrimination	General Discrimination, Systems & Policy	No HR controls with policies and procedures to ensure no discrimination	Minor
53	Discrimination	Race, Caste, National Origin, Ethnic Group, Religion	No facility or provision to allow for religious practices such as daily prayers as per local law requirement	Minor
54	Discrimination	Sex, Gender	No sexual harassment committee / appointments where required by local law	Minor
55	Discrimination	Age	Recruitment defines a specific age	Minor
56	Discrimination	Age	No recruitment of young workers 16-18 yrs. contrary to law	Minor
57	Discrimination	Age	A defined retirement / maximum age when not permitted by law	Minor

Fair Treatment, Discipline and Grievances

1	Fair treatment, Discipline and Grievances	Systems, Policies and Procedures	Systemic evidence of unfair treatment, harassment, intimidation and / or abuse	Critical
2	Fair treatment, Discipline and Grievances	Systems, Policies and Procedures	Evidence of physical abuse	Critical
3	Fair treatment, Discipline and Grievances	Systems, Policies and Procedures	Evidence of corporal punishment	Critical
4	Fair treatment, Discipline and Grievances	Systems, Policies and Procedures	Incidental evidence of unfair treatment, harassment and / or abuse	Major
5	Fair treatment, Discipline and Grievances	Systems, Policies and Procedures	No formal policies, mechanisms and/or procedures for workers to report on rights abuses	Major
6	Fair treatment, Discipline and Grievances	Disciplinary	No disciplinary Code, policy or procedures in place	Major
7	Fair treatment, Discipline and Grievances	Disciplinary	Disciplinary Code, policy or procedures in place but not communicated to workers	Major
8	Fair treatment, Discipline and Grievances	Disciplinary	Disciplinary Code, policy or procedures in place but not accessible to workers and no evidence of system being effective	Major
9	Fair treatment, Discipline and Grievances	Disciplinary	Disciplinary Code, policy or procedures in place but not communicated to workers	Major
10	Fair treatment, Discipline and Grievances	Disciplinary	No recordkeeping	Major
11	Fair treatment, Discipline and Grievances	Grievances	No Grievance policy, mechanism or procedures in place	Major

12	Fair treatment, Discipline and Grievances	Grievances	Grievance policy, mechanism or procedures in place but not communicated to workers	Major
13	Fair treatment, Discipline and Grievances	Grievances	Grievance policy, mechanism or procedures in place but not accessible to workers and no evidence of system being effective	Major
14	Fair treatment, Discipline and Grievances	Grievances	Evidence of workers being disciplined for using grievance mechanism	Major
15	Fair treatment, Discipline and Grievances	Grievances	Evidence of workers being intimidated for using the grievance mechanism	Major
16	Fair treatment, Discipline and Grievances	Grievances	No penalties for violent or abusive behaviour are in place	Major
17	Fair treatment, Discipline and Grievances	Grievances	Management not trained in use of grievance mechanisms	Major
18	Fair treatment, Discipline and Grievances	Grievances	No consultation with workers on the grievance mechanism	Minor
19	Fair treatment, Discipline and Grievances	Grievances	No record keeping	Minor
20	Fair treatment, Discipline and Grievances	Grievances	No feedback given to reportees	Minor
21	Fair treatment, Discipline and Grievances	Grievances	No remedy in place	Minor
22	Fair treatment, Discipline and Grievances	Grievances	Grievance issues not resolved are referred to external mediation mechanisms	Minors
23	Fair treatment, Discipline and Grievances	Grievances	Managers and / or supervisors do not understand how the grievance system works	Minors

Wages, benefits and terms of employment

No.	Category	Subcategory	Issue	WIETA Compliance Risk Rating
1	Wages	Record keeping and documentation	Workers assisted to open bank accounts	Good Practice
2	Wages	Benefits & Insurance	Maternity leave is above statutory minimum with pay	Good Practice
3	Wages	Benefits & Insurance	All UIF paid for all employees by company	Good Practice
4	Wages	Benefits & Insurance	Leave allowances and benefits are above the statutory minimum	Good Practice
5	Wages	Benefits & Insurance	Employees are given private medical insurance	Good Practice
6	Wages	Benefits & Insurance	Company provides a range of additional benefits, including free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	Good Practice
7	Wages	Benefits & Insurance	Death in service benefit	Good Practice
8	Wages	Benefits & Insurance	Meal and transportation are provided free of charge	Good Practice
9	Wages	Benefits & Insurance	Workers are given private medical insurance which exceeds the statutory minimum	Good Practice
10	Wages	Benefits & Insurance	Profit share for every employee	Good Practice
11	Wages	Payment of Wages	Workers are paid for downtime	Good Practice
12	Wages	Payment of Wages	Advantageous housing and / or land distribution to compensate for unpaid benefits and severance	Good Practice
13	Wages	Payment of Wages	Different wage rates which meet the living wage benchmark based on age alone for the same work and skill set, it is not contrary to local law and there is a collective bargaining agreement in place	Good Practice
14	Wages	Payment of Wages	There is a process in place to provide the living wage as per Anker Methodology which meets basic needs, including housing, food, clothing, medical etc.	Good Practice
15	Wages	Payment of Wages	All workers receive wages well above the Living wage benchmark set by the Anker Methodology for the year in assessment	Good Practice

16	Wages	Payment of Wages	Workers can significantly increase their earning potential beyond a living wage through a production bonus or other bonus scheme.	Good Practice
17	Wages	Payment of Wages	Systemic instances of employees working without payment	Business Critical
18	Wages	Record keeping and documentation	No payroll records exist	Critical
19	Wages	Record keeping and documentation	Falsified, duplicate or intentionally incomplete payroll records including verified inconsistencies	Critical
20	Wages	Record keeping and documentation	No pay stubs / payslips were provided to employees	Critical
21	Wages	Deductions	Deductions which are made without worker's written permission e.g., food allowance deductions / accommodation deductions / not provided for by national law	Critical
22	Wages	Benefits & Insurance	Systemic instances of non-payment of sick leave	Critical
23	Wages	Payment of Wages	Isolated instances of employees working without payment	Critical
24	Wages	Payment of Wages	All workers are paid less than the legal minimum wage	Critical
25	Wages	Payment of Wages	Workers are paid piece rate and wages are below legal minimum wage	Critical
26	Wages	Payment of Wages	Systemic instances of miscalculations / deductions mean that worker earns below minimum legal wage	Critical
27	Wages	Payment of Wages	Wages for all employees never paid in the time required by law	Critical
28	Wages	Overtime Premium	No premium is paid for overtime hours for all employees, and this is contrary to law	Critical
29	Wages	Record keeping and documentation	No payroll records available on date of audit	Major
30	Wages	Record keeping and documentation	Wages could not be verified due to unknown inconsistencies e.g., no system in place to manage hours	Major
31	Wages	Record keeping and documentation	Systemic absence of payslips / payroll and other related records	Major
32	Wages	Record keeping and documentation	Systemic incidents of payslips inconsistent with wages paid	Major

33	Wages	Record keeping and documentation	Payslips are unclear / not understood including missing information, unclear calculations or not in workers language	Major
34	Wages	Deductions	Systemic occurrence of pay being deducted for disciplinary measures e.g., lateness, absenteeism, disciplinary warnings, errors in production etc.	Major
35	Wages	Deductions	Deductions made for PPE or other essential work-related items	Major
36	Wages	Deductions	Loans exceed the legally allowed maximum limit	Major
37	Wages	Benefits & Insurance	Systemic instances of insufficient legally required leave payments, e.g., annual, maternity, paternity leave	Major
38	Wages	Benefits & Insurance	Isolated instances of non-payment of sick leave	Major
39	Wages	Benefits & Insurance	No accident insurance for all workers	Major
40	Wages	Benefits & Insurance	No social insurance paid for any employees	Major
41	Wages	Benefits & Insurance	No records retained of all required social insurances	Major
42	Wages	Benefits & Insurance	Non-contribution of Employees Provident Fund & Employer Trust Fund	Major
43	Wages	Benefits & Insurance	Legally required allowances, bonuses or benefits are not paid / paid incorrectly for any employee	Major
44	Wages	Payment of Wages	Isolated instances of workers paid less than the legal minimum wage	Major
45	Wages	Payment of Wages	Different wage rates based on age alone for the same work and skill set and it is contrary to local law	Major
46	Wages	Payment of Wages	Systemic failures of wage miscalculation / deductions leading to wage reduction (but not below legal minimum wage)	Major
47	Wages	Payment of Wages	Isolated instances of miscalculations / deductions mean that worker earns below minimum legal wage	Major
48	Wages	Payment of Wages	Worker misclassification resulting in wage or benefit deficiency	Major
49	Wages	Payment of Wages	Workers are not paid during stoppage of production in line with local law	Major
50	Wages	Payment of Wages	Workers do not understand conditions of pay (including deductions etc.) in advance of employment	Major

51	Wages	Payment of Wages	Systemic incidents of wages being delayed upon termination	Major
52	Wages	Payment of Wages	Systemic occurrence of wages not paid on time	Major
53	Wages	Payment of Wages	Systemic occurrence of wages being paid / partly paid in cash (i.e., unofficially) to avoid tax and other requirements	Major
54	Wages	Payment of Wages	Workers report that mistakes in their pay packet are common, and they are difficult to rectify and/or it takes a long time.	Major
55	Wages	Overtime	All workers receive a premium rate for overtime, but does not meet the legal requirements	Major
56	Wages	Overtime	No premium is paid for overtime hours	Major
57	Wages	Overtime	All TES / temporary workers' overtime not paid correctly	Major
58	Wages	Overtime	Workers moved to other facilities homeworking to avoid paying them for overtime	Major
59	Wages	Record keeping and documentation	Isolated absence of payslips / payroll and other related records	Minor
60	Wages	Record keeping and documentation	Isolated absence of payslips / payroll and other related records	Minor
61	Wages	Record keeping and documentation	Isolated incidents of payslips inconsistent with wages paid	Minor
62	Wages	Record keeping and documentation	Payslips are not provided in a timely manner	Minor
63	Wages	Deductions	Isolated occurrence of pay being deducted for disciplinary measures e.g., lateness, absenteeism, disciplinary warnings, errors in production etc.	Minor
64	Wages	Deductions	Disciplinary deductions not recorded	Minor
65	Wages	Benefits & Insurance	Isolated instances of insufficient legally required leave payments, e.g., annual, maternity, paternity leave	Minor
66	Wages	Benefits & Insurance	No UIF paid for some employees	Minor
67	Wages	Benefits & Insurance	Some UIF paid for all employees	Minor
68	Wages	Benefits & Insurance	Some UIF paid for some employees	Minor

69	Wages	Benefits & Insurance	Isolated individual incidents of incorrect UIF payments	Minor
70	Wages	Benefits & Insurance	Delayed payment of UIF contributions to SARS	Minor
71	Wages	Benefits & Insurance	Isolated instances of legally required allowances, bonuses or benefits not being paid for some employees	Minor
72	Wages	Payment of Wages	Different wage rates based on age alone for the same work and skill set	Minor
73	Wages	Payment of Wages	Isolated failures of wage miscalculation / deductions leading to wage reduction (but not below legal minimum wage)	Minor
74	Wages	Payment of Wages	Excessive wage deductions with wage take home way below minimum wage	Minor
75	Wages	Payment of Wages	Isolated incidents of wages being delayed upon termination	Minor
76	Wages	Payment of Wages	Isolated occurrence of wages not paid on time	Minor
77	Wages	Payment of Wages	Isolated occurrence of wages being paid / partly paid in cash (i.e., unofficially) to avoid tax and other requirements	Minor
78	Wages	Payment of Wages	Payment in kind forms part of wages e.g., payment of wages in goods, services or other	Minor
79	Wages	Payment of Wages	No public display of wage rates as per law	Minor
80	Wages	Payment of Wages	Workers report that mistakes in their pay packages are common, but they are rectified	Minor
81	Wages	Payment of Wages	Wage slips are not in a language workers understand.	Minor
82	Wages	Overtime Premium	All workers receive a premium rate for overtime, but some workers' premium does not meet the legal requirements	Minor
83	Wages	Overtime Premium	Overtime premium is between +10% and 25% and this is not contrary to local law	Minor
84	Wages	Overtime Premium	Overtime premium is below legislation rates	Minor
85	Wages	Overtime Premium	Workers are unsure of overtime rates/policy	Minor

Working hours

1	Working hours	Hours - Record keeping and management systems	Site uses accurate and verifiable time keeping system	Good Practice
2	Working hours	Hours - Record keeping and management systems	The employment site has a robust system for recording working hours and uses this information to monitor and control overtime.	Good Practice
3	Working hours	Hours - Record keeping and management systems	Company records the level of overtime worked by workers and ensures that overtime is not excessive per worker	Good Practice
4	Working hours	Hours - Record keeping and management systems	Good wages & hours record keeping in place	Good Practice
5	Working hours	Hours - Record keeping and management systems	Workers can earn above minimum and/or industry standards whilst hours are controlled within legal requirements.	Good Practice
6	Working hours	Standard Hours	Flexible working hours available	Good Practice
7	Working hours	Overtime	Overtime agreements have been collectively bargained	Good Practice
8	Working hours	Overtime	Working Time Policies clearly explained to employees	Good Practice
9	Working hours	Overtime	Overtime can be refused and there is a clear system for refusal	Good Practice
10	Working hours	Annual / sick / maternity / family Leave	All workers understand what paid leave is due to them	Good Practice
11	Working hours	Annual / sick / maternity / family Leave	Paid leave allowance exceeds the legal requirement	Good Practice
12	Working hours	Hours - Record keeping and management systems	Falsified, duplicate or intentionally incomplete working hour / time records including verified inconsistencies	Critical
13	Working hours	Hours - Record keeping and management systems	Excessive working hours could not be verified due to unknown inconsistencies e.g., no system in place to manage hours	Critical
14	Working hours	Hours - Record keeping and management systems	Total inconsistency between working-hours records and other site records e.g., production records	Critical

15	Working hours	Hours - Record keeping and management systems	Systemic working hour / time records missing or incomplete	Critical
16	Working hours	Hours - Record keeping and management systems	Working hours / time records are not monitored by site	Critical
17	Working hours	Hours - Record keeping and management systems	No time records available at the audit resulting in working hours could not be verified	Critical
18	Working hours	Overtime	Excessive overtime hours i.e., total hours more than 72 hours per week on a regular basis and over an extended period.	Critical
19	Working hours	Overtime	Systemic / regular overtime hours which exceed the legal requirement daily / weekly / monthly over an extended period	Critical
20	Working hours	Overtime	Site does not monitor / is not aware of overtime hours for all employees	Critical
21	Working hours	Overtime	Illegal or improper use of overtime for pregnant / young or specific categories of worker	Critical
22	Working hours	Rest breaks and rest days	Systemic occurrence of workers not receiving 1 day rest for every 7 worked	Critical
23	Working hours	Annual / sick / maternity / family Leave	No sick leave provided for any workers	Critical
24	Working hours	Annual / sick / maternity / family Leave	No maternity / parental leave given to employees in line with legal requirements including adoptions leave or other legally required leave	Critical
25	Working hours	Hours - Record keeping and management systems	Total inconsistency between working-hours records and other site records - but correct records made available upon request	Major
26	Working hours	Hours - Record keeping and management systems	Isolated working hour / time records missing or incomplete	Major
27	Working hours	Standard Hours	Working hour records missing for some employees e.g., TES or temporary workers	Major

28	Working hours	Standard Hours	Systemic instances of workers working higher standard hours than legal limit without Doel overtime exemption	Major
29	Working hours	Standard Hours	Contracted working hours (excluding overtime) regularly exceed 48 per week	Major
30	Working hours	Standard Hours	Improper use of other types of contracts e.g., zero hours contracts / variable hour contracts / part-time contracts to avoid regular employment	Major
31	Working hours	Standard Hours	Workers not aware of working hours in advance of employment	Major
32	Working hours	Overtime	Overtime is not used responsibly i.e., extent, frequency and level of hours worked by individual workers and / or whole workforce are excessive.	Major
33	Working hours	Overtime	Isolated occurrence of excessive overtime hours which exceed the local law - daily / weekly / monthly	Major
34	Working hours	Overtime	Overtime hours frequently used to replace regular employment	Major
35	Working hours	Overtime	Site is not aware of overtime hours for some employees e.g., agency or temporary workers	Major
36	Working hours	Overtime	Overtime is not voluntary for some workers (e.g., agency / temporary workers) including threats of penalties e.g., threats of dismissal, pay cuts, demotion etc.	Major
37	Working hours	Overtime	Overtime is not voluntary for all workers including threats of penalties e.g., threats of dismissal, pay cuts, demotion etc.	Major
38	Working hours	Total Hours	Total hours exceed 60 hours per week on a regular basis for a majority of the workforce	Major
39	Working hours	Total Hours	Total hours exceed 60 hours on a regular basis for a minority of the workforce	Major
40	Working hours	Total Hours	Total hours exceed 60 hours per week on an occasional basis for the majority of the workforce	Major
41	Working hours	Rest breaks and rest days	Systemic occurrence of workers not receiving 1 day rest in every 7 days	Major
42	Working hours	Rest breaks and rest days	Isolated occurrence of workers not receiving 1 day for every 7 days worked	Major

43	Working hours	Rest breaks and rest days	Workers are not entitled to daily meal and / or rest breaks that are in accordance with legislation	Major
44	Working hours	Rest breaks and rest days	Evidence of inadequate rest breaks between two or more consecutive shifts	Major
45	Working hours	Annual / sick / maternity / family Leave	No sick leave provided for some workers	Major
46	Working hours	Annual / sick / maternity / family Leave	Insufficient (as per law) / unreasonably restricted leave for all workers e.g., annual, maternity, family responsibility leaves	Major
47	Working hours	Annual / sick / maternity / family Leave	Insufficient leave allowance when compared with contracts	Major
48	Working hours	Annual / sick / maternity / family Leave	Workers expected to work public holidays without time / monetary compensation i.e., involuntary	Major
49	Working hours	Hours - Record keeping and management systems	Isolated inconsistencies between working hours records and other site records e.g., production records	Minor
50	Working hours	Standard Hours	Isolated instances of workers working higher standard hours than legal limit without exemption from Doel	Minor
51	Working hours	Standard Hours	Standard / contracted hours is not defined by contract / employment agreement	Minor
52	Working hours	Overtime	Contract / employment conditions 'require' overtime, but there is no practice of requiring overtime	Minor
53	Working hours	Overtime	No clear policy on overtime or not communicated to workers	Minor
54	Working hours	Rest breaks and rest days	Isolated occurrence of workers not receiving 1 day rest in every 7 days	Minor
55	Working hours	Annual / sick / maternity / family Leave	Insufficient (as per law) / unreasonably restricted leave for some workers e.g., annual, maternity, family responsibility leaves	Minor
56	Working hours	Annual / sick / maternity / family Leave	No policy on annual leave or not communicated to workers	Minor
57	Working hours	Overtime	Occasional compulsory overtime	Minor

Regular Work

1	Regular employment	Contract of Employment / Letter of appointment	All workers have clear, signed and understandable contracts which meet legal requirements	Good Practice
2	Regular employment	Contract of Employment / Letter of appointment	Full training given to all workers on terms and conditions and in necessary languages	Good Practice
3	Regular employment	Contract of Employment / Letter of appointment	Good contract practices and systems at the site	Good Practice
4	Regular employment	Subcontracting	Substantial evidence of forced/ bonded/ trafficked/ prison labour at subcontractor level	Critical
5	Regular employment	Subcontracting	Substantial evidence of Child / Underage Labour at subcontractor site	Critical
6	Regular employment	Home-Workers	Child / Underage Labour was noted working with homeworkers	Critical
7	Regular employment	Contract of Employment / Letter of appointment	Workers are required to sign blank papers, resignation letters etc.	Critical
8	Regular employment	Contract of Employment / Letter of appointment	Systemic occurrence of unreasonable terminations	Critical
9	Regular employment	Permanent / Seasonal Workers	Systemic occurrence of permanent and/or seasonal workers not receiving full legal benefits, wages, allowances and social security entitlements, PPE charged for etc.	Critical
10	Regular employment	TES / Contract Labour	Systemic occurrence of contract workers not receiving full legal benefits, wages, allowances and social security entitlements, PPE charged for etc.	Critical

11	Regular employment	Permanent / Seasonal Workers	Inadequate contracts for permanent and/or seasonal workers resulting in unprotected employment or salary / benefits status for workers	Critical
12	Regular employment	TES / Contract Labour	Inadequate contracts for TES / Contract workers resulting in unprotected employment or salary / benefits status for workers	Critical
13	Regular employment	Temporary Employees	Excessive and repeated use of temporary labour / contracts used to replace regular employment	Critical
14	Regular employment	Temporary Employees	Systemic occurrence of temporary workers not receiving all legally required benefits wages allowances and benefits e.g., social insurance	Critical
15	Regular employment	TES and Subcontracting	No system in place to monitor TES and sub-contractors t	Critical
16	Regular employment	TES and Subcontracting	All production subcontracted without client knowledge	Critical
17	Regular employment	TES and Subcontracting	Some production processes are sub-contracted without client knowledge	Critical
18	Regular employment	TES and Subcontracting	Substantial evidence of excessive overtime at subcontractor site	Critical
19	Regular employment	TES and Subcontracting	Substantial evidence of unsafe/unhygienic working conditions at subcontractor site	Critical
20	Regular employment	TES and Subcontracting	Labour carried out by subcontractors who do not have the legal right to work	Critical

21	Regular employment	TES and Subcontracting	No records TES / Contract workers at the site	Critical
22	Regular employment	Contract of Employment / Letter of appointment	No contracts / letters of appointment in place	Major
23	Regular employment	Contract of Employment / Letter of appointment	Workers have not been given / do not have a copy of contracts or letter of appointments	Major
24	Regular employment	Contract of Employment / Letter of appointment	Inadequate contracts in place (e.g., missing crucial elements e.g., remuneration / hours, working place, legislation applied, terms of employment (permanent etc.) or other ILO minimum requirements)	Major
25	Regular employment	Contract of Employment / Letter of appointment	Contracts in place but not signed by worker	Major
26	Regular employment	Contract of Employment / Letter of appointment	Contracts of employment changed without communication or facility imposing additional terms or requirements on worker after employment contract signed	Major
27	Regular employment	Contract of Employment / Letter of appointment	Contracts not understandable for workers e.g., not in language of worker etc.	Major
28	Regular employment	Contract of Employment / Letter of appointment	Excessive probationary period stated in contract / letter of appointment	Major
29	Regular employment	Contract of Employment / Letter of appointment	Systemic incidents of contracts requiring overtime	Major

31	Regular employment	Contract of Employment / Letter of appointment	Zero hours contracts in place which do not meet legal requirements	Major
32	Regular employment	Contract of Employment / Letter of appointment	Isolated occurrence of unreasonable terminations	Major
33	Regular employment	Contract of Employment / Letter of appointment	Contracts for young workers not signed by parent or legal guardian / approved by local authority as per law	Major
34	Regular employment	Contract of Employment / Letter of appointment	Information about internal rules and regulations is not available e.g., by providing handbooks or terms & conditions for workers and it is a legal requirement	Major
35	Regular employment	TES / Contract Labour	Labour providers used on site not known by management	Major
36	Regular employment	TES / Contract Labour	No system in place to monitor labour providers	Major
37	Regular employment	TES / Contract Labour	System in place to monitor labour providers but inadequate	Major
38	Regular employment	TES / Contract Labour	TES / labour providers / contractors used do not meet legal requirements as a labour provider e.g., not registered	Major
39	Regular employment	TES / Contract Labour	Majority of workers in precarious employment (e.g., seasonal contract, apprentices, trainees, probationary workers not moved to permanent status in line with law)	Major
40	Regular employment	TES / Contract Labour	Agencies are charging recruitment fees which exceed legal limits	Major

41	Regular employment	TES / Contract Labour	Isolated occurrence of contract workers not receiving full legal benefits, wages, allowances and social security entitlements, PPE charged for etc.	Major
42	Regular employment	TES / Contract Labour	Contract workers receiving benefits according to law, but not the same as permanent employees	Major
43	Regular employment	TES / Contract Labour	Contract workers receive disciplinary fines in contrast to permanent employees e.g., lateness etc.	Major
44	Regular employment	TES / Contract Labour	Illegal / unreasonable deductions made from contract workers in comparison to permanent workers e.g., for accommodation / transport / PPE	Major
45	Regular employment	TES / Contract Labour	Contract workers work excessive working hours	Major
46	Regular employment	TES / Contract Labour	Systemic incidents of contract workers not being offered permanent contracts, contrary to law	Major
47	Regular employment	TES / Contract Labour	Contract workers on 0-hours contracts / not guaranteed work e.g., turned away at the beginning of day with no compensation	Major
48	Regular employment	TES / Contract Labour	Contract workers have no contract in place and the site has no system for checking and ensuring contracts comply including availability of contracts	Major

49	Regular employment	TES / Contracted Labour	Excessive and repeated use of contract labour used to replace regular employment	Major
50	Regular employment	Temporary Employees	Temporary workers are fired and rehired to avoid paying benefits	Major
51	Regular employment	Temporary Employees	Systemic / all temporary workers on 0-hours contracts / not guaranteed work, e.g., turned away at the beginning of day with no compensation	Major
52	Regular employment	Temporary Employees	Temporary workers have no / inadequate contract in place	Major
53	Regular employment	Temporary Employees	Systemic incidents of temporary workers not being offered permanent contracts, contrary to law	Major
54	Regular employment	Temporary Employees	Illegal / unreasonable deductions made from temporary workers e.g., for accommodation / transport / PPE	Major
55	Regular employment	Temporary Employees	Isolated occurrence of temporary workers not receiving all legally required benefits wages allowances and benefits e.g., social insurance	Major
56	Regular employment	Temporary Employees	Temporary workers receiving benefits according to law, but not the same as permanent employees	Major
57	Regular employment	Temporary Employees	Temporary workers work excessive working hours	Major

58	Regular employment	Apprentices/Trainees	Minority of workers in precarious employment (e.g., seasonal contract, apprentices / trainees / probationary workers) not moved to permanent status in line with law	Major
59	Regular employment	Apprentices/Trainees	Apprentices / trainees / probationary workers not receiving correct legal wages, allowances, bonuses, benefits, UIF insurances	Major
60	Regular employment	Apprentices/Trainees	Apprentices / trainees / probationary workers' conditions not meeting law	Major
61	Regular employment	TES / Subcontracting	System in place to monitor sub-contractors but missing crucial elements e.g., wages & hours, Child / Underage Labour etc.	Major
62	Regular employment	TES / Subcontracting	Client requirements on social / environmental conditions not communicated to sub-contractor	Major
63	Regular employment	TES / Subcontracting	Subcontracting is agreed by client but not included in audit	Major
64	Regular employment	TES / Subcontracting	Subcontractors not earning minimum wage or equivalent	Major
65	Regular employment	Seasonal / Migrant Workers	All foreign nationals not checked for legal right to work	Major
66	Regular employment	Seasonal / Migrant Workers	Hours of work not monitored for seasonal workers	Major
67	Regular employment	Seasonal / Migrant Workers	Excessive working hours for seasonal workers	Major

68	Regular employment	Seasonal / Migrant Workers	Seasonal workers not working in safe and hygienic conditions	Major
69	Regular employment	Contract of Employment / Letter of appointment	Isolated instances of no contracts / letters of appointment in place	Minor
70	Regular employment	Contract of Employment / Letter of appointment	Contracts in place but isolated instances of no signature of workers	Minor
71	Regular employment	Contract of Employment / Letter of appointment	Contracts / employment letters not supplied prior to employment to ensure workers understand the terms and conditions	Minor
72	Regular employment	Contract of Employment / Letter of appointment	Isolated incidents of contracts requiring overtime	Minor
73	Regular employment	Contract of Employment / Letter of appointment	Contracts / appointment letters not adequately and securely stored	Minor
74	Regular employment	Regular Employment Record Keeping	No documented procedures for selection, contracting, induction and termination of workers including agency and temporary workers	Minor
75	Regular employment	TES / Subcontracting	Site does not have correct legal registration for employment of TES workers	Minor
76	Regular employment	TES / Subcontracting	TES are charging recruitment fees from workers NOT within legal limits	Minor
77	Regular employment	TES / Subcontracting	Isolated incidents of TES workers not being offered permanent contracts, contrary to law	Minor
78	Regular employment	Temporary Employees	Temporary workers on site not known by management	Minor

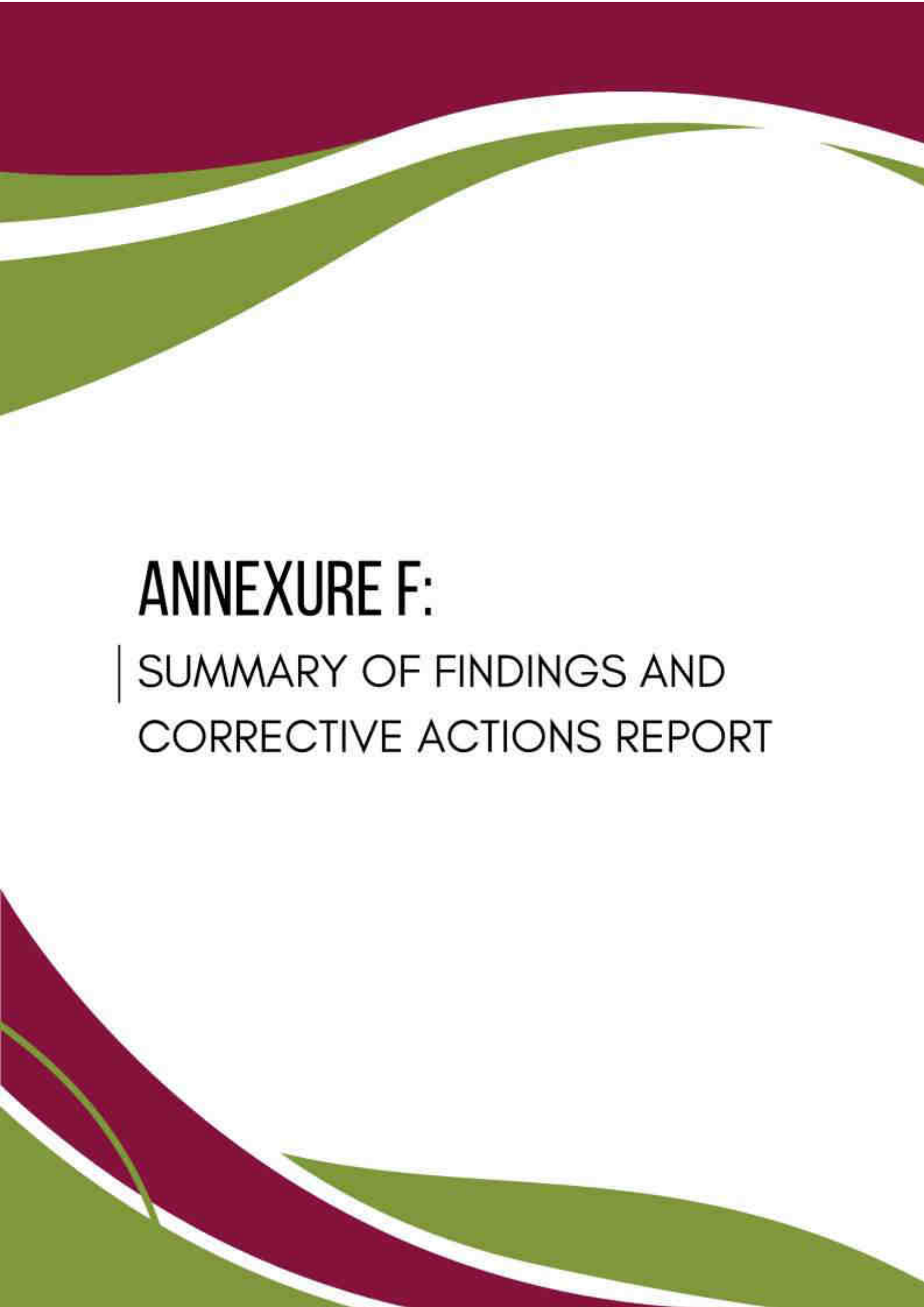
79	Regular employment	Subcontracting	No policy on managing and selecting sub-contractors including policy on obtaining clients' approval	Minor
80	Regular employment	Subcontracting	System in place to monitor sub-contractors but missing minor elements	Minor
81	Regular employment	Subcontracting	Production processes are used for client's products and subcontracted with client knowledge but no written approval	Minor
82	Regular employment	Subcontracting	Subcontract is components only and agreed as out of scope with client	Minor
83	Regular employment	Subcontracting	Subcontract workers on site were not receiving full legal and social security entitlements	Minor
84	Regular employment	Seasonal workers	Isolated incidences of seasonal workers not receiving legally required benefits & UIF insurance	Minor
85	Regular employment	Apprentices/Trainees	Total apprentices / trainees exceed the legal percentage limit within the workforce	Observation

Worker Accommodation

1	Housing and Tenure	Housing benefits & Living conditions	Employees are given title deed of their house	Best Practice
2	Housing and Tenure	Housing benefits & Living conditions	Employees enjoy land title deed	Best Practice
3	Housing and Tenure	Evictions	Occupants unlawfully evicted or removed from the house without legal court order	Critical
4	Housing and Tenure	Housing benefits & Living conditions	Accommodation is unsafe and poses an immediate risk to employee's lives or limb	Critical
5	Housing and Tenure	Accommodation and tenure rights	Right to family life and dignity of employees are adversely impacted	Major

6	Housing and Tenure	Accommodation and tenure rights	Legal ESTA occupiers (over 60 and worked for more than 10 years) do not enjoy rights and conditions as at time of obtaining rights	Major
7	Housing and Tenure	Evictions	Legal Occupiers not provided with lawful opportunity to explore alternative arrangements during lawful eviction	Major
8	Housing and Tenure	Housing Deductions	Housing deductions exceed legal requirements of 10% from wages	Major
9	Housing and Tenure	Housing Deductions	Fines deducted from wages for housing transgressions	Major
10	Housing and Tenure	Housing Deductions	Visible hazardous electrical wiring connections	Major
11	Housing and Tenure	Housing Deductions	For communal housing more than 25% is deducted from employees residing in household	Major
12	Housing and Tenure	Housing Deductions	For family housing more than 1 employee/family member has deductions taken from wages for housing	Major
13	Housing and Tenure	Housing benefits & Living conditions	Cooking and sanitation areas are not separated	Major
14	Housing and Tenure	Housing benefits & Living conditions	Cooking and sleeping facilities for employees not separated	Major
15	Housing and Tenure	Housing benefits & Living conditions	Sewage systems overflowing causing health risks	Major
16	Housing and Tenure	Housing benefits & Living conditions	Severe black mould risks due to poor ventilations and extreme heat, condensation and humidity	Major
17	Housing and Tenure	Housing benefits & Living conditions	Major Structural damage to housing structure, roofing, floors and walls	Major
18	Housing and Tenure	Housing benefits & Living conditions	No sanitation facilities to employees in housing	Major
19	Housing and Tenure	Housing benefits & Living conditions	No access to potable water for employees in housing	Major
20	Housing and Tenure	Managing Risks	Housing maintenance plan in place but major housing defects observed	Major
21	Housing and Tenure	Accommodation and tenure rights	Tenure rights not covered in housing agreements and policies	Minor
22	Housing and Tenure	Accommodation and tenure rights	Employers shows lack of understanding of tenure rights	Minor
23	Housing and Tenure	Accommodation and tenure rights	No Tenure rights information given to occupants	Minor
24	Housing and Tenure	Housing Policies and Agreements	No housing policy or agreement in place	Minor

25	Housing and Tenure	Housing Policies and Agreements	Formal policy / agreement in place with the employee but no reference to housing maintenance plan maintenance	Minor
26	Housing and Tenure	Housing Policies and Agreements	Formal policy / agreement in place with the employee but no reference to respective rights in terms of ESTA	Minor
27	Housing and Tenure	Managing Risk	No housing maintenance plan in place	Minor
28	Housing & Tenure	Managing Risk	Maintenance plan in place but no inspections done to determine defects	Minor
29	Housing and Tenure	Managing Risk	Maintenance plan in place but minor defects observed	Minor
30	Housing and Tenure	Managing Risk	No adequate fire prevention and management measures in place	Minor
31	Housing and Tenure	Managing Risk	No household survey undertaken of community to determine social, health and safety risks	Minor
32	Housing and Tenure	Housing Deductions	Housing and Electricity is deducted from wages	Minor
33	Housing and Tenure	Housing benefits & Living conditions	Sewage systems blockages	Minor
34	Housing and Tenure	Housing benefits & Living conditions	Poor waste management measures	Minor
35	Housing and Tenure	Housing benefits & Living conditions	Limited Signs of black mould risk due to poor ventilations and extreme heat, condensation and humidity	Minor
36	Housing and Tenure	Housing benefits & Living conditions	Visible damp or water leakage	Minor
37	Housing and Tenure	Housing benefits & Living conditions	No maintenance undertaken for minor defects such as broken locks, minor cracks and cracked windows and floors	Minor
38	Housing and Tenure	Housing benefits & Living conditions	Density exceeds size of employees in house as per standard	Minor



ANNEXURE F:

| SUMMARY OF FINDINGS AND CORRECTIVE ACTIONS REPORT

Employment site and Auditor details

Member/Supplier name:
Site town:
Site name:
Audit date:
Auditor Name:
Audit Body:

Summary of Findings and Corrective Actions Report						
Code Area	Good Practices & Observations	Non Compliances	Recommended Corrective Actions			
		Non-compliance observed OR Compliant ('C')	Critical, Major or Minor	Agreed action to be taken	Person(s) responsible for action	Time scale s for completion
A: LABOUR						

0. Ethical Management System & Code Implementation						
2. Prohibition on child labour and Young workers						
2.1 No Child Labour						
2.1.2 If young workers are employed, their employment is age appropriate.						
3.1 Prohibition on forced, bonded, prison or indentured labour						
5.1 Freedom of Association and the right to bargain collectively						
6.1 Workers shall not be unfairly discriminated against						
6.1 .1 No Discrimination						
6.4 EE plan and/or SDL						
Workers shall be fairly treated and fair disciplinary measures shall be adopted						
1.1. No harsh or inhumane treatment						
1.2. Disciplinary & Grievance procedures						
2. Working hours shall not be excessive and working conditions shall be fair						
2.1. Ordinary working hours						

2.2. Overtime hours						
2.3. Leave						
2.4. Employment contracts						
3. Fair Remuneration and Sustainable Incomes						
3.1. Wage in adherence						
3.2. Deductions in adherence						
3.3. Payslip in adherence						
4. Regular Employment shall be provided						
5. Temporary Employment Service						
6. Housing and Security of Tenure						
7. Social Responsibility and Community Development						
B: OCCUPATIONAL HEALTH AND SAFETY						
11.1. Health and Safety Systems						
11.2. Health and Safety Training						
11.3. Disease, Injury & Emergency Management						
11.4. Risk Identification & Assessment						

11.5. Risk control						
11.6. Emergency Procedures						
11.7. Building & Equipment						
11.8. Chemical Handling & Storage						
11.9. Social Facilities						
11.10. Alcohol Harms						

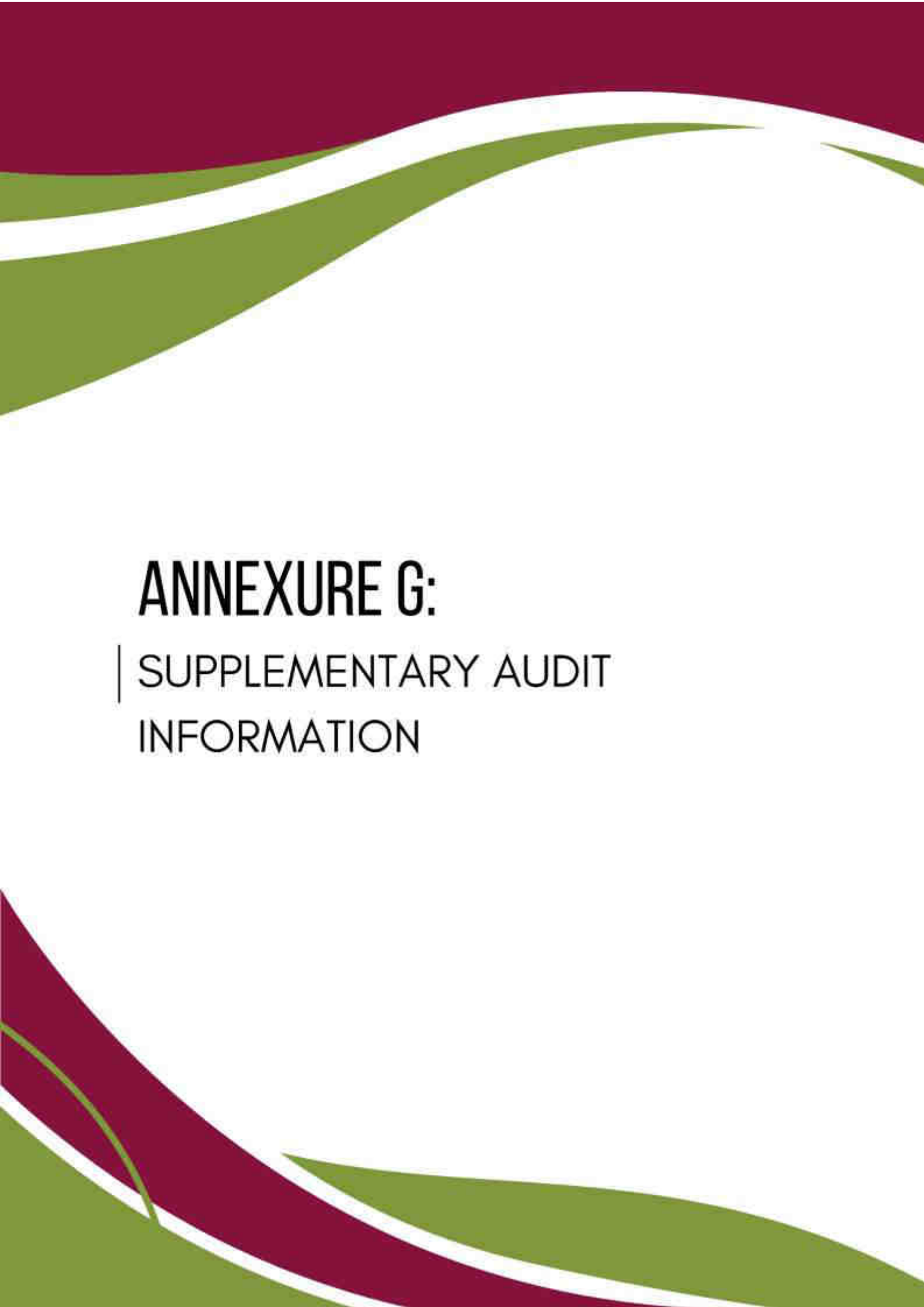
Employment Site Comment or dispute of findings

Comments	Site Representative Signature	Date

Acceptance of Findings

Site Representative Name and Position	Signature	Date

Auditors Signature	Date



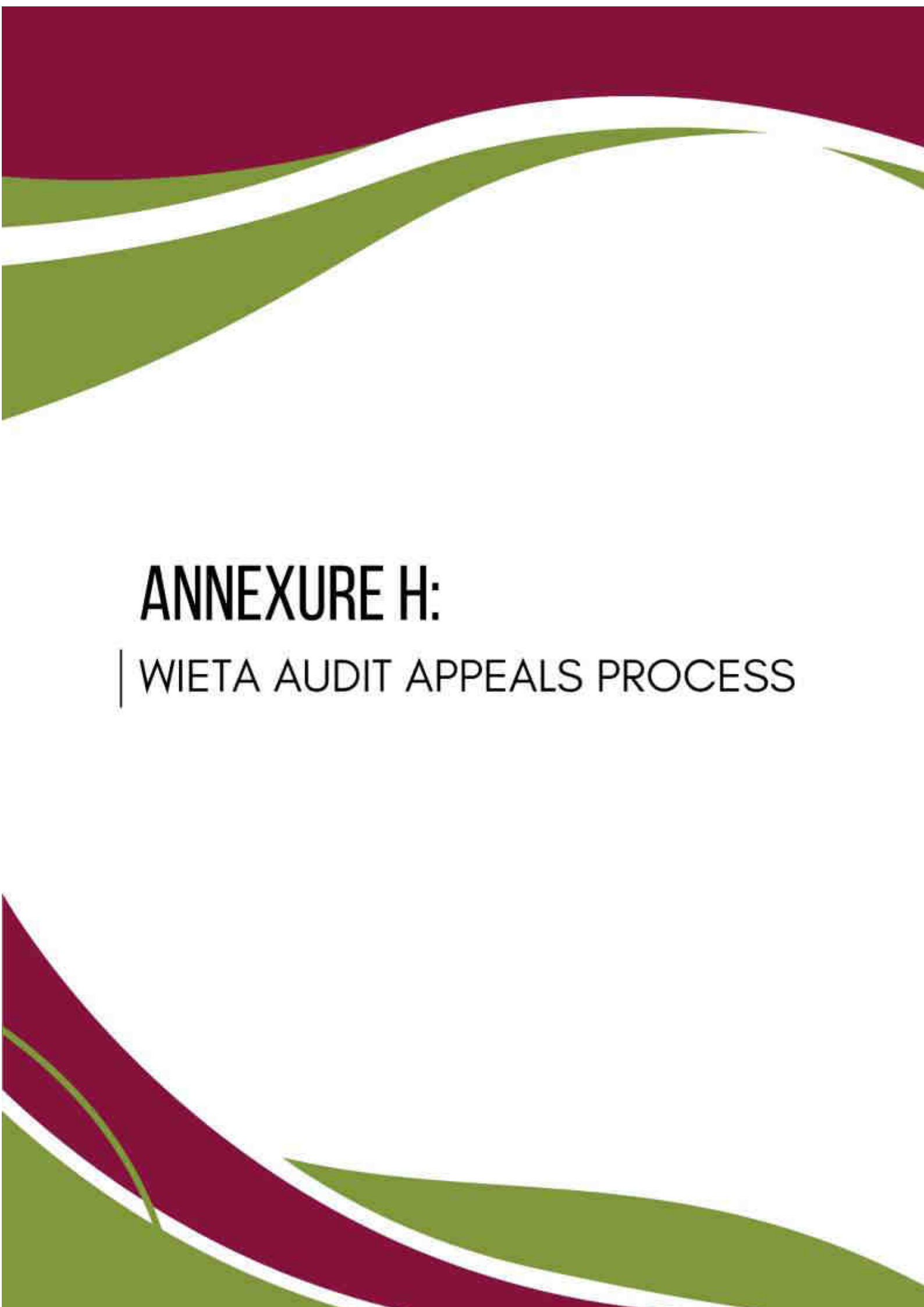
ANNEXURE G:

| SUPPLEMENTARY AUDIT INFORMATION

Member/Supplier name:
Site town:
Site name:
Audit date:
Auditor Name :

Supplementary Audit Information

Area of Concern <i>(description of the issue, who was involved, and when did this occur)</i>	Evidence / Observations <i>(a description of the evidence observed)</i>	Related Labour Standard(s)



ANNEXURE H:

| WIETA AUDIT APPEALS PROCESS

Introduction

This procedure is designed to process disputes pertaining to the quality of the audit and the conduct of the auditor.

It is recognised that such disputes could come from employees, their representatives, managers and owners of production sites, second tier agencies, (exporters), importers, retailers, or any member of WIETA, and any other source.

Disputes include (but may not be limited to) the integrity and professionalism of the WIETA audit program, auditors and the validity of the assurance process.

Disputes must be submitted to WIETA in writing and signed by the complainant.

If requested or indicated by the circumstances, confidentiality regarding the source of disputes will be respected by all stakeholders and employees of WIETA, in line with all WIETA policies and procedures.

In the case of disputes or complaints which do not appear to fall within the scope above, the CEO of WIETA will ascertain the opinions of Board members about the eligibility of the dispute, and then either initiate the disputes procedure, or refer the complainant to other agencies as recommended by Board members. All eligible disputes will fall initially under the scope of the work of the Independent Assurance Dispute Panel of WIETA.

Complaints relating to WIETA Code violations are regulated by the **WIETA Incidents Report and Violations Guidelines**.

Request for Dispute of Audit Findings and Auditor Misconduct

Upon receipt of the WIETA report on the WIETA online platform, businesses have twenty (20) **business days** after receipt of audit report to review and dispute these findings before the audit report becomes final.

In order to appeal the findings, the employment site must submit a written request for a reconsideration of audit findings to their third-party Audit Body, who undertook the audit. WIETA can be copied in on the dispute submission. The written request must be received by the Audit Firm and WIETA office via email. and must include, at a minimum, the following:

- » A detailed statement of the issue(s) in dispute
- » Documentation or relevant evidence which the employment site contends supports his/her position.

The dispute will initially be reviewed by the Audit Firm. The Audit Firm Audit Manager will then liaise with the WIETA office on the outcome of the dispute. This will be communicated to the auditee. Should the auditee still not be satisfied with the outcome of the results of the dispute, the auditee can

then escalate the appeal to WIETA for review by the Dispute Panel. This Panel will however, not consider documentation which was not made available to auditors at the time of the audit. Due consideration will be given as to an explanation as to why the documentation was not present at the time of the audit. Should the request be accepted, the audit report will be revised, and the employment site will be notified.

In cases where complaints against auditor are being made, WIETA will request that the Audit Firm undertake a conduct review of the auditor. The outcome of this review will then be communicated to WIETA and to the auditee concerned. The audit firm will be required to take the necessary performance management action will be taken against auditors found guilty of professional misconduct and transgressions against the WIETA Standard, Audit Competency Requirements as well as APSCA professional rules of engagement.

Notification of the decision will be made in writing within **twenty-one (21) business days** of receipt of appeal.

In cases of audit finding disputes, where the request is not be approved, the site will be informed that further corrective actions will need to be included as part of the corrective action plan.

Incidents Reports Post Audit: Risk Matrix				
Any Human rights transgressions, Labour or Ethical Code Violations Reported to WIETA OR negative media exposure/publicity that impacts the WIETA brand and / or reputation	High	Refusal or unwillingness on the part of the site implicated, to allow WIETA access to investigate the incident/s OR Where access can investigate and the site is found to have violated the Code, but fails to undertake any remedial action recommended	Certificate suspended	Failure to comply with request to investigate incident OR Failure to comply with recommendation for remedial action within required timeframes Results in immediate suspension of certificate with requirements for re-audit focusing on alleged violations areas and the implementation of ongoing quarterly Worker Mobile Monitoring Mechanism.
	Medium	WIETA has access to site/s to investigate incident allowed. Remedial action suggested, is undertaken only after 6 months of incident report, and approved	If violation has occurred, certificate withheld until remedial action is received and approved. Ongoing quarterly Worker Mobile Monitoring Programme to be implemented	Announcement of re-audit after lapse of annual assurance
	Low	WIETA has access to site/s to investigate incident allowed Remedial action undertaken within 3 months of incident report and approved	If incident is proven – re-audit within normal audit cycle with implementation of ongoing quarterly Worker Mobile Monitoring Mechanism No impact on certificate	Re-audit follows usual cycle



ANNEXURE I:

| GRIEVANCES REPORTED,
STANDARDS VIOLATIONS
PROTOCOL AND PROCESS



Preamble

The UN Guiding Principles on Business and Human rights clearly sets out guidelines for business regardless of sector, type, size, ownership structure or where located to respect the rights of its workers and ensure that human rights are promoted and where violations occur, these are immediately remedied.

WIETA embraces these principles and therefore believes that all businesses in the wine supply chain undertake due diligence in support of the promotion, protection and enforcement of human, women and labour rights of agricultural workers employed in cellars, bottling facilities and on farms.

WIETA also supports the international approach taken on human and women rights due diligence. An approach which holds that business need to take responsibility for ensuring that people's rights are protected, both in the workplace and on their business premises and property and that businesses be held accountable for any negative impact on human, women and labour rights, taking the responsibility to ensure that appropriate remedies are put in place to restore the rights of their employees and general citizens impacted by rights infringements within the business.

The guiding principles can therefore be summarised in three words.

PROTECT – RESPECT – REMEDY

Where worker rights violations are reported, WIETA has a responsibility to evoke the WIETA Grievance and Standards Violations Protocol V4 to investigate, assess against the WIETA Standard, and identify restorative solutions. Members and supply chain commit to adhering and complying to the remedial actions required. These solutions would require that the necessary remedial actions are followed, and a more responsible ethical business practice is adopted.

Effective communication, transparency, a co-operative and collaborative approach is critical to building good working relationships and restoring trust.

To assist such a co-operative approach, WIETA has prepared a set of guidelines to follow when human, women and labour rights infringement and/or Standard violations are reported either via the media, WhatsApp line, email or through a complaint letter within or outside of WIETA membership.

The guidelines are intended to maintain common understanding, transparency and cooperation throughout the investigation and resolution of the alleged human, women and labour right infringement and/or Standard violation. The aim is to reach an amicable solution whereby violations has been addressed and a remedy action plan identified by all parties as final.

On instruction of the WIETA Board, these guidelines are reviewed to enable an effective and efficient protocol.

The Guidelines

1. Definition

- 1.1 The alleged human, women, or labour rights infringement and/or Standard Violation and Incidents Protocol contain guidelines agreed by WIETA for the investigation of alleged violations involving members and for remediation where it is established that a Standard violation has occurred.

2. Purpose

- 2.1 The purpose of the guidelines is to
 - (a) ensure that alleged Standard & human, women or labour rights violations are brought to WIETA in a way that facilitates the investigation of the complaint.
 - (b) ensure that the investigation of the grievance, and any remediation found to be necessary, occurs expeditiously and transparently.
 - (c) encourage the sharing and transparency of information amongst WIETA members regarding supply chain labour and ethical practices.
 - (d) build positive working relationships and the confidence of stakeholder groups in each other and
 - e) Promote the use of grievance resolutions processes which will be made available for internal and external parties to reach an consensual but fair outcome where disputes arise.
 - f) ensure that remedial action is taken where the outcome of the investigation has established that a violation occurred
 - g) that in the event that an investigation is refused by the member or where remedial action is declined or no commitment is given towards any actions within a given period, said member will face suspension of the site's assurance letter and membership. Refer to Annexure 1 hereto attached.

- h) establish members' commitment to the Incidents and Standard Violations Protocol and remedial action.

3. Parties to the Protocol

- 3.1 The mutual obligations set out in the protocol will apply to participants within WIETA (wine industry producers, bottlers, brands and growers, trade unions and NGO's).
- 3.2 It is understood that grievance pertaining to human, women and labour rights infringements and/or WIETA Standard violation arise, they usually originate from the partners or affiliates of the trade union and NGO members, farm workers or through media reports.
- 3.3 WIETA has established a Labour Desk, with the function of the desk is to act as a liaison between internal and external parties to undertake preliminary assessments and violations. The Labour Desk will have further responsibility to follow up on remedies, review, outcomes and recommendations of complaints and violations. The Labour Desk is working on a referral basis with linkages to government and non-government entities for grievances and violations that has occurred. WIETA will recommend the site appoint external mediators to resolve such conflicts with cost of mediation covered by the site.

4. Principles

- 4.1 The principles underlying these guidelines are the following:

Transparency – the parties involved are open with each other about all aspects of the grievances and its investigation and remediation i.e. source and nature of the grievances, specific details and time of occurrence, method of investigation, timetable for investigation, results, remediation plan, timetable and verification.

Co-operative approach – the parties adopt a co-operative approach to working with each other, during investigations of grievances and achieving WIETA Standard compliance where breaches have occurred.

Respect for the facts – an emphasis at all stages (grievance investigation, and remediation) on establishing the facts as reliably as possible.

Direct communication – facilitating direct communication amongst those affected by the alleged Standard Violation so that the issues can be resolved as close as possible to their point of origin, involving the WIETA Office and the WIETA Board only as a last resort.

Promptness – investigation and remediation to occur within the shortest period appropriate to the nature of the grievances or Standard breach.

Finality –to produce a definite result, i.e. a position where all remedies or avenues have been exhausted.

- 4.2. Use of the WIETA Reported Grievances and Standards Violations Protocol process cannot bar employees from using other means of redress (e.g. collective bargaining agreements, grievance procedures, CCMA processes, mediation and arbitration simultaneously, alternative dispute resolution mechanisms, as the legal framework and parties to these other means of redress are different from those of the WIETA.
- 4.3 Where a labour practice is the subject of a complaint via another channel of redress, this should be made known to WIETA.

5. Scope of the Protocol

- 5.1 The Protocol covers grievances in respect of human, women, and labour rights infringements and/or of WIETA Standard violations that are either
 - (a) specific and very serious, requiring an instant response, or
 - (b) specific and on-going, requiring prompt investigation in line with these guidelines.
- 5.2 In instances where the information about an alleged Standard violation is not specific enough (e.g. to a particular member site) or not definite enough (e.g. hearsay not supported by reliable testimony) to trigger these guidelines, such information should still be passed on to the relevant wine brand, cellar and applicable worker representative structure for them to use in planning their supply chain monitoring activity.
- 5.3 The parties should discuss in each case whether the information constitutes general background information, or information that is intended to trigger these guidelines. A specific set of questions has been developed to determine whether the Protocol is to be followed.

6. Definition of “member sites” for the Purposes of the Protocol

- 6.1 These guidelines apply to alleged human, women, and labour rights infringements and/or WIETA Standard violations occurring on member sites that
 - (a) are within the scope of application of the WIETA Standard and
 - (b) have a direct and identifiable relationship with WIETA members.

- 6.2 Where incidents occur on sites that are not member sites, the complaint will be directed to the necessary authorities such as the Department of Employment and Labour and Department of Agriculture or any other applicable department or designated body to investigate further.
- 6.3 The Protocol does not apply to alleged violations outside the scope of the WIETA Standard. These grievances are, where applicable, referred outside of the organisation.

7. Process for Invoking the Incidents Protocol

- 7.1 Complaints concerning labour, interest or rights-based disputes in contravention of the WIETA Standard can be referred in writing to the Labour Desk under Standards and Assurance section within WIETA.
- 7.2 Complaints received telephonically or via WhatsApp from workers need to be lodged by the WIETA office in a prescribed format and record kept.
- 7.3 Complaints can also be lodged in terms of any possible Standard Violations from the WIETA Complaints Application form, external parties or social, print or broadcast media reports, for further investigation.
- 7.4 As much information as it is reasonably possible about the transgression needs to be gathered to evoke the Incidents Protocol. In this regard an Incidents Investigation Questionnaire would need to be completed. Attached as Annexure A.
- 7.5 The general principle is that as much detail as possible about the grievance should be supplied. However, in some circumstances there may be a risk of victimisation of the employees concerned. If so, this should be stated by the Complainant communicating the grievance and the names of the individuals concerned may be withheld.
- 7.6 Where the grievance concerns alleged Standard breaches affecting large numbers of employees (e.g. to do with pay rates, overtime, health, and safety) there is no requirement to divulge the names of individual workers. However, the supporting information supplied should still be sufficient to identify the time, place, and circumstances of the alleged violation(s).
- 7.7 If the grievance relates to employees being wrongfully dismissed, the names of the employees should be supplied, and relevant documentation supplied.
- 7.8 Within ten (10) working days of the complaint received, the WIETA Labour Desk Co-ordinator will conduct a preliminary assessment of the nature of the alleged transgression / dispute. The purpose of the preliminary assessment is to find the

facts and record these as reliably as possible. The WIETA Labour Desk Co-ordinator may also be required to conduct off-site interviews with employees of the alleged violator where this is necessary for the employees to freely express themselves.

- 7.9 If the grievance relates to behaviour that has already been the subject of other investigations or is *sub-judice*, the results of these investigations should be considered by the investigation carried out under these guidelines.
- 7.10 Should the alleged transgressing site refuse access to allow the assessment to take place, the Assurance and Risk Matrix Policy provisions will come into effect.
- 7.11 When informing the site that a grievance has been made, WIETA should make it clear to the WIETA member that there is a “no victimisation” policy in relation to employees who may have made complaints of Standard Violation and that any victimisation will be regarded as a serious breach of the Standard.

8. Investigation Report

- 8.1 When the investigation has been completed, the investigator should write a report, which will be shared with the Standards and Assurance section/division for review.
- 8.2 The investigation report should state:
 - Who carried out the investigation?
 - When it was done.
 - What methods were used (in sufficient detail to give the reader an understanding of the investigation process i.e. meetings or other communication channels).
 - What the coverage of the investigation was (i.e. what proportion of the employees and the work site were covered).
 - Whether off-site worker interviews were conducted.
 - The results of the consultation with the persons or organisation originating the complaint.
 - What the findings of the investigation were, specific to each complaint.
 - Recommendations to be made including remedial plan.
 - Recommendations on any referrals to external agencies
 - Draft recommendation report to member site
- 8.3 In order to support the “no victimisation” policy, the names of individual non-managerial employees should not be disclosed in the investigation report.

9. Remediation

9.1 Remediating Labour Based Non-Compliances

- 9.1.1 Where the WIETA Labour Desk Coordinator report confirms any or all the alleged Standard breaches, WIETA will negotiate a remediation plan with the member company. This plan should provide for prompt remediation of the violations, considering the nature of the violation and the type of remediation required.
- 9.1.2 The remediation plan must be shared with the relevant employees, the person or organisation originating the complaint and WIETA.
- 9.1.3 The remediation plan should contain:
 - A description of each infringement and/or WIETA Standard breach being addressed.
 - The nature of the remediation action.
 - The timescale for the remediation action.

9.2 Meeting to Consider the Investigation Report and Remediation Plan

- 9.2.1 Within two weeks after the circulation of the investigation report, the parties concerned must meet to discuss the report and decide on the next steps.
- 9.2.2 If the parties concerned agree with the findings of the investigation report, and the report discloses Standard breaches, the next step is to reach agreement on the remediation plan.
- 9.2.3 The views of the company workforce and the organisation originating the complaint should be considered in assessing the accuracy of the investigation and the contents of the remediation plan.
- 9.2.4 If the person or organisation originating the complaint disagrees with the findings of the investigator's report, this disagreement should be communicated to WIETA who will refer the matter back to the Accreditation Committee, along with any additional information necessary to explain the disagreement.
- 9.2.5 The Committee should examine this information seriously and take the appropriate steps, which may include a further enquiry into the member company's operations, if necessary, to establish the facts. The parties should agree who undertakes this investigation, the terms of reference and the status of the report. The results of this further enquiry should also be reported back to all parties and reasons given for the findings.

9.3. Unresolved Disputes

- 9.3.1 Where the complaint cannot be resolved through a remedial plan of action in joint agreement by the aggrieved and transgressing parties, the nature of the dispute will be referred to the Accreditation Committee for review.

9.3.2 The following will be considered:

- The nature of the dispute will be reviewed i.e. evictions, harassment, abuse cases, rights-based violations
- the degree of leverage WIETA must resolve the dispute.
- Possible referral mechanisms/agencies to be identified where the rights violations go beyond the scope of the WIETA Standard or where WIETA deems there to be a conflict of interest or where the transgressor refuses to take any responsibility for remedies and refuses intervention.
- Or whether to seek joint action with wine industry members.

9.4 Mediation as a Workplace Dispute Resolution and Remedial Tool

- 9.4.1 In the case where the dispute is of such a nature that mediation is deemed an appropriate remedial tool and appropriate and agreed mechanism for seeking to resolve both workplace or interest-based disputes, a mediator will be appointed by WIETA, at the cost to the site, from an *approved mediator list after consultation and agreement with the parties concerned*.
- 9.4.2 Any documentation relevant to the dispute should be handed to the mediator as part of the dispute process. Where the mediator can resolve the dispute during a fact-finding exercise this should be encouraged.
- 9.4.3 On a date mutually agreeable to all parties, the dispute will be mediated in line with agreed-to mediation protocol guidelines. The proceedings shall be “without prejudice” and shall not be referred to in any other proceedings for any purpose whatsoever.
- 9.4.4 The mediation process should be concluded as speedily as possible and at the most be completed within three months of the referral following the circulation of the preliminary assessment report to parties.
- 9.4.5 The procedure will be that of mediation, not arbitration or conciliation. No finding will be made against any party. The role of the mediator will be, with his/her knowledge of the wine industry and agricultural sector, to assist the parties in reaching an amicable resolution.
- 9.4.6 In the event of a resolution being reached, the outcome shall be put in writing and signed by both parties. The decision shall constitute a full and final settlement of the dispute. All parties to that mediation shall then withdraw any legal proceedings that may have been instituted because of the dispute. There will be no further recourse to any legal action by either party.
- 9.4.7 The proceedings and the outcome of the mediation shall, always, remain confidential.

- 9.4.8 Both parties to the dispute should receive a copy of the signed agreement and WIETA would need feedback on progress made in accordance with the signed implementation remedy plan.
- 9.4.9 The mediator shall, after the completion of the mediation, whether it has been resolved or not, hand back all documentation collected from the respective parties and destroy all notes taken during the mediation process.
- 9.4.10 In the event of a matter not being resolved, the matter will proceed as if there had been no mediation. This outcome shall also be communicated to WIETA who will then refer the unresolved matter to the Accreditation Committee for review in terms of the Incidents Reporting: Assurance and Risk Matrix Policy, hereto attached as Annexure 1.
- 9.4.11 The outcome of any mediation process shall be regarded as private and confidential save where the parties agree to a public statement.
- 9.4.12 If, at any stage, both parties agree that the mediator should recommend the matter be taken to arbitration, then he/she may do so, and such arbitration shall be conducted in terms of the Arbitration Act. In such a case, the parties are bound to the arbitrator's decision, and the arbitration will be concluded in writing for the signature of both parties. Where the matter has been arbitrated, both parties reserve their rights in terms of section 145 of the Labour Relations Act.

10. Failure to Remedy

- 10.1 Where remedial action and /or dispute resolution is deemed appropriate by WIETA but where transgressing parties refuse to commit to remedy or refuse mediation and such a dispute and Standard violation remains un-remedied, WIETA retains the right to undertake the following action:
- Refer the dispute / violation to an appropriate agency i.e. Department of Labour or Department of Agriculture, Human Rights Commission, CCMA Workplace Dispute Resolution Mechanism Unit etc.
 - Refer the matter to the Wine Value Chain Parties and
 - Refer the transgressing member internally for review in terms of the Assurance and Risk Matrix Policy, hereto attached as Annexure 1, for Assurance and / or membership suspension.
 - WIETA refers matter to the Accreditation Committee to decide around suspension of certificate and membership.

11. Monitoring of remedies

- 11.1 WIETA will monitor the member company's compliance with the remediation plan and / or mediation outcome. When remediation is complete, the company will be

requested to write to the Standards Manager, via the WIETA CEO, describing the remediation actions that have been undertaken and stating that remediation is complete.

- 11.2 If the person or organisation originating the complaint disagrees with the statement that remediation is complete, this opinion should be communicated to the Standards Manager, along with any additional information necessary to explain the disagreement. The Panel should discuss the differences between the two positions and will be discussed to reach an agreement on what course of action should be followed.
- 11.3 If the process takes longer than six months from the date the complaint was made, the WIETA office should provide an interim report at the six-month point stating what has been completed, what remains to be done and the timetable for completion. A copy of this report should go to the Accreditation Committee on what has been implemented and report to be tabled to the WIETA Board with minutes of such a decision to be take up with the WIETA Board who will determine a course of action appropriate to the circumstances and aligned to the WIETA Assurance and Risk Matrix Policies.
- 11.4 If remediation is still not complete after a further six months, the WIETA member company should provide a further interim report stating what has been completed, what remains to be done and the timetable for completion. This report should be referred via the Accreditation Committee which should determine a course of action appropriate to the circumstances, to the Board.
- 11.5 Where a Standard breach is remedied, the issue should be kept under review by the company in its audit process.

12. Time frames for Incidents Reporting, Investigation and Remediation

- 12.1 The following timeframes are recommended:
 - Preliminary assessment undertaken within 10 days of grievance received
 - Preliminary Assessment Report circulated to aggrieved and transgressing parties within one week of completion of preliminary assessment
 - Remediation plan agreed to within one month of receiving report
 - Remedies put in place required within 3 months of receiving report
 - Report to WIETA on impact of remedies within 3 months of report
 - Where recommended, referral to mediation within two weeks of Preliminary Assessment Report
 - Mediation completed within 3 months of referral
 - If site does not comply with timelines, then WIETA assurance will be withdrawn
- 12.2 If agreement cannot be reached, the issue may be referred to the WIETA Board for an opinion.

- 12.3 The decision of the Accreditation Committee will be final and binding on the parties.

13. Disagreements over the Interpretation or Implementation of these Guidelines

- 13.1 In the event of a disagreement over the interpretation of these guidelines or the appropriate response to an alleged Standard Violation, the parties should first try to resolve the disagreement in direct discussion with each other, in the spirit of mutual trust and co-operation described in the preamble.

14. Costs of Investigation and Remediation

- 14.1 The costs of the investigation, where there is a violation at the member site and any necessary remediation is undertaken, should be met by the WIETA member company.
- 14.2 Where mediation is recommended as a tool for remedy. WIETA will endeavour to seek to cover part costs for this mechanism through fundraising initiatives in association with local and international partners.

Annexure A – Incidents Reporting: Assurance & Risk Matrix

	Incidents Reports Post Audit: Risk Matrix			
Any Human rights transgressions, Labour or Ethical Standard Violations Reported to WIETA OR negative media exposure/publicity that impacts the WIETA brand and / or reputation	High	Refusal or unwillingness on the part of the site implicated, to allow WIETA access to investigate the incident/s OR Where access can investigate and the site is found to have violated the Standard, but fails to undertake any remedial action recommended	Certificate suspended	Failure to comply with request to investigate incident OR Failure to comply with recommendation for remedial action within required timeframes Results in immediate suspension of certificate with requirements for re-audit focusing on alleged violations areas and the implementation of ongoing Monitoring Mechanism.
	Medium	WIETA has access to site/s to investigate incident allowed. Remedial action suggested, is undertaken only after 6 months of incident report, and approved	If violation has occurred, certificate withheld until remedial action is received and approved. Ongoing Monitoring Programme to be implemented	Announcement of re-audit after lapse of annual assurance
	Low	WIETA has access to site/s to investigate incident allowed Remedial action undertaken within 3 months of incident report and approved	If incident is proven – re-audit within normal audit cycle with implementation of ongoing Monitoring Mechanism No impact on certificate	Re-audit follows usual cycle

- Refer to Addendums A to D below for process and procedures

Addendum A



WIETA Labour Desk

Complaints Hotline Application Form

Complainant Details

Name of WIETA Member initiating the complaint	
Name of Complainant	
What is the relationship between the Complainant submitting the complaint and the workers affected	
Date of Submission of Complaint	

Complainant Address	
Complainant Tel Number :	
Complainant Email Address :	

Details of Site where Complaint originates

Name of WIETA Member Site	
Name of Owner on site	
Name of Manager on Site	
Site Physical Address	
Town / area where farm is located	
Site Tel Number :	

Site Email Address :	
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Background Information to Complaint

WIETA Code Breach – list the section of the WIETA Code being breached (There may be multiple breaches – list each one)	
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Give a description of the breach for each section of the Code violated .	

**(There may be multiple breaches –
List them)**

What is the scale of the alleged problem – How many workers are affected? Give the circumstances, time and place	

Is there immediate physical danger to workers? If so, describe this	
Have other remedies been taken to address the problem i.e. grievance procedures Referral to the CCMA Charges being laid against the alleged perpetrator	

If yes to above, What has been the outcome of this action?	
Has a union taken up the issue? Is there any advocacy around the issue? Describe	
What preferred remedy are the workers affected proposing?	

Are there any other organisations WIETA should contact who may be useful in the investigation?	

List of Supporting documents

Complaints Report	
Photos	
Affidavits	
Administrative documents such as payslips etc	

Disciplinary notifications / Dismissal letters etc	
Other	

Signature of Complainant

Date

Addendum B

WIETA Labour Desk: Access & Functionality Overview

The WIETA Labour Desk is a key resource for workers in the wine industry, providing a platform to report human and labour rights violations. It aligns with WIETA's commitment to the **UN Guiding Principles on Business and Human Rights**, ensuring workers' rights are respected throughout the wine supply chain. In support of South Africa's Whistleblowing Act, the Labour Desk offers a safe, confidential avenue for workers to report violations while promoting a culture of transparency and accountability.

How to Access the WIETA Labour Desk

1. Reporting Violations:

- Workers or stakeholders can submit complaints directly to the WIETA Labour Desk via email, phone, or online through the WIETA website.
- Reports should detail the violation and include relevant supporting information to ensure prompt investigation.
- Whistleblowers can remain anonymous, and all reports are treated with strict confidentiality, aligning with the updated legislation on **South Africa Whistleblowing Act** requirements for protecting reporters.

2. Preamble to Human Rights Due Diligence (HRDD):

- The Labour Desk preamble is based off broader Human Rights Due Diligence processes. It ensures that allegations of human rights violations are investigated promptly, promoting due diligence and accountability across the wine supply chain of WIETAs members.
- Human Rights Due Diligence underscores the importance of proactive engagement with labor rights, enabling WIETA members to prevent violations before they occur, and ensuring swift remediation when they do.

3. Incidents Reporting & Code Violations Investigations Protocol:

- Once a violation is reported, WIETA conducts a **preliminary assessment** within 10 working days.
- If the allegation is valid, the Labour Desk Coordinator will sort to liaise with the relevant parties regarding the incident or violation.
- The findings are presented to the **WIETA Standards Manager and WIETA CEO**.
- A **remediation plan** is then developed in collaboration with the relevant parties, ensuring violations are addressed and corrective actions implemented.

Key Functions of the WIETA Labour Desk

- **Guidance & Support:** Offers advisory services on labour rights and workplace standards.

- **Confidential Reporting:** Ensures safe, anonymous reporting of violations under whistleblowing protections.
- **Training & Capacity Building:** Provides training for farm workers and employers on labour rights and ethical practices.
- **Monitoring Compliance:** Tracks the implementation of remediation plans to ensure lasting improvements in labour conditions.

By connecting workers, producers, and stakeholders, the WIETA Labour Desk plays a vital role in upholding ethical labour practices, fostering fairness, and promoting social responsibility in the wine industry.

Download the complaints form from the WIETA website homepage at www.wieta.org.za or contact the Labour Desk for assistance.

For assistance or to report a violation, contact the **WIETA Labour Desk** at:

- Email: labourdesk@wieta.org.za
- Phone: +27 063 766 6548
- Online: www.wieta.org.za

Addendum C

WIETA Labour Desk Complaints Review and Resolution Framework

This framework outlines the process for reviewing complaints and signing off resolutions involving the **Labour Desk Coordinator**, **WIETA Standards and Stakeholder Engagement Manager**, and **WIETA CEO**.

The Labour Desk Complaints Hotline receives various types of complaints and provide advices on allegations and complaints that need further investigation to ascertain whether a violation against the WIETA Standard has occurred. The process is contained in ***Annexure I_ Incidents & Code Violations_ V5 2025***.

The following procedure documents the process that is followed internally through the Labour Desk, by the Labour Desk Co-ordinator to open up a case file, review the complaints submission, obtain the evidence in support of the submission, investigate the complaint, where a violation has been detected and confirmed, log a report against the complaint, manage the remediation plan process, monitor the remedial plan outcome and manage the sign off and closure of the complaint.

1. Complaint Submission and Initial Review

Roles: Labour Desk Coordinator

- **Receive complaint:** Complaints are submitted through email, phone, or online via the WIETA website.
- **Case Management :** Open up a case folder under Audit Programme / Incidents and Violation / Case Management / Year of incident / Month of Incident / Name of Site
- **M&E Matrix Report :** Populate the Incidents Reporting Matrix to track the status of the complaint. Assign the progress status of the complaint throughout the process.
- **Verify completeness:** Ensure all required information and supporting documents (e.g., complaint details, evidence, etc.) are included in the complaint form.
- **Acknowledge receipt:** Send an acknowledgment of the complaint within 48 hours to the complainant, confirming its receipt and outlining next steps.
- **Preliminary assessment:** Conduct a quick initial review to identify whether the complaint falls within the scope of WIETA's Incidents Reporting and Code Violations Investigations Protocol and potentially constitutes a transgression of the WIETA standard. This step must be completed within **5 working days**.

2. Investigation Phase

Roles: Labour Desk Coordinator, WIETA Standards Manager

- **Investigation:** Once the complaint is validated, the Labour Desk Coordinator will contact the affected parties, both complainant and the producer, to determine further details of the complaint.
- **Formal Notification of an alleged violation:** Initial contact with the producer is made via written correspondence to the producer site citing the nature of the alleged violation and requesting that feedback is given on this. The correspondence letter is also file in the case folder.
- **Follow up:** Following feedback from the member site, the Labour Desk Co-Ordinator will then follow up with the parties concerned. This follow up may take the form of an on-site investigation. This should occur within **10 working days** of receiving the complaint.
- **Monitor investigation progress:** Both the Labour Desk Coordinator and WIETA Standards Manager oversee the investigation's progress, ensuring adherence to timelines and protocols.
- **Receive investigation report:** The Labour Desk Coordinator submits a detailed report outlining the findings, facts, and recommendations to the Standards Manager within **5 working days** after the investigation is concluded.

3. Complaint Review & Recommendation

Roles: Labour Desk Coordinator, WIETA Standards Manager

- **Review findings:** The Labour Desk Coordinator and WIETA Standards Manager review the investigation report together to assess the facts and whether this a violation of the WIETA Standard, severity of the violation, and recommended actions.
- **Formulate resolution:** In collaboration with the parties, a remediation plan is developed and signed off by the site that addresses the corrective actions of the findings of the investigation. This includes setting timelines and corrective actions needed to resolve the issue.
- **Engagement with stakeholders:** If necessary, engage with relevant stakeholders (e.g., complainant, WIETA member site) to discuss the proposed resolution. Ensure transparent communication and gather feedback on the remediation plan.

4. Approval of Remediation Plan

Roles: WIETA CEO

- **Final approval:** The proposed remediation plan, alongside the investigation report, is submitted to the WIETA CEO for review and sign off.
- **Sign off :** This decision should be made within **7 working days** of receiving the recommendation from the Labour Desk Coordinator and Standards Manager.

5. Implementation and Monitoring

Roles: Labour Desk Coordinator, WIETA Standards Manager

- **Implement the remediation plan:** The Labour Desk Coordinator works with the affected parties to ensure that corrective actions outlined in the remediation plan are implemented within the agreed-upon timelines (within **3 months**).
- **Monitoring:** The Labour Desk Coordinator monitors progress, ensuring compliance with the remediation plan, and provides regular updates to the WIETA Standards Manager and WIETA CEO.

6. Final Sign-off and Closure

Roles: WIETA CEO

- **Final review:** Once all corrective actions have been completed, the WIETA Standards Manager submits a final report to the Standards Manager.
- **Resolution sign-off:** The Standards Manager reviews the final report and, if satisfied with the remediation outcomes, signs off on the case as resolved this will be done last week of the month.
- **Referral:** The final report is be sent to the CEO for review. The CEO can refer the matter to the Accreditation Committee for further consideration should the remedy still not comply with the Standards Requirements.
- **Escalation:** Should the member site refuse to co-operate within the required timeframes or fail to implement the required remedy or violate the rights of workers and community in any way through intimidation or retaliation, the CEO will make recommendations to the Committee on the withdrawal of assurance, and the Committee may take a decision to withdrawal of assurance or even withdrawal of membership.
- **Closure:** The Labour Desk Coordinator formally closes the case and notifies all relevant parties of the final resolution, ensuring documentation is properly archived.
- **Monthly sign off:** WIETA Labour Desk Coordinator and WIETA Standards Manager will meet to formally sign off cases between the 25-30 of each month with the WIETA CEO.

Key Timelines

- **Acknowledgment of Complaint:** Within 48 hours
- **Preliminary Assessment:** Within 5 working days
- **Investigation and Reporting:** 10 working days
- **Remediation Plan Approval:** 7 working days post-investigation
- **Remediation Implementation:** 1-3 months depending on severity
- **Final Closure:** Upon completion of corrective actions and final approval by the WIETA CEO.

Addendum D

Accessing the WIETA Labour Desk Complaints Hotline

The WIETA Labour Desk is a vital resource for reporting human and labour rights violations within the wine industry. Workers and stakeholders can safely and confidentially report violations, ensuring compliance with the **UN Guiding Principles on Business and Human Rights** and South Africa's **Whistleblowing Act**.

How to Report:

- **Email:** Submit your complaints form to labourdesk@wieta.org.za.
- **Phone:** Call or text your complaint to WIETA's WhatsApp hotline on **+27 063 766 6548** for immediate support.
- **Online:** Visit www.wieta.org.za to submit your complaint.

For a formal complaint submission, please fill out the **WIETA Complaints Form**. This form requires detailed information on the nature of the violation, including:

1. **Complainant Details:** Provide your name, relationship to the workers affected, and contact information.
2. **Site Details:** Information on the WIETA member site where the violation occurred.
3. **Code Breach Details:** List and describe the sections of the WIETA Code being breached.
4. **Background Information:** Provide the scale, circumstances, and any immediate dangers related to the violation.
5. **Remedies and Actions:** Describe any previous attempts to address the issue (e.g., CCMA referral, union advocacy).
6. **Supporting Documents:** Attach evidence such as photos, reports, and other documents that can support the investigation.

Download the form from the WIETA website at www.wieta.org.za or contact the Labour Desk for assistance.

<https://wieta.org.za/wp-content/uploads/2024/09/Labour-Desk-Complaints-Hotline-form.pdf>

All complaints are treated with confidentiality, and whistleblowers can remain anonymous to protect their identity in line with South Africa's whistleblowing protections.