Corporate Responsibility and Environmental Management Policy
Summary of Audits

#	Assessment Areas	2013 All Qtrs	2014 All Qtrs	2015 All Qtrs	2016 All Qtrs	2017 All Qtrs	2018 All Qtrs	2019 All Qtrs	2020 1st Qtr	2020 2nd Qtr
1	**Forced Labor**									
1.1	Review hiring practices to ensure they prohibit forced or bonded labor.	Y	Y	Y	Y	Y	Y	Y	Y	Y
1.2	Determine if workers are free to leave the supplier location in off-hours.	Y	Y	Y	Y	Y	Y	Y	Y	Y
1.3	Verify that identification papers are not withheld from employees.	Y	Y	Y	Y	Y	Y	Y	Y	Y
2	**Child Labor**									
2.1	Check for reliable proof of age and retain a copy of the relevant document proofing age on file.	Y	Y	Y	Y	Y	Y	Y	Y	Y
2.2	If applicable, verify that workers under age 18 are not performing work that is hazardous in nature.	Y	Y	Y	Y	Y	Y	Y	Y	Y
2.3	Determine if workers under age 18 are working only the legally specified number of hours.	Y	Y	Y	Y	Y	Y	Y	Y	Y
2.4	Determine if workers are kept on trainee wages beyond legally specified durations.	Y	Y	Y	Y	Y	Y	Y	Y	Y
3	**Wages and Benefits**									
3.1	Determine how workers' time on the job is recorded, and that it is recorded accurately.	Y	Y	Y	Y	Y	Y	Y	Y	Y
3.2	Review timesheets or other records to determine if workers' wages are being calculated accurately.	Y	Y	Y	Y	Y	Y	Y	Y	Y
3.3	Review payroll records and determine that all mandated pay and benefits are provided.	Y	Y	Y	Y	Y	Y	Y	Y	Y
3.4	Review evidence that workers are given information relating to wages in an understandable form.	Y	Y	Y	Y	Y	Y	Y	Y	Y
3.5	Determine if workers are provided with required insurance(s).	Y	Y	Y	Y	Y	Y	Y	Y	Y
3.6	Determine if social security and other contributions have been made	Y	Y	Y	Y	Y	Y	Y	Y	Y
4	**Working Hours**									
4.1	Review system for recording time worked to determine that time is recorded accurately and completely.	Y	Y	Y	Y	Y	Y	Y	Y	Y
4.2	Review if employees are taking company holidays and vacation days.	Y	Y	Y	Y	Y	Y	Y	Y	Y
4.3	Review to verify that employees are provided payroll receipts and identification of accumulated vacation days.	Y	Y	Y	Y	Y	Y	Y	Y	Y
5	**Nondiscrimination**									
5.1	Legally required posters regarding nondiscrimination are posted in working areas.	Y	Y	Y	Y	Y	Y	Y	Y	Y
5.2	Mangement communicates written policies on nondiscrimination to employees.	Y	Y	Y	Y	Y	Y	Y	Y	Y
5.3	Review hiring practices to determine whether classes of people are barred from employment.	Y	Y	Y	Y	Y	Y	Y	Y	Y
5.4	Determine whether people with certain characteristics are either channeled into certain jobs or barred from certain jobs.	Y	Y	Y	Y	Y	Y	Y	Y	Y

5.5	Review procedures for employees to bring concerns of discrimination to the attention of management for resolution. This applies as well to situations where employees are working off-location.	Y	Y	Y	Y	Y	Y	Y	Y	Y
6	**Respect and Dignity**									
6.1	Written policies and practices are in place prohibiting harassment and abuse.	Y	Y	Y	Y	Y	Y	Y	Y	Y
6.2	Review personnel files for any records of disciplinaryactions. Determine if discipline has been appropriate, based on the infraction.	Y	Y	Y	Y	Y	Y	Y	Y	Y
6.3	Determine that no cases of monetary fines are present.	Y	Y	Y	Y	Y	Y	Y	Y	Y
6.4	Review procedures for employees to bring concerns of abuse to the attention of management for resolution. This applies as well to situations where employees are working off-location.	Y	Y	Y	Y	Y	Y	Y	Y	Y
7	**Freedom of Association**									
7.1	Determine if open feedback channels exist for employees to bring issues to the attention of management for resolution.	Y	Y	Y	Y	Y	Y	Y	Y	Y
7.2	Determine whether workers affiliated with organizations are subjected to discriminatory treatment.	Y	Y	Y	Y	Y	Y	Y	Y	Y
8	**Health and Safety**									
8.1	Perform a "walk-through" of the facility looking for potential health and safety hazards and controls including clear emergency egress (aisles, exit doors, exit signage, etc.); use of protective equipment; machine guarding; isolation of energized electrical wiring and equipment; chemical labeling and storage; sanitation; lifting devices and use of proper lifting techniques; lighting, etc.	Y	Y	Y	Y	Y	Y	Y	Y	Y
8.2	A health and safety manager has been appointed to oversee compliance.	Y	Y	Y	Y	Y	Y	Y	Y	Y
8.3	Workplace incidents are reported and investigated and action taken to minimize the potential for future occurrence.	Y	Y	Y	Y	Y	Y	Y	Y	Y
9	**Environmental Responsibility**									
9.1	Determine compliance with all applicable environmental laws, regulations and standards such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting.	Y	Y	Y	Y	Y	Y	Y	Y	Y
9.2	Check the process or procedure by which the facility identifies applicable environmental laws, regulations, and standards.	Y	Y	Y	Y	Y	Y	Y	Y	Y
9.3	With knowledge of applicable international, country and local environmental laws, regulations, and standards, review records for required permits, certifications, compliance to law, required environmental reporting, and compliance design and product specifications, and contract documents.	Y	Y	Y	Y	Y	Y	Y	Y	Y
9.4	Look for signs or evidence of current activities or processes that would be in violation of the applicable environmental laws, regulations, and standards.	Y	Y	Y	Y	Y	Y	Y	Y	Y
9.5	Develop programs for the efficient use and conservation of energy.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
9.6	Develop programs for the efficient use and conservation of water.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
9.7	Develop programs for the efficient use of materials, including waste reduction, material reuse, and recycling.	Y	Y	Y	Y	Y	Y	Y	Y	Y

10	**Laws and Regulations**									
10.1	Determine if management has a good knowledge of all local laws including employment, health and safety, and environmental practices.	Y	Y	Y	Y	Y	Y	Y	Y	Y
10.2	Determine if supplier has committed sufficient company resources to compliance.	Y	Y	Y	Y	Y	Y	Y	Y	Y
10.3	Review processes and procedures for compliance.	Y	Y	Y	Y	Y	Y	Y	Y	Y
10.4	Senior management supports compliance objectives and practices and enforces them.	Y	Y	Y	Y	Y	Y	Y	Y	Y
10.5	Management representatives have been named who are responsible for monitoring compliance.	Y	Y	Y	Y	Y	Y	Y	Y	Y
10.6	Company periodically monitors compliance.	Y	Y	Y	Y	Y	Y	Y	Y	Y
10.7	Company encourages employees to report suspected noncompliance	Y	Y	Y	Y	Y	Y	Y	Y	Y
11	**Ethical Dealings**									
11.1	Company follows written policies and guidelines on conflicts of interest, giving and receiving of gifts, business trips, hospitality, entertainment, use of agents, and facilitation payments that are in accordance with law.	Y	Y	Y	Y	Y	Y	Y	Y	Y
11.2	Company has good accounting policies, procedures, and record keeping.	Y	Y	Y	Y	Y	Y	Y	Y	Y
11.3	Company conducts periodic financial audits to confirm that accounts are in order.	Y	Y	Y	Y	Y	Y	Y	Y	Y
11.4	Clear communications channels exist for employees to report violations or issues of concern.	Y	Y	Y	Y	Y	Y	Y	Y	Y
11.5	Have and follow policies that prohibit retaliation for employee reporting.	Y	Y	Y	Y	Y	Y	Y	Y	Y
12	**Communications**									
12.1	Provide employees with access to its Corporate Responsibility and Environmental Management Policy in local languages.	Y	Y	Y	Y	Y	Y	Y	Y	Y
12.2	Provdide employees with Prime Contractor Supplier Conduct Principles in local languages.	Y	Y	Y	Y	Y	Y	Y	Y	Y
12.3	Company provides employees access to written hiring and employment policies as well as critical health and safety information.	Y	Y	Y	Y	Y	Y	Y	Y	Y
12.4	Company has open channels of communication between employees and management to foster resolution of problems and improve overall working conditions and competitiveness.	Y	Y	Y	Y	Y	Y	Y	Y	Y
13	**Monitoring and Record Keeping**									
13.1	Develop and maintain all necessary documentation to support compliance, such documentation must be accurate and complete.	Y	Y	Y	Y	Y	Y	Y	Y	Y
13.2	Provide Prime Contractors with access to relevant records, upon Prime's request.	Y	Y	Y	Y	Y	Y	Y	Y	Y
13.3	Allow Prime Contractor representatives to conduct confidential interviews with employees and with management separately.	Y	Y	Y	Y	Y	Y	Y	Y	Y