

Sedex Members Ethical Trade Audit Report

Version 7



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Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA methodology are stated (with reasons for deviation) in the SMETA declaration.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the code areas below.

2-pillar audits include:

- Labour standards:
 - 0. Enabling accurate assessment
 - 1. Employment is freely chosen
 - 1.A. Responsible recruitment and entitlement to work
 - 2. Freedom of association and right to collective bargaining are respected
 - 4. Child labour shall not be used
 - 5. Legal wages are paid
 - 5.A. Living wages are paid
 - 6. Working hours are not excessive
 - 7. No discrimination is practiced
 - 8. Regular employment is provided
 - 8.A. Sub-contracting and homeworkers are used responsibly
 - 9. No harsh or inhumane treatment is allowed
- Health and safety:
 - 3. Working conditions are safe and hygienic
- Environment:
 - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
 - 10.B. Environment 4-pillar
- Business ethics:
 - 10.C. Business ethics

(2) Where appropriate, non-compliances or non-conformances were raised where either local law or the base code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

(3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit details

Site details

Sedex site reference	ZS280246924	Site name	G4S Secure Solutions doo
Business name	G4S Secure Solutions doo	Site address	Third party location RS

Audit details

Sedex company reference	ZC173641506	Auditor company name	Bureau Veritas Certification
Audit company address	67/71 boulevard du Chateau, Neuilly sur Seine Cedex, FR, 92571		
Date of audit	2025-12-01	Audit conducted by	Jelena Vidakovic
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		
Time in and out	Day 1	Day 2	
	In 09:00	In	09:00
	Out 17:00	Out	13:00
Audit type	Periodic		
Was the audit announced?	Semi announced		
Was the Sedex SAQ available for review?	Yes		

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Who signed and agreed CAPR? Biljana Gogić / Procurement specialist for goods and services and QMS Manager

Any conflicting information SAQ/Pre-Audit Info No

Is further information available? No

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	No	No
B: Present at the audit?	Yes	No	No
C: Present at the closing meeting?	Yes	No	No
Reason for absence at the opening meeting	No WR or active Union on site		
Reason for absence during the audit	No WR or active Union on site		
Reason for absence at the closing meeting	No WR or active Union on site		

SMETA declaration

Auditor team

SMETA declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.
2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.

Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)

The audit covered the Head Office (HO) and two operational locations. The worker sample and document review included employees from both locations.

Lead auditor	Jelena Vidakovic	APSCA Number	21702034
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Additional auditor	Nina BABOVIC	APSCA Number	32200506
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Date of declaration	2025-12-02
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Site representation


Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Biljana Gogić
Title	Procurement specialist for goods and services and QMS Manager
Date of declaration	2025-12-02


Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...		GE ZAF601231503
5.A. Living wages are paid	5.A.A Review workers' total pay including ben...	Base code	NC ZAF601231500
	5.A.B Put in place a wage improvement plan th...	Base code	NC ZAF601231501
10.B. Environment 4-Pillar	10.B.E Identify and monitor potential negativ...		GE ZAF601231502
10.C. Business ethics	10.C.F Develop and implement a transparent an...	Base code	NC ZAF601231504


Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen				
1.A. Responsible recruitment and entitlement to work				
2. Freedom of association and right to collective bargaining are respected				
3. Working conditions are safe and hygienic				
4. Child labour shall not be used				
5. Legal wages are paid				
6. Working hours are not excessive				
7. No discrimination is practiced				
8. Regular employment is provided				

 Not addressed

 Fundamental improvements required

 Some improvements recommended

 Robust management systems

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	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	✗	✗	✗	✗
9. No harsh or inhumane treatment is allowed	✔	✔	✔	✔
10.A. Environment 2-Pillar	✔	✔	✔	✔
10.C. Business ethics	✔	✔	✔	ⓘ

✗ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✔ Robust management systems

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Site details

Company and site details

Sedex company reference	ZC173641506	
Sedex site reference	ZS280246924	
Company name	G4S Secure Solutions doo	
Business ownership type	SERVICE	
Site name	G4S Secure Solutions doo	
Site name in local language		
GPS location	GPS address	HO: Viline vode 6, 11000 Belgrade, Serbia, location adress: Bulevar Peka Dapčevića 32, 11000 Belgrade
	Coordinates	44.81997, 20.48695
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Biljana Gogić
	Job title	Procurement specialist for goods and services and QMS Manager
	Phone number	+381 62 76 1032
	Email	biljana.gogic@rs.g4s.com
Applicable business and other legally required business license numbers and documents	Business License from national registry nr. 06043429 From 12.11.2025. (with not validity as per national law)	

[← Management systems](#)

[Worker analysis →](#)

Site activities

Site function Service Provider

Site activities

Primary Private security activities

Secondary

Other

Product type Private security activities

Process overview

Company provides private security services, including guarding (static security), mobile patrols, access control and visitor management, CCTV monitoring, alarm response/intervention, event security, and loss prevention. Deliverables are security coverage hours and incident-prevention/response services, supported by reporting and communication to the client. The service is delivered unarmed, as the use of weapons is legally prohibited, and officers rely on prevention, observation, de-escalation, and escalation to police/emergency services when needed. Where transport is required to cover posts and shifts, transport is organized by the provider or reimbursed/paid**, depending on the exact assignment and client site requirements (e.g., organized commute or covered travel costs for the team assigned to the audited client).

What level of mechanization best describes the work at this site? No mechanisation is carried out

Site scope

Is the audited site a physically continuous area? Yes

What is the area of audited site to its boundary? 300m²

[← Management systems](#)

[Worker analysis →](#)

Site scope

Building 1	Last construction works on site	1985
	If building is shared, provide details	Company have one floor in shared building. Other two floors are for other companies (distribution company and company for wholesale of hygiene items)
	Number of floors	1
	Description of floor activities	Management offices, Logistic and Planning offices, Administrative offices

Is there any difference between the site scope of the audit and the Sedex site profile? No

Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site? No

Is any activity conducted onsite not included within the scope of the audit? No

Worker accommodation and transport

Are there any site-provided worker accommodation buildings? No

Does the site organise worker transport to the worksite? Not applicable
Company isn't providing transport to workers but paying where applicable

[← Site details](#)

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Work patterns

Approximate workers on site per month (% of peak)	January	95-100%	February	95-100%
	March	95-100%	April	95-100%
	May	95-100%	June	95-100%
	July	95-100%	August	95-100%
	September	95-100%	October	95-100%
	November	95-100%	December	95-100%

Is there any night shift work at the site? Yes

Company operates in two shifts per 12h on the audited location (mostly 07-19, 19-07), everything is agreed upon with the client. Working hours of administration are from 09:00 to 17:00.

What percentage of the workforce, including temporary and agency workers, work during the night shift? 89%

Was the audit conducted across all shift times, and did it include a representative sample of workers from each shift time in interviews and sampling? Yes

Company did include interviews and records of the workers who are working both shifts

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? ISO 45001 (OHS), ISO 14001 (Environmental management), Other management system certification

ISO 9001 QS-0160 valid till 5.5.2026, ISO 14001 ES-02 valid till 14.9.2027, OH 0261 valid till 7.10.2028, all issued by YUQS

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[Worker analysis →](#)

Site assessments

Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community? **Yes**
Assessed and defined in CSR commitment

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site? **Yes**
Last one one in July 2025

[← Site details](#)

[Worker analysis →](#)

Worker analysis

Gender disaggregated data available Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	57 (62.6%)	34 (37.4%)	- -	91 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	55 (65.5%)	29 (34.5%)	- -	84 (92.3%)
Temporary or fixed term employees	2 (28.6%)	5 (71.4%)	- -	7 (7.7%)
Agency or subcontracted workers	0 -	0 -	- -	0 (0%)
Seasonal workers	0 -	0 -	- -	0 (0%)
Self-employed workers	0 -	0 -	- -	0 (0%)
Informal workers including home workers	0 -	0 -	- -	0 (0%)
Apprentices, trainees or interns	0 -	0 -	- -	0 (0%)

* % of total workforce

[← Site details](#)

[Worker interviews →](#)

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	0 -	0 -	- -	0 (0%)
International migrant workers	0 -	0 -	- -	0 (0%)
Total migrant workers	0 -	0 -	- -	0 (0%)

* % of total workforce

Where workers have migrated internally, N/A
list the most common internal states
workers have moved from

Workers by age

	Men	Women	Other	Total
18 - 24 years old	0 -	0 -	- -	0 (0%)
15 - 17 years old	0 -	0 -	- -	0 (0%)
Under 15 years old	0 -	0 -	- -	0 (0%)

* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

Is the worker analysis data relevant for peak season and current to the audit? Yes

Please list the nationalities of all workers, with the three most common nationalities listed first Serbian

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Serbian	62%	38%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 -	0 -	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 -	0 -	- -	0 (0%)
Workers paid hourly / daily rate	0 -	0 -	- -	0 (0%)
Salaried workers	57 (62.6%)	34 (37.4%)	- -	91 (100%)

* % of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 (0%)
Paid weekly	0 -	0 -	- -	0 (0%)
Paid monthly	57 (62.6%)	34 (37.4%)	- -	91 (100%)
Other	0 -	0 -	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details N/A

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	6 (75%)	2 (25%)	- -	8
Supervisors or team leaders	17 (41.5%)	24 (58.5%)	- -	41
Administrative staff	30 (85.7%)	5 (14.3%)	- -	35

[← Worker analysis](#)

[Worker interviews →](#)

Worker interview summary

Gender disaggregated data available Men and women

Which methods of worker engagement were used? Individual interviews
Group interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?

Was the interview sample representative of all types of nationality and employment types of workers? Yes

Was the interview sample representative of the gender composition of the workforce? Yes

Number and size of group interviews 1 group of 5

Did workers understand the purpose of the audit? Yes

Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers? Yes

Was there any indication that workers had been 'coached' in how they should respond to questions?

No

What was the general attitude of the workers towards their workplace?

Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?

Other (provide details)

There were no significant complaints raised during interviews

What did the workers like the most about working at this site?

Freedom of movement
Job security
Work atmosphere (e.g. treatment by supervisors)

Additional comments

Workers interviewed were generally satisfied with their jobs and described management as professional and approachable, with clear communication and respectful treatment. They reported feeling comfortable during the interview process and raised no complaints.

Attitude of workers' committee/union representatives

N/A No active or representative union on site

Attitude of managers

Management showed a cooperative and professional attitude toward the audit, provided requested documents and access in a timely manner, and supported the interview process without interfering. No major issues were observed during the audit process.

Workers interviewed by type

	Total
Permanent workers	7

Workers interviewed by type

Temporary or fixed-term employees	3
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	10

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	3	2	-	5
Workers interviewed individually	4	1	-	5

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	0	0	-	0

Measuring workplace impact

Gender disaggregated data available Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	9.43%	12.9%	-	22.33%
Last full calendar year (2024)	6.74%	12.35%	-	19.09%
Previous full calendar year (2023)	7.15%	12.62%	-	19.77%

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.47%	10.91%	-	11.38%
Last full calendar year (2024)	1.21%	12.05%	-	13.26%
Previous full calendar year (2023)	0.83%	11.72%	-	12.55%

Number of days lost through job absence in the year, calculated as: $(\text{Number of days lost through job absence in the year}) / [(\text{Number of employees on 1st day of the year} + \text{Number of employees on the last day of the year}) / 2] * (\text{Number of available workdays in the year})$.

Are accidents recorded? Yes
According to the national law

[← Worker interviews](#)

[Code area 0 →](#)

Annual number of work related accidents and injuries (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Calculated as (number of lost days due to work accidents and work related injuries * 100) / number of total workers.

Percentage of workers that work on average more than 48 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	9.67%	6.0%	-	15.67%
Last full calendar year (2024)	10.12%	5.75%	-	15.87%

[← Worker interviews](#)

[Code area 0 →](#)

Percentage of workers that work on average more than 48 total hours in a given week

Previous full calendar year (2023)	8.93%	5.89%	-	14.82%
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Percentage of workers that work on average more than 60 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Auditors were able to conduct and complete the audit without any obstruction. They had full access to all requested documents, interviewees, and the facility. No bribes were offered and no threats were made. The company provided an accurate site description and the Sedex site profile during the audit. Human rights are included in the Human Rights Policy dated 5.5.2023. The last employee training was conducted on 14.11.2025, and the code can also be found on bulletin boards in the factory.</p> <p>ETI Business Code, version 2, dated August 2022 Human Rights Policy dated 5.5.2023 Decision for person responsible for Code Business License from national registry nr. 06043429 From 12.11.2025. (with not validity as per national law) Training records dated 14.11.2025</p>		

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment? No

Did any workers selected by the auditor decline to be interviewed? No

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements Robust Management Systems

Management systems

Explanation for management systems grades

Policies and procedures

Grade: Robust

The company has a clear policy that prohibits forced labor and human trafficking, ensuring that all employment is voluntary. The policy is aligned with local laws and international standards and is regularly reviewed.

Resources

Grade: Robust

A designated senior manager is responsible for enforcing the policy, with support from trained HR staff. Sufficient resources are allocated to maintain effective implementation and oversight.

Communication and Training

Grade: Robust

All employees and managers receive regular training on the right to freely chosen employment, including during onboarding. The company also informs workers of how to report any concerns confidentially.

Monitoring

Grade: Robust

Internal audits and checks are conducted to verify that no forced labor practices exist. Anonymous reporting channels are in place, and audit results are reviewed for continuous improvement.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

Systems and evidence examined to validate this code section

There is no evidence of forced or bonded labour within the company. Workers are not controlled through threats, coercion, or violence, and they can freely leave the workplace after work, as confirmed through worker interviews. Surveillance is not used to monitor employees, and workers are free to communicate without fear of punishment. No worker is in debt to the company, and there are no financial schemes that prevent employees from leaving. Also, during the audit, no evidence was found of any restrictions on workers' freedom to leave the site at the end of the workday.

All payments comply with the law. Each employee has signed an employment contract, and copies are kept in their personal files along with their IDs; the company does not retain any original documents. Employees can resign with notice, and no deposits are required for recruitment. This was confirmed through a review of personal files and worker interviews. Time records and pay slips for 20 randomly selected workers (permanent and temporary) were reviewed for October 2025 (current month), June 2025 (non-peak month), and March 2025 (non-peak month).

Human rights are covered in the Human Rights Policy dated 5.5.2023. The mechanism for employee complaints is described in the Whistleblowing Policy dated 26.6.2023.

ETI Business Code, version 2, dated August 2022

Human Rights Policy dated 5.5.2023

Regulations on work dated 29.12.2016

Whistleblowing policy 26.6.2023

20 randomly selected personal files and pay slips for October 2025 (current month), June 2025 (non-peak month), and March 2025 (non-peak month)

Training records

Interview with workers

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement? Not Applicable

Does the site utilise any workers who are prisoners? No

Does the site use the labour of persons required to work under any government scheme? No

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements Robust Management Systems

Management systems

Explanation for management systems grades

Policies and procedures

Grade: Robust

The company has clear policies ensuring responsible recruitment and verifying workers' legal right to work. These policies also address key topics such as human rights, data protection, anti-discrimination, and forced labour.

Resources

Grade: Robust

A senior manager is formally assigned to oversee responsible recruitment, supported by a structured team. Adequate resources are allocated to ensure ethical and lawful hiring practices.

Communication and Training

Grade: Robust

Employees, managers, and recruiters receive regular training on ethical recruitment, worker rights, and legal compliance. Training is part of onboarding and repeated annually, including awareness of risks like contract substitution and fake job offers.

Monitoring

Grade: Robust

Internal audits and checks are regularly carried out to verify that recruitment practices meet legal and policy standards. No major issues have been identified, and monitoring is transparent and ongoing.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

Systems and evidence examined to validate this code section

The company checks original photographic identification for all workers to confirm they have the legal right to work. Records are kept as evidence that all workers have this legal right.

The nature of the work, working conditions, living conditions, employment terms, wages, and benefits match what was communicated to workers during recruitment. Requirements and protections for children and young workers are included in the employment contract process and also with other partners by sharing the Internal Code of Conduct (Internal CoC) with all interested parties.

The company verifies that all workers are recruited legally and fairly. There are no foreign workers, so visas and travel costs were not part of the audit. There is no evidence that any worker pays recruitment fees. The company complies with all applicable laws related to recruitment and employment.

Interview with workers

20 randomly selected personal files and pay slips for October 2025 (current month), June 2025 (non-peak month), and March 2025 (non-peak month)

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	Directly
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (excluding dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site?	No
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[← Code area 1.A](#)

[Code area 2 →](#)

Percentage of workers that are migrant 0%

Do any workers migrate from other states, provinces or regions within the country to work at this site? No

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process? No
No recruitment fees and costs are detected

Were recruitment fees or costs identified during worker interviews? No
No recruitment fees or costs identified

2. Freedom of association and right to collective bargaining are respected

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements Robust Management Systems

Management systems

Explanation for management systems grades

Policies and procedures

Grade: Robust

The company has a clear policy that supports workers' rights to join trade unions and bargain collectively without fear of retaliation. These policies follow both local laws and international standards and are reviewed regularly.

Resources

Grade: Robust

A responsible team, led by a senior manager, ensures that collective bargaining rights are respected and any concerns are addressed. The company maintains active communication with unions and worker representatives.

Communication and Training

Grade: Robust

Employees are informed about their rights through onboarding, handbooks, and regular communication. Managers and HR staff are trained to understand and support freedom of association and collective bargaining.

Monitoring

Grade: Robust

The company performs regular audits to ensure respect for these rights, with results shared with unions and workers. There are open feedback channels, and any issues raised are promptly resolved.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

Systems and evidence examined to validate this code section

There is no active or representative trade union operating within the company. Although the FTO G4S Serbia Union and the G4S Secure Solutions trade union organization do formally exist, they are not active nor representative in the context of the company.

The company also does not have an alternative worker-representation mechanism, such as elected workers' representatives, as this is not a legal requirement. In addition, employees have confirmed that they do not feel the need for such a system. During the interviews, employees stated that they have no need for a trade union and are satisfied with the existing communication channels and the way employee-related matters are handled within the company.

ETI Business Code, version 2, dated August 2022

Human Rights Policy dated 5.5.2023

Regulations on work dated 29.12.2016

Interview with workers

2. Freedom of association and right to collective bargaining are respected

Data points

Are trade unions allowed by law in the national context?	No
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Not Applicable
Are the worker representatives freely elected by the workforce as a whole?	Not Applicable
Does union/worker committee membership reflect the gender composition of the workforce?	Not Applicable
Does the membership reflect the nationality composition of the workforce?	Not Applicable
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

[← Code area 2](#)

[Code area 3 →](#)

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements Robust Management Systems

Management systems

Explanation for management systems grades

Policies and procedures

Grade: Robust

The company has detailed health and safety policies to ensure safe and hygienic working conditions. These policies are regularly updated and cover accident prevention, hygiene, and emergency procedures.

Resources

Grade: Robust

A dedicated H&S team and responsible person oversee safety, with sufficient resources allocated for PPE, cleaning, and equipment. Regular inspections and investments help maintain a safe environment.

Communication and Training

Grade: Robust

All employees receive health and safety training during onboarding and through regular refreshers. Emergency procedures, PPE use, and reporting channels are clearly communicated to all staff.

Monitoring

Grade: Robust

Routine audits and inspections are conducted to check compliance with health and safety standards. Any hazards or incidents are documented, reviewed, and addressed without delay.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...		GE ZAF601231503

Systems and evidence examined to validate this code section

The company has implemented a comprehensive Health & Safety (H&S) management system, certified against ISO 45001, certificate OH-0261, valid until 07.10.2028, issued by StandCert. The company has internally appointed two H&S officers, one of whom also has a regional H&S role. In addition, the company maintains an entire department dedicated to providing H&S and fire safety services internally and externally.

Fire safety equipment—including fire extinguishers, hydrants, smoke detectors, and manual alarms—is available and within valid inspection dates. Evacuation routes are mostly accessible and clearly marked, and the assembly point is visibly signposted to enable prompt evacuation. Evacuation instructions were updated on 20.05.2024, and an emergency procedure was last revised in May 2024.

First aid kits are available in the production area, with first aid-trained personnel identified on the boxes, and important emergency contact numbers displayed nearby. The company has certified first aiders, and training records confirm ongoing competency.

A fire safety training and fire drill were conducted with all employees, including all shifts, on 23.05.2025. Additional H&S and fire safety training sessions were held on 01.03.2025, 01.12.2025, and 01.07.2024. Workers deployed at client sites (“on the field”) also undergo mandatory H&S and fire safety training conducted directly by client facilities.

No injuries have been reported in the audited facility during the past 12 months. Injuries occurring at client sites, where the company’s security officers provide services, are processed in accordance with applicable law, and the relevant evidence was reviewed during the audit. The company actively encourages workers to report near misses. Across both the headquarters and the visited sites, a strong visual communication system is in place, highlighting important H&S elements, procedures, and rules clearly visible to workers.

The company stated that no HSE inspections have recently been conducted by authorities.

Personal Protective Equipment (PPE) is provided to all workers free of charge, and proper PPE use was observed during the audit. PPE usage is also covered in the H&S training program. Electrical installations and grounding are maintained and regularly inspected by the landlord. Due to the nature of operations, the company does not use machines; however, all sampled equipment (where applicable) was inspected, and the corresponding reports were valid and within their respective validity periods.

Drinking water is available for all workers, and micro-climatic testing was conducted on 29.10.2025. A grievance mechanism is in place, enabling workers to raise concerns, including H&S-related issues. Changing rooms and toilets are clean and gender-separated. The company does not use banned chemicals, and no evidence of chemical use was found.

The company has an H&S Committee, as required by law, which meets on a quarterly basis. The most recent meeting record is dated 14.10.2024.

The company does not provide transportation or food directly but ensures these benefits are paid according to legal requirements. Medical examinations, including eye examinations, are provided to all workers in compliance with regulations.

Visited Sites:

During the audit, two sites were visited, and interviews were conducted with workers present at each location. A short site tour was performed at both sites. H&S and fire safety measures were fully implemented and respected at both locations, despite being remote from the headquarters.

Reviewed Documentation and Evidence

HSE Policy

HSE responsible person appointment – JS, JM, decision dated 01.08.2025

HSE responsible person license – JS, issued 23.05.2021

HSE responsible person license – JM, issued 11.05.2025

Risk Assessment – June 2023

Micro-climatic testing report (summer) – 29.10.2025

H&S Committee meeting record – 14.10.2024

Fire drill record – 23.05.2025

Fire safety training record – 01.03.2025

H&S training records – 01.12.2025, 01.07.2024

First aider training certificate – JM, 15.03.2022

Advanced first aider training certificate – 21.04.2022

Fire extinguisher testing records – 13.06.2025

Fire automatic system testing records – performed by landlord

Fire safety rulebook – 21.03.2018

Evacuation instruction – 20.05.2024

Evacuation plan

Fire safety training record – 16.08.2018

Emergency procedure – May 2024

Findings: good examples

ZAF601231503

Good example

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.

Description

Company is certified against ISO 45001

[← Code area 3](#)

[Code area 4 →](#)

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	Yes
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	Not applicable
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes Business License from national registry nr. 06043429 From 12.11.2025. (with not validity as per national law)
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No

[← Code area 3](#)

[Code area 4 →](#)

Does the site have a structural engineer evaluation? Yes

[← Code area 3](#)

[Code area 4 →](#)

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements Robust Management Systems

Management systems

Explanation for management systems grades

Policies and procedures

Grade: Robust

The company has clear, well-documented policies that strictly prohibit child labour and align with ILO standards and local laws. A thorough age verification process is applied during recruitment to ensure compliance.

Resources

Grade: Robust

Dedicated staff oversee child labour compliance, with sufficient resources allocated to enforce policies. HR teams are trained and equipped to perform age checks and monitor recruitment procedures.

Communication and Training

Grade: Robust

HR and recruitment staff receive regular training on legal requirements and child labour risks. The zero-tolerance policy is clearly communicated to all employees and embedded in induction materials.

Monitoring

Grade: Robust

The company conducts regular audits and checks to prevent child labor, including in the supply chain. Anonymous reporting and strong controls are in place, with corrective actions taken immediately if needed.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

Systems and evidence examined to validate this code section

No young or child workers were identified during the audit. Document checks confirmed that the youngest employee is 19 years old. There were no employees younger than this, even though employment from age 15 is permitted by law.

The company has a clear procedure to verify the age of applicants before recruitment. During the selection process, the company checks ID cards and keeps a copy in each employee's individual file, in line with legal requirements. Each employee dossier included a photocopied ID card showing the employee's name, home address, and date of birth.

ETI Business Code, version 2, dated August 2022

Human Rights Policy dated 5.5.2023

Regulations on work dated 29.12.2016

Site tour

Training records dated 14.11.2025.

20 randomly selected personal files for temporary and permanent workers

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	0%
Enter the legal age of employment	15
Enter the age of the youngest worker identified	19
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	No

[← Code area 4](#)

[Code area 5 →](#)

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

Management systems

Explanation for management systems grades

Policies and procedures

Grade: Some Improvements Recommended

The company has clear wage policies ensuring employees are paid at least in line with legal requirements and applicable international standards. Wage levels are reviewed regularly based on cost of living, inflation, and legal updates. However, the company does not currently have a formal living wage analysis or a defined plan to close any living wage gaps.

Resources

Grade: Robust

An HR team oversees wage structures, ensuring they cover basic living needs and comply with all laws. Systems and tools are in place to track, review, and process wages accurately and transparently.

Communication and Training

Grade: Robust

Wage policies are explained during onboarding and included in employee handbooks and regular updates. HR staff are trained on accurate wage calculation, and employees have access to support if they have concerns.

Monitoring

Grade: Robust

Wages are audited regularly to confirm timely, accurate, and fair payment. Employee feedback is collected to assess whether wages meet basic needs, and corrective actions are taken when needed.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

Systems and evidence examined to validate this code section

Time records and pay slips for 10 randomly selected workers (permanent and temporary) were reviewed per month for October 2025 (current month), June 2025 (non-peak month), and March 2025 (non-peak month). Wages are paid monthly, usually by the 10th day for the previous month, via bank transfer. All legally required deductions, including taxes and insurance, are correctly applied.

The review confirmed that all workers receive a basic wage above the legal minimum. The lowest wage found was 59,969 RSD (512.55 EUR, using an exchange rate of 117 RSD = 1 EUR). Wages fully reflect all hours worked, and payslips are issued monthly in a format that workers can understand. Payslips include details of regular hours, overtime, public holidays, and legal deductions, and all sampled payslips were signed by the workers.

Workers are paid for all time worked, including meetings and required training, and this training is provided free of charge. Before employment starts, workers receive clear written wage information in a language they understand, and they also receive clear written information about any wage changes during employment.

There is no evidence of in-kind benefits or deductions beyond what is legally allowed. Serbian labour law allows disciplinary deductions of up to 20%, but this is not practiced by the company. This summary is based on a review of wages and payslips for workers at both locations.

30 randomly selected personal files and pay slips for selected 10 workers for October 2025 (current month), June 2025 (non-peak month), and March 2025 (non-peak month).

Time presence records for selected 10 workers
Regulations on work dated 29.12.2016
Interview with workers

5. Legal wages are paid

Data points

What is the basic wage paid to workers? Wages are based on job skills and experience
Wages meet a living wage

Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers? Only digital payments

How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits? I don't know

Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers? Not applicable

Summary information

Is legal wage/legally recognised CBAs data available for any of these options? Monthly

Is actual wage data available on site for any of these options? Monthly

Maximum legal working hours	Max hours per day	8.0
	Max hours per week	Non applicable
	Max hours per month	Non applicable

[← Code area 5](#)

[Code area 5.A →](#)

Actual required working hours	Required hours per day	8.0
	Required hours per week	Non applicable
	Required hours per month	Non applicable
Maximum legal overtime hours	Max hours per day	4.0
	Max hours per week	Non applicable
	Max hours per month	Non applicable
Actual overtime hours	Max hours per day	4.0
	Max hours per week	Non applicable
	Max hours per month	Non applicable
Minimum legal wage	Min per hour	337.0
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum wage	Actual per hour	340.73
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable
Minimum legal overtime wage	Min per hour	424.62
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable

[← Code area 5](#)

[Code area 5.A →](#)

Actual minimum overtime wage	Actual per hour	429.31
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	30
Provide the date and details of the records	10 records per month for October 2025 (current month), June 2025 (non-peak month), and March 2025 (non-peak month) are checked
Are there different legal minimum/legally recognised CBAs wage grades?	No
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Meets legal minimum
Indicate the breakdown of workforce per earnings	100% of workers receive a basic wage higher than the legal minimum, with the lowest observed wage being 59969 RSD (equivalent to 512.55 EUR, based on an exchange rate of 117 RSD to 1 EUR)
Are there any bonus schemes used?	No
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
5.A. Living wages are paid	5.A.A Review workers' total pay including ben...	Base code	NC ZAF601231500
	5.A.B Put in place a wage improvement plan th...	Base code	NC ZAF601231501

Systems and evidence examined to validate this code section

The company does not conduct formal reviews of workers' total pay against credible living wage benchmarks, nor does it use statistical living-wage data as part of its wage-setting process.

Nevertheless, the company ensures that all wages exceed the legally defined minimum wage, and salaries are reviewed annually and adjusted in line with general living-standard trends and internal company policies.

While no structured living-wage methodology is in place, the company maintains that employee compensation is kept above the statutory minimum and aligned with market practices.

30 randomly selected personal files and pay slips for selected 10 workers for October 2025 (current month), June 2025 (non-peak month), and March 2025 (non-peak month).

Time presence records for selected 10 workers

Interview with workers

Findings: non-compliances

ZAF601231500

Non-compliance

Code area

5.A Living wages are paid

Status

Open*

Workplace requirement

5.A.A Review workers' total pay including benefits and compare it with a credible 'living wage' to calculate a 'living wage gap', and understand what proportion of the workforce has a gap.

Time given to resolve

Verification method

Collaborative action required

Issue title

903 - CAR: A living wage gap analysis has not been completed

Area of non-compliance/non-conformance

Base code

Description

Company didn't make a living wage gap analysis

Corrective and preventative actions

Company will make a living wage gap analysis

* PDF generated at 13:30 (UTC) on 19 Jan 2026. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF601231501

Non-compliance

Code area

5.A Living wages are paid

Status

Open*

Workplace requirement

5.A.B Put in place a wage improvement plan that aims to pay workers a living wage within a stated timeframe.

Time given to resolve

Verification method

Collaborative action required

Issue title

906 - CAR: A wage improvement plan (with Living Wage as the goal) has been completed but it is missing key elements

Area of non-compliance/non-conformance

Base code

Description

There isnt a wage improvement plan (with Living Wage as the goal) has been completed but it is missing key elements

[← Code area 5.A](#)

[Code area 6 →](#)

Corrective and preventative actions

Company will make a wage improvement plan (with Living Wage as the goal) has been completed but it is missing key elements

* PDF generated at 13:30 (UTC) on 19 Jan 2026. [View this finding on the Sedex platform](#) for live updates and closure details.

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met Some Improvements Recommended

Appoint a manager with sufficient seniority who is responsible for implementing procedures Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements Robust Management Systems

Management systems

Explanation for management systems grades

Policies and procedures

Grade: Some Improvements Recommended

The company has clear policies that limit daily and weekly working hours in line with local laws and international standards. These include rules on overtime, breaks, and rest days, and are regularly reviewed. However, tracking and record-keeping of working time could be strengthened further (it is monitored, but the documentation and consistency could be improved).

Resources

Grade: Robust

Work planning systems and time-tracking tools help manage workloads and prevent excessive overtime. HR and managers ensure compliance and adjust staffing when needed to protect employee well-being.

Communication and Training

Grade: Robust

Employees are informed about working hour limits, overtime rules, and rest rights during training and onboarding. There are open channels to report overwork concerns without fear.

Monitoring

Grade: Robust

Working hours are monitored through digital systems and regular audits. Any issues are addressed quickly to maintain legal compliance and ensure work-life balance.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

Systems and evidence examined to validate this code section

Time records and payslips were reviewed for a sample of 10 randomly selected workers (permanent and temporary) from both company locations. The review confirmed that all workers receive legally required rest and meal breaks, including continuous rest time between shifts. In the sample, the maximum overtime recorded was 32 hours, and the highest number of consecutive working days without a break was 6.

According to both management and workers, overtime is voluntary and, when it occurs, it is paid in line with the law at 126%. Supporting evidence (payslips and time records) was reviewed for October 2025 (current month), June 2025 (non-peak month), and March 2025 (non-peak month). All workers are entitled to at least 20 days of annual leave, and wages are paid by the 10th of the following month.

At the audited location, the company operates in two 12-hour shifts, as agreed with the client. At the head office, administration working hours are from 09:00 to 17:00. Employees have one or two breaks during the shift, depending on working hours. The company uses a manual system to record working hours, and adequate evidence of compliance with working time requirements was provided for the three months reviewed. All of the above was also confirmed by workers during interviews.

Regulations on work dated 29.12.2016.

30 randomly selected personal files and pay slips for selected 10 workers for October 2025 (current month), June 2025 (non-peak month), and March 2025 (non-peak month) including employees from both locations.

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	126%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	N/A Company is paying 126% for the OT
Excluding overtime, what are the regular working hours per week for workers at this site?	40.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	44.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	48.0
Maximum number of days worked without a day off in sample	6

[← Code area 6](#)

[Code area 7 →](#)

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements Robust Management Systems

Management systems

Explanation for management systems grades

Policies and procedures

Grade: Robust

The company has a clear anti-discrimination policy that prohibits unfair treatment based on race, gender, religion, age, disability, or any protected characteristic. The policy is updated regularly and aligned with national and international standards.

Resources

Grade: Robust

An HR or compliance officer oversees enforcement of the policy, and resources are available to support a fair and inclusive workplace. Confidential reporting channels and accommodation for employees with special needs are in place.

Communication and Training

Grade: Robust

Employees receive regular training on anti-discrimination and diversity, with special focus on recruitment, promotion, and workplace behavior. The company promotes open communication and reinforces a zero-tolerance approach.

Monitoring

Grade: Robust

Internal audits and surveys track equality practices, and any reported incidents are thoroughly investigated. Data on hiring, promotions, and salaries is reviewed to ensure fairness and prevent bias.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

Systems and evidence examined to validate this code section

Discrimination is covered in the ETI Base Code (Business Code), version 2, dated August 2022. During the audit, no evidence of discrimination was found, and management does not tolerate discrimination.

There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliation. Health checks for workers are carried out in line with legal requirements. The approach to recruitment, training, development, and promotion is the same for all workers, as defined in the Labour Rulebook.

Grievance mechanisms are available to all workers, regardless of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliation. The company does not use disciplinary measures in practice. The grievance mechanism is anonymous and accessible to all workers and other interested parties through the SpeakUp system and contact phone numbers.

Interview with workers

ETI Business Code, version 2, dated August 2022

Human Rights Policy dated 5.5.2023

Regulations on work dated 29.12.2016

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)? 2%

Representation of women in managerial roles (ratio of women workers to women managers) 5%

Representation of women in supervisory roles (ratio of women workers to women supervisors) 70%

Three most common nationalities in managerial and supervisory roles Serbian

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements Robust Management Systems

Management systems

Explanation for management systems grades

Policies and procedures

Grade: Robust

The company has clear policies that guarantee stable and regular employment, with all employees receiving written contracts. Temporary contracts are used only when justified, in full compliance with labour laws.

Resources

Grade: Robust

HR staff manage employment practices and track contract types using a digital HR system. Resources are in place to support permanent employment and to help workers transition from temporary roles when possible.

Communication and Training

Grade: Robust

Employees are informed of their rights and contract terms at hiring. HR and management receive training on maintaining regular employment in line with legal and ethical standards.

Monitoring

Grade: Robust

Contracts and employment practices are regularly audited to ensure most workers are on stable, long-term contracts. Any use of short-term contracts is monitored and must meet legal and policy requirements.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

Systems and evidence examined to validate this code section

All obligations to employees under Serbian labour law have been fulfilled. Workers are employed under contracts signed between each employee and the company. All employees have been registered with the labour and social insurance authorities from the date their contracts were signed.

The company meets its contractual and legal obligations in cases of dismissal, termination, or redundancy, as confirmed through interviews. The company does not use apprenticeship, temporary, irregular, subcontracted, or non-employment labour models. There are no migrant workers engaged by the company.

ETI Business Code, version 2, dated August 2022

Human Rights Policy dated 5.5.2023

Regulations on work dated 29.12.2016

Personal files

Interview with workers

Interview with management

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

8.A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Not Addressed
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Not Addressed
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Not Addressed
Monitor the effectiveness of procedures to meet policy and workplace requirements	Not Addressed
Explanation for management systems grades	<p>Policies and Procedures Grade: Not Addressed The company does not currently engage subcontractors or homeworkers, and therefore has not developed formal policies or procedures related to their selection, evaluation, or monitoring.</p> <p>Resources Grade: Not Addressed As subcontracting and homework are not part of the company's operations, no specific team or resources have been allocated for managing these functions.</p> <p>Communication and Training Grade: Not Addressed Since subcontractors and homeworkers are not utilized, there are no communication or training programs in place to address responsibilities, ethical practices, or legal requirements in this area.</p> <p>Monitoring Grade: Not Addressed The company does not conduct monitoring related to subcontractors or homeworkers, as these practices are not currently used within its operations.</p>

[← Code area 8](#)

[Code area 9 →](#)

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Based on site tour and interviews with management and workers it was concluded that no sub-contractors and homeworkers are on site. The site has no intention in future to hire homeworkers and subcontractors.</p> <p>Site tour Worker interview Management interview</p>		

8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent? Not applicable

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No
N/A

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No
Company doesn't use subcontractors

[← Code area 8.A](#)

[Code area 9 →](#)

Are any sub-contractors used?

No

[← Code area 8.A](#)

[Code area 9 →](#)

Audit company:
Bureau Veritas Certification

Audit reference:
ZAA600172383

Start Date:
2025-12-01

End Date:
2025-12-02

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements Robust Management Systems

Management systems

Explanation for management systems grades

Policies and procedures

Grade: Robust

The organization has a clear, comprehensive policy prohibiting all forms of harsh or inhumane treatment—including physical, verbal, sexual harassment, bullying—aligned with international human rights standards. The policy applies to employees, contractors, and visitors, and is regularly updated and communicated.

Resources

Grade: Robust

Adequate resources support enforcement, including dedicated HR personnel to monitor behavior, investigate complaints, and manage grievance mechanisms with confidentiality and protection from retaliation. Management is trained to handle conflicts and inappropriate conduct promptly.

Communication and Training

Grade: Robust

Regular, mandatory training for all employees and specific training for managers promote awareness of acceptable workplace behavior, conflict resolution, and reporting channels. The company maintains open communication to reinforce its zero-tolerance policy.

Monitoring

Grade: Robust

Robust monitoring includes audits, employee surveys, grievance tracking, anonymous reporting tools, and performance reviews to detect and address any mistreatment. Corrective actions are taken promptly to improve the workplace environment.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

Systems and evidence examined to validate this code section

There is no evidence that the company has disciplinary practices involving punitive, harsh, or degrading treatment. During the audit, no indicators of inhumane or inappropriate behavior were identified. Interviewed workers consistently confirmed that they are treated with respect and that any corrective actions—if applied—are carried out in a manner aligned with legal and ethical requirements.

There is no evidence that the company conducts body searches of workers, as confirmed through interviews.

A confidential grievance mechanism is available to all workers, allowing them to raise concerns through several channels, including the SpeakUp system, anonymous reporting options, and dedicated contact phone numbers. A formal whistleblowing mechanism exists, and workers demonstrated strong awareness of both the internal procedure and the legally prescribed whistleblower process. They reported that concerns can be raised without fear of retaliation.

Interviews revealed that many employees have been with the company for a long time. Workers expressed a high level of satisfaction, describing the company as a positive and supportive employer that pays significant attention to worker well-being. They stated that they can approach supervisors or management at any time, that communication is open, and that issues are resolved transparently and respectfully. Workers highlighted that they feel genuinely treated with dignity and that most matters are resolved through dialogue and mutual understanding.

All new employees receive induction training upon joining, including topics such as respectful workplace behavior, prevention of harassment, and gender-based violence. Refresher training is provided regularly, with the most recent session held on 14.11.2025. Workers demonstrated good understanding of the company’s policies and their rights.

Reviewed Documentation and Evidence

- Whistleblowing Policy – 26.06.2023
- ETI Business Code, Version 2 – August 2022
- Human Rights Policy – 05.05.2023
- Regulations on Work – 29.12.2016
- Worker interviews
- Management interviews
- Training records – 14.11.2025

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process The grievance process is available to all workers
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What type of grievance mechanism(s) are available?	SpeakUp system
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Number of grievances raised in the last 12 months	1
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Number of grievances resolved in the last 12 months	1
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10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements Robust Management Systems

Management systems

Explanation for management systems grades

Policies and procedures

Grade: Robust

The company has comprehensive environmental policies aligned with relevant local, regional, and national laws, covering resource use, waste management, and overall environmental impact. These policies are regularly reviewed, and a dedicated team tracks legal updates and communicates changes to employees. The company has had no environmental inspections in the past year, demonstrating strong compliance readiness.

Resources

Grade: Robust

Sufficient resources are allocated to environmental management, including appointed personnel responsible for compliance and implementation. Regular internal reviews and audits support continuous improvement and corrective actions.

Communication and Training

Grade: Robust

There is an ongoing communication and training program to keep employees informed about environmental requirements and best practices relevant to the company's operations. Training is periodically updated, and clear channels exist for reporting environmental concerns.

Monitoring

Grade: Robust

The company conducts regular internal checks and periodic external assessments to monitor environmental performance and ensure good practices in day-to-day operations. Environmental performance is tracked, and any identified issues are addressed promptly through corrective actions.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

Systems and evidence examined to validate this code section

The company ensures compliance with local, regional, and national environmental laws. No environmental licences or permits are legally required for this type of business. The company maintains appropriate documentation for resource use and waste disposal, demonstrating commitment to legal and environmental requirements. There are no specific client requirements related to environmental topics.

No hazardous chemicals are used due to the nature of the work, as the company provides security services. Security workers do not use tear gas or other chemical agents in the performance of their duties. The company is aware of the environmental laws relevant to its sites and has clear processes for communicating updates and keeping this information current. The company has not had any visits from environmental inspectors in the last 12 months. The company is certified to ISO 14001.

EMS policy dated 3.10.2022

List of all applicable laws and regulations available on dated 11.4.2025

EMS objectives dated 30.1.2025

10.A. Environment 2–Pillar

Data points

<p>Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?</p>	<p>No</p>
<p>Does the site have any valid environmental or energy management certificates?</p>	<p>Yes, ISO 14001 ES-02 valid till 14.9.2027</p>
<p>Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?</p>	<p>No</p>
<p>Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?</p>	<p>Yes Yes. The company has introduced basic adaptive measures to protect security staff from climate-related conditions, such as providing appropriate seasonal protective equipment, ensuring access to water and rest areas, and adjusting work schedules during extreme weather. Additional improvements are planned as climate risks evolve.</p>

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
10.B. Environment 4-Pillar	10.B.E Identify and monitor potential negativ...		GE ZAF601231502
Systems and evidence examined to validate this code section	<p>The company has an Environmental Policy and has appointed an officer responsible for environmental matters. The policy is shared with all interested parties and is also published on the company website.</p> <p>The company has a plan and goals to reduce environmental resource use (waste, fuel, and energy). It has implemented an environmental management system to track energy consumption and waste generation. However, the company does not recycle waste. The company has not had visits from environmental inspectors in the last 12 months. The company is certified to ISO 14001.</p> <p>The company has a system to measure and monitor the consumption of key utilities, such as water, energy, and natural resources, and it has clear targets to reduce consumption. Records were checked during the audit. The company monitors resource consumption and reports this information to headquarters, which calculates overall GHG emissions for all locations combined. The individual location does not measure its own GHG emissions. The company monitors potential impacts on biodiversity, and confirms that no biodiversity impacts are identified/expected from the provided security services (i.e., there is no direct impact to mitigate).</p> <p>EMS policy dated 3.10.2022 List of all applicable laws and regulations available on dated 11.4.2025 EMS objectives dated 30.1.2025 Environmental aspects dated 27.01.2025 EMS expert appointed, BG, dated 26.4.2023. EMS audit report dated 9.9.2025 Contract with waste disposal operator – textile waste dated 26.9.2025 Contract with waste disposal operator – paper and plastic waste dated 3.1.2020 Contract with waste disposal operator – electronic waste dated 2.6.2014 Waste flow document paper waste dated 9.10.2025 Waste flow document plastic waste dated 27.11.2025</p>		

[← Code area 10.A](#)

[Code area 10.C →](#)

Findings: good examples

ZAF601231502

Good example

Code area

10.B Environment 4-Pillar

Workplace requirement

10.B.E Identify and monitor potential negative environment impacts of operations and supply chain and have in place systems that prevent, mitigate or remedy the impacts of their own operations.

Description

Company is certified against ISO 14001

[← Code area 10.B](#)

[Code area 10.C →](#)

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Responsible use and management of water
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Not Applicable
Does the site have reduction targets in place to manage climate related risks?	Yes, to reduce scope 1 greenhouse gases (GHGs) Yes, to reduce scope 2 greenhouse gases (GHGs) Yes, to reduce scope 3 greenhouse gases (GHGs) Yes, other climate-related target
Are any of these science-based targets?	No, but we anticipate setting one in the next two years
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	Yes Reduction of electrical and electronic waste by 3%, reduction of waste gases by 5%, reduction of fuel consumption by 3%, reduction of electricity consumption by 5%
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Not Applicable

[← Code area 10.B](#)

[Code area 10.C →](#)

Usage/discharge analysis

	Last full calendar year (2024)	Previous full calendar year (2023)
Total electricity consumption from non-renewable sources (kWh)	166,293	335,951
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	None	None
Types of renewable energy used	Data not available	Data not available
Total natural gas consumption (kWh)	0	0
Usage of other purchased fuels	fuel (diesel and petrol in total) 617727L	fuel (diesel and petrol in total) 654584L
Has the site completed any carbon footprint analysis?	No	No
Water sources	local water authority	local water authority
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	583.3	668.4
Water discharged	city sewage	city sewage
Water volume discharged (m3)	583.3	668.4
Water volume recycled (m3)	0	0

[← Code area 10.B](#)

[Code area 10.C →](#)

Total waste produced (mt)	1.9	2.6
Total hazardous waste produced (mt)	0	0
Waste to recycling (mt)	1.9	2.6
Waste to landfill (mt)	0	0
Waste to other (mt)	0	0
Total product produced (mt)	0	0

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements

Some Improvements Recommended

Explanation for management systems grades

Policies and procedures

Grade: Robust

The company has clear policies against bribery, corruption, and unethical conduct, aligned with laws and shared with all employees and suppliers.

Resources

Grade: Robust

A dedicated team ensures these policies are followed, with proper training and internal controls in place.

Communication and Training

Grade: Robust

Ethics training is provided regularly to all staff, and employees can report concerns confidentially without fear of retaliation.

Monitoring

Grade: Some improvements needed

There is a grievance system in place for all employees to report mistreatment.

However, an anonymous reporting channel should also be established for third parties (e.g., contractors, suppliers, and other external stakeholders) to strengthen accessibility and oversight.

[← Code area 10.B](#)

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
10.C. Business ethics	10.C.F Develop and implement a transparent an...	Base code	NC ZAF601231504

[← Code area 10.B](#)

Systems and evidence examined to validate this code section

The company conducts its business ethically, without any form of bribery, corruption, or other unethical practices. The company fully understands the importance of compliance with fiscal and legislative requirements and is committed to maintaining integrity across all financial and operational processes.

Top management undergoes mandatory internal headquarters training covering Human Rights, Anti-Bribery, Data Protection, Anti-Trust, and related governance topics. Regular CSR trainings are organized as part of the induction program for new employees, with periodic refresher sessions provided for all staff. These trainings place strong emphasis on the company's Speak Up system, a confidential whistleblowing mechanism designed to encourage reporting of misconduct.

The company has established several policies related to business ethics, human rights, anti-bribery, and anti-fraud. The organization actively monitors legal and regulatory updates to ensure continuous compliance with all applicable requirements. Protection of personal data is treated as a priority, and the company fully complies with national data protection laws.

The ETI Base Code and the company's Social Responsibility Policy have been communicated to all suppliers via email, and suppliers have confirmed receipt and understanding. A transparent system is in place for confidential reporting and investigation of unethical behavior, ensuring that no retaliation occurs against individuals who raise concerns. Training on ethical conduct and reporting mechanisms is provided upon arrival for all new employees.

The site has not been subject to any fines, sanctions, or prosecutions related to business ethics, corruption, or compliance regulations. A grievance mechanism for workers is established; however, the procedure for third-party stakeholders is not fully transparent or easily accessible. All required business licenses, permits, and registrations comply with legal requirements and were made available to auditors during the assessment.

Reviewed Documentation and Evidence

- Organization Chart – 22.09.2025
- ETI Business Code, Version 2 – August 2022
- Supplier Code of Conduct – 01.01.2023
- Human Rights Policy – 05.05.2023
- Decision appointing the responsible person for Code/CSR Policy – 26.04.2023
- Business License from national registry (No. 06043429) – 12.11.2025 (valid without expiration as per national law)
- Training Records – 14.11.2025

[← Code area 10.B](#)

Social Media Policy – 12.09.2022
Anti-Bribery Policy – August 2023
Anti-Fraud Policy – 26.06.2023
Community Investment Policy – 09.01.2023

[← Code area 10.B](#)

Findings: non-compliances

ZAF601231504

Non-compliance

Due 2026-01-15

Code area

10.C Business ethics

Status

Closed (2026-01-19)*

Workplace requirement

10.C.F Develop and implement a transparent and accessible mechanism that effectively allows confidential and anonymous reporting, monitoring and investigation of any fraudulent or unethical business practices without fear of reprisals towards the reporter.

Time given to resolve

30 days

Issue title

957 - No grievance mechanism communicated to relevant external parties (e.g. the local community)

Verification method

Desktop audit

Description

During the management interview, it was found that while the company has a grievance system in place internally but there is no effective mechanism that ensures confidential and anonymous grievance reporting to third parties and stakeholders.

Area of non-compliance/non-conformance

Base code

Corrective and preventative actions

Company will implement an effective mechanism that ensures confidential and anonymous grievance reporting to third parties and stakeholders.

* PDF generated at 13:30 (UTC) on 19 Jan 2026. [View this finding on the Sedex platform](#) for live updates and closure details.

[← Code area 10.C](#)

10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?

No

Provide any certified anti-bribery management systems for the site

Company isn't certified against ISO 37001

[← Code area 10.C](#)

Attachments



[Time evidence.jpg](#)



[Panic light.jpg](#)



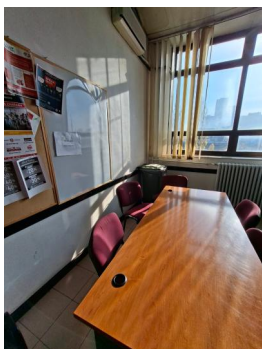
[Notice board.jpg](#)



[Safety Instructions Slips, Trips and Falls.jpg](#)



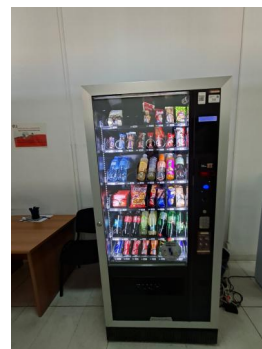
[Safety rules.jpg](#)



[Kitchen 1.jpg](#)



[Regularly checked fire extinguisher.jpg](#)



[Vending machine.jpg](#)



[Notice board 1.jpg](#)



[Men toilet.jpg](#)



[Suggestion box.jpg](#)



[Evacuation sign.jpg](#)



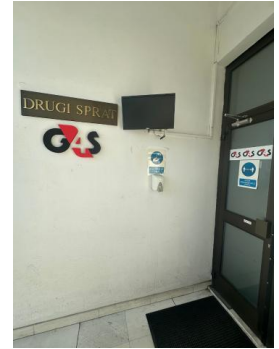
[Fore hydrant.jpg](#)



[Women toilet.jpg](#)



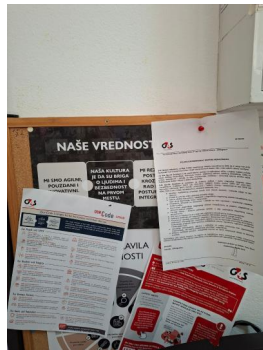
[Potable water.jpg](#)



[Entrance.jpg](#)



[Evacuation plan and fire alarm.jpg](#)



[Company Code.jpg](#)



[Kitchen.jpg](#)



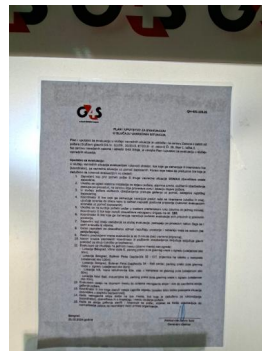
[First aid kit 1.jpg](#)



[Golden safety rules.jpg](#)



[First aid kit.jpg](#)



[Emergency Response and Evacuation Instructions.jpg](#)



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[Fire safety at site 2.jpg](#)



[Toilets for the security at site 2.jpg](#)



[Assembly point at site 2.jpg](#)



[Site 2.jpg](#)



[Changing rooms at site 2.jpg](#)

