

CDC Minutes on Proposed changes V3

30.09.2024



Pilot audits carried out as per the code revision plan in three locations –

Rousdon Mullai – South India – Scope – Estate with BL

Dhandaria Tea – Assam – Scope – Estate with BL

Dalgaon Tea – West Bengal – Estate

CDC Attended by –

Rajesh Bhuyan - tSTF

Anandita Ray Mukherjee - tSTF

Daleram Gulia – CP

Lucy Frazer – OS

Mathew Sebastian - CB

Minakshi Sharma - IP

Pinkoo Neog – RI

Monoj Das & Piyali Debnath – NGO

The outcome from Pilot Audits and Stakeholders Feedback. Additions and changes are highlighted in **Red**.

Proposed changes in General Management



G 1.1 - The verified facility shall have a trustea program policy and an objective statement with the documented KPIs which outlines the top management's commitment to comply with the trustea code and enables continuous improvement. While creating the policies on workers' rights to freedom of association the Trade Union representatives shall be engaged. Display of all policies in the local language or the language workers understand is mandatory at the unit's entrance.

G 1.2 - The entity shall have a program risk management plan including risk assessment and mitigation to program implementation addressing the three pillars of trustea program. The plan must include the potential risks related to workers' rights to freedom of association and others.

G 1.6 - The top management shall review the internal audit report periodically (minimum once every year) as a part of continual improvement. In case of any non-conformity raised, on that occasion Root Cause Analysis (RCA) has to be a part of the NC closure.

G 1.7 - The verified facility shall have a policy outlining its principles on business ethics, applicable legal requirements and vendors' ethics as well especially for disclosing gifts and hospitality. The policy should also address actual, perceived or potential conflict with internal controls in place to monitor and identify potential breaches or fraud and periodic compliance checks.

G 1.11 - Documents, either electronic or physical shall be retained as per the document retention policy. Security of the electronic data should be ensured as per trustea data security policy. The policy must say that the information is protected and all collected data/documents are processed, stored, transferred, and disposed of responsibly and safely. All the records and documents required by the standard should be up-to-date and accessible to the internal and external verifiers and retained for a minimum period of four years. Legal documents shall be retained as per the relevant requirement.

Proposed changes in Environment

E 5.1 - Sustainable management of waste which minimizes impact on the environment and community is to be integrated into the operations. The verified facility shall have a waste management plan including identification, opportunities for prevention, categorization, segregation, reduction, recycling and environment-friendly disposal by **ensuring waste hand over to government authorized waste management operators based on the type of wastes handling approval.** Practices like the reuse of non-hazardous waste, vermicomposting and biochar application are to be implemented based on feasibility. The process to sensitize all the relevant stakeholders is to be an integral part of the plan.

E 5.2 - No burning shall be practiced as a method of waste disposal. **A policy shall be in place for the management of plastic production or purchase, use, and end-of-life treatment that is updated periodically.** Plastic items, PVC and other non-biodegradable and toxic wastes shall never be burnt and shall be disposed of as per government regulations

Proposed changes in Safety

S 3.2 - There shall be a documented risk assessment and relevant verifiable action plans, covering all potential occupational health or safety risks of the workforce. **The risk assessment document shall have a health & safety committee responsible for overall safety-related risk mitigation.**

S 3.11 Adolescent workers (who have completed their fourteenth year but have not completed his/her eighteenth year) and women, shall not be involved in handling and spraying agrochemicals and any hazardous processes like handling storage and disposal of hazardous containers, and PPEs. **Compliance with the Child Labour Prohibition Act is mandated and The child and young labour policy shall cover Remediation measures in case of violation.**

Proposed changes in livelihood

L 1.1 - The verified facility shall maintain documents to show the records of all workers employed, including temporary and casual workers, each year in the factory and on-field. The documentation shall include names, the average monthly payment (including cash in-kind), age and gender. Ensure an established process for workers to be provided with information relating to any decision that changes or affects their terms of employment.

L 1.3 - All workers (permanent, temporary, contractual and migrant) shall be paid the same gross wages that comply with national legislation or collective bargaining agreements whichever is higher. If workers are paid per unit weight of harvested tea, on a normal working day they shall be allowed to earn at least the national or sector-established minimum wage. Deductions from wages for any reason shall not be made beyond the provisions of the law and without the consent of the employee. Company policy on wages and the appointment letter shall state that the compensation and remuneration will be made based on applicable CBA or Govt. notified wages.

L 1.4 - Workers shall not be required to work more than the legally mandated hours and overtime hours per week and per quarter. The weekly day off shall be provided as per applicable legal provisions. Seasonal allowance to exceed standard overtime hours is permissible subject to written approval from the relevant authority. Also overtime payment shall be made as per the law. Policy for regular working hours and overtime, shall clearly state, overtime is voluntary and no penalties will be imposed on workers for refusing overtime. Availability of provision of equal opportunity for overtime among all types of workers, and way for workers to report cases of involuntary overtime to management must be the part of the policy.

L 2.1 - The verified facility shall respect the right of all workers to establish and/or join a worker organization of their choice. The facility shall not in any way block the effective functioning of such organisations. A clear process of including inputs received from workers representative shall be considered during the policy making.

Proposed changes in livelihood

L 2.3 - The verified facility shall not permit the use of forced or bonded labour (As per ILO definition of slave labour) under any circumstances, including workers sourced through third-party contractors.. Training on employment must include all workers (including new joiners) ensure pertaining necessary information about the termination, retirement and disciplinary action. Documented HR procedure for transparent recruitment and training procedure for migrant workers with clear, complete information about their working terms and conditions as well as their rights, pre-departure and post-arrival, in a language that they understand. Separate policy for migrant labour must include the necessary information on freedom of movement, terms of joining and leaving the organization etc. Process of Management Monitoring must be ensured at all levels.

L 2.5 - Equality of treatment: Workers shall have access to jobs, training, and promotion on equal terms, irrespective of gender, age, ethnic origin, colour, marital status, sexual orientation, political opinion, religion or social origin. . Availability of Documented procedure shall ensure transparency in recruitment, complete information sharing to all worker about their working terms and conditions as well as their rights, pre-departure and post-arrival, in a language that they understand

L 2.9 - An entity must have a policy in place to prevent and address sexual harassment and other forms of violence against women and girls. Ensure effective implementation of the policies in creating a safe and empowering workplace as per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and relevant revisions. The process to refer survivors of violence to essential community services such as healthcare, psychological support, legal aid, etc should be a part of the policy. Awareness programmes shall be in place to increase safety for women and reduce gender-based violence both for workers and women in the community.

➤ **Complete Audit checklist will be a part of the revised standard as an annexure**