



Worldwide Responsible Accredited Production Certification Program Condensed Pre-Audit Self-Assessment

Introduction

WRAP's Condensed Pre-Audit Self-Assessment (PASA) is designed to help facility management evaluate their current level of social compliance performance and identify gaps prior to a WRAP audit. Completing this document will familiarize management with the key requirements necessary to achieve full compliance with **WRAP's 12 Principles** and attain WRAP Certification in an efficient and timely manner.

Facilities are strongly encouraged to complete the Condensed PASA. WRAP monitoring partners may require facilities to submit it prior to the WRAP audit.

If you have any questions with this document or WRAP's requirements, please contact WRAP at info@wrapcompliance.org.

Important Notes

General information

1. WRAP's Certification Program is built on effective **management systems** covering **WRAP 12 Principles**. Facilities are expected to maintain documented processes, procedures, training programs, and defined responsibilities for all areas of operations, related **social compliance and supply chain security**.
2. **Facility executives** must demonstrate a clear understanding of and commitment to integrating WRAP's 12 Principles into daily operations. This leadership commitment drives the development and implementation of essential policies and procedures, helping to ensure and sustain a **humane, lawful and safe workplace** for all workers.
3. The implementation of WRAP's 12 Principles helps facilities comply with **national and local laws** as well as **international standards**, while also reducing operational risks and strengthening the facility's reputation as a **reliable and responsible business partner** in global supply chain.
4. WRAP audits assess compliance with all **11 ILO Indicators of Forced Labour**. WRAP-certified facilities may request a formal statement confirming its compliance by contacting WRAP at info@wrapcompliance.org. Certified facilities may also request a separate statement of compliance related to **supply chain security**.

5. The [WRAP Facility Handbook](#) outlines WRAP's requirements and provides guidance to help facilities understand WRAP's policies and procedures. Facilities are required to review the Handbook to obtain a first-hand understanding of WRAP compliance expectations.

Getting Ready for An Audit

6. **Facilities may use consultants** to assist in developing social compliance management systems; however, consultants **may not represent the facility** during a WRAP audit or communicate with WRAP or the audit firm on the facility's behalf.
7. **New facilities** seeking WRAP Certification for the first time must be in operation for **at least 90 days** before an audit. Auditors will review 90 days of required records—such as production, payroll, business licenses, and other legally required permits. Facilities lacking sufficient documentation will require an on-site follow-up audit.
8. **Renewal facilities** may not begin the online recertification process more than **90 days before** the current certificate expires, unless explicitly instructed by WRAP.
9. Facilities must conduct **internal monitoring at least once every six months**. The full-length PASA may be used as a guidance tool and as documentation for this internal monitoring. Facilities may find Annex C of this document useful as it lists the most **common non-compliances** found in WRAP Certified facilities.
10. **Emergency exit doors that cannot be changed to outward-opening must remain securely open** with an appropriate locking mechanism during all working hours.
11. Facilities **must conduct a fire drill at least once every six months and for all shifts, including overnight shift**. Photos with date and time stamps must be kept along with evacuation time records. Facilities must provide the dates of the last two fire drills and the planned date for the next drill.
12. Facilities producing goods for export to the United States **must maintain at least 30 consecutive days of 24/7 CCTV footage** for cargo handling and storage areas, yards, container/truck/trailer storage, packing areas, and facility entry/exit points.
13. Facilities in Canada and Mexico must fill out [Q50-52](#).

Audit Process

14. WRAP audits are **unannounced within a four-week window**, issued by the monitoring partner selected by the facility. Auditors may arrive on any working day. It is the facility's responsibility to inform auditors of rest days and public holidays to prevent arrival on non-working days. Failure to do so may result in forfeiture of the audit.

Facility must also inform auditors of all shifts, including **overnight shift operations**, which are include in WRAP audit scope.
15. Facilities are encouraged to prepare all necessary documents in advance, including legally required **licenses, certificates, permits, wage and attendance records**, to name just a few.

16. Upon arrival, auditors must be **granted full access** to conduct the audit.
17. Each audit begins with an **opening meeting** and concludes with a **closing meeting**. During the **opening meeting**, auditors introduce themselves, explain the audit process, request permission to take photos, and identify the documents required for review. Facilities may ask any questions at this time.
18. WRAP requires auditors to take photos during a facility walk-through, which is an important part of the audit process. Photos are used **solely for audit reporting purposes to illustrate** general facility's health and safety conditions and relevant physical observations. Auditors are required to redact all recognizable faces and avoid photographing sensitive information, such as product label details. Photo use must comply with **GDPR**.
19. Worker interviews are a critical part of the audit. Facilities must provide a **private interview space** away from management offices to avoid any actual or perceived influence over workers. Worker interviews are also conducted for overnight shifts, where applicable.
20. Auditors may inform facility of any **non-compliances** observed during the audit. Minor non-compliances may be corrected and verified on-site, with results reflected in the audit report.
21. During the **closing meeting**, auditors review all **non-compliances** identified during the audit. Facilities are expected to provide **proposed corrective actions, projected completion dates** and the **person(s) responsible** for each non-compliance.
22. If facilities disagree with any non-compliances raised during the audit, the facilities can contact WRAP at info@wra.compliance.org to formally explain its position.



Worldwide Responsible Accredited Production Certification Program Condensed Pre-Audit Self-Assessment (PASA) Questionnaire

Facility Details	
1. Completion date of this document:	
2. Facility name in English & local language, if needed:	
3. Facility WRAP ID:	
4. Facility address: The address is where production takes place and verified by the audit. Do not use facility's head office if different.	
5. Last certification validation period :	
6. Number of years facility has been in operation at this location:	<p>Your facility must reside at the current location noted and have at least 90 days of records before an audit can take place.</p> <p>If your facility has insufficient records at the time of the audit, a follow-up audit must occur at least 90 days after the initial audit so that sufficient records (a minimum of 90 days) are available for review.</p>
7. Full description of building(s) (incl. # of buildings, # of floors, production processes in each floor, size and age of building(s)):	
8. Does the facility have any sister facilities in the same location or nearby?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, describe:
9. Does the facility share a building with other facilities/businesses?	<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </div> <div style="width: 50%;"> If Yes, does the facility conduct a joint evacuation drill with other facilities/businesses? <input type="checkbox"/> Yes <input type="checkbox"/> No </div> </div>
10. Does the facility share any workers or production processes with other facilities?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, describe in detail:
11. Are there any plans for this facility to relocate?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, indicate the date the relocation may occur:

12. Is the registered business name and site address the same as listed above?	<input type="checkbox"/> Yes <input type="checkbox"/> No If No, explain & provide registered name & address:
---	---

Facility Contact Information			
<i>Contact name & title #1:</i>		<i>Contact name & title #2:</i>	
<i>Contact #1 email address:</i>		<i>Contact #2 email:</i>	
<i>Contact #1 phone:</i>		<i>Contact #2 phone:</i>	

Site Information	
13. a. Provide applicable business license, other legally required license, and permits, such as environmental, H&S, building safety licenses and permits, etc.:	<p style="color: red;">Legally required licenses and permits must be up to date. Any expired licenses or permits are treated as noncompliance.</p>
b. Does your facility's business license include other businesses/facilities/sites?	<input type="checkbox"/> Yes <input type="checkbox"/> No
c. Does the facility have a parent company or belong to a corporate group?	<input type="checkbox"/> Yes <input type="checkbox"/> No
14. What are the main products manufactured at site?	
15. List production processes in the facility:	Production processes will be listed on WRAP's certificate. Ensure they are corrected communicated with auditors.
16. Number of production lines and main equipment used:	
17. Monthly production capacity:	
18. Main buyers and their production percentages, and facility's export market: (Only if facility agrees to disclose buyers)	
19. List social compliance, environmental & CTPAT audits conducted in the past 12 months: (Only if facility agrees to disclose such info)	

20. Worker turnover Rate:		
21. Number of employees & others at this facility: <i>NOTE: Onsite subcontracted workers are part of the audit. Auditors may select them for interviews.</i>	Workers: Male: Female:	Onsite subcontracted workers: Male: Female:
	Supervisors: Male: Female:	Management & admin. staff working in the offices:
22. Language(s) spoken by workers:		
23. Language(s) spoken by supervisors:		
24. Language(s) spoken by management:		
25. Full-time contracted workers:	Male: Female:	
26. Short-term contracted workers:	Please state length of contract:	
27. # of young workers (legal min. working age to 18 years old):	Male: Female:	
28. Nationality of owner(s/entities):		
29. Nationality of management:		
30. Workers Nationality (top 5 countries)		
31. a. Domestic migrant workers:	Male: Female:	
b. List ALL provinces/states where they are from:		
32. Contract workers from agency(ies):	Male: Female:	
33. What form of worker representation exists in the facility? (Note: Some form of worker representation must exist to address workplace grievances.)		
34. List any workers' unrest/strike in the past 12 months:	Provide reasons for such occurrence:	
35. Regular workdays (e.g., Mon-Sat):		
36. Weekly rest day(s):		
37. List daily shifts, incl. overnight production:		
38. Facility's peak season(s):		

39. List daily legally required breaks (number and duration):			
40. What is the lowest wage level paid for a regular work week/month?	<input type="checkbox"/> Below minimum <input type="checkbox"/> At minimum <input type="checkbox"/> Above minimum		
41. Are all relevant records, incl. wage and attendance records, kept in the audited facility for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No If No, explain:		
42. Are there dorms/apartments provided by the facility/labor brokers/agents for workers/management?	<input type="checkbox"/> Yes <input type="checkbox"/> No	% of workforce residing in dorms/apartments:	

For Renewal Facilities Only

43. Has your facility moved locations (or changed addresses) since the last WRAP audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, state the old address and new address:		
44. Has your facility had any significant structural changes in the past 12 months?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, provide a description of the structural changes:		
45. Has there been a change in square footage in the past 12 months?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, explain:		
46. Has there been a change in management/ownership within the facility in the past 12 months?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, explain:		
47. Has your facility changed its name in the past 12 months?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, provide the old name and new name:		
48. Has this facility had an increase or decrease in workers since the last WRAP audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Reason for change and %:	
49. Was a Post Certification Audit (PCA) conducted during the last certification cycle?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, provide findings and factory's corrective actions taken:		

Below questions are for facilities in Canada & Mexico only.

50. Does the facility work with its transportation providers to track conveyances/trucks from origin to the final destination point?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, provide findings and your factory's corrective actions taken:		
51. Does the facility have a "no-stop" policy if land border shipments are in proximity to the United States?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, provide findings and your factory's corrective actions taken:		
52. Does the facility require its cargo movers to incorporate a "last chance" verification process for U.S. bound shipments?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, provide findings and your factory's corrective actions taken:		

WRAP's Zero Tolerance Policy

WRAP commits to working with facilities to remediate any zero-tolerance issues. This requires full cooperation from the facilities. If a facility is unwilling to go through the remediation process or refuses to correct the noncompliance, WRAP reserves the right to expire or suspend a facility's certificate as the last resort.

Zero-tolerance issues are typically deliberate and ongoing human rights violations, such as:

- Child labor (including slavery, forced labor, trafficking, serfdom, debt bondage, prostitution, pornography, work that involves children in illicit activity, or work that is likely to harm the child physically or morally)
- Forced labor (including bonded labor, not allowing workers to leave at their own will, and forced overtime)
- Inhumane treatment of workers (including threats of physical harm or extreme intimidation, corporal punishment, and mental or physical coercion)
- Unethical actions that encourage auditor(s) to compromise their integrity
- Threatening physical harm towards the audit team
- False representation of a certificate or audit report (i.e., altered, forged, or fraudulent documents)
- False representation of production processes (including hiding full or partial production floors and/or operations from an auditor)



Principle 8 Health and Safety

Responsible Person (s) Policies Procedures Trainings



Principle 9 Freedom of Association and Collective Bargaining

Responsible Person (s) Policies Procedures Trainings



Principle 10 Environment

Responsible Person (s) Policies Procedures Trainings



Principle 11 Customs Compliance

Responsible Person (s) Policies Procedures Trainings



Principle 12 Security

Responsible Person (s) Policies Procedures Trainings



Worldwide Responsible Accredited Production (WRAP)

12 Principles

The WRAP Principles are based on generally accepted international workplace standards, local laws and workplace regulations, and include the spirit or language of relevant conventions of the International Labor Organization (ILO), the United Nations (UN) Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the Organization for Economic Cooperation and Development (OECD)'s Guidelines for Multinational Enterprises. The Principles encompass human resources management, health and safety, environmental practices, and legal compliance including import/export and customs compliance and security standards, ILO Convention 138 (Minimum Age) and Convention 95 (Protection of Wages) are explicitly referenced by Principle 3 Prohibition of Child Labor and Principle 5 Compensation and Benefits, respectively. In addition, WRAP Principles cover all aspects of the 11 ILO Indicators of Forced Labour. With respect to security standards, Principle 12 Security is benchmarked against the United States Custom and Border Protection's Customs and Trade Partnership Against Terrorism (CTPAT) program.

The Principles are meant to promote responsible business practices and sustainability in supply chain management; reduce, prevent and eliminate potential harms to workers; help businesses strengthen human rights due diligence, traceability and identification of adverse impacts in supply chains; and contribute to the advancement of the United Nations Sustainable Development Goals (SDGs), in particular SDG 8 (Decent Work and Economic Growth) and SDG 12 (Responsible Consumption and Production).

The WRAP Certification Program's objective is to independently monitor and certify a facility's compliance with these standards, to validate that production within the facility's premises during all work shifts occurs under safe, lawful, human and ethical conditions. Facilities participate voluntarily and commit to ensuring that their practices will meet these standards, and further commit to passing along, on their part, the expectation that their contractors and suppliers likewise comply with these standards.

1. Compliance with Laws and Workplace Regulations

Facilities will comply with laws and regulations in all locations where they conduct business.

All facilities will comply with the legal requirements and standards of their industry under the local and national laws of the jurisdictions in which the facilities are doing business, along with any applicable international laws. This will cover all labor and employment laws of those jurisdictions, as well as laws governing the conduct of business in general, including rules and standards of ethics dealing with corruption and transparency, and any relevant environmental laws.

2. Prohibition of Forced Labor

Facilities will not use involuntary, forced, indentured or trafficked labor.

Facilities will maintain employment strictly on a voluntary basis. Facilities will not use any forced, prison, indentured, bonded or trafficked labor. This will include ensuring that any workers they hire will be under labor contracts that fully comply with all relevant legal requirements and do not impose any form of coercion (including imposing substantial fines or loss of residency papers by workers leaving employment or restricting a worker's ability to voluntarily end his/her employment). In addition, workers should not be employed subject to any financial or collateral guarantee or debt security; any recruitment fees involved should be borne by facilities, not workers. Further, facilities will ensure that the workers' travel documents are not withheld, and that all written contracts are in a language understood by the workers.

3. Prohibition of Child Labor

Facilities will not hire any employee under the age of 15 (14 in less-developed countries) or under the minimum age established by law for employment, whichever is greater, or any employee whose employment would interfere with compulsory schooling. Facilities will not hire forced or indentured child labor.

Facilities will ensure they do not engage in any form of child labor, including, but not limited to, the internationally recognized worst forms of child labor. Consistent with ILO Convention 138, facilities may not employ any person at an age younger than the law of the jurisdiction allows and in any case not below the age of 15 (14 in less-developed countries), even if permitted by local law. In addition, facilities will adhere to local legal requirements regarding mandatory schooling. Further, if, where permitted by local law, a facility employs young workers (defined as workers whose age is between the minimum age of employment and 18 years), the facility will also comply with any applicable legal restrictions on the nature and volume of work performed by such young workers, as well as any other requirements imposed by law, including limitations related to working hours

and to ensuring that such young workers do not perform any hazardous work (e.g., chemical handling or operating heavy machinery).

4. Prohibition of Harassment and Abuse

Facilities will provide a work environment free of supervisory or co-worker harassment and abuse, and free of corporal punishment in any form.

Facilities will ensure a workplace that is respectful of a worker's rights and dignity. This includes ensuring that no corporal punishment or physical coercion be used. Facilities will not engage in or tolerate – either at the workplace or in residential quarters provided by facilities or labor brokers acting on their behalf – any sexual harassment or abuse, indecent or threatening gestures, abusive tone or language or any other kind of undesired physical or verbal contact, such as bullying. In particular, facilities will ensure proper training at all levels - including management, supervisors and workers - to secure a workplace free of harassment and abuse.

5. Compensation and Benefits

Facilities will pay at least the minimum total compensation required by local law, including all mandated wages, allowances and benefits.

Facilities will ensure proper compensation for their employees for all the work done, by providing in a timely manner all the wages and benefits that are in compliance with the local and national laws of the jurisdiction in which they are located. This will include any premiums for overtime work or work done during holidays, as well as any other allowances or benefits, including any mandatory social insurance, required by local law.

6. Hours of Work

Hours worked each day, and days worked each week and each month, should not exceed the limitations of the country's law. Facilities will provide at least one day off in every seven-day period, except as required to meet urgent business needs.

Facilities are required by local law to adhere to any limits set on regular working hours as well as any limits set on overtime work. Long term participation in the WRAP Certification Program is contingent upon meeting the limitations set by local law. WRAP recognizes that this can be a particularly challenging requirement, especially when taking into account local enforcement norms and customs. In light of this reality, WRAP will permit full compliance with local laws on working hours to be achieved incrementally, provided that a given facility meets the following conditions: is fully

transparent about its working hours; ensures that those hours are all being worked voluntarily, in conditions that protect worker safety and health; compensates all employees in keeping with WRAP Principle 5; and shows improvement toward meeting the working hours' requirements from one audit to the next.

7. Prohibition of Discrimination

Facilities will employ, pay, promote, and terminate workers on the basis of their ability to do the job, rather than on the basis of personal characteristics or beliefs.

Facilities will ensure that all terms and conditions of employment are based on an individual's ability to do the job, and not on the basis of any personal characteristics or beliefs. Facilities will ensure that any employment decision - involving hiring, firing, assigning work, paying or promoting - is made without discriminating against the employees on the basis of race, color, national origin, gender, age, sexual orientation, religion, disability, or other similar factors (pregnancy, political opinion or affiliation, social status, etc.).

8. Health and Safety

Facilities will provide a safe and healthy work environment. Where residential housing is provided for workers, either directly by facilities or through labor brokers, facilities will ensure it is safe and healthy housing.

Facilities will provide a safe, clean, healthy and productive workplace for their employees. Facilities shall prioritize worker health and safety above all else, and proactively address any safety issues that could arise. This will include a wide variety of requirements, such as, ensuring, among other things, the availability of clean drinking water (at no charge to workers), adequate medical resources, fire exits and safety equipment, well-lighted and comfortable workstations, clean restrooms. Further, facilities shall adequately train all their workers on how to perform their jobs safely.

9. Freedom of Association and Collective Bargaining

Facilities will recognize and respect the right of employees to exercise their lawful rights of free association and collective bargaining.

Facilities will respect the freedom of each employee to choose for him- or her-self whether or not to join a workers' association. Facilities cannot discriminate against workers based on whether or not they choose to associate. Both the facility and the workers shall ensure they conduct themselves in accordance with all relevant laws in this

regard. Facilities will ensure an effective mechanism is in place to address any workplace grievances.

10. Environment

Facilities will comply with environmental rules, regulations and standards applicable to their operations, and will observe environmentally conscious practices in all locations where they operate.

Facilities will ensure compliance with all applicable legally mandated environmental standards, and should demonstrate a commitment to protecting the environment by actively monitoring their environmental practices. In particular, facilities will ensure proper waste management, including monitoring the disposal of any waste material - whether solid, liquid or gaseous - to ensure such disposal is done safely and in a manner consistent with all relevant laws. Facilities are encouraged to minimize their impact on the environment by applying the principles of reduce, reuse and recycle throughout their operations.

11. Customs Compliance

Facilities will comply with applicable customs laws, and in particular, will establish and maintain programs to comply with customs laws regarding illegal transshipment of finished products.

Facilities will ensure that all merchandise is accurately marked or labeled in compliance with all applicable laws. In addition, facilities will keep records for all materials and orders, as well as maintain detailed production records.

12. Security

Facilities will maintain appropriate procedures in order to ensure proper corporate security, transportation security, and people and physical security at the facility.

Facilities will ensure adequate controls are in place to safeguard against introduction of any non-manifested cargo. In this regard, WRAP recognizes the United States Customs and Border Protection (CBP)'s CTPAT Guidelines for Foreign Manufacturers as minimum requirements and has adopted those guidelines under this Principle.

Appendix B: Corrective Action Plan



Corrective Action Plan

**If no non-compliances or observations were raised, simply note “No NC”
AND lead auditor and facility representative *still* need to sign this document.**

This “Corrective Action Plan” shall be used to summarize all facility non-compliances and observations and to document a corrective action plan that both the auditor and facility management believe is reasonable to ensure compliance, realignment and continuous adherence to WRAP’s Principles and local/national laws.

This form should be used in the following manner:

- Document all non-compliances and observations individually on the form below, prior to the closing meeting and use the form as an agenda during the closing meeting;
- During the closing meeting, ensure that management understands the findings;
- Management shall come up with its own corrective actions for all non-compliances and observations;
- Each non-compliance must be rated as follows:

Zero Tolerance: Deliberate and egregious ongoing human rights violations and unethical behavior. They require immediate corrective action and must be reported to WRAP within 24 hours or no more than 48 hours

- Child labor, including worst forms of child labor
- Forced labor, including bonded labor, not allowing workers to leave at their own will and forced overtime
- Inhumane treatment of workers, including threats of physical harm or extreme intimidate, corporal punishment, mental or physical coercion
- Unethical actions that encourage auditor(s) to compromise their integrity
- Threatening physical harm towards the audit team
- False representation of a certificate or audit report, i.e., altered, forged, or fraudulent documents
- False representation of production processes, including hiding full or partial production floors and/or operations from an auditor

Major: Systematic violations of local/national law and/or WRAP Principles, and/or any health and safety condition that might pose significant risk to workers’ basic rights and/or safety

- Failure of management systems, including excessive minor non-compliances that reveal an underlying dysfunction
Note: If there are several minor non-compliances against the same Principle, it may warrant a major non-compliance on internal monitoring (i.e. Q1.4a)
- Non-transparency
- Issues that require on-site verification, especially those that can only be fully validated with worker interviews and/or addressed through worker training
- Partially or fully denied access

Minor: Occasional or isolated violations of local/national law and/or WRAP Principles that do not seriously compromise workers' basic rights and/or safety

- Non-compliances that do not require onsite verification, worker interviews and/or worker training
- Minor situations that do not affect a large number of workers

Observation

- Currently not a noncompliance but could potentially become one if timely actions are not taken (internal monitoring can help identify such issues); for example, certificates/permits that are valid during the audit but look set to expire in the near future with no indication that the facility has taken the steps necessary to ensure timely renewal. In addition, under certain circumstances (outlined in detail under WRAP Principle 6), excessive working hours will also be noted as an observation (instead of a noncompliance)
- Delays caused by the authority in issuing certificates/permits. Facilities must have already passed the necessary inspections and are only waiting for the paperwork

Corrective Action Plan

Please document only one non-compliance/observation per row.

NC # & Major, Minor or Observation	WRAP clause number (e.g., Q8.4) and relevant local/national laws	Non-compliances	A. Facility's corrective action plan B. Projected completion date C. Responsible person's name and title
1			A. B. C.
2			A. B. C.
3			A. B. C.
4			A. B. C.
5			A. B. C.
6			A. B. C.

** Please continue to Signature page to acknowledge the result of the audit.*

SIGNATURE PAGE

1. Leave one signed copy of CAP and signature pages with management
2. Retain one signed copy for report submission to WRAP
3. ***Insert FULL scanned copy of this page immediately following CAP pages in audit report***

By e-signing below, both parties acknowledge that the closing meeting was held (if facility does **NOT** agree with an NC(s)/observation(s), facility can still contact WRAP to explain their position **even if the facility signs below**. If so, contact WRAP within 10 business days).

Initial Audit Signatures

<i>Date(s) of the audit:</i>	
<i>Name of lead auditor:</i>	
<i>E-signature of lead auditor & date:</i>	
<i>Name and title of facility representative:</i>	
<i>E-signature of facility representative & date:</i>	

Onsite Follow-Up Signatures (If Applicable)

<i>Date(s) of the audit:</i>	
<i>Name of lead auditor:</i>	
<i>E-signature of lead auditor & date:</i>	
<i>Name and title of facility representative:</i>	
<i>E-signature of facility representative & date:</i>	

Appendix C: Common Non-compliances Found in WRAP Audits

Analysis of nearly **6,300 WRAP audits conducted in 2025** shows that **97% of all non-compliances** were concentrated on the following four WRAP Principles:

- **Principle 8: Health and Safety** – 57%
- **Principle 12: Security** – 21%
- **Principle 6: Hours of Work** – 12%
- **Principle 1: Compliance with Local and National Laws** – 7%

The issues outlined below represent the most frequently cited non-compliances and can serve as a practical checklist for **internal monitoring and self-assessments**. This checklist is intended to help facilities proactively address gaps in advance of a WRAP audit and to support ongoing monitoring for continuous improvement.



Principle 8 Health and Safety (57% of non-compliances)

Common findings include:

- Improper or inconsistent use of **Personal Protective Equipment (PPE)**
- Safety warnings and signage **not provided in a language understood by workers**
- Required **machine safety guards** not installed or maintained
- **Emergency exits blocked or kept locked** during working hours
- Incomplete, outdated, or missing **Material Safety Data Sheets (MSDS)**
- Electrical panels and boxes missing **appropriate safety warning labels**



Principle 12 Security (21% of non-compliances)

Frequently observed issues include:

- Lack of **restricted access controls** to sensitive areas based on job role
- Inadequate **seal control and verification procedures**
- Weak or undocumented **ID badge and access device management**
- Absence of formal **security incident reporting procedures**
- Failure to maintain **30 consecutive days of CCTV recordings**, covering 24/7 operations
- Insufficient **physical barriers** to secure cargo loading and storage areas



Principle 6 Hours of Work (12% of non-compliances)

Typical violations include:

- **Monthly** overtime hours exceeding legal limits
- **Daily** overtime hours exceeding legal limits

- **Weekly** overtime hours exceeding legal limits
- Inaccurate, incomplete, or inconsistent attendance **and timekeeping records**
- **Yearly** overtime hours exceeding legal limits
- Failure to provide at least **one rest day after six consecutive working days**



Principle 1 Compliance with Laws and Workplace Regulations (7% of non-compliances)

Common shortcomings include:

- General **violations of local labor laws or regulations**
- Subcontractors lacking documented **acknowledgement of WRAP requirements**
- Failure to conduct **internal compliance monitoring at least twice per year**
- Non-compliance with **labor and employment laws**, including wage, contract, and benefit requirements

Appendix D: Working Hours Action Plan (WHAP)



Worldwide Responsible Accredited Production

Working Hours Action Plan 3.0

(Effective July 20, 2020)

Working Hours Action Plan (WHAP) is a tool to help facilities that experience challenges with excessive working hours define an action plan to systematically reduce overtime hours. The overall goal is to work towards attaining full compliance with the local laws.

The facility fills out Sections I & II below. The auditor assesses them and provides comments in Section III. WRAP has issued a separate guidance document. Please refer to it on how to fill out or assess a WHAP.

1. Facility name:			
2. Facility WRAP ID #:		3. Country:	
4. Facility type:	<input type="checkbox"/> New certification	<input type="checkbox"/> Renew Certification	<input type="checkbox"/> Lapsed
5. Latest onsite audit date(s): <i>e.g.: July 18 - 19, 2019</i>		6. WHAP from last certification cycle:	<input type="checkbox"/> Yes <input type="checkbox"/> No

Section I. Working Hours, Observations Noted, and Reduction Target

	<i>a. Regular working hours</i>	<i>b. Legally allowed overtime hours</i>	<i>c. Any excessive overtime hours raised as observation (Yes, No or N/A)</i>	<i>d. Highest hours observed (Taken from Principle 6 in initial audit report)</i>	<i>e. Reduction target (choose ONE target only)</i>
7. Daily:					
8. Weekly:					
9. Monthly:					
10. Quarterly:					
11. Yearly:					

12. Others:					
--------------------	--	--	--	--	--

Section II A. Top Three (3) Main Processes with HIGHEST Working Hours for Reduction Target

(No need to list the processes if the hours do not exceed legal limit.)

	<i>a. Processes</i>	<i>b. List HIGHEST working hours of the target chosen in Section I e above:</i>	<i>c. Provide two periods with highest working hours in b:</i>
13. Process 1:			
14. Process 2:			
15. Process 3:			

Section II B. Root Causes for Excessive Hours and Improvement Actions

16. Root Causes	17. Improvement Actions <i>(Actions must be specific. e.g., management will hire about 15 sewing workers within 30 days to reduce the hours in sewing department.)</i>
a.	
b.	
c.	
18. Facility responsible person(s)' name & date:	

Section III. Auditor's Assessment

19. Has facility achieved the recertification target(s) set in last WHAP, if applicable?		a. Target Set in Last WHAP	b. Target achieved (Yes, No, or N/A)
	Daily		
	Weekly		
	Monthly		
	Quarterly		
	Yearly		
20. a. Provide any comments on the improvement actions taken by facility (as compared with last WHAP), if applicable:			
b. If this is the facility's first WHAP, are the improvement actions proposed in Q17 acceptable?	<input type="checkbox"/> Yes Provide reasons: <input type="checkbox"/> No Provide reasons:		

21. What is the facility's average weekly working hours (data should be taken from Principle 6 in initial audit report)?	
22. Auditor's name and date reviewed:	

Section IV. Facility Interim WHAP Status

(TO BE COMPLETED BY FACILITY 6 MONTHS AFTER CERTIFICATION)

<i>Complete whichever that applies</i>	<i>a. Interim status on highest working hours during the past 6 months</i>	<i>b. Date of Reporting</i>
23. Daily:		
24. Weekly:		
25. Monthly:		
26. Quarterly:		
27. Yearly:		
28. Other:		