



[2018]

FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING AGRICULTURAL REPORT

Company: Syngenta

Country: India

Crop: Corn

Production Process: Detasseling

Assessment Location: Eluru District of West Godavari, Andhra Pradesh, India

Monitor: LINK Ethical Trade Consulting

Assessment Dates: 17-20 January 2019

Number of assessed farms: 11

Total area covered: 48 acres

Number of farmers interviewed: 10

Total number of workers: 45

Number of workers interviewed: 45

To view more about the FLA's work with Syngenta, please visit the FLA website [here](#).
To access the FLA Agriculture Monitoring Benchmarks, please visit [this page](#).

Employment Relationship

Compliance Status

Section	Benchmark	Compliance status	Farms
Human Resource Management System	ER.1.1	In compliance	
	ER.2.1 (PR)	Not Initiated	All Farms
	ER.2.1.1 (PR)	N/A	
Recruitment and Hiring	ER.3.1	In compliance	
	ER.3.1.1	Noncompliance	All Farms
	ER.3.1.2	Noncompliance	All Farms
	ER.4	In compliance	
	ER.5.1	In compliance	
	ER.5.2	In compliance	
	ER.5.3	In compliance	
	ER.6 (PR)	In Progress	All Farms
	ER.7.1	In compliance	
	ER.7.2	In compliance	
	ER.7.3	In compliance	
	ER.7.4	In compliance	
	ER.7.5	In compliance	
	ER.7.6	Noncompliance	All Farms
	ER.7.7	In compliance	
ER.7.8	In compliance		
Terms and Conditions	ER.9.1	In compliance	
	ER.9.2	In compliance	
	ER.9.2.1	Noncompliance	All Farms
	ER.9.2.2	In compliance	
	ER.9.2.3	Noncompliance	All Farms
	ER.9.3	In compliance	
	ER.9.3.1	In compliance	
	ER.9.3.2	In compliance	
	ER.9.3.3	In compliance	
	ER.10	N/A	
	ER.11	In compliance	
	ER.12.1	Noncompliance	All Farms
	ER.12.1.1	In compliance	
	ER.12.2	N/A	
	ER.13.1	Noncompliance	All Farms
ER.13.2 (PR)	In Progress	All Farms	
ER.13.3 (PR)	In Progress	All Farms	
Administration	ER.15.1	In compliance	
	ER.15.2	In compliance	
	ER.15.2.1	Noncompliance	All Farms
	ER.16.1	In compliance	
	ER.16.2	In compliance	
	ER.17.2 (PR)	Not Initiated	All Farms except one farm
	ER.17.3 (PR)	In compliance	
ER.17.4 (PR)	In compliance		
Worker Involvement	ER.18.1	Noncompliance	All Farms
	ER.18.2 (PR)	Not Initiated	All Farms
Right to Organize and Bargain	ER.19	In compliance	
Work Rules and Discipline	ER.20.1	Noncompliance	All Farms
	ER.20.2	Noncompliance	All Farms
	ER.20.3 (PR)	Not Initiated	All Farms
	ER.20.4	Noncompliance	All Farms
	ER.20.6	Noncompliance	All Farms
	ER.20.7	Noncompliance	All Farms

	ER.20.8	Noncompliance	All Farms
	ER.20.9 (PR)	Not Initiated	All Farms
	ER.20.11	Noncompliance	All Farms
Access to Training for Family Members	ER.21	Noncompliance	All Farms
HSE Management System	ER.24.1.	In compliance	
	ER.24.2 (PR)	Not Initiated	All Farms
	ER.24.3	In compliance	
	ER.24.4 (PR)	Not Initiated	All Farms
	ER.24.4.1 (PR)	Not Initiated	All Farms
	ER.24.4.2 (PR)	Not Initiated	All Farms
	ER.24.4.3 (PR)	Not Initiated	All Farms
	ER.24.4.4 (PR)	Not Initiated	All Farms
	ER.24.4.5 (PR)	Not Initiated	All Farms
	ER.24.4.6 (PR)	Not Initiated	All Farms
Grievance Procedures	ER.25.1 (PR)	Not Initiated	All Farms
	ER.25.2 (PR)	Not Initiated	All Farms
	ER.25.3	Noncompliance	All Farms
	ER.25.4	Noncompliance	All Farms

Employment Relationship Assessment Summary

Proof of Age Documentation

Benchmarks:

ER.3.1.1: Employers shall take reasonable measures to ensure such documentation is complete and accurate.

ER.3.1.2: In those cases where proof of age documentation is not readily available or unreliable, employers shall take all necessary precautions which can reasonably be expected of them to ensure that all workers are at least the minimum legal working age, including requesting and maintaining medical or religious records of workers, or through other means considered reliable in the local context.

ER.7.6: contract, temporary, casual, daily, seasonal or migrant workers receive at least the minimum wage or the prevailing industry wage whichever is higher, and all legally mandated benefits such as social security, other forms of insurance, annual leave and holiday pay;

**Noncompliance
in all farms**

Findings/Noncompliance Explanation:

1) The seed organizers recruit the workers mostly through DWACRA (Development of Women and Children in Rural Area) program. This group is a micro-credit finance group supported by local government under microfinance activities. There were 3 groups of workers under two different DWACRA groups which the team interviewed in 3 different villages. All workers were part of these groups, and were female workers only. Based on the assumption that all females were part of the groups; fulfilling basic age requirement, there was no recruitment of young or child workers. But this system has not been documented by Syngenta to ensure that the age proof verification system is implemented.

2) The workers did not receive legal minimum wages for the sample farms visited during IEM. More details are listed in the Compensation section.

Source: Interviews with seed organizers and workers.

Company Action Plan:

Syngenta field production considering different types of records to confirm the age of the workers. If the workers are members of DWACRA group, by default, they are above 18 years and need not to collect the proof..

Syngenta Corn production launched the fair compensation project in de-tasselling activity and observed positive impact on wage payment. Further, the project shall also be continued next season and seed organisers shall be encouraged to pay minimum wage. As decided in this project plan, the growers and workers shall be sensitised on minimum wage and encouraged to maintain the records.

Deadline Date:	Activity	Outcome	Timeline	Responsible
	Collection of age proofs of young or doubtful aged workers	All the young workers share their age proofs	Nov 2019 to April 2022	Seed organizer and his field team
	Continuation of Fair Compensation Project: Nov 2019 to Feb 2020	Increased awareness on minimum wages & expecting comply with MW rate	Nov 2019 to April 2025	Field Production Team

Terms and Conditions

<p>Benchmarks:</p> <p><i>ER.9.2: Employment terms shall be those to which the worker has voluntarily agreed, provided those terms do not fall below:</i></p> <p><i>ER.9.2.1: provisions of national laws;</i></p> <p><i>ER.9.2.3: the FLA Workplace Code.</i></p> <p><i>ER.12.1: Employers shall regularly inform workers about workplace erules, health and safety information, and laws regarding workers' rights with respect to freedom of association, compensation, working hours, and any other legally required information, and the FLA Code through appropriate means, including posted in local language(s) throughout the workplace's common areas or in the surrounding community. In the case of workplaces with informal labor structures, these communication and awareness raising activities could be done with support from supply chain intermediaries such as cooperatives, organizers, tier one suppliers or the participating company.</i></p> <p><i>ER.13.1: Farmer, share cropper or any kind of supervisor who is leading workers shall have knowledge of the local labor laws and the FLA Code.</i></p>	<p>Noncompliance in all farms</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------

Findings/Noncompliance Explanation:	<p>The employment terms under compensation, working hours are not adhered as per the legal regulations (more details pertaining to this issue is listed under Compensation and HOW sections). There is no communication of FLA code standards to the workers. The seed organizer and his staff are not aware of the FLA CoC completely. Therefore the seed organizer and their staff are not training the workers on the various clauses of the FLA CoC.</p> <p><u>Source:</u> Interviews and document review at farms</p>
--------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Company Action Plan:	<p>Refresher training on Fair Labour Standards shall be organised before the start of the season (Oct 2019) to all the production teams including seed organisers and field supervisors. All the CoC bench marks shall be communicated to them and the understanding of the level ensured by having training evaluation.</p> <p>As a further step, the field production team shall raise the awareness on fair labour standards to all the farm workers phase wise. Initial year focus shall be given to de-tasselling workers, it is the responsibility of field supervisors. As it is high labour consuming activity, in 2 years, all the de-tasselling workers can be covered under this farm level awareness campaign and next step is other farm workers shall be sensitised on this.</p>
-----------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Deadline Date:	Activity	Outcome	Timeline	Responsible
	Refresher Training FLP standards to Field Production Team	Better understanding of FLP standards and its bench mark	Oct 2019 (Before the season)	FLP Team
	Farm level workers on FLP standards	Increased knowledge among farm workers on FLP standards	Nov 2019 to Feb 2021	Field Production team

Administration

<p>Benchmarks:</p> <p><i>ER.15.2.1: Advances must be properly documented, and their receipt and accuracy must be confirmed by the recipient worker, in writing whenever possible (e.g. signature, thumbprint).</i></p>	<p>Noncompliance in all farms</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------

Findings/Noncompliance Explanation:	<p>There are no written records between the seed organizer and the workers with respect to advances paid, wages, or legal deductions if any. The workers are paid advances through their group leader (DWACRA group leader who coordinates between seed organizer and worker for the job accomplishment) and most of these transactions are done orally and not in writing.</p>
--------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	<u>Source:</u> Interviews with the seed organizers and workers and record verification			
Company Action Plan:	<p>Syngenta introducing a digital application to record the worker's attendance and wage payment from dry season 2019. It shall be used to record real-time attendance, working hours, payment of wage and advance wage to the de-tasselling workers only. Worker's check-in and check-out time can be recorded and an application calculates the wage rate based on the working hours. Syngenta is exploring to collect the acknowledgement for the payment through worker's thumb impression or photos.</p> <p>It is the responsibility of Seed Organisers and field supervisors to record the data through their mobile devices on daily basis. They shall be well trained on this application usage, and enough technical support, shall be given from FLP team side regularly.</p> <p>Syngenta team shall monitor this and ensure the payment of minimum wages. Fair Labour Project team is responsible to ensure the authenticity of the data and cross verify it regularly. Every workers can access the details of attendance and wage payment, and he/she has to confirm it by providing their thumb impression; a high level transparency shall be maintained.</p>			
Deadline Date:	Activity	Outcome	Timeline	Responsible
	Introduction of application for Worker' Attendance and Wage payment – Pilot testing	Real time recording of attendance and wage payment of workers	Oct 2019	FLP Team
	Usage and recording of attendance and wage payment to de-tasselling workers	Real time recording of attendance and wage payment of workers; transparency of record	Oct 2019 – Feb 2020	Field Production Team

Worker Involvement				
<p>Benchmarks:</p> <p><i>ER.18.1: Employers shall have a clear and transparent system of worker and employer communication that enables workers to consult with and provide input to the employer or the company management. This might include regular conversation between workers and employer, suggestion boxes, workers committees, designated spaces for worker meetings, and meetings between employer and workers' representatives. For small farms with informal labor structures, this means that the workers can openly reach and communicate with the producer/farmer.</i></p>				Noncompliance in all farms
Findings/Noncompliance Explanation:	<p>At this point, there is no consultation with the workers on issues concerning them like committees, eating areas, PPE's etc. These grievances were shared with the auditors, but workers had no understanding of raising these issues with Syngenta.</p> <p><u>Source:</u> Interviews with workers</p>			
Company Action Plan:	<p>Syngenta shall increase the number of workers sensitisation sessions from upcoming season (Oct 2019). Farm level sessions shall be conducted on fair labour standards and it also includes the topic on grievance mechanism. A huge number of workers shall be involved in corn fields and as per company's plan cover all the workers in 5 years phase wise. As committed earlier, initial focus is on de-tasselling workers. By 2020-21, all these workers can be covered. Pocket card and other communication tools with grievance numbers shall be distributed to individual farm workers and explained to them use this channel to raise a complaint directly to Syngenta.</p>			
Deadline Date:	Activity	Outcome	Timeline	Responsible
	Workers Awareness Sessions – De-tasseling workers	Increased awareness on FLP standards & grievance channel	Oct-19 to Mar 2021	Seed organiser & field supervisor
	Distribution of Pocket Cards and other communication tools	Ready availability of grievance number with the workers	Every season	Seed organiser & field supervisor

Work Rules and Discipline

Benchmarks:

ER.20.1: Employers shall have disciplinary rules and practices that embody a system of progressive discipline (e.g. a system of maintaining discipline through the application of escalating disciplinary action moving from verbal warnings to written warnings to suspension and finally to termination).

ER.20.2: Any person supervising workers shall be aware of the disciplinary rules and practices.

ER.20.4: The disciplinary system shall be applied in a fair and non-discriminatory manner and include a management review of the actions by someone senior to the manager who imposed the disciplinary action.

ER.20.6: Disciplinary rules and practices shall be clearly communicated to all workers.

ER.20.7: Workers must be informed when a disciplinary procedure has been initiated against them.

ER.20.8: Workers have the right to participate and be heard in any disciplinary procedure against them.

ER.20.11: The disciplinary system shall include a third party witness during imposition, and an appeal process. In case of smallholder settings, existing appeal mechanism at community level is acceptable.

**Noncompliance
in all farms**

Findings/Noncompliance Explanation:

There is no disciplinary action for now as the verbal agreement for hiring workers is between the seed organizer and the worker leader, and not all the workers. So in case of any dispute the worker has to deal with the worker leader.

Source: Interviews with workers and seed organizers

Company Action Plan:

Syngenta developing disciplinary procedures and this will be discussed and communicated during farm level workers awareness sessions.

Syngenta shall encourage the seed organiser to make formal written agreement between seed organiser, worker leader and workers. Initially, it shall be tried with one seed organiser and extended to others from upcoming years. The formal agreement shall be covered with the clauses related to disciplinary rules.

In case of dispute, workers can also approach the grievance channel (a mobile phone number - 8888041444) and raise complaint also. Further, it will be investigated by a deputed person to find out the cause. If company's interference is required in the case, it shall be handled by the grievance redressal committee. Victim workers shall be communicated with the update and action.

Deadline Date:

Activity	Outcome	Timeline	Responsible
Workers Awareness Sessions – Detasseling workers	Awareness on disciplinary rules and practices	Oct-19 to Mar 2021	Seed organiser & field supervisor
Encourage and preparation of written agreement	Written agreement b/w seed organiser, worker leader & workers	Oct-19 to April 2022`	Seed organiser

Access to Training for Family Members

Benchmarks:

ER.21: Family members (spouses and adult children) involved directly or indirectly in agriculture production shall have access to all training and awareness raising activities conducted for the workers and growers on the farms.

**Noncompliance
in all farms**

Findings/Noncompliance Explanation:

Family members are not invited as the training sessions are only for farmers. The monitoring team could not verify any records for worker trainings on the pretext provided by Syngenta that the workers are seasonal and therefore not the same. Most of the trainings are verbal and informal in nature. Also, these trainings do not cover all the workers, but only few cluster of workers. The family members are not invited for these trainings either.

Source: Interview with seed organizers, farmers, workers.

Company Action Plan:

Syngenta observed that the family members are not involved in major farm activities like de-tasselling, harvesting, land preparations etc. In general, in small land holdings

the family members of the farmers involve in sowing and weed cleaning; and the percentage of family workers in the range of 10% to 15%.

As per Syngenta’s workers training plan, initially target major task of de-tasselling due to the fact that it consumes more than 50% of workers requirement for a farm. By end of 2020-21 production year, Syngenta targets to reach all these workers and then focus on reaching rest of the workforce including family members involved in farm activities.

In addition to this, the field production team shall design a tracking mechanism to ensure that each and every individual worker has participated in the awareness session. The seed organiser and his team are responsible to track and ensure the participation of workers; and he will maintain the list of all attendees.

Deadline Date:	Activity	Outcome	Timeline	Responsible
	Workers Awareness Sessions a. De-tasseling workers b. Rest of workers – including family members	Increased awareness on FLP standards	a. Oct-19 to Mar 2021 b. Oct-2021 to Mar 2025	a. Seed organizer & field supervisor b. Grower & field supervisor
	Encourage and preparation of written agreement	Written agreement b/w seed organiser, worker leader & workers	Oct-19 to April 2022`	Seed organiser
	Design the tracking chart for workers participation in sessions	Documents maintained at Seed organiser or in IMS centre	Oct-19 to Mar 2020	Field Production Team

Grievance Procedures

<p>Benchmarks:</p> <p>ER.25.3: FLA-affiliated companies shall make sure that a confidential non-compliance reporting mechanism is available for farmers and workers in the supply chain (such as members of cooperatives or suppliers of seed organizers). Through this channel, any code violation can be communicated to the company in the event that the local and farm level grievance redress mechanisms fail to sufficiently address the issue.</p> <p>ER.25.4: The company shall create awareness of this communication and non-compliance reporting mechanism to its service providers and suppliers.</p>	<p>Noncompliance in all farms</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------

Findings/Noncompliance Explanation:	<p>No grievance handling procedure is available at the seed organizer level and in the farms. There is no system wherein workers can raise their concerns with Syngenta, directly or indirectly.</p> <p><u>Source:</u> Interviews with seed organizers and workers</p>
--------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Company Action Plan:	<p>Syngenta field production team shall always raise the awareness on grievance channel (a mobile number – 8888041444 at national level) during farm level worker’s awareness session. From dry season 2019 onwards, the number of awareness sessions shall be increased. Here, they will explain on grievance redressal procedure and maintenance of confidentiality of the call. National and IMS centre level grievance redressal committees are formed to investigate, addressing the issue and to follow up. It consists of members from Syngenta, organiser, farmers and workers, external expert (NGO) etc.</p> <p>To expand the channel outreach, decided to share the IMS centre postal address to the workers. All the communication tools including individual pocket cards shall be printed with grievance phone number and IMS centre address. Workers can either call to the mobile number or write to IMS centre. In addition to this, FLP coordinator and Syngenta Field production managers visiting the locations and farms during the farm activities, the workers can approach for their concerns. Confidence shall be built among the farm level sessions with the workers.</p>
-----------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Deadline Date:	Activity	Outcome	Timeline	Responsible
	Workers Awareness Sessions – Covering topics on grievance mechanism	Increased awareness on grievance channel	Oct-19 to Mar 2022	Seed organiser & field supervisor
	Distribution of Pocket Cards	Ready availability of grievance number and address for the workers	Every season	Seed organiser & field supervisor

Non-discrimination

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	ND. 1	In compliance	
Recruitment and Employment Practices	ND.2.1	In compliance	
	ND.2.3	In compliance	
Compensation Discrimination	ND. 3	Risk of Noncompliance	All Farms
Discrimination in Training and Communication	ND. 4	Risk of Noncompliance	All Farms
Marital or Pregnancy-Related Discrimination	ND.5.1	In compliance	
	ND.5.2	In compliance	
	ND.5.3	In compliance	
	ND.6.1	In compliance	
	ND.6.1.1	In compliance	
Health-Related Discrimination	ND. 7	In compliance	
	ND.8	In compliance	
	ND. 9	In compliance	
Respect of Culture and Religion	ND.11	In compliance	

Non-discrimination Assessment Summary

Compensation Discrimination	
<p>Benchmarks: ND.3: <i>There shall be no differences in compensation for workers performing equal work or work of equal value based on gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group, ethnic origin, employment status (e.g. local workers vs. migrant workers), or membership in unions or other workers' representative bodies.</i></p>	
Risk of Noncompliance in all farms	
Findings/Noncompliance Explanation:	<p>Gender specific job activity are defined in the farms wherein women are not hired to till the soil or for pesticide spraying, but all other jobs are done by women. Although there is same wage for same activity, but women are recruited for activities which are lower in wages.</p> <p><u>Source:</u> Interviews with farmers and workers</p>
Company Action Plan:	<p>Syngenta shall increase the number of workers sensitisation sessions from upcoming season (Oct 2019) and ensured to cover the female workforce. These farm level sessions shall be conducted on fair labour standards and non-discrimination discussed here. During village level pre-season or mid - season meetings, farmers shall be encouraged and awareness raised on discriminatory practices.</p> <p>A detailed study and analysis shall be done in the upcoming season and build the action plan to address this issue.</p>

Deadline Date:	Activity	Outcome	Timeline	Responsible
		Farmers Awareness Sessions	Raised awareness on non-discrimination	Every season

Discrimination in Training and Communication				
<p>Benchmarks: ND.4: Employers shall guarantee that all workers have equal access to training and capacity building and no discrimination takes place based on the characteristics noted above, nor on literacy or location of the workers. Training and communication should be given in the native language accessible to workers.</p>				Risk of Noncompliance in all farms
Findings/Noncompliance Explanation:	<p>There is no evidence of any kind of training imparted to workers. Therefore, discriminatory practices in training and communication could not be verified.</p> <p><u>Source:</u> Interviews with farmers and workers</p>			
Company Action Plan:	<p>Syngenta shall increase the number of workers sensitisation sessions from upcoming season (Oct 2019). These farm level sessions shall be conducted on fair labour standards including non-discrimination. A huge number of workers shall be involved in corn fields and as per company's plan cover all the workers in 5 years phase wise. As committed earlier, initial focus is on de-tasselling workers. By 2020-21, all of these workers can be covered.</p> <p>During these sessions, various IEC tools such as pocket cards, posters, handouts shall be distributed to them, which will have pictorial messages and easily understood in their local language. The details of grievance channel shall also be covered in these tools, and the workers can contact the company or raise compliants on any discriminatory practices.</p>			
Deadline Date:	Activity	Outcome	Timeline	Responsible
	Workers Awareness Sessions – De-tasseling workers	Increased awareness on FLP standards & grievance channel	Oct-19 to Mar 2021	Seed organiser & field supervisor
	Use of IEC tools	Availability of reference material and grievance number with the workers	Every season	Seed organiser & field supervisor

Health, Safety and Environment

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HSE.1.	Noncompliance	All Farms
Document Maintenance, Permits and Certificates	HSE.2 (PR)	Not Initiated	All Farms
	HSE.3.1	In compliance	
	HSE.4 (PR)	Not Initiated	All Farms
Evacuation Requirements and Procedure	HSE.5.1 (PR)	In compliance	
	HSE.5.2	In compliance	
Safety Equipment and First Aid	HSE.6.1 (PR)	In Progress	All Farms
	HSE.6.2 (PR)	Not Initiated	All Farms
	HSE.16.3 (PR)	Not Initiated	All Farms
Personal Protective Equipment	HSE.7 (PR)	In compliance	
	HSE.8	In compliance	
Chemical Management	HSE.9.1	In compliance	
	HSE.9.2	In compliance	
	HSE.9.2.1	In compliance	
	HSE.10	In compliance	
	HSE.11.1	In compliance	
Protection Reproductive Health	HSE.11.2	In compliance	
	HSE.12.1	In compliance	
Infrastructure	HSE.12.2 (PR)	In compliance	
	HSE.13 (PR)	In compliance	
	HSE.17.1	In compliance	
	HSE.17.2 (PR)	Not Initiated	All Farms
	HSE.19 (PR)	N/A	
	HSE.21 (PR)	Not Initiated	All Farms
Machinery Safety	HSE.22 (PR)	Not Initiated	All Farms
	HSE.14.1	In compliance	
	HSE.14.2	In compliance	
	HSE.14.3	In compliance	
Ergonomics and Medical Facilities	HSE.14.4	In compliance	
	HSE.15.2 (PR)	Not Initiated	All Farms
	HSE.16.2	In compliance	

HSE Assessment Summary

General Compliance	
Benchmarks:	<i>HSE.1: Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.</i>
	Noncompliance in all farms
Findings/Noncompliance Explanation:	<p>The PPEs provided to workers were not appropriate - the workers were given a T-shirt to protect them from injuries. However, it is not convenient to wear for the women workers who usually wear a saree. The material is very thick which makes it very hot to wear in the farms. The workers are given a netted cap as opposed to goggles for protection which is not appropriate as the net does not adequately cover the face or eyes. The gloves and rubber boots are not long or tight enough to protect the workers from any snake bites. There is, on an average, 2-3 snake bites every month.</p> <p><u>Source:</u> Interviews and visual inspection</p>
Company Action Plan:	Syngenta has an objective to raise awareness on usage of safety equipment or

materials by all the farm workers. After many research and experiments within the entire seed industry, recommended these safety equipment such as full sleeve cotton t-shirts, caps with net, gloves, boots, etc. Due to huge number of workers engaged in corn farm activities, it is difficult to distribute to all and track all these workers regarding their specific individual requirements. During farm level sessions, encourage them to practice using this kind of safety equipment, and also buy themselves as per their requirements for all types of farm work engaged in entire year. Still, Syngenta shall continue distributing these PPEs and conduct a mapping before the start of every season to identify the actual requirement of the PPE for the workers.

Syngenta field production taking top most precautions to avoid the snake bites in farms:

- Distributing the safety boots to workers in the locations where the snake bite incidences are more.
- Workers are encouraged to work in a group for all the activities as an emergency preparedness and emergency contact number are always available with the group leader.
- Anti-snakes are placed in all the locations with sufficient quantity – field supervisors are the immediate contact point for the need and ensured to reach within 30 minutes to nearest hospital along with victim and anti-venom.

Syngenta field production and FLP team shall monitor and assess this frequently during entire crop cycle especially during high labour-intensive activity.

Deadline Date:	Activity	Outcome	Timeline	Responsible
	Workers Awareness Session on PPE usage & precautions on snake bites	Increased awareness and usage o PPEs by the farm workers	Oct-19 to Mar 2025	Seed organiser & field supervisor
	Assessment on PPE requirement & distribute to workers	Raised awareness on PPE and its availability with all the workers	Oct-19 to Mar 2025	Field Production & FLP Team
	Precaution for stings & bites: a. Ensure the availability of anti-snake venom in all the location b. Awareness on emergency procedure and preparedness	Minimised the incidence of snake bite		Field Production Team

Hours of Work

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HOW.1.1	Noncompliance	All Farms
	HOW.1.2	In compliance	
	HOW.1.3	In compliance	
	HOW.1.4	In compliance	
Rest Day	HOW.2	In compliance	
Meal and Rest Breaks	HOW.3	In compliance	
Protected Workers	HOW.4.1	In compliance	
	HOW.4.2 (PR)	Not Initiated	All Farms
	HOW.4.3	In compliance	
Overtime	HOW.5.1	In compliance	
	HOW.5.2	In compliance	
	HOW.6.1	In compliance	
	HOW.6.2	In compliance	
	HOW.6.3 (PR)	In compliance	
	HOW.7	In compliance	
Public Holidays and Leave	HOW.8.1	Noncompliance	All Farms
	HOW.8.2	In compliance	
	HOW.8.3	In compliance	
	HOW.9	In compliance	
	HOW.10.1	N/A	
	HOW.11 (PR)	N/A	
	HOW.12.1 (PR)	N/A	
	HOW.12.2 (PR)	Not Initiated	All Farms
	HOW.13	In compliance	
	HOW.14	In compliance	
	HOW.15 (PR)	In compliance	
	HOW.16 (PR)	Not Initiated	All Farms

Hours of Work Assessment Summary

General Compliance	
Benchmarks: HOW.1.1: Employers shall comply with all national laws, regulations and procedures concerning hours of work, public holidays and leave.	
Noncompliance in all farms	
Findings/Noncompliance Explanation:	<p>There is no system to verify whether legal working hours are adhered to. The legal working hour permitted is 6 hours per day. Whereas the women workers work 7-7.5 hours per day (8:30/9AM until 4PM). They work few hours in one farm, but all workers move in the same group, from one farm to the other, in the same region, under the same seed organizer, thus making their daily working hours as 7-7.5 hrs of work. Sometimes, there is overtime of additional 2 hrs, which is very sporadic, for which more wage payments are made. But none of this could be corroborated in the absence of any documents.</p> <p><u>Source:</u> Interviews with seed organizers and record verification on the site.</p>
Company Action Plan:	<p>Syngenta field production team introduced new worker's attendance tool which helps to record working hours and other details of workers and their activities. From 2019 onwards, a digital tool will be introduced to record these details. Both the models</p>

	<p>helps seed organisers to track individual workers about their working hours.</p> <p>During internal monitoring, observed group of workers perform the work under a seed organiser from 8:30/9:00am till 1:00pm, and later, same set of workers going for different village with different organiser. In general, these workers were working more than the legal working hours. Syngenta field production team shall continue sensitising and motivating the seed organisers and his team on Hours of work; encouraged to pay the overtime compensation as well.</p>			
Deadline Date:	Activity	Outcome	Timeline	Responsible
	Training on CoC and its benchmarks to the seed organisers – Discussion	Raised awareness on overtime components and started working hours	By Oct 19	FL Team
	Record maintenance at farm or seed organisers level	Maintained manual records at farm level or location level	Every season	Seed Organisers
	Introduction of digital tool for attendance recording	Start using attendance tool in de-tasselling work	From Nov 2019	FLP & FP Team

Public Holidays and Leave				
<p>Benchmarks: <i>HOW.8.1: Employers shall provide workers with all official public holidays as required under national laws, regulations and procedures.</i></p>				<p>Noncompliance in all farms</p>
Findings/Noncompliance Explanation:	<p>Employers do not provide any official holidays as required by the law. The workers work around 45 days in a season in one region, in different farms. And they work around 6 - 6.5 days in a week. There are no leaves provided on public holidays.</p> <p><u>Source:</u> Interviews and record verifications on the farms</p>			
Company Action Plan:	<p>De-tasselling work in corn seed production is very important activity. It will take place every alternate 3 days and 4 times in a farm within 12 days, and set of workers shall be engaged to perform this task in pre-selected farms. After completion of work in one area, the same set of workers move to next area / group of farms. It is highly required to the business and must be completed within 40 – 45 days in one location based on the season window.</p> <p>Still as mentioned in above auditors comment, continued to ensure the weekly offs (half day).</p>			
Deadline Date:	Activity	Outcome	Timeline	Responsible
	Record maintenance at farm or seed organisers level	Maintained manual records at farm level or location level	Every season	Seed Organisers
	Introduction of digital tool for attendance recording	Start using attendance tool in de-tasselling work	From Nov 2019	FLP & FP Team

Compensation

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	C.1.1	Noncompliance	All Farms
	C.1.2	In compliance	
	C.1.3	In compliance	
	C.1.4	In compliance	
Minimum Wage/Fair Compensation	C.2.1	Noncompliance	All Farms
	C.2.2	Noncompliance	All Farms
	C.2.3	In compliance	
	C.2.5 (PR)	Not Initiated	All Farms
	C.2.6 (PR)	Not Initiated	All Farms
Farmer/Producer Income	C.3	Noncompliance	All Farms
	C.4 (PR)	Not Initiated	All Farms
Wage Payment and Calculation	C.6	In compliance	
	C.7.1	In compliance	
	C.7.2	Noncompliance	All Farms
	C.7.3 (PR)	Not Initiated	All Farms
	C.7.4 (PR)	Not Initiated	All Farms
	C.7.5	In compliance	
	C.8.1	In compliance	
	C.8.2	Noncompliance	All Farms
	C.8.3	In compliance	
	C.8.4 (PR)	In compliance	
	C.9 (PR)	In compliance	
	C.10.1	In compliance	
	C.10.1.1	In compliance	
	C.10.2	In compliance	
C.10.3	In compliance		
Workers Awareness	C.11.1.1	In compliance	
	C.11.1.2	In compliance	
	C.11.1.3	In compliance	
	C.11.1.4	In compliance	
	C.11.1.5	In compliance	
	C.13 (PR)	Not Initiated	All Farms
Fringe Benefits	C.12.1	In compliance	
	C.12.2 (PR)	N/A	
	C.12.3	N/A	
	C.12.4	N/A	
	C.12.5	N/A	

Compensation Assessment Summary

General Compliance / Minimum Wage/Fair Compensation

Benchmarks:

C.1.1: Employers shall comply with all national laws, Collective Bargaining Agreements in force, regulations and procedures concerning the payment of compensation to workers.

C.2.1: Employers shall pay workers at least the legal minimum wage, the prevailing industry sector wage, or the wage pursuant to Collective Bargaining Agreements that are in force, whichever is higher, for regular working hours (not including overtime). Hourly or daily compensation shall be calculated based on the legal minimal wage, the prevailing industry sector wage, or the wage pursuant to Collective Bargaining Agreements that are in force, whichever is higher. Workers should also be informed by the employer about the legal minimum wage applicable to them.

C.2.2: Employers shall provide all legally required benefits to all workers.

C.3: Employers shall ensure that the wages for daily, casual, longterm, task specific or contract workers are paid in accordance with

**Noncompliance
in all farms**

the national laws applied to regular workers. For work based on production quotas and piece work performed during normal working hours, workers must get paid the proportionate minimum wage or the relevant industry average wage, whichever is higher.

Findings/Noncompliance Explanation: The seed organizers do not pay legal minimum wages to the workers. The wage payment system in the farms is done via piece rate system - for example 1 acre of de-tasseling is paid at INR 2,500 - 4,200 depending on the number of workers employed. On an average, 8-10 workers are employed for de-tasseling in the farms, which means they are paid an average of INR 300 per day. This is below the legal minimum wage rate of INR 363 (Zone II, as per the Minimum Wages Act). Also, there is some indication of overtime work, which is paid at INR 100 plus snacks, for workers working 2 additional hours in a day. But due to absence of any records or documents, most of the information cannot be corroborated.

Source: Interviews and Labor department circular on minimum wages

Company Action Plan: Syngenta already launched fair compensation project to address the issue of under payment. Since 2017 started, this project in corn de-tasseling activity and different actions were taken as remediation plan to implement at farm level. Overall result were encouraging and found positive reaction towards ensuring the fair wages to the workers. Still encouraging to continue the same effort to address the issue –

- Training to the field team – seed organizer and field supervisors on fair compensation
- Raise awareness among the de-tasseling workers before start of the season / activity.
- Encourage the field team to have record maintenance – worker’s attendance & wage payment.
- In 2019, launching digital application for worker’s attendance and wage payment. It helps to collect the real time data from the field and easy to monitor.
- Effective monitoring of the de-tasseling activity managed by the seed organizers and his team. FP and FLP team will monitor this regularly in crop cycle.

Deadline Date:	Activity	Outcome	Timeline	Responsible
	Refresher training to the field team on fair compensation	Raised awareness on legal wage & maintenance of documentation	Sept / Oct 2019	FLP Team
	Village level workers awareness session	Raised awareness among the de-tasseling workers on their rights of fair wages	Every season	Seed organiser & field supervisors
	Maintenance of workers attendance & wage payment	Maintained the documents at location level of all the workers	Every season	Seed organiser & field supervisors
	Launch digital application for worker attendance and wage payment	Started using the new application by the field team & collecting the data	Oct 2019 onwards	FLP & FP Team
	Monitoring of de-tasseling activity	Collect the compliance status at least three times in crop cycle	Every season	FLP & FP Team

Wage Payment and Calculation

Benchmarks:

C.7.2: FLA-affiliates shall ensure that farmers/producers receive payments and certification premiums through a traceable and reliable payment system.

C.8.2: Employers shall comply with all applicable laws, regulations and procedures governing the payment of premium rates for work on holidays, rest days, and overtime. There might however be specific working schemes voluntarily agreed by the workers to work on holidays and rest days for short-term seasonal work, which would make this provision not applicable.

Noncompliance in all farms

Findings/Noncompliance Explanation:	<p>Farmers do not pay their workers through online accounts or bank cheque but in cash, as a result, it does not allow for any documentation review, discrepancy settlement etc. According to the Payment of Wages (Amendment) Bill 2017, employers are expected to pay wages to workers through cheque or by transferring into their bank account without their written authorisation. This regulation has been introduced to control wage payment discrepancies.</p> <p><u>Source:</u> Interviews and records verification on the farms</p>			
Company Action Plan:	<p>Agriculture sector in Industry list under unscheduled industry category, hence above-mentioned guidelines / bill will not be applicable here. Indian agriculture is not an organised sector and majority of the workers do not have bank account. Though central govt. promotes the creation of bank accounts for every household, but not all the family members have the bank account.</p> <p>Syngenta planned to initiate the labour service agency model at least in one location on pilot basis in 2019. All the de-tasselling workers of this location shall be hired through this agency, and will try to pay their wages to their bank account. The agency will be responsible to maintain the records of employment such as agreements, attendance, wage payment etc. Field production team will support this agency to follow compliance guidelines. Based on the result extended to other areas from next year onwards.</p>			
Deadline Date:	Activity	Outcome	Timeline	Responsible
	Labour Service agency – Pilot Project	Hiring workers and wage payment through agency	Oct 2019 – Feb 2020	FP & FLP Team

Overview - Farms vs. Non-compliances

Total number of Farms:11

	Employment Relationship	Non-discrimination	Harassment or Abuse	Forced Labor	Child Labor	Freedom of Association and Collective Bargaining	Health, Safety and Environment	Hours of Work	Compensation	Total
% of farms with non-compliances or risk of non-compliances	100%	100%	0%	0%	0%	0%	100%	100%	100%	
Farm No. 1	19	2	0	0	0	0	1	2	6	30
Farm No. 2	19	2	0	0	0	0	1	2	6	30
Farm No. 3	19	2	0	0	0	0	1	2	6	30
Farm No. 4	19	2	0	0	0	0	1	2	6	30
Farm No. 5	19	2	0	0	0	0	1	2	6	30
Farm No. 6	19	2	0	0	0	0	1	2	6	30
Farm No. 7	19	2	0	0	0	0	1	2	6	30
Farm No. 8	19	2	0	0	0	0	1	2	6	30
Farm No. 9	19	2	0	0	0	0	1	2	6	30
Farm No. 10	19	2	0	0	0	0	1	2	6	30
Farm No. 11	19	2	0	0	0	0	1	2	6	30
TOTAL	209	22	0	0	0	0	11	22	66	330