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1. INTRODUCTION

URSA (Understanding Responsible Sourcing Audit) is an audit protocol which enables an independent assessment of a supplier’s performance and compliance against all applicable laws and regulations and the additional requirements of Unilever’s Responsible Sourcing Policy [RSP]. Our supplier partners become part of a continuous improvement process, in which they not only meet compliance requirements but also are audited having a positive social impact.

The RSP Fundamental Principles requirements go beyond the minimum legal requirements. This is a deliberate stance by Unilever to encourage our suppliers to drive their businesses towards the good and best practices of responsible sourcing.

The Fundamental Principles

Across Unilever we’ve set industry leading benchmarks for responsible sourcing to deliver on our commitment to sustainable growth.

Mandatory Requirements

We have introduced Mandatory Requirements for our suppliers to establish and maintain a business relationship with Unilever.

Continuous Improvement Benchmarking

We have introduced a three-stage continuous improvement process for suppliers, with a progression from the Mandatory Requirements required to work with us, through advancing to Good Practice to achieving and maintaining Best Practice.
This document is intended to aid Unilever Suppliers. We want to ensure you are successful, so it is important that you are familiar with the protocol and the Responsible Sourcing Policy (RSP).

This briefing document will guide you through the audit process and provide necessary information for you to understand what is expected and enable you to be prepared to undergo an URSA audit.

The benchmarks of the RSP are relevant for all our suppliers and we expect you will cascade the principles through your supply chain.

URSA goes wider and deeper than industry accepted protocols and assesses supplier practices in Labour Standards, Health & Safety, Human Rights, Business Integrity, Environmental Management, and Land Tenure Rights. Undergoing an URSA audit is necessary to meet Unilever’s requirements for compliance and to climb the RSP ladder to achieve the Good Practice Benchmark

Available at www.unilever.com in 12 languages
2. AUDIT OVERVIEW

Here we describe the process and ways of working to prepare your company before, during and after an URSA audit:

☑ Audit request
☑ Preparation for audit
☑ On site audit
☑ Audit reporting
☑ Audit follow up: verification assessment

2.1 AUDIT REQUEST

As a Unilever supplier, to start the URSA audit process, you have to have completed your company and where applicable site registration in USQS (Unilever Supplier Qualification System). The system then determines using a number of inputs including risk if your site is in scope to undergo an URSA audit. If it is required because of risk or the requirement that you progress on the continuous improvement ladder to Good Practice, then the audit booking process will be automatically initiated in USQS.

Suppliers in scope for an URSA audit:

☑ Supplier sites operating in designated High Risk countries
☑ Supplier sites who need to demonstrate their ability to meet the RSP Good Practice Benchmark
☑ Any supplier based on performance that demonstrates non alignment with the principles of the Unilever Responsible Sourcing Policy (RSP)
Once it is determined that it is necessary for you to undergo an URSA audit, USQS will automatically send a request for audit quotation to each of Unilever’s preferred Audit Companies:

✓ Bureau Veritas
✓ Control Union
✓ DNV GL
✓ Intertek
✓ SGS

Based on availability you will receive quotations proposals and provisional audit dates from up to 5 Audit Companies. Once you select your preferred company, you will be able to start planning and preparing for the URSA audit.

2.2 PREPARATION FOR AUDIT

It is important that your site teams take an active part in the audit process and you understand the full scope of the assessment in advance of the audit. Full participation by your management and worker / union representatives is essential.

There will be an audit agenda prepared by the audit company, which aligns timing for the audit. The agenda should be sent to you at least 15 days prior to audit date.

*Appendix 5.1 gives a generic example of a 3 day audit schedule*
The audit involves a site tour, policy, procedure and document review and worker interviews.

The auditor(s) conduct a site tour where supplier health & safety, labor, human rights, ethics, management, quality and environmental practices are evaluated for incorporation of all legal requirements and all elements required to align with the RSP and reach the Good Practice Benchmark. Early review and preparation is key to a productive and successful appraisal. You are encouraged to familiarize all personnel with the components of your responsible sourcing management system and to do an evaluation prior to the audit reviewing all hazardous activities, including fire evacuation, health and safety, environmental and labour practices and implement any improvements before the audit.

During the audit you will be asked to have documentation and records available for assessment. We encourage you to prepare these in advance and have someone available during the audit who can show the auditor the process elements and how the documents and records support the process that they are associated with.

Appendixes 5.2 and 5.3 cover some preparation tips and the type of documents and records that will need to be made available.

Worker interviews are an important part of an URSA audit and the auditor will select workers at random to participate – this must be done with the full and transparent cooperation of your management. Keeping in mind to minimize the impact to production.

In audits, all workers who work on the site must be considered in scope, including, agency, temporary works, permanent workers and migrant works etc. The auditor will randomly sample from all worker populations for participation in the interview process. This allows wide coverage and gives good insight into how your business is conducted.
Any third party Labor Providers (agencies) the site uses should be aware of the audit. They should be provided with the necessary materials to prepare for the audit and they should be made to understand the importance of having the correct key personnel and documentation available during the audit.

*Any findings, issues, or observations raised in the interviews will be investigated and managed with due care and sensitivity and the interviewee’s identity will be protected. Names will never be reported by the auditor.*

We are providing you with a pre-audit checklist [Appendix 5.4]. It may be useful to complete a gap analysis against requirements prior to the audit. This is an opportunity to ensure that your policies and practices cover the full scope of the audit and address the elements that go beyond legislation, as stated in the Unilever Responsible Sourcing Policy.

**How long is the URSA?**

The length of an URSA audit is dependent on the size of your workforce at the site to be audited and the size of the site. Typically a site or up to 100 workers has an audit time of 2.5 days, 100 – 500 workers, 3.5 days.

During the audit quotation stage, the auditor will confirm the number of days required for an URSA audit at your site.
2.3 ON SITE AUDIT

The aim of the on-site audit is to evaluate the performance of a site of employment / factory against a labor code or standard, local laws and Unilever Responsible Sourcing Policy (RSP).

The URSA audit includes the following stages:

- **Opening meeting**: It ensures good organization of audit visit.

- **Site Tour**: For auditor to look at your operation and people at work.

- **Interviews**: There will be meetings scheduled between the auditor and managers as well as randomly selected workers and union representatives. (Appendix 5.2)

- **Documentation review**: The need for preparation and availability of documents should be emphasized by the auditor in the communication with you, prior to audit date. (Examples of which documents you should have ready refer to at Appendix 5.3)

- **Pre-closing meeting**: The auditing team will have this time to align and prepare information on findings and evidences.

- **Closing meeting and summary of findings**: It is essential that sufficient time is allowed for a full discussion at the closing meeting. The corrective actions must be fully discussed, agreed and recorded. This is your opportunity to acknowledge any non-compliance issues that have been raised. This is also an opportunity to discuss future follow-up audits if applicable and depending on the issues agree timing. Remember all issues, and non-conformances are time bound for resolution.
2.4 AUDIT REPORTING

The auditor will record the audit findings in English in the required URSA standard report template. The auditor should provide a copy of this report to you so you can agree that it is a true representation of the audit.

If you need a report in the local language, it should be agreed directly with the audit company at the time of your audit quotation. The Audit Companies also have the ability to issue audit findings and reports in formats required for your other customers. You should talk to your chosen audit company before your URSA audit if you need them to provide the audit results in additional formats. Please keep in mind that you may be charged for this extra service but it will lesson the burden of additional audits.

Unilever requires URSA reports uploaded in USQS to be in English.

During the audit any breach of legal requirements, any bad practice or any missing actions to align with good practice in the Unilever RSP will be documented by the auditor, discussed with your management and will result in a non-compliance issue (NC) being recorded.

All non-conformances including key incidents, critical issues will require corrective action planning and implementation. Actions for each have specific time frames for mitigation and closure. However, all must be verified by the auditor within 90 days of the audit for the NC to be considered closed and the supplier to be compliant in USQS.
The URSA Audit Report provides an overview of the site to the site management, the parent company and the site’s customers. It includes:

- Good practices that are in place.
- Specific non-compliance issues.
- Areas for improvement.
- Evidence and information to substantiate any findings.
- Photographs which will be used to identify both, good practices and non-compliances (always after agreement with the site management)

Additionally, for each non-compliance (NC) the audit report will provide clarity on the issue and can include:

- A description of the non-compliance.
- Frequency of the issue - whether it is an isolated incident or a more systemic problem.
- The number of people impacted by the issues.
- Reference to, and details of the relevant area of the Code and/or local law.
- Detailed evidence to substantiate findings. (Photographs may be used, where appropriate).
Application of non-compliance assessment:

Where there is a gap between legal requirements and RSP, then **whichever gives the higher protection** will be applied as the basis for assessment and compliance.

Non-compliance issues will be recorded where a practice does not meet the required standards.

There are 3 types of non-compliances:

✅ **Key Incident (KI):** any human rights issue that severely affects the workers, or a human safety issue which may cause risk to life or limb.

✅ **Critical issue (C):** may have a serious risk of affecting workers wellbeing or safety at work and would have a big impact on workers.

✅ **Non-compliance (NC):** may affect workers wellbeing or safety at work but has less severe impact or risks associated with it.

All 3 need to be addressed but a **Key Incident** has a higher degree of severity because of its associated human risk and must be given immediate attention to minimize and control the risk.
KEY INCIDENTS

Where there are any issues that are deemed to be of severe risk to human life or threaten the well-being of the workers these will be identified as **key incidents** and the auditor will inform Unilever of these key incidents within 24 hours of the incident being noted.

A key incident requires immediate discussion with Unilever. Because of the seriousness, mitigation through a control plan should begin at notification by the auditor of a key incident finding as failure to act could result in harm to your workers and could affect the business relationship. Through the discussion both parties should gain an understanding of the impact to your workers, the necessary steps to mitigate that impact and the time line to complete.

(Appendix 5.5 lists the key incidents that may be identified in an audit)

An **observation** may be recorded during the audit when a current practice meets legal or policy requirements but there is some element or cause that may lead to a non-compliance issue if the cause of the observation is not addressed and change implemented.
AFTER AUDIT:

✓ You will further develop and implement corrective action plans to address all non-compliance issues.

✓ All issues are rated for severity (key issues, critical issues, non compliances) and will be time bound for action.

✓ The verification method will be defined by the issue type and can be either desktop or on-site follow up. Follow up requires the auditor to come back to the site within 90 days.

✓ Updating your corrective action status is done in USQS. You are required to update any and all corrective action plans in USQS. The system will generate an automatic task with a link to the corrective action plans (CAPRs), [Appendix 5.6].

✓ Note: once you access the task in USQS, you should chose “Action” to edit/add information. Only update the corrective action in the system once you are ready for the auditor to verify completed actions. (Note: The “task” link can only be used once. If you need a new task you have to contact the technical support [Appendix 5.10]

✓ Please talk to the Audit Company to ensure that the verification is completed by day 90 after audit.
2.5 AUDIT FOLLOW UP

Finding issues during an audit is only one part of any audit program. Most important are the actions taken by your site to correct the issues found. Corrective actions must be verified by the auditor, giving both the site and its customer’s confidence in the actions taken.

Corrective actions must ensure improvement, and not just compliance. A verification assessment is required for auditor to verify completion of corrective actions. Verification assessment can be a re-visit to the site or a desktop verification were evidence can be sent to the auditor (emails, photographs, etc.).

Some corrective actions are time dependent. For example, for wages and hours corrective actions, can only be by verified by and on site audit, and a minimum of 2 months new records need to be available for review.

Once a supplier has completed an audit, all corrective actions that have been implemented must be verified and closed by the auditor in the USQS database. Only then will a supplier be considered at Good Practice Level of RSP.

REMEMBER! At the end of the 90 days window all corrective action must be verified by the auditor and closed in USQS.
What is the frequency of URSA audit?

The need for the next full audit assessment is determined by the number and severity of issues recorded in your full audit audit. This will be detailed at the end of the audit by the auditor.

Each NC is given a scoring and the audit has a total non-compliance score by summing up all NCs:

- **Key Incidents and Critical NC**: Score +100
- **All Other NC**: Score = 20 to 90
- **Observations**: Score = 0 to 10

Observations will not be managed in USQS and will not be required to be verified by the auditor, therefore their score is zero.

Audit validity:

- NC Score +100: 1 YEAR
- NC Score = 20 to 90: 2 YEARS
- NC Score = 0 to 10: 3 YEARS
3.1 EXAMPLE OF AUDIT AGENDA

Day 1:

**Morning:**
Opening meeting (management team including Health & Safety, Environmental, Union and HR representatives).

Site tour (Health & Safety rep. and Environmental rep. to be available) Health & Safety, including selection five employees for interviews.

Individual employee interviews, including one union representative interview.

Reviewing of HR documentation (handbooks/employee files/payroll/time records) including paperwork (when authorized) of those individuals interviewed

**Afternoon:**
Group employee interviews (four groups of five people) and remaining individual interviews

Health & Safety documentation, HR documentation including those interviewed and further tour/interviews if required.

Raise findings, best practice and issues with management, with presentation of plan for the next day.

Days following:

**Morning**
Further HR documentation (handbooks/employee files/payroll/time records) including paperwork (when authorized) of those individuals interviewed.

Further review of payroll/time/employee files if required.

Review Health & Safety documentation and further tour/interviews if required.

**Afternoon:**
Auditor to prepare CAP report for closing meeting.

Closing meeting with management: raise findings, best practice and issues with management.
3.2 SITE PREPARATION FOR AUDIT

Communications – Internal
All site management should be briefed prior to the audit, to guarantee they understand the scope of the audit and what is required from each department. They should be instructed on the importance of having the correct key personnel and documentation available on the day of the audit. Union or other worker representatives as well as any Labor Agency should be briefed about the audit and to ensure their availability and understanding. There should be a contact within the site for the workforce if they have any questions or worries about the audit e.g. HR Manager.

Site Preparation
A quiet room free from interruptions and large enough to accommodate both group and individual interviews should be reserved for the auditors use throughout the audit (this should be a place where workers will feel comfortable). Any questions or points the site may have about the audit should be referred to the auditor for clarification.

Workers Interviews
The purpose of the interviews is to establish what workers feel about working at the site, as well as to support the documentary evidence already examined. It will be necessary to interview a cross section of workers. These interviews may be in groups or one to one. Management must not be present at these to safeguard the confidentiality of individuals. The selection of workers will only be undertaken by the auditor/audit team to ensure a representative sample of the workforce. The interviews will ensure where possible a minimum disruption to work flows. The interviews will be conducted in a place where workers feel comfortable. All information obtained in these discussions will remain confidential to the workers involved. Under no circumstances will individual comments be attributed to individual workers.
3.3 LIST OF USEFUL DOCUMENTS

To assist the site with audit preparations the auditor should provide a list of typical documents that should be made available to the auditor on the day of the audit.

Typical Documentation that will be reviewed:

- Factory floor plan
- Applicable laws and regulations
- Labor contracts
- Employee handbook (terms and conditions of employment)
- Collective Bargaining Agreements (CBA)
- Training records
- A list of all the chemicals and solvents used on this site
- Permits, operating licenses, Certificates of Operations, etc.
- Government Inspection Reports, e.g., sanitation, fire safety, structural safety, environmental compliance, etc.
- Machinery inspection/service logs
- Accident and injury log - Details of most common issues// Details of any serious issues
- Emergency action procedures
- Evacuation plan - Note: to be reviewed on facility tour but it’s also useful if facility can note on the auditor copy how many workers are in each area to help choose employees to interview.
- Time records for the past 12 months
- Payroll records for past 12 months
- Piece rate records for the past 12 months (if applicable)
- Insurance, tax and other required receipts
- Details (policy type, date valid until, company name):
- Production records
- Minutes of joint committees on H&S or other matters
- Previous ethical trade audit reports, corrective action logs, internal audits
- Business Policies on ALL elements that are covered in the Unilever Responsible Sourcing Policy: for example: Child labour, Wage and hours of work, Disciplinary Procedures, Discrimination and Harassment, Benefits and allowances, Health & Safety, Zero tolerance of land grabbing, Environmental management; Business Practices, etc.
3.4 PRE AUDIT CHECKLIST

Once you are familiar with Unilever RSP, it might be useful to perform a check against the 12 fundamental principles, to ensure you are aligned and aware of the requirements that your URSA auditor will assess.

This is an opportunity to ensure that you cover the full scope of the audit and address the elements that go beyond legislation, as stated in the Unilever approach to Responsible Sourcing.

**Self-assessment checklist.** You may want to use to complete a gap analysis against requirements prior to the audit, please ask your Procurement Relationship Manager to provide you a copy of this file.
3.5 LIST OF KEY INCIDENTS

- There is evidence of fraudulent behavior to gain business advantages e.g. bribes, inducements or tax evasion, falsified records.
- There is evidence of product quality issues with actual cause, or potential to cause serious risk to customer or consumers of the brand in question.
- There is retention by employer or employment agency of original identification papers and / or passports unless required by law.
- There is evidence of involuntary labor - prisoners or others.
- Facility employs workers under the age of 15 years old or higher if the local law states higher.
- There is evidence of children in the working areas of the facility premises, either working or playing or with parents on the job.
- There is evidence of falsification of hours and wage records.
- Fire alarm system is not installed and/or is not functioning correctly.
- Fire alarm noise and visual alerts are not distinctive, or cannot be heard / seen in all areas and it is not recognized by all workers and visitors
- Fire exits are not sufficient in number to allow all workers to exit quickly in an emergency.
- Fire exits are restricted and/or cannot be opened immediately in an emergency.
- Fire exits don’t open in the direction of egress and aren’t maintained appropriately. Exits are not push bar or other quick release mechanism and padlocked doors.
Aisles and exits are blocked and don’t allow easy egress of workers.

Electrical wiring is not adequately encased and secured.

Safe operating procedures aren’t known for hazardous tasks and operators aren’t trained.

Unsafe practices which constitute a threat to life were seen during site tour.

Body and eyewash facilities are not provided in hazardous environments and/or they aren’t in date and in good order to be used.

Facility issues physical disciplinary action, punishment, harass or intimidate workers.

There is evidence of discrimination based on caste, national origin, ethnicity, religion, age, disability, gender, material status, sexual orientation, union membership, political affiliation, health, disability or pregnancy.

Workers are subjected to searches of body or possessions which are discriminatory or invasive.

There is evidence of illegal appropriation of land.

Facility does not demonstrates compliance to local legal environment standards and requirements.
3.6 CORRECTIVE ACTION PLAN REPORT (CAPR) EXAMPLE

Auditor completes the record of the NC and generates a corrective action plan in USQS. You will receive a notification to record your completed action plan against each NC (to be complete once ALL actions have been implemented).
3.7 AFTER AUDIT TASKS IN USQS

SUPPLIERS:

✓ Each NC has a set time for the corrective action to be completed and this may help you to prioritize actions.
✓ You must liaise with the auditor to agree a date for the auditor to verify that all corrective actions are fully implemented – which will close the NC. The maximum time for the verification of corrective action by the auditor is 90 days from the audit.
✓ When you have completed all actions and you are ready for the auditor to verify completion, you have to update the corrective action plan in USQS.
✓ This will move the next task to the auditor to close off the NC in USQS.
✓ Ensure the date for verification of NCs is agreed as soon as possible with the auditor.

Note: If a supplier fails to meet the closure and verification requirements there is a trigger in the system to escalate the non-compliance to Unilever. You must inform Unilever if you think you are unable to meet the 90 day milestone.

AUDITORS:

✓ If any of the NCs raised were key issues ensure 1) the supplier takes immediate action to remove/manager the risk. 2) ensure that you inform Unilever to allow them to contact the supplier
✓ Ensure that a detailed audit closure meeting takes place and the supplier is clear on audit issues, good examples and observations, and understands the next steps for them.
✓ Once the supplier has agreed to the audit report content, the auditor should load the audit report into USQS, including all NCs raised during audit. The supplier will then record in USQS their corrections against each of the NCs.
✓ The verification of closure of all NCs in USQS by the auditor must be completed (by day 90 after audit) for supplier to be considered compliant to USQS.
✓ Ensure the date for verification of NCs is agreed as soon as possible with the supplier.

SUPPLIERS AFTER AUDIT BOOKING:

✓ Your NC score triggers next full audit. Refer to the “URSA Brief for Supplier” for details of scoring.
✓ Booking process: the USQS system will trigger a “request for audit” task link 3 months before the expiry date of previous audit.
**APPENDIX**

### 3.8 EXAMPLE OF LETTER RE CORRECTIVE ACTION PLAN IN USQS

**Site 47.** Dear Eric Pond,

Thank you for completing a Responsible Sourcing audit. Your next steps are to develop and then implement corrective action plans to address all non-compliance issues (NCs) reported during the audit. Each NC has a set time for the corrective action to be completed and this may help you to prioritise actions.

Whilst implementing the corrective actions, you must liaise with the auditor to agree a date for the auditor to verify that all corrective actions are fully implemented and so to close the NC. The maximum time for the verification of corrective action by the auditor is **90 days** from the audit. The verification of **closure of all NCs in USQS** by the auditor **must be completed** for you to be considered **compliant to USQS**.

**How to enter your corrective actions and get verification for closure:** The auditor has entered the NCs into USQS and this creates a corrective action plan template for each NC. The link to these templates is given below. You will also receive a full audit report with the NCs clearly described, and the full report will be in USQS.

You are required to develop and implement your corrective actions to address all NCs and once you have **completed all actions** and you are ready for the auditor to verify completion, **you have to update the corrective action plan in USQS with action taken**. Please include documents and photographs as evidence of completion, to help the auditor complete the verification step.

- To assist you here is the direct link to the form, "Non Conformance Close-out". Please click directly on the issue title to access in view mode.

**Please be aware** that you should chose Action to edit/add information once you are ready for the auditor to verify completed actions. Please liaise with the auditor to ensure that the verification is completed by day 90 after audit.

**Observations** are recorded where there is a site practice which does not contravene the law or standard, but if not corrected it could lead to a more serious non-compliance.

- Please note that there were observations noted in the audit and we advise that you look at the full audit report to review the details of the observations in column I of the audit checklist.
- We recommend that you should consider implementing improvement actions against the observations to ensure that they do not become non-compliance issues.

Completing a responsible sourcing audit is a critical step in the sourcing process and any delay on your side might impact your ability to supply, or continue to supply, Unilever.
3.9 EXAMPLE OF PROMPT EMAIL TO RENEW YOUR RS AUDIT

Dear [Name],

Reminder: Regarding the responsible sourcing audit that will expire on DATE: 07/31/2015

Thank you for your continued support to provide Unilever with information under the Unilever Supplier Qualification Process.

To remain in compliance with Unilever’s qualification process, you are required to renew your responsible sourcing audit.

We invite you to contact your audit company to arrange a new responsible sourcing audit. This audit must be completed before the audit due date 07/31/2015.

Please agree a suitable date for the audit to take place and enter this agreed date in the system, within the next 5 business days.

To assist you here is the direct link to the form, Responsible Sourcing Renewal Registration.

Please be advised that failure to contract and undergo a new audit, and close out and have verified all non-compliance issues raised in the audit may impact your ability to supply, or continue to supply, Unilever.

Thank you for your prompt attention to complete this task.

If you have any questions or require support, please contact USOS.Helpdesk1@Unilever.com (English & French), USOS.Helpdesk2@Unilever.com (Spanish & Portuguese), or USOS.Helpdesk3@Unilever.com (Mandarin & Japanese).
3.10 CONTACT DETAILS FOR SERVICE PROVIDER

If you have any questions or require support, please contact:

usqs.helpdesk1@unilever.com (English & French)  
usqs.helpdesk2@unilever.com (Spanish & Portuguese)  
usqs.helpdesk3@unilever.com (Mandarin & Japanese)

For technical issues, please contact usqs.technical@unilever.com

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<th>Support Regions</th>
<th>Category</th>
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