



# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details				
Sedex Company Reference: (only available on Sedex System)	ZC: 1065524	Sedex Site Reference: (only available on Sedex System)	ZS: 1039202	
Business name (Company name):	M/s IR Exports Pvt Ltd.			
Site name:	M/s IR Exports Pvt Ltd.			
Site address: (Please include full address)	154 L M N, Sector-7, IMT Manesar, Phase-II, HSIIDC, Gurgaon-122050, Haryana	Country:	India	
Site contact and job title:	Mr. Prashant Kumar Rai – Manager-HR & Compliance			
Site phone:	+918447165404	Site e-mail:	<a href="mailto:hrd@iracc.co">hrd@iracc.co</a>	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	16 & 17 May 2022			

<b>Audit Company Name &amp; Logo:</b>  	<b>Report Owner (payer):</b> <b>M/s IR Exports Pvt Ltd.</b>
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact [grievance@sedex.com](mailto:grievance@sedex.com).

To confirm the validity of this report, please visit <https://www.sedex.com/audit-verifier/>

## Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

(2) The audit scope was against the following reference documents

### 2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
  - Universal rights covering UNGP
  - Management systems and code implementation,
  - Responsible Recruitment
  - Entitlement to Work & Immigration,
  - Sub-Contracting and Home working,

### 4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)

(3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.

(4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

## SMETA Declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Best Practice Guidance and SMETA Measurement Criteria.

- (1) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (2) Any Non-Compliance against customer code alone shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Any exceptions to this must be recorded here (e.g. different sample size): None

Auditor Team (s) (please list all including all interviewers):

Lead auditor: Amit Kundra APSCA number: RA 21704039

Lead auditor APSCA status: RA ( In good standing)

Team auditor: Parul Jaglan APSCA number: RA 21700536

Team auditor: Girish Sharma APSCA number: RA 21703972

Interviewers: Amit Kundra APSCA number: RA 21704039

Report writer: Amit Kundra- Auditor

Report reviewer: Pooja Nayyar- Report Reviewer-SM

Date of declaration: 17.05.2022

*Note: The focus of this ethical audit is on the ETI Base Code and local law. The additional elements will not be audited in such depth or scope, but the audit process will still highlight any specific issues.*

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

## Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.	Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A <a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None observed
0B <a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	00	01	00	<b><u>Summary of observation</u></b>  1. Based on the audit process it was noted that facility had not completed SEDEX SAQ.
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None observed
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None observed
3. <a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	03	00	00	<b><u>Summary of non-compliances:</u></b>  1. It was noted during tour of the facility that 01 out of 05 overlock operator was not using face mask. Further to note facility had provided the same.  2. It was noted during tour of the facility that drinking water point found in unhygienic condition located at ground floor.

									3. It was noted during tour of the facility that evacuation route found faded in canteen section located at terrace.
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None observed
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None observed
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None observed
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None observed
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None observed
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None observed
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None observed
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None observed
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	Not applicable
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None observed
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None observed

General observations and summary of the site:

#### Audit Process

This initial audit was conducted by Intertek India Pvt Ltd. There were 03 auditors, who assessed the facility's operations on 1<sup>st</sup> day and two auditors the next day. The scope of this audit was based on 4 Pillar SMETA systems.

Auditor entered the facility at 09.35 am and conducted an opening meeting with facility management Mr. Prashant Kumar Rai Manager -HR & Compliance according to the ETI Base Code. He assured full co-operation to this audit.



### Site Summary :-

- The products manufactured at this site are woven garments, scarfs, bags, kids and ladies' garments
- Overall responsibility for meeting the standards is taken by Mr. Prashant Kumar Rai Manager -HR & Compliance
- A total of 1206 employees on site, 152 are nonproduction employees and 1054 are production employees. Out of 1206 employees, 777 are directly engaged by the facility and 429 employees are engaged by 03 contractors. Out of 1206 employees 1069 are male and 137 are female employees.
- The youngest worker on site was 19 years old.
- There was a worker committee at this facility. A worker representative was present during the opening and closing process; the facility management said the worker representative could not be spared for the whole audit. And the management would communicate the outcome of the audit to the employees through poster in the workshops and would discuss at next worker committee meeting.
- There is evidence of both male and female in management and among supervisor, the distribution was Male 90 %, Female 10 %.
- The facility has consistent business throughout the year.
- There is no union at this factory.
- The audited facility has changed its name from IR Apparels and Accessories to IR Exports Pvt Ltd in February 2022. The management, nature of business, products, premises, remains the same. The new name has come into effect in February 2022 although the company has been in existence for many years before its name was changed to IR Exports.
- 52 workers were selected for interview; they were interviewed as 8 groups of 4 employees each and the balance of 20 workers were interviewed individually.
- All workers said they were satisfied with their employment at the factory.
- 52 attendance records and payroll records for April 2022 (Current month), 52 attendance records and payroll records for October 2021 (Random month) and 52 attendance records and payroll records for May 2021 (Random month) were reviewed in this audit.
- Legal minimum wage was paid to all workers; legal minimum wage was INR 10098.88 per month. Facility has paid INR 10099.00 per Month.
- All employees worked for 6 days a week from Monday to Saturday with weekly off on Sunday. All employees work in general shift: from 9:00 to 18:00 with 30 minutes lunch break from 13:00 to 13:30 hours and two 15 minutes tea break at 11:00 and 16:00 hours.
- Salary to all employees including contractor employees is fixed on monthly basis and paid once in a month accordingly. Salary to all these employees is paid through bank transfer for 100% of the employees by on or before 7<sup>th</sup> day of every month.
- Payrolls for the period from May 2021 to April 2022 and attendance records for the period from 1 May 2021 to 30 April 2022 were provided for review. Randomly sampled 52 attendance records and payroll records for April 2022 (Current month), 52 attendance records and payroll records for October 2021 (Random month) and 52 attendance records and payroll records for May 2021 (Random month) were reviewed in this audit for further checking on status of wages and working hours.
- Based on the provided attendance records, standard working hours in this facility were 8 hours per day, 48 hours per week with at least 1 day off in a week.
- Based on the provided attendance records and payrolls, overtime working was paid correctly. Employees were paid at least 200% rate of standard wage for overtime hours in normal workdays and no overtime hours in public holidays and rest days was observed.

- Based on the provided attendance records, the status of overtime hours in sample was as below.

April 2022 – 2 hours per day, 6 hours per week and 14 hours in a month.

October 2021 – 2 hours per day, 6 hours per week and 12 hours in a month

May 2021 – 2 hours per day, 6 hours per week and 14 hours in a month

## Issues Found

### NC's

#### 3-Safety and Hygienic Conditions:

- It was noted during tour of the facility that 01 out of 05 overlock operator was not using face mask. Further to note facility had provided the same.
- It was noted during tour of the facility that drinking water point found in unhygienic condition located at ground floor.
- It was noted during tour of the facility that evacuation route found faded in canteen section located at terrace.

### Observations:

#### 0B Management systems and code implementation

- Based on the audit process it was noted that facility had not completed SEDEX SAQ.

### Good Example

None observed

### Additional Auditor Remark:

The audited facility has changed its name from IR Apparels and Accessories to IR Exports Pvt Ltd in February 2022. The management, nature of business, products, premises, remains the same. The new name has come into effect in February 2022 although the company has been in existence for many years before its name was changed to IR Exports



*\*Please note the table above records the total number of Non-compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.*

## Site Details

Site Details																																															
A: Company Name:	M/s IR Exports Pvt Ltd.																																														
B: Site name:	M/s IR Exports Pvt Ltd.																																														
C: GPS location: (If available)	GPS Address: Plot no. 154 L-M and N, Phase – II, Sector – 7, IMT Manesar, Gurgaon – 122001 (Haryana).	Latitude: 28.3515 N Longitude: 76.9428 E																																													
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	License number for 154 L, M, N-GGN online-I-21 valid till 31.12.2024 for 1400 manpower and 805 HP																																														
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	The facility manufactures woven garments, scarfs, bags, kids and ladies' garments																																														
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<table border="1"> <thead> <tr> <th>Production</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td><b>Building no 154-L</b></td> <td></td> <td></td> </tr> <tr> <td>Basement</td> <td>Cutting,</td> <td>None</td> </tr> <tr> <td>Ground Floor</td> <td>Packing, Finishing, Admin,</td> <td>None</td> </tr> <tr> <td>First Floor</td> <td>Stitching</td> <td>None</td> </tr> <tr> <td>Second Floor</td> <td>Stitching</td> <td>None</td> </tr> <tr> <td><b>Production Building no 154-M</b></td> <td></td> <td>None</td> </tr> <tr> <td>Basement</td> <td>Fabric store</td> <td>None</td> </tr> <tr> <td>Ground Floor</td> <td>Admin, Showroom</td> <td>None</td> </tr> <tr> <td>First Floor</td> <td>Sampling, R&amp;D</td> <td>None</td> </tr> <tr> <td>Second Floor</td> <td>Washing, Lunch Area and Production</td> <td>None</td> </tr> <tr> <td><b>Production Building no 154-N</b></td> <td></td> <td>None</td> </tr> <tr> <td>Basement</td> <td>Cutting and Fabric Store</td> <td>None</td> </tr> <tr> <td>Ground Floor</td> <td>Admin Block, Production (stitching)</td> <td>None</td> </tr> <tr> <td>First Floor</td> <td>Packing, Finishing</td> <td>None</td> </tr> </tbody> </table>		Production	Description	Remark, if any	<b>Building no 154-L</b>			Basement	Cutting,	None	Ground Floor	Packing, Finishing, Admin,	None	First Floor	Stitching	None	Second Floor	Stitching	None	<b>Production Building no 154-M</b>		None	Basement	Fabric store	None	Ground Floor	Admin, Showroom	None	First Floor	Sampling, R&D	None	Second Floor	Washing, Lunch Area and Production	None	<b>Production Building no 154-N</b>		None	Basement	Cutting and Fabric Store	None	Ground Floor	Admin Block, Production (stitching)	None	First Floor	Packing, Finishing	None
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	Second Floor	Stitching,	None
	Terrace	Lunch area	None
	Is this a shared building?	NO	None
	<p>The facility manufactures woven garments, scarfs, bags, kids and ladies' garments. The facility is situated at 154 L-M and N, Phase – II, Sector – 7, IMT Manesar, Gurgaon – 122001 (Haryana). The plot area of each facility is 3038 Square metre and built-up area is 6181 square metre.</p> <p>F1: Visible structural integrity issues (large cracks) observed?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: No such cracks observed</p> <p>F3: Does the site have a structural engineer evaluation?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>F4: Please give details: Evaluated on 05.05.2022.</p>		
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input checked="" type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Subcontractor		
H: Month(s) of peak season: (if applicable)	Consistent business throughout the year		
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<p>The facility is manufacturing woven garments, scarfs, bags, kids and ladies' garments.</p> <p>The process is Fabric—cutting—Finishing—washing—packing—dispatch.</p> <p>The machineries used in the production are stitching, cutting, washing, compressor, Diesel Generators, Overlock Machines, etc.</p>		
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Grievance Committee) <input type="checkbox"/> None		
K: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No N1: If no, please give details : Not applicable as facility had not provided accommodation to their employees and it is not legally required

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:35 am Day 1 Time out: 06:00 pm	Day 2 Time in: 09:55 am Day 2 Time out: 05:00pm	Day 3 Time in: N/A Day 3 Time out: N/A
B: Number of auditor days used:	4.5 Audit Days (03 Auditors * 1 day and 02 Auditors * 1 day)		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define:		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 11 May to 10 June 2022 (04 weeks) <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If No, why not : Facility did not complete the SAQ.		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause N/A as has not completed the SAQ.		
G: Who signed and agreed CAPR (Name and job title)	Mr. Prashant Kumar Rai – Manager –HR & Compliance		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	Not Applicable		
J: Previous audit type:	Not Applicable		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives

A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Worker representative was present in opening and closing meeting.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	There is no trade union exist in the factory.		



## Worker Analysis

The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity.

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	692	00	377	00	00	00	00	1069
Worker numbers – female	85	00	52	00	00	00	00	137
Total	777	00	429	00	00	00	00	1206
Number of Workers interviewed – male	34	00	09	00	00	00	00	43
Number of Workers interviewed – female	06	00	03	00	00	00	00	09
Total – interviewed sample size	40	00	12	00	00	00	00	52



A: Nationality of Management	Indian	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i>	Nationalities: B1: Nationality 1: <u>INDIAN</u> B2: Nationality 2: _____ B3: Nationality 3: _____	Was the list completed during peak season? <input type="checkbox"/> Yes <input type="checkbox"/> No NA If no, please describe how this may vary during peak periods: There is no peak season.
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 <u>100</u> % C1: approx % total workforce: Nationality 2 _____ C2: approx % total workforce: Nationality 3 _____	
D: Worker remuneration (management information)	D: _____% workers on piece rate D1: _____% hourly paid workers D2: <u>100</u> % salaried workers  Payment cycle: D3: _____% daily paid D4: _____% weekly paid D5: <u>100</u> % monthly paid D6: _____% other D7: If other, please give details	



Worker Interview Summary		
A: Were workers aware of the audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	8 groups of 4 employees ( 32 employees)	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 15	D2: Female: 5
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If N, please give details – Not applicable	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	Employees do not have any complaints.	
I: What did the workers like the most about working at this site?	Facility has provided the salary on time, Good environment, and Cooperative management.	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	Good	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:		
M: Attitude of workers: (Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk		

52 workers (09 Females & 43 Males) were selected for interview, they were interviewed as 8 groups of 4 employees and balance 20 workers were interviewed individually.

The workers were assured of confidentiality and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory and that they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors who treated them with respect. They were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used. They felt able to complain directly to their supervisors but also felt free to give their general concerns to their grievance representative who would take it to the management

N: Attitude of worker's committee/union reps:

*(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk*

Based on the interaction with workers committee representative, it was noted that workers committee representatives are not discriminated against and their grievances stated by the workers were effectively solved by the facility management. Further no negative comments were received.

O: Attitude of managers:

*(Include attitude to audit, and audit process. Both positive and negative information should be included)*

The facility management was found to be cooperative throughout the audit and accepted to take necessary corrective action for the non-compliances noted.

## Audit Results by Clause

### 0A: Universal Rights covering UNGP

[\(Click here to return to summary of findings\)](#)

#### 0.A. Guidance for Observations

0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.

0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights

0.A.3 Businesses shall identify their stakeholders and salient issues.

0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.

0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.

0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.

Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

### Current Systems and Evidence Examined

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

#### Current systems:

1. Based on review of records facility has established a policy covering human rights impacts and issues.
2. Mr. Prashant Kumar Rai Manager -HR & Compliance is responsible for implementing standards concerning Human rights

#### Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

##### Details:

- Interaction with Management and Interview with employees.
- Employee Handbook was reviewed. It stipulates complying with ETI Code, written policies and procedure that being provided individually to employees.
- Company Manual contains details of Code and Business Ethics with the commitment of being compliant in all aspects of business and integrity aligned with the client's requirement and local law.
- Employees' training records showed the facility conducted training for employees about the social compliance when they enter the facility.

##### Any other comments:

None

A: Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility has a policy on Universal Rights covering UNGP.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Mr. Prashant Kumar Rai Job title–Manager -HR & Compliance
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Facility has provided a following grievance mechanism for confidential reporting anonymously without fear of retaliation and any breaches of policies and procedures. <ol style="list-style-type: none"> <li>1. Workforce Representative</li> <li>2. Prevention of Sexual Harassment committees Representative.</li> <li>3. Works committee.</li> <li>4. Grievance Committee</li> </ol>
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility had "Data Privacy policy" and ensures all worker, supplier and customer information is confidential.

Findings	
<b>Finding: Observation</b> <input type="checkbox"/> <b>Company NC</b> <input type="checkbox"/> <b>Description of observation:</b> None observed  <b>Local law or ETI/Additional elements / customer specific requirement:</b> Not applicable  <b>Comments:</b> Not applicable	<b>Objective evidence observed:</b> Not applicable



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Good examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed:  Not applicable

## Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: ___10___ %	A2: This year 10___ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	10	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: ___5___ %	C2: This year 5___ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	5	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Please describe: Facility had maintained Form-26 & 26A, however no accidents have occurred till date.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: No accidents and injuries have occurred till date. Number: Not Applicable	F2: This year: No accidents and injuries have occurred till date. Number: Not Applicable
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	No accidents and injuries have occurred till date.	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: Nil	H2: This year: Nil
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months ___0___% workers	I2: 12 months ___0___% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ___0___% workers	J2: 12 months _0_____% workers
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## 0B: Management system and Code Implementation

[\(Click here to return to summary of findings\)](#)

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.  
0.B.2 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with  
0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.  
0.B.4 Suppliers are expected to communicate this Code to all employees.  
0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

## Current Systems and Evidence Examined

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

### Current systems:

1. Based on facility tour and review of records, facility has implemented the ETI base code and the code has been displayed in notice board and communicated to all the employees during induction training.
2. Mr. Prashant Kumar Rai Manager -HR & Compliance is responsible for compliance with the code.
3. Based on review of records that facility had obtained legally required Business license and approved plant layout from the concerned authority.
4. The facility communicates this code to all employees by training as confirmed by training records and employee interviews.
5. The ETI based code was posted on-site for employee's review.
6. The facility had set up policy and appointed one staff to update labor law requirement.

**Evidence examined-to support system description (Documents examined &relevant comments. Include renewal/expiry date where appropriate):**

### Details:

1. Facility Policy and Procedures
2. Employee Handbook was reviewed. It stipulates complying with ETI Code, written policies and procedure that being provided individually to employees.
3. Company Manual contains details of Code and Business Ethics with the commitment of being compliant in all aspects of business and integrity aligned with the client's requirement and local law.
4. Employees' training records showed the facility conducted training for employees about the social compliance when they enter the facility.

Any other comments:  
None

## Management Systems:

<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  A1: Please give details: No such fine imposed on the site till date.</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  B1: Please give details: The facility has established the policies and procedure with respect to social compliance.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Facility had effectively implemented the social compliance system and ensuring the same by conducting an audit in a periodic manner, necessary corrective and preventive action has been taken by the facility for the non-compliance raised during the audit. Further the report of the same was maintained by the facility.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  D1: Please give details:  All the employees have undergone an induction training where the social compliance policies and procedures were explained.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  E1: Please give details:  Based on interaction with the employees, the training provided found effective.</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  F1: Please give details: NA</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  G1: Please give details: Facility has dedicated HR department to take care of HR activities.</p>
<p>BSCIH: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  H1: Please give details: Mr. Prashant Kumar Rai Manager HR &amp; Compliance is responsible for compliance with the code.</p>
<p>I: Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  I1: Please give details: Facility had "Data Privacy policy" to ensure all worker information is confidential.</p>

J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility had a system to ensure the same whether the information was shared on a need-to-know basis only.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility has conducted risk assessment to evaluate policy and procedure effectiveness.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Based on the interaction with the management and review of record that effective action has been taken for the risk identified during internal audit.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Facility has a policy which requires labour standards of suppliers
<b>Land rights</b>	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Facility had obtained "Business License" and "Approved Plant Layout" from the concerned authority which is found valid.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: Facility have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: Facility has written policy and procedures specific to land rights.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: Facility has compensated the owner for the land prior to the facility being built.

<p>R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  R1: Please give details: Facility has written policy to check all legal aspects before taking any land. Facility has taken legal opinion before taking the land</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  S1: Please give details: NA</p>

### Non-compliance:

1. Description of non-compliance:	Objective evidence observed:
<input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against customer code:	(where relevant please add photo numbers)
None observed <b>Local law and/or ETI requirement:</b>  Not applicable <b>Recommended corrective action:</b> Not applicable	Not applicable

**Observation:**

<p><b>Description of observation:</b> Based on the audit process it was noted that facility had not completed Sedex SAQ.</p> <p><b>Local law or ETI requirement:</b> 0. B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p><b>Comments:</b> It is recommended to the facility to fill SAQ before audit.</p>	<p><b>Objective evidence observed:</b> Record review</p>
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**Good Examples observed:**

<b>Description of Good Example (GE):</b>  None observed	<b>Objective evidence observed:</b>  Not applicable
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## 1: Freely Chosen Employment

[\(Click here to return to summary of findings\)](#)

### ETI

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

## Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

### Current systems:

1. The factory has a policy which prohibits forced labour, and this was available for review.
2. There was a non-formalised application procedure which states that workers must present their ID's for proof of age but that only copies must be kept in the personnel files and the original given back to the workers.
3. The employee handbook – given to all workers on joining, states that workers within their probation period are free to leave without any notice and once a worker is permanent (this is out of probation) they can resign from the factory with one month's prior written notice, given to their supervisor or the personnel office. The handbook also states that they will be given their full wages on their last day of work.
4. The terms and conditions of employment in the handbook state that the workers are free to leave the workplace outside of their working hours.
5. The factory did not require any payment for work tools, PPE, IC/staff card, training, etc.
6. The factory did not use prison labour.
7. The above was confirmed in management and employee interview.

### Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

#### Details:

1. Personnel files
2. Resignation records of recent 3 months
3. Factory rules
4. Employee handbook
5. Management and employee interview

Any other comments: None

A: Is there any evidence of retention of original documents, e.g. passports/ID's

- ☐ Yes  
☒ No

A1: If yes, please give details and category of workers affected:

B: Is there any evidence of a loan scheme in operation

- ☐ Yes  
☒ No

B1: If yes, please give details and category of worker affected:

C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: Employees are free to leave their job by giving one month notice period.
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding: NA
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: Employees are free to leave their workplace without any restriction at the end of the work day.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected:
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable H1: Please describe finding:

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code:  None observed <b>Local law and/or ETI requirement</b> N/A <b>Recommended corrective action:</b> N/A	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i> N/A

Observation:	
<b>Description of observation:</b> None observed	<b>Objective evidence observed:</b>

<b>Local law or ETI requirement:</b>  <b>Comments:</b>	
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Good Examples observed:	
Description of Good Example (GE): None observed	<b>Objective evidence observed:</b> N/A

## 2: Freedom of Association and Right to Collective Bargaining are Respected

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

### ETI

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

### Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### Current systems:

1. There is no union at the site.
2. There is workers committee at the site, worker representatives were elected by employees.
3. Based on employee's interview, employees can approach top management directly to report their grievances and necessary corrective action is taken by the management.
4. Facility has formed a Workers Committee and Grievance committee and conducted meetings once in two months and the minutes of meetings are recorded for verification and future reference.
5. Based on employee's interview, the facility does not restrict employees from organizing trade unions and has an open mind approach towards the activities of trade unions and their organizational activities.
6. Based on the employee's interview and interaction with facility management, works committee employee representatives are not discriminated and they are free to carry out their functions like meetings on periodical basis.

#### Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

##### Details:

1. Social compliance system program and procedure
2. Suggestion box, complaint feedback
3. Meeting minutes
4. Works Committee Minutes dated 16/03/2022
5. Employee interview and management interview
6. Employee handbook and employment contracts were reviewed. They both stated that employees are free to form trade unions. Nobody will be treated differently whether they are members of the union.

##### Any other comments:

None

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Grievance Committee) <input type="checkbox"/> None	
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Facility has provided suggestion box, where employees are free to express their problems / suggestions / complaints for any grievances. While interviewing, all employees reported that they are free to approach the management for any problem.  D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Based on the employee's interview and review of records that, works committee employee representatives are free to carry out their functions like meetings with adequate facilities on periodical basis and the record of the same was maintained.	
F: Name of union and union representative, if applicable:	Not applicable. No union existed in facility.	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Worker committees existed in facility.	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Based on workers interview it was noted that all workers are aware about the workers representative,
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 24.04.2020 for both buildings
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: 1	



L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	Facility had conducted last meeting on 16/03/2022. Topics discussed during the committee meeting were regarding prevention of child labour and health and safety, housekeeping, etc.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If <b>Yes</b> , what percentage by trade Union/worker representation	M1: __0__% workers covered by Union CBA	M2: __0__% workers covered by worker rep CBA
M3: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA	

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  None observed  <b>Local law and/or ETI requirement:</b> N/A  <b>Recommended corrective action:</b> N/A	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i> N/A

Observation:	
<b>Description of observation:</b> None observed  <b>Local law or ETI requirement:</b> N/A  <b>Comments:</b> N/A	<b>Objective evidence observed:</b> N/A

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: N/A

### 3: Working Conditions are Safe and Hygienic

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

#### ETI

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

### Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### Current systems:

##### 1. General Health and Safety management

- Mr. Prashant Kumar Rai Manager -HR & Compliance is responsible for Health & Safety aspects for the site.
- Potable water was freely available in all areas and test certificates were available.
- Adequate clean toilets segregated by gender were available to employees.
- Ventilation, temperature and lighting were adequate for the production processes.
- Minutes of meetings show that there are monthly meetings between the workers and the facility management, and each point is acted on.

##### 2. Fire Safety

- There were at least 2 exits from each work area and these were clearly marked
- Fire- fighting equipment like fire extinguishers (111), Emergency Light (36), fire alarm call point (26) Fire hydrant (18), Fire reel (10) smoke detectors (160), sprinklers (185) were provided in the facility which was found enough.
- Evacuation diagrams were posted in all areas and understood by all workers interviewed.
- Fire drills were organized and recorded every 2 months as per the law.
- Facility has marked all the exits and emergency exits in a language understood by majority of the employees.

##### 3. Machine & Electrical safety

- All machine and electrical equipment were maintained in good condition.
- There were competent mechanic & electricians at the site to do the electrical work.
- Facility had obtained periodic inspection certificate for all the machineries used.

##### 4. Chemical safety

- All chemicals were correctly labelled
- Material Safety Data Sheets were available for the chemicals used by the facility

## 5. Medical services

- Facility has provided well equipped first aid boxes in each production area (Total 18 first aid box) and they were well stocked.
- There were 26 first aiders and they had been trained through St. John Ambulance Association on 17/02/2020(12), 19.07.2020 (5), and 01.03.2021 (09)

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

Details:

- Health and Safety Policy
- Health and safety manual
- Fire License – for 154-L and 154-M valid till 11/05/2023 and 11/05/2023 respectively and for 154-N valid till 19.04.2023
- Industrial accident records – Updated till April 2022 for both the buildings.
- Health & Safety Committee meeting minutes dated 12/03/2022 for both buildings.
- Drinking Water Test report dated 08/03/2022 for both buildings.
- Fire Drill conducted once in 2 months. Last drill was conducted on 09/04/2022 for all the buildings.
- Interaction with Management and Interview with employees.

Any other comments:  
None

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility had established general Health & Safety, occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers during induction training.
B: Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Facility had included the social compliance policies in worker's manual.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: Facility had maintained the approved plant layout as per the current setup.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Visitors to the site informed on H&S and provide with personal protective equipment.
E: Is a medical room or medical facility provided for workers?  If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility has appointed a full-time nurse at the facility and has a tie up with a nearby hospital-Medicure Hospital.

F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: Facility had trained their 26 employees from St. Johns Ambulance.
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: <b>Not applicable</b> as facility does not provide transport to employees.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: <b>Not applicable</b> as facility does not provide living space to employees.
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Facility has conducted H&S risk assessment which includes evaluating the arrangements for workers doing overtime e.g. driving after a long shift.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility is meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Based on interaction with facility management that the facility does not use any banned chemicals and meet all the environmental standards based on customer requirement

### Non-compliance:

#### 1. Description of non-compliance:

☒ NC against ETI
☒ NC against Local Law
☐ NC against customer code:

It was noted during tour of the facility that 01 out of 05 over lock operator was not using face mask. Further to note facility had provided the same.

#### Law:

According to Section 7A (2b) of The Factories Act, 1948, Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances.

#### ETI requirement

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is

#### Objective evidence observed:

(where relevant please add photo numbers)

NC#1

Factory tour

reasonably practicable, the causes of hazards inherent in the working environment.

#### Recommended corrective action:

It is recommended to the facility to impart training to use PPE i.e. face mask while working.

**Action by:** Mr. Prashant Kumar Rai / Manager – HR and Compliance

**Timescale:** 30 days

**Verification Method :** Desktop

#### 2. Description of non-compliance:

☒ NC against ETI ☒ NC against Local Law ☐ NC against customer code:

It was noted during tour of the facility that drinking water point found in unhygienic condition located at ground floor.

#### Law:

According to Rule 40 of Model Rules of The Factories Act, 1948, All practicable measures shall be taken to ensure that water is free from contamination.

#### ETI requirement

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

#### Recommended corrective action:

It is recommended to the facility to maintain drinking water point in hygienic condition.

**Action by:** Mr. Prashant Kumar Rai / Manager – HR and Compliance

**Timescale:** 30 days

**Verification Method :** Desktop

#### 3. Description of non-compliance:

☒ NC against ETI ☒ NC against Local Law ☐ NC against customer code:

It was noted during tour of the facility that evacuation route found faded in canteen section located at terrace.

#### Law:

According to Section 38 (1 & 2) of The Factories Act, 1948, Every factory shall provide and maintain 1) a) safe means of escape for all person in the event of fire and b) the necessary equipment and facilities for extinguishing fire  
2) Effective measures shall be taken to ensure that in every factory all the workers are familiar with the means of escape in case of fire and have been adequately trained in the routine to be followed in such cases.

NC#2  
Factory tour

Facility tour  
NC#3

### ETI requirement

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

### Recommended corrective action:

It is recommended to the facility to mark evacuation routes properly.

**Action by:** Mr. Prashant Kumar Rai / Manager – HR and Compliance

**Timescale:** 30 days

**Verification Method :** Desktop

### Observation:

#### Description of observation:

None observed

#### Local law or ETI requirement:

#### Recommended corrective action:

#### Objective evidence observed:

### Good Examples observed:

#### Description of Good Example (GE):

None observed

#### Objective Evidence Observed:

#### 4: Child Labour Shall Not Be Used

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

##### ETI

- 4.1 There shall be no new recruitment of child labour.
- 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

#### Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

##### Current systems:

1. Based on interaction with the factory management, all employees are hired by the Human Resource Department only.
2. Based on review of hiring policy documents, employee's ID for age proof such as Voter ID, Aadhar Card, PAN Card and School Certificate was checked by HR department prior to hiring. The employees without valid ID certificates are not being hired.
3. Based on the policy review, the minimum hiring age of the facility is above 18 years old.
4. Based on employees' interview, any suspect of child labor can be reported to facility management.
5. Based on the employee interviews, review of facility's Anti Child Labor & Hiring Policy and age proof documents, the facility has complied with ILO Standards for Child Labor.

##### Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

##### Details:

1. Child Labor and Child Labor Remediation Policy.
2. Age Proof records of 52 out of 52 selected samples.
3. Interaction with Management and Interview with employees.

##### Any other comments:

None

A: Legal age of employment:	14 Years old for young employees and 18 years old for adult workers
B: Age of youngest worker found:	19 years
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	00 %



E: Are workers under 18 subject to hazardous work assignments? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes <input type="checkbox"/> No NA If yes ,please give details
--	--

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  None observed  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>

Observation:	
<b>Description of observation:</b> None observed  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

Good Examples observed:	
<b>Description of Good Example (GE):</b> None observed	<b>Objective Evidence Observed:</b>

## 5: Living Wages are Paid

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key information\)](#)

### ETI

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

### Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### Current systems:

1. Based on review of wage records, the facility has paid the applicable minimum wages to all the employees.
2. Based on employee's interview, wages are fixed on daily rated, calculated and paid on monthly basis on or before 7th of respective month.
3. Based on employee's interview, wage slips are provided to all the employees and employees are aware of their wage calculations.
4. Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules.
5. Based on employee's interview and record review all the employees are received appointment letter with written and understandable information about their employment conditions in respect to wages.

#### Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

##### Details:

1. Facility Policy.
2. Salary register Pay slip and Time records for 52 selected samples for 03 months April 2022 (current), October 2021 (Random) and May 2021 (Random).
3. Employees Provident Fund Remittance and challans.
4. Leave with wage records (Form No: 15) and Leave encashment records.
5. Settlement and Gratuity paid records.
6. List of National and Festival Holidays.
7. Interaction with management and Employees.

#### Any other comments:

None

### Non-compliance:

<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  None observed  <b>Local law and/or ETI requirement:</b> N/A <b>Recommended corrective action:</b> N/A	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>  N/A
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<b>Observation:</b>	
<b>Description of observation:</b> None observed  <b>Local law or ETI requirement:</b> N/A <b>Comments:</b> N/A	<b>Objective evidence observed:</b> N/A

<b>Good Examples observed:</b>	
Description of Good Example (GE): None observed	<b>Objective Evidence Observed:</b>

## Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 08 hour per day / 48 hours per week	A1: 08 hour per day / 48 hours per week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 02 hour per day / 12 hours per week	B1: 2 hours per day / 6 hours per week.	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: The local minimum wages of Haryana	C1: Unskilled INR 10099. per month	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	applicable for industry to this facility are as under: Unskilled INR 10098.88 per month Semi-skilled A10603.78 per month Semi-Skilled- B 11133.96 per month Skilled A 11690.67 per month Skilled B 12275.21 per month Highly skilled 12888.92 per month	Semi-skilled A10603.78 per month Semi-Skilled- B 11133.96 per month Skilled A 11690.67 per month Skilled B 12275.21 per month Highly skilled 12888.92 per month	
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 200% of normal rate of wages	D1: 200% of normal rate of wages	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<b>Wages analysis:</b> <a href="#">(Click here to return to Key Information)</a>		
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
A1: If <b>No</b> , why not?	Not applicable	
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	52 attendance records and payroll records for April 2022 (Current month), 52 attendance records and payroll records for October 2021 (Random month) and 52 attendance records and payroll records for May 2021 (Random month) were reviewed in this audit.	
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If <b>Yes</b> , please give details:  Unskilled INR 10098.88 per month Semi-skilled A10603.78 per month Semi-Skilled- B 11133.96 per month Skilled A 11690.67 per month Skilled B 12275.21 per month Highly skilled 12888.92 per month

D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	D1: If <b>No</b> , please give details:	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> 10099.00	
F: Please indicate the breakdown of workforce per earnings:	F1: ____% of workforce earning under minimum wage F2: ____% of workforce earning minimum wage F3: _100__% of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week/month etc.</i> 8.33% of their total salary was provided to all the employees as bonus		
H: What deductions are required by law e.g. social insurance? Please state all types:	Employee Provident Fund, Employee state insurance and LWF		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Please list all deductions that <b>have</b> been made.	1.ESI@0.75% 2.PF@12%  Please describe:
		Please list all deductions that <b>have</b> not been made.	1. 2.  Please describe: NA
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type  <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Facility had implemented biometric thumb impression system to record the in/out time recording and all time worked by the employees are recorded		
M: Is there a defined living wage:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

<p><i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i></p>	<p>M1: Please specify amount/time: Facility did not define any living wages. At present facility is following the applicable minimum wages as notified by the State Government</p>
<p>M2: If yes, what was the calculation method used.</p>	<p> <input type="checkbox"/> ISEAL/Anker Benchmarks  <input type="checkbox"/> Asia Floor Wage  <input type="checkbox"/> Figures provided by Unions  <input type="checkbox"/> Living Wage Foundation UK  <input type="checkbox"/> Fair Wear Wage Ladder  <input type="checkbox"/> Fair-trade Foundation            Other – please give details:            NA         </p>
<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<p> <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No            N1: Please give details: Haryana Government will revise the minimum wages every year and the same will be paid to the employees accordingly.         </p>
<p>O: Are workers paid in a timely manner in line with local law?</p>	<p> <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No         </p>
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p> <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No            P1: Please give details: Based on employee's interview and record review all the employees irrespective of caste creed, sex are receiving equal rates for equal work.         </p>
<p>Q: How are workers paid:</p>	<p> <input type="checkbox"/> Cash  <input type="checkbox"/> Cheque  <input checked="" type="checkbox"/> Bank Transfer  <input type="checkbox"/> Other            Q1: If other, please explain: NA         </p>

## 6: Working Hours are not Excessive

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

### ETI

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where **all** of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

### Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### Current systems:

1. Facility has restricted normal working hours to 8 hours per day and 48 hours per week.
2. Based on tour of the facility, it was noted that the working hours and weekly rest day are displayed on notice board.
3. The facility has implemented Biometric time recording system which is acknowledged by each employee on daily basis.
4. Overtime is voluntary.

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

Details:

- Facility Policy.
- In/Out time records and Salary register for 52 selected samples for 03 selected months.
- Interaction with management and Employees.
- Sample pay slips with recorded hours all employees interviewed
- Employees contracts
- Quality and production records were not provided to cross check the working hours.

#### Regular working hours analysis –

April 2022 (Current month) – 8 hours per day and 48 hours per week  
October 2021 (Random month) – 8 hours per day and 48 hours per week  
May 2021 (Random month) – 8 hours per day and 48 hours per week

#### Overtime hours analysis –

April 2022 – 2 hours per day, 6 hours per week and 14 hours in a month.  
October 2021 – 2 hours per day, 6 hours per week and 12 hours in a month.  
May 2021 – 2 hours per day, 6 hours per week and 14 hours in a month.

#### Any other comments:

None

#### Non-compliance:

##### 1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:  
None observed

##### Local law and/or ETI requirement:

N/A

##### Recommended corrective action:

N/A

**Objective evidence observed:**  
*(where relevant please add photo numbers)*

N/A

#### Observation:

##### Description of observation:

None observed

##### Local law or ETI requirement:

N/A

##### Comments:

N/A

**Objective evidence observed:**

N/A



Good Examples observed:	
<b>Description of Good Example (GE):</b> None observed	<b>Objective Evidence Observed:</b> N/A

<b>Working hours' analysis</b> Please include time e.g. hour/week/month <a href="#">(Go back to Key information)</a>					
<b>Systems &amp; Processes</b>					
A. What timekeeping systems are used: time card etc.	Describe: Biometric				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details				
C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:			
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:			
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:			
		N/A			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If <b>yes</b> , please detail hours, %, types of workers affected and frequency Please give details:			

F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <b>In accordance with Factories Act 1948, Chapter VI, Section 52 (1),</b> No adult worker shall be required or allowed to work in a factory on the first day of the week (hereinafter referred to as the said day) unless- (a) He has or will have a holiday for a whole day on one of the three days immediately before or after the said day, and (b) The manager of the factory has, before the said day or the substituted day under clause (a) whichever is earlier, - (i) Delivered a notice at the office of the Inspector of his intention to require the worker to work on the said day and of the day which is to be substituted, and (ii) Displayed a notice to that effect in the factory: Provided that no substitution shall be made which will result in any worker working for more than ten days consecutively without a holiday for a whole day
	Maximum number of days worked without a day off (in sample): 6	
	06 days	
<b>Standard/Contracted Hours worked</b>		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:  N/A
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:  N/A
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	<b>Highest OT hours:</b>  April 2022 – 2 hours per day, 6 hours per week and 14 hours in a month. October 2021 – 2 hours per day, 6 hours per week and 12 hours in a month May 2021 – 2 hours per day, 6 hours per week and 14 hours in a month	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	___1___%	

L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract/employment agreement/handbook/worker interviews/refusal arrangements: <b>Overtime is voluntary, and the employees can refuse the overtime.</b>
<b>Overtime Premiums</b>		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages:  200%
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: and days a week max hour.  200%
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	
	NA	
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> <b>Overtime is voluntary</b> <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)	
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:	
	NA	
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details:	

increased order volumes?	
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable

## 7: No Discrimination is Practiced

[\(Click here to return to summary of findings\)](#)

### ETI

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

### Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### Current systems:

1. Based on review of wage records and employee interview, no discrimination was noted in hiring, compensation, access to training, promotion, termination or retirement.
2. Mr. Prashant Kumar Rai Manager -HR & Compliance is responsible for the investigation and disposal of discrimination case.
3. Based on wage records review, the facility provides the same pay for male/female employees for same work of similar nature.
4. No employee was required to do the examination of the Pregnancy, hepatitis B virus and HIV.
5. Anti-discrimination procedure on hiring, compensation, promotion and access to training is available during the audit.
6. Gender divisions did not exist in the facility; both female and male employees were distributed in all types of work.
7. There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
8. There was no evidence of sexual harassment.

#### Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

##### Details:

1. Facility Policy.
2. The hiring and termination procedure leave application records and employee handbook.
3. Time in and out records, full and final settlement records and training records.
4. Appointment letter with terms and conditions for 52 out of 52 selected samples.
5. Salary and other benefit records.
6. Interaction with management and Employees

##### Any other comments:

None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: _90___ % A2: Female__10___ %
B: Number of women who are in skilled or technical roles e.g. where specific	15

qualifications are needed i.e. machine engineer / laboratory analyst:	
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found C1: Please give details: NA

Professional Development	
A: What type of training and development are available for workers?	Facility had a system of professional development of their employees & staff based on character, attendance, any disciplinary action, involvement in training program etc.
B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details:

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  None observed  <b>Local law and/or ETI requirement:</b> N/A  <b>Recommended corrective action:</b> N/A	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>  N/A

Observation:	
<b>Description of observation:</b> None observed <b>Local law or ETI requirement:</b>	<b>Objective evidence observed:</b> N/A

<b>Comments:</b> N/A	
-------------------------	--

Good Examples observed:	
<b>Description of Good Example (GE):</b> None observed	<b>Objective Evidence Observed:</b> N/A

## 8: Regular Employment Is Provided

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

### ETI

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

### Additional Elements: Responsible Recruitment

8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.

8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.

8.5 Employment agencies must only supply workers registered with them.

8.6 Workers pay no recruitment fee at any stage of the recruitment process.

8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

## Current Systems and Evidence Examined

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

### Current systems:

1. Based on record review and employee's interview appointment letters issued to all 52 out of 52 selected employees.
2. Based on interaction with the facility management, it was noted that all employees are employed on regular basis and through different contractors; and no casual, agency and apprentice employees were engaged.
3. Facility does not employ any migrant workers.
4. Based on interaction with employees, no recruitment fee is required at any stage of the recruitment process.

### Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

#### Details:

1. Facility Policy.
2. Appointment letter with terms and conditions for 52 out of 52 selected samples.
3. Salary and other benefit records.
4. Interaction with management and Employees.

#### Any other comments:

None



Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  None observed  <b>Local law and/or ETI requirement:</b> N/A  <b>Recommended corrective action:</b> N/A	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i> N/A

Observation:	
<b>Description of observation:</b> None observed  <b>Local law or ETI requirement:</b> N/A <b>Comments:</b> N/A	<b>Objective evidence observed:</b> N/A

Good Examples observed:	
<b>Description of Good Example (GE):</b> None observed	<b>Objective Evidence Observed:</b>

## Responsible Recruitment

All Workers	
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions  A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: NA
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category(ies) of workers affected:

C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – NA C1: If other, please give details:
D: If any checked, give details:	NA

Migrant Workers:		
<p><i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i></p>		
A: Type of work undertaken by migrant workers:	No migrant worker in this facility.	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used:  B2: Total number of (outside of local country) recruitment agencies used: NA	
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: NA	C2: Observations:
D: Are Any migrant workers in skilled, technical, or management roles  Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input type="checkbox"/> No NA  D1: If yes, number and example of roles:	

## NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other NA B1- If other, please give details:
C: If any checked, give details:	NA

Agency Workers (if applicable)	
(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
A: Number of agencies used (average):	A1: Names if available: Facility does not employ any agency workers
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA D1: Please give details:

E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No NA E1: Please give details:
---	---

<b>Contractors:</b> <i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>							
A: Any contractors on site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: If yes, how many contractors are present, please give details: 429 employees through 3 contractors for security  <table style="width: 100%; border: none;"> <tr> <td style="width: 70%;">1. SDS Security</td> <td style="width: 30%;">16 Employees</td> </tr> <tr> <td>2. M S Enterprises</td> <td>395 Employees</td> </tr> <tr> <td>3. Aryan and S N Security services</td> <td>18 Employees</td> </tr> </table>	1. SDS Security	16 Employees	2. M S Enterprises	395 Employees	3. Aryan and S N Security services	18 Employees
1. SDS Security	16 Employees						
2. M S Enterprises	395 Employees						
3. Aryan and S N Security services	18 Employees						
B: If <b>Yes</b> , how many workers supplied by contractors?	429 ( 377 male and 52 female)						
C: Do all contractor workers understand their terms of employment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: NA						
D: If <b>Yes</b> , please give evidence for contractor workers being paid per law:	As per verification of wages and working hours records it was noted that contract employee was paid as per law.						

### 8A: Sub-Contracting and Homeworking

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

8A.1 There should be no sub-contracting unless previously agreed with the main client.

8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.

*Note to auditor on homeworking:*

*Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.*

*Note to auditor on subcontracting: auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers*

### Current Systems and Evidence Examined

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

#### Current systems:

1. At present, Facility is not using any Subcontractor.
2. The facility does not use home workers.

#### Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

1. Facility Policy.
2. Inward and outward material register.
3. Production records.
4. Interaction with management.

#### If any processes are sub-contracted – please populate below boxes

Process Subcontracted		
Name of factory		
Address		

Process Subcontracted		Process 4
Name of factory		
Address		

Process Subcontracted	Process 5	Process 6
Name of factory		
Address		

Details:

### Non-compliance:

<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against customer code:  None observed  <b>Local law and/or ETI /Additional Elements requirement:</b> N/A  <b>Recommended corrective action:</b> N/A	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i> N/A
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Observation:	
<b>Description of observation:</b> None observed  <b>Local law or ETI/Additional elements requirement:</b> N/A <b>Comments:</b> N/A	<b>Objective evidence observed:</b> N/A

Good Examples observed:	
<b>Description of Good Example (GE):</b>  None observed	<b>Objective Evidence Observed:</b> N/A

Summary of sub-contracting – if applicable <input checked="" type="checkbox"/> Not Applicable please x	
A: Has the auditor made a simple calculation to compare capacity with workers' workload in order to identify possible unrecorded work or undeclared sub-contracting	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe:
B: If subcontractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: If <b>Yes</b> , summarise details:
C: Number of subcontractors/agents used:	

D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If <b>Yes</b> , summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	

Summary of homeworking – if applicable			
<input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If <b>Yes</b> , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?			
F: What processes are carried out by homeworkers?			
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

**9: No Harsh or Inhumane Treatment is Allowed**  
[\(Click here to return to summary of findings\)](#)

**ETI**

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Additional elements:

9.2 companies should provide access to a confidential grievance mechanism for all workers

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 <sup>rd</sup> party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility has Anti sexual harassment committee and the grievance was directly to them if any.
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	Facility Anti sexual harassment committee representative will communicate the details to their employees in their respective section and workers are aware of these channels and have access to the same.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Direct communication during meeting
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: Facility had effective grievance mechanism in place where workers, communities & suppliers can express their grievance through Suggestion box, Hot line, Committee meetings etc.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details NA
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details NA
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain NA
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details NA



I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?

☐ Yes  
☒ No

II: If yes, please give details NA

### Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### Current systems:

1. Facility has formed the Anti-sexual harassment committee. Based on the interaction with the facility management and employee's interview, it is noted that no case of abuse or discipline has happened in the facility and the facility has a written disciplinary procedure that is displayed in the notice board of the facility.
2. According to the documentation, the facility management had established a disciplinary procedure for employees' misbehaviour which included oral warning, written warning and finally termination and the site, had developed a training program for all employees on the procedure. Employee interview confirmed that employees were aware of the disciplinary procedure.
3. There is an internal process for grievance and suggestion box has been provided, where employees can report a grievance (harassment, bullying, discrimination etc.), any received complaint will be handled by management, without any reprisal for the employee in question. All sampled employees were aware of this system

#### Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

1. Facility Policy
2. Interaction with management and Employees.
3. The relevant policy on prevention of harassment and abuse
4. Internal grievance procedure documentation.
5. Training records

Any other comments:

None

### Non-compliance:

#### 1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:  
None observed

#### Local law and/or ETI requirement:

N/A

#### Objective evidence observed:

(where relevant please add photo numbers)

N/A

**Recommended corrective action:**

N/A

**Observation:**

**Description of observation:**

None observed

**Local law or ETI requirement:**

N/A

**Comments:**

N/A

**Objective evidence**

**observed:**

N/A

**Good Examples observed:**

**Description of Good Example (GE):**

None observed

**Objective Evidence**

**Observed:**

N/A

## 10. Other Issue areas: 10A: Entitlement to Work and Immigration

[\(Click here to return to NC-table\)](#)

### Additional Elements

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.

10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

### Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### Current systems:

1. Based on the review of employee attendance records and employee's interview, the facility has not employed any foreign nationals.
2. Based on the review of employee personal files, all the employees are holding the legal rights to work.

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

Details:

1. Hiring procedure
2. Personnel files
3. Employee handbook
4. Interaction with Management and Employees

Any other comments:

None

### Non-compliance:

#### 1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

None observed

**Local law and/or ETI /Additional Elements requirement:**

N/A

**Recommended corrective action:**

N/A

**Objective evidence observed:**

(where relevant please add photo numbers)

N/A

### Observation:

<b>Description of observation:</b> None observed  <b>Local law and/or ETI /Additional Elements requirement:</b> N/A  <b>Recommended corrective action:</b> N/A	<b>Objective evidence observed:</b>  N/A
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Good examples observed:	
<b>Description of Good Example (GE):</b> None observed	<b>Objective Evidence Observed:</b> N/A

## 10. Other issue areas 10B4: Environment 4–Pillar

[\(Click here to return to summary of findings\)](#)

To be completed for a 4–Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar

### B.4. Compliance Requirements

10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.

10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.

10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements

10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.

10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details).

10B4.7 Businesses shall make continuous improvements in their environmental performance.

10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation

10B4.9 Businesses should have a nominated individual responsible for co–ordinating the site's efforts to improve environmental performance.

### B4. Guidance for Observations

10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.

10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

*Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in place. Following this assessment, the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)*

## Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

### Current systems:

1. The facility has established and maintained environmental policy & Mr. Prashant Kumar Rai – Manager-HR & Compliance is responsible for environmental aspects.
2. The facility had obtained the environment impact assessment report, environmental impact approval and environmental protection acceptance check.

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

Details:

- Facility Policy

- Facility has obtained the air and water exemption certificate from the pollution control board valid till 30.09.2023
- Air Ambient quality test conducted on 07.03.2022, 08.03.2022 and 09.03.2022
- Noise test conducted on 07.03.2022 and 08.03.2022
- Air emission test conducted on 07.03.2022 and 08.03.2022
- Interaction with management and employees.

Any other comments:

None

### Non-compliance:

#### 1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local

☐ NC against customer code:

None observed

**Local law or ETI requirement:**

Not applicable

**Objective evidence observed:**
*(where relevant please add photo numbers)*

Not applicable

### Observation:

#### Description of observation:

None observed

**Local law or ETI requirement:**

Not applicable

**Comments:**

Not applicable

**Objective evidence observed:**

Not applicable

### Good examples observed:

Description of Good Example (GE): None

**Objective evidence observed:**

Not applicable

<b>Environmental Analysis</b> <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Mr. Prashant Kumar Rai – Manager-HR & Compliance
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: aspect and Impact analysis done.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: NA
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? Yes and displayed
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: It covers all impacts. Facility addresses below Points through Environmental policy – 1. Following Local & national law for water air and Hazardous waste management 2. Reduction of Energy usage and water usage. Treatment of wastewater before discharging to local drain 3. Proper disposal of waste as per Local pollution Board Guidelines
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: Forest Stewardship Council (FSC)
H: Have all legally required permits been shown? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Factory have valid consent for pollution.
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: Used chemical records maintained.

J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility uses client approved chemicals.
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Targets in place for environmental aspects.
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: Please give details: N/A
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Installed electricity and water meter.
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: No subcontracting process.

#### Usage/Discharge analysis

Criteria	Previous year: Please state period: Jan2021 to Dec 2021	Current Year: Please state period: Jan 2022 to April 2022
Electricity Usage: Kw/hrs	1426299 units	405426 units
Renewable Energy Usage: Kw/hrs	NIL	NIL
Gas Usage: Kw/hrs	50265.95 cubic meter	188672.81 cubic meter
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If <b>Yes</b> , please state result	NA	NA
Water Sources: Please list all sources e.g. lake, river, and local water authority.	Local Water Authority	Local Water authority
Water Volume Used: (m <sup>3</sup> )	2769 KL	588 KJL
Water Discharged: Please list all receiving waters/recipients.	ETP	ETP
Water Volume Discharged:	1938 KL	411.6 KL



(m <sup>3</sup> )		
Water Volume Recycled: (m <sup>3</sup> )	NO	NO
Total waste Produced (please state units)	2600 Kg	1200 Kg
Total hazardous waste Produced: (please state units)	ETP SLUDGE 750 kg E-WASTE 15 Kg	ETP Sludge 1150.00 Kg E-WASTE 25 Kg
Waste to Recycling: (please state units)	Nil	Nil
Waste to Landfill: (please state units)	Nil	Nil
Waste to other: (please give details and state units)	NA	NA
Total Product Produced (please state units)	3130861 pcs	525850 pcs

### 10C: Business Ethics – 4-Pillar Audit

[\(Click here to return to summary of findings\)](#)

To be completed for a 4-Pillar SMETA Audit

#### 10C. Compliance Requirements

10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.

10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.

10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.

10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.

10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,

10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics

10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

#### 10C. Guidance for Observations

10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.

10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

Note for auditors and readers. This Business Ethics section is intended to take not more than 0.25 auditor days. It is an assessment not an audit.

### Current Systems and Evidence Examined

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

#### Current systems:

- Mr. Prashant Kumar Rai – Manager-HR & Compliance is responsible to ensure compliance with this code.
- Facility has policies on business ethics covering anti-corruption and anti-bribery including gift and gratuity and same is displayed.
- Facility meets the requirements of local and national laws related to bribery, corruption, and fraudulent Business Practices.
- Facility has transparent system in place for confidentially reporting and dealing with unethical Business Ethics without fear of reprisals towards the reporter.

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

Details:

- Facility has developed policies on business ethics covering anti-corruption and anti-bribery including gift and gratuity and same is displayed in local language.
- Facility has provided training to their staff including those in sales, purchasing and logistics on business ethics policy and procedure and reporting mechanism.

Any other comments:

None

#### Non-compliance:

##### 1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

None Observed

##### Local law and/or ETI requirement:

Not applicable

##### Recommended corrective action:

Not applicable

##### Objective evidence observed:

(where relevant please add photo numbers)

Not applicable

#### Observation

**Description of observation:** None observed

**Local law or ETI requirement:** Not applicable

**Comments:** Not applicable

##### Objective evidence observed:

Not applicable

#### Good examples observed:

Description of Good Example (GE): None

##### Objective evidence observed:

Not applicable

A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	<input checked="" type="checkbox"/> Internal Policy <input checked="" type="checkbox"/> Policy for third parties including suppliers Please give details: Facility has developed policies on business ethics covering anti-corruption and anti-bribery including gift and gratuity and same is displayed in local language.
B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Trainings are conducted, and records are available.
C: Is the policy updated on a regular (as needed) basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Policy is updated on a regular basis and when required.
D: Does the site require third parties including suppliers to complete their own business ethics training	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Factory has a requirement their third parties including suppliers to complete their own business ethics training

Other findings

Other Findings Outside the Scope of the Code
None

Community Benefits <i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
None

## Appendix 1

<p><b>Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."</b></p> <p><input type="checkbox"/> Not Applicable please x</p>	
<p><b>NOTE:</b> The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p><b>Instruction to Audit Company:</b> fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
<b>ETI Code / Additional Elements</b>	<b>Customer's Supplier Code equivalent</b>
<b>0.A. Universal Rights covering UNGP</b>	<b>0.A. Universal Rights covering UNGP</b>
<p><b>0.A. Guidance for Observations</b></p> <p>0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.</p> <p>0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.</p>	
<b>0.B. Management Systems &amp; Code Implementation</b>	<b>0.B. Management Systems &amp; Code Implementation</b>
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p>	

<p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	
<b>ETI 1. Forced Labour</b>	<b>ETI 1. Forced Labour</b>
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.</p>	
<b>ETI 2. Freedom of association and the right to collective bargaining are respected</b>	<b>ETI 2. Freedom of association and the right to collective bargaining are respected</b>
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.</p>	
<b>ETI 3. Working conditions are safe and hygienic</b>	<b>ETI 3. Working conditions are safe and hygienic</b>
<p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>3.2 Workers shall receive regular and recorded Health &amp; Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p>	

<p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health &amp; Safety to a senior management representative.</p>	
<b>ETI 4. Child labour shall not be used</b>	<b>ETI 4. Child labour shall not be used</b>
<p>4.1 There shall be no new recruitment of child labour.</p> <p>4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	
<b>ETI 5. Living wages are paid</b>	<b>ETI 5. Living wages are paid</b>
<p>5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</p> <p>5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.</p> <p>5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.</p>	
<b>ETI 6. Working Hours are not excessive</b>	<b>ETI 6. Working Hours are not excessive</b>
<p>6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p>	



<p>6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where <b>all</b> of the following are met:</p> <ul style="list-style-type: none"> <li>– this is allowed by national law;</li> <li>– this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;</li> <li>– appropriate safeguards are taken to protect the workers' health and safety; and</li> <li>– The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.</li> </ul> <p>6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.</p>	
<b>ETI 7. No discrimination is practised</b>	<b>ETI 7. No discrimination is practised</b>
<p>7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p>	
<b>ETI 8. Regular employment is provided</b>	<b>ETI 8. Regular employment is provided</b>
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or</p>	

<p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p><b>Additional Elements: Responsible Recruitment</b></p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p> <p>8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.</p> <p>8.5 Employment agencies must only supply workers registered with them.</p> <p>8.6 Workers pay no recruitment fee at any stage of the recruitment process.</p> <p>8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
<b>8A: Sub-Contracting and Homeworking</b>	<b>8A: Sub-Contracting and Homeworking</b>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.</p> <p>8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<b>ETI 9. No harsh or inhumane treatment is allowed</b>	<b>ETI 9. No harsh or inhumane treatment is allowed</b>
<p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.</p> <p>Additional elements:</p> <p>9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<b>10. Other Issue areas: 10A: Entitlement to Work and Immigration</b>	
<p><b>Additional Elements</b></p> <p>10A.1 Only workers with a legal right to work shall be employed or used by the supplier.</p> <p>10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
<b>10. Other issue areas 10B2: Environment 2-Pillar</b>	

<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p>10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.</p> <p><i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	
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SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
Environment Section	Environment Section
<p><b>B.4. Compliance Requirements</b></p> <p>10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.</p> <p>10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.</p> <p>10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements</p> <p>10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.</p> <p>10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.</p> <p>10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).</p> <p>10B4.7 Businesses shall make continuous improvements in their environmental performance.</p> <p>10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation</p> <p>10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.</p> <p><b>B4. Guidance for Observations</b></p> <p>10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.</p> <p>10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p>	
Business Practices Section	

### 10C. Compliance Requirements

10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.

10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.

10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.

10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.

10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,

10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics

10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

### 10C. Guidance for Observations

10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.

10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented.

## Photo Form

## Non-Compliance Photo Form

		
NC#1 Overlock operator not using PPE i.e. face mask	NC# 2 Drinking water point in unhygienic condition	NC# 3 Evacuation route found faded in canteen

## Observation Photo













//	//	//
//	//	//













## GE Photo

None	None	None
N/A	N/A	N/A















## General Photo

		
Facility main gate	Facility inside view	Facility address
		
No child labour	Security room	Facility inside view
		
Emergency number displayed	Attendance machine	Fire control panel
		
Evacuation map	Fire extinguisher	Fire MCP













		
Fire Hooter	Sprinkler /Smoke detectors	Cutting area
		
First aid box	Cutting & Bundling area	Emergency light
		
Hydrant & Hose reel at staircase	Carton store	Smoke detector & Modular
		
Warehouse	Finishing area	Emergency exit



		
Toilet	Finishing area	Finishing area
		
Finishing area	First aid box at Floor	Fire MCP at floor
		
Packing area	Hand rails provided	Exit gates
		
Sewing area	Drinking water point	Staircase



		
Sewing area	Spot Removal area	Washing area
		
Checking/Finishing area	Eye wash station	Chemical room
		
MSDS displayed	Sewing Lines	Sewing lines
		
Finishing & Packing area	Finishing area	Sewing lines

		
Assembly area marked	Assembly area	Notice board
		
ETI code displayed	Hooter	Abstract of the Acts
		
Trims store	Fabric store	Fabric store
		
Lab	Factory info displayed	Notice board



		
Abstract of the Acts	Facility view between blocks	Boiler
		
Medical room	ETP	DG set
		
Electrical Panel	Drinking water	Kitchen at canteen
		
Suggestion box	Visual fire alarm	Sampling area

		
RO Plant	Air Compressor	Water tank
		
RO plant	Canteen area	Hand wash station
		
Drinking water point	Creche	Medical Room



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