




# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 415002458	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 415002616	
Business name (Company name):	Safran Design			
Site name:	Safran Design			
Site address: <i>(Please include full address)</i>	M Wing, 2 <sup>nd</sup> Floor, Tex Centre, Chandivali, Off Saki Vihar, Road, Chandivali, Andheri (East) Mumbai-400072, Maharashtra	Country:	India	
Site contact and job title:	Mr.Raul- Production Manager			
Site phone:	+91 9029420088	Site e-mail:	<a href="mailto:raul@safrandesign.com">raul@safrandesign.com</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:	5th May 2021			

<b>Audit Company Name &amp; Logo:</b>  	<b>Report Owner (payer):</b> <i>(If paid for by the customer of the site please remove for Sedex upload)</i>  <b>Safran Design</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):

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

Lead auditor: Amit Bhandare Lead auditor APSCA number: RA 21700707

Lead auditor APSCA status: Registered Audit (RA)

Team auditor: Nitin Mayekar auditor

APSCA number: ASCA 21700812

Interviewers: Amit Bhandare Lead auditor

APSCA number: RA 21700707

Report writer: Nitin Mayekar auditor

Report reviewer: Meeta Pednekar Intertek Report Reviewer CSR

Date of declaration: 5<sup>th</sup> May 2021

*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 <i>(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.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	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	<ul style="list-style-type: none"> <li>None Observed</li> </ul>
0B <a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> <li>None Observed</li> </ul>
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> <li>None Observed</li> </ul>
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> <li>None Observed</li> </ul>
3. <a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	04	00	00	<p><i>Summary of Non-Compliance finding1</i> It was noted from review of records that facility has not obtained Fire NOC as on day. However, facility maintained Form B for period June-December 2020 and this Form B is not submitted to fire department.</p> <p><i>Summary of Non-Compliance finding2</i> It was noted from facility tour that 01 out of 03 evacuation plan posted is not matched with existing layout of the floor.</p>

									<p><i>Summary of Non-Compliance finding3</i> It was noted from facility tour that 02 out of 04 exits door found opening inwards direction</p> <p><i>Summary of Non-Compliance finding4</i> It was noted from facility tour that facility has not installed eye protecting guards to 02 out of 04 overlock stitching machine</p>
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> <li>None Observed</li> </ul>
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	01	00	00	<p><i>Summary of Non-Compliance finding1</i> It was noted from the review of records and management interaction that there is miscalculation in employees provident fund for 08 out 10 sampled individual employees in the month of October 2020 and August 2020. For e.x. employees provident fund is remitted INT 1242 and INR 1274 instead of INR 1500 and iNR 1680.</p>
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> <li>None Observed</li> </ul>
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> <li>None Observed</li> </ul>
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> <li>None Observed</li> </ul>
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> <li>None Observed</li> </ul>

9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	01	00	00	<p><i>Summary of Non-Compliance finding1</i> It was noted from review of the records that facility has formed anti-sexual harassment committee 17/10/2020 with 4 members. However facility has not appointed External members during the formation of committee.</p>
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> <li>• None Observed</li> </ul>
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	<ul style="list-style-type: none"> <li>• Not applicable since 4 Pillar audit</li> </ul>
10B4	<u>Environment 4-Pillar</u>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	03	00	00	<p><i>Summary of Non-Compliance finding1</i> It was noted interaction with facility management that facility has not obtained consent to establish and operate for air, water and disposal of hazardous waste from pollution control board.</p> <p><i>Summary of Non-Compliance finding2</i> It was noted interaction with facility management that facility has not conducted ambient air monitoring in the facility</p> <p><i>Summary of Non-Compliance finding3</i> It was noted interaction with facility management that facility has not conducted ambient noise monitoring in the facility</p>
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> <li>• None Observed</li> </ul>

#### General observations and summary of the site:

This Initial audit was conducted by Intertek India Pvt. Ltd. There were 02 auditors, who assessed the facility's Operations in 1.5 days (2 Auditors for 0.75 day). The scope of this audit was based on 4 Pillar SMETA systems. Overview of opening meeting, facility management responses: - Auditor entered the facility at 8.30 am May 05, 2021 and conducted an opening meeting with facility management according to the ETI Base Code. Mr. Parmeshwar Raul – Production Manager were present in the meeting and assured full cooperation to this audit.

Site Summary:- The products manufactured at this site high fashioned women garments. Overall responsibility for meeting the standards is taken by Mr. Parmeshwar Raul – Production Manager. There were total of 34 employees (Male-29 and Female-05) on site, which includes 02 Management and Staff (02 Male and 00 Female) to look after day to day administration & production. Facility does not engage contract employees. Facility has 25 interstate migrant employees (25 Male and 00 employees) from Uttar Pradesh and West Bengal.

The facility's operations are carried out only on 2<sup>nd</sup> floor of concrete industrial shared building wherein ground floor, first floor, third floor & fourth floor belongs to other company. Details are given below:-

Second floor - Fabric stores, Inspection, Pattern, Cutting, (Embroidery - sub contractor), Stitching, Checking, Pressing (Finishing), Packing, Dispatch

Ground floor, first, third and fourth floors- Located all other facilities under different name different management and different employees and are not belongs to audited facility.

Facility started its operation in existing location since February 2021, prior to relocation it was operational with same facility name located nearby in Andheri MIDC. All employees are transferred to this existing location.

#### **Payment of Wages & Maximum Workforce Capacity During Covid-19 Outbreak: Not applicable (NA) since facility has started its operation from February 2021**

**\*Date of closure of facility for lockdown: NA**

**\*Date of reopening: NA**

**\*Date of receiving any special approval to operate the factory during lock-down: NA**

**\*Percentage strength the facility operated with during lock-down: NA**



**\*Percentage of employee strength with which the facility operated on the date of audit:** NA

**\*If employees were paid during lock-down:** NA

**\*Supreme Court Judgement on full payment of wages during lock-down:** - NA

**\*One line Note on hygiene and social distancing practice at the facility:** NA

**Bio-Metric Attendance System:**

Facility has Biometric attendance system for company employees working in production and non-production related activities.

The youngest worker on site was 30 years old.

The facility has uniform production throughout year.

10 employees were selected for interview. Out of which 05 employees were interviewed individually and 01 groups of 05 employees were interviewed in group. All workers said they were satisfied with their employment at the factory. All the Employees are paid by Bank transfer. They also said they were able to make suggestions to their supervisors and sometimes they had seen these suggestions used.

10 Records to show wages and hours were taken for 3 months from the period of April 2020 to March 2021. Wages and in/out time records were reviewed for March 2021 (Current month) - 10 samples, October 2020 (Random month)-10 samples and August 2020 (Random month)-10 samples. Facility has Biometric attendance system for company employees working in production and non-production related activities.

Based on the available records of Standard hours on site were on an average 37.17 per week. Legal minimum wage is paid to all the employees. Legal minimum wage is INR 12475 per month. Minimum wages paid by the facility is INR 13000 per month.

Overtime was performed at the facility and was found within the legal limits. The employees work for 6 days a week in Single shift. Sunday is observed at weekly off.

The normal working hours are as follows: General Shift: 10:00 am to 07:00 pm Lunch Break: 30 minutes (Staggered) Tea Break: 15 minutes (15 minutes each 2 breaks). But due to lockdown, timings were revised to 8:30 am to 04:30 pm. Weekly Off: Sunday for all employees. Wages are calculated on monthly basis and paid on or before 07th day of the wage period.

**Summary of Findings (Positive Observations and Negative Observations)**

Positive Observations: 1. Management approach towards this audit was very positive and they assured necessary steps to improve labor Standard in their facility. 2. There is no evidence of child and forced labour. 3. There is no evidence of discrimination, harassment and abuse or unfair disciplinary practices.

Negative Observations:

Non-compliances were observed in the area of "Working conditions are Safe and Hygienic", "Living Wages & Benefits", "Harsh or Inhuman Treatment" and "Environment 4 Pillar": Details are given below:

**Working Conditions are Safe and Hygienic***Summary of Non-Compliance finding1*

It was noted from review of records that facility has not obtained Fire NOC as on day. However, facility maintained Form B for period June-December 2020 and this Form B is not submitted to fire department.

*Summary of Non-Compliance finding2*

It was noted from facility tour that 01 out of 03 evacuation plan posted is not matched with existing layout of the floor.

*Summary of Non-Compliance finding3*

It was noted from facility tour that 02 out of 04 exits door found opening inwards direction

*Summary of Non-Compliance finding4*

It was noted from facility tour that facility has not installed eye protecting guards to 02 out of 04 overlock stitching machine

**Living Wages & Benefits***Summary of Non-Compliance finding1*

It was noted from the review of records and management interaction that there is miscalculation in employees provident fund for 08 out 10 sampled individual employees in the month of October 2020 and August 2020. For e.x. employees provident fund is remitted INT 1242 and INR 1274 instead of INR 1500 and INR 1680.

**Harsh or Inhuman Treatment***Summary of Non-Compliance finding1*

It was noted from review of the records that facility has formed anti-sexual harassment committee 17/10/2020 with 4 members. However facility has not appointed External members during the formation of committee.

**Environment 4 Pillar**

*Summary of Non-Compliance finding1*

It was noted interaction with facility management that facility has not obtained consent to establish and operate for air, water and disposal of hazardous waste from pollution control board.

*Summary of Non-Compliance finding2*

It was noted interaction with facility management that facility has not conducted ambient air monitoring in the facility

*Summary of Non-Compliance finding3*

It was noted interaction with facility management that facility has not conducted ambient noise monitoring in the facility

Observations: None

Good Examples: None.

Auditor Notes: Mr. Pralhad Magdum is observer in this audit

*\*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:	Safran Design																			
B: Site name:	Safran Design																			
C: GPS location: (If available)	GPS Address: Not available	Latitude: Not available Longitude: Not available																		
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Factory license no. 30394 valid for 50 employees, & 50 HP; valid up to 31.12.2023																			
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturer of high fashioned 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 Building no. 1</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor 1</td> <td>Another companies</td> <td>Not applicable</td> </tr> <tr> <td>Floor 2</td> <td>Fabric stores, Inspection, Pattern, Cutting, (Embroidery - sub contractor), Stitching, Checking, Pressing (Finishing), Packing, Dispatch</td> <td>None</td> </tr> <tr> <td>Floor 3</td> <td>Another companies</td> <td>Not applicable</td> </tr> <tr> <td>Floor 4</td> <td>Another companies</td> <td>Not applicable</td> </tr> <tr> <td>Is this a shared building?</td> <td>Yes</td> <td>Factory is located only on 2<sup>nd</sup> floor</td> </tr> </tbody> </table> <p>Safran Design is located at 2<sup>nd</sup> floor in 'M' Wing of Tex Centre Commercial Building, Chandivali, Off Saki Vihar, Road, Chandivali, Andheri (East) Mumbai-400072, Maharashtra. The total built up area is about 4000 sq.ft. Facility started its operation in the existing location since February 2021. Prior to this the facility was in operation since January 2019 at another location in Andheri MIDC. Factory relocated to Chandivali</p>		Production Building no. 1	Description	Remark, if any	Floor 1	Another companies	Not applicable	Floor 2	Fabric stores, Inspection, Pattern, Cutting, (Embroidery - sub contractor), Stitching, Checking, Pressing (Finishing), Packing, Dispatch	None	Floor 3	Another companies	Not applicable	Floor 4	Another companies	Not applicable	Is this a shared building?	Yes	Factory is located only on 2 <sup>nd</sup> floor
Production Building no. 1	Description	Remark, if any																		
Floor 1	Another companies	Not applicable																		
Floor 2	Fabric stores, Inspection, Pattern, Cutting, (Embroidery - sub contractor), Stitching, Checking, Pressing (Finishing), Packing, Dispatch	None																		
Floor 3	Another companies	Not applicable																		
Floor 4	Another companies	Not applicable																		
Is this a shared building?	Yes	Factory is located only on 2 <sup>nd</sup> floor																		

	<p>location in January 2021 and started its operation in February 2021. All the employees were transferred to the existing site after relocation. In view of the facilities, the facility situated in 01 concrete building at 2<sup>nd</sup> floor and was found structurally sound.</p> <p>For below, please add any extra rows if appropriate.</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: Not applicable</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: Facility has obtained stability certificate from competent structural engineer on dated 30 April,2021.</p>
<p>G: Site function:</p>	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input 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"/> Sub-Contractor
<p>H: Month(s) of peak season: (if applicable)</p>	<p>September to November</p>
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>Facility is engaged in manufacturing of ready-made dresses (high fashioned ladies garments            Fabric stores – Inspection – Pattern making – Cutting - (Embroidery - sub contractor) – Stitching – Checking - Pressing (Finishing) – Packing – Dispatch</p>
<p>J: What form of worker representation / union is there on site?</p>	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
<p>K: Is there any night production work at the site?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>L1: If yes, approx. % of workers in on site accommodation</p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<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 checked="" type="checkbox"/> No N1: If no, please give details

Audit Parameters			
A: Time in and time out	Day 1 Time in: 08:30 am Day 1 Time out: 04:30 pm	Day 2 Time in: NA Day 2 Time out: NA	Day 3 Time in: NA Day 3 Time out: NA
B: Number of auditor days used:	2 Auditors X 0.75 Day= 1.5 Man days		
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 checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail:    weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Parmeshwar Raul – Production Manager		
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 type="checkbox"/> Yes <input checked="" 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	Worker representatives were busy on production floor		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	No union in the facility, hence not applicable		



## 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*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	04	00	00	25	00	00	00	29
Worker numbers – female	05	00	00	00	00	00	00	05
Total	09	00	00	25	00	00	00	34
Number of Workers interviewed – male	02	00	00	05	00	00	00	07
Number of Workers interviewed – female	03	00	00	00	00	00	00	03
Total – interviewed sample size	05	00	00	05	00	00	00	10



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



Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: <i>(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)</i>	1 group of 5 employees	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 02	D2: Female: 03
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. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details	
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?	None	
I: What did the workers like the most about working at this site?	Salary payment done on or before 7 <sup>th</sup> day of every month.	
J: Any additional comment(s) regarding interviews:	Based on employee's interaction, it was observed that all of them were favourable with the management and facility environment and no negative information was reported. Overall, they displayed a positive attitude towards the management and the workplace	
K: Attitude of workers to hours worked:	None	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes		

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*

A total of 10 employees were interviewed and same number of records were reviewed for the month of March 2021 (Current month, October 2020 (Random month) and August 2020 (Random month)

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 and managers who treated them with respect.

They were able to make suggestions to their supervisors 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

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*

Members from worker committee looked very positive towards the management and no negative information reported.

O: Attitude of managers:

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

The facility management showed a positive attitude towards this audit during the whole audit process. All documentation requested for review was provided timely. At the end of the audit, all the non-compliances were accepted by the facility and further the facility management stated that they will take corrective actions on the non-compliances noted during the audit

## 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) Facility has drafted separate social policies for each salient issue where human rights impacts are covered and the same is communicated to all employees.
- 2) The social policies are communicated throughout their supply chain including suppliers and sourcing agents.
- 3) Facility has measured their direct, indirect and potential impacts on stakeholders i.e., suppliers (right holders) human rights through assessments/internal audits.
- 4) Facility has designated by Mr. Parmeshwar Raul – Production Manager, responsible for implementing standards concerning Human rights.

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

- Policies displayed in the facility premises.
- Interaction with management and employees.

Any Other comments : None

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  A1: Please give details: Policy is available.</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please give details:  Name: Mr. Parmeshwar Raul  Job title: Production Manager</p>
<p>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?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  C1: Please give details: Facility has provided following grievance mechanism for confidential reporting and anonymously without fear of retaliation.</p> <ol style="list-style-type: none"> <li>1. Grievance Committee</li> <li>2. Works Committee</li> <li>3. Open Door Policy</li> </ol>
<p>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)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  D1: If no, please give details</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  E1: Please give details: Facility has formed Data privacy policy named as IT policy which ensures all employees, supplier and customer information remains confidential.</p>

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

**Good examples observed:**

Description of Good Example (GE):  
None

**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: ___0___ %	A2: This year ___0___ %
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]	None	
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 ___2___ %
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	2 %	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe:	
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: Number: Nil	F2: This year: Number: Nil
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]	Nil	
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: 00	H2: This year: 00
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months ___8___ % workers	I2: 12 months ___5___ % 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



**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 was displayed on notice board.
2. Mr. Parmeshwar Raul – Production Manager is responsible for compliance with the code.
3. Based on review of records and interaction with management facility has communicated code of conduct to their suppliers and obtained a commitment from them to comply with this code requirement.
4. Based on review of records that facility had obtained legally required Business license from the concerned authority.

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

Details

1. Facility Policy and Procedures, Business License is valid till 31st December 2023
2. Approved Building layout dated 29/04/2021.
3. Interaction with Management and Interview with employees.

**Any other comments:**

None observed

**Management Systems:**

A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?

- Yes
- No

A1: Please give details: The site has not been subjected to any fines / prosecutions for noncompliance to any regulations for the last 12 Months.

B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?

- Yes
- No

B1: Please give details: Facility has developed policies and procedures on force labour, child labour, no discrimination, harassment & abuse.

	These policies are displayed at notice board in local language (Hindi) and communicated to all employees.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Facility has regular interaction with workers
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: There is regular training to all managers and workers on force labour, child labour, discrimination and harassment & abuse.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility has maintained ETI training records of all employees
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).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: Not applicable
G: Is there a Human Resources manager/department? If Yes, please detail.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: Not applicable
H: Is there a senior person / manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Mr. Parmeshwar Raul – Production Manager
I: Is there a policy to ensure all worker information is confidential?	<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.
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 "Data Privacy policy" to ensure all worker information is confidential.
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 the 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: Facility has conducted risk assessment on health and safety part which

	addresses the issues and defines the remedial action plan to reduce the identified risk
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 conducted risk assessment on health and safety part which addresses the issues and defines the remedial action plan to reduce the identified risk
<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. Facility is located in a private industrial area. Facility has leased agreement with the industrial complex.
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 have 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: All the original Lease hold rights papers were available with payment proof.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: Facility has taken legal opinion before taken on lease. All the original Lease hold rights papers were available.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details:

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

Observation:	
<p><b>Description of observation:</b>                      None observed</p> <p><b>Local law or ETI requirement:</b>                      Not applicable</p> <p><b>Comments:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>                      Not Applicable</p>

Good Examples observed:	
<p><b>Description of Good Example (GE):</b>                      None observed</p>	<p><b>Objective evidence observed:</b>                      Not applicable</p>

**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:**

Based from interaction with employees, management and review of records,

1. Employees are recruited through a personal interview. Employees are not required to lodge any deposits or identity papers with the facility before or after joining the services.
2. The facility does not require monetary deposit or deposition of employee's original ID card such as a condition of employment.
3. Employees are free to leave at the end of their shift and there are overtime hours done in the facility on voluntary basis.
4. The facility does not restrict the employee's freedom of movement.

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

- Details:** 1 Facility Policy and Procedures  
2 Interaction with Management and Interview with employees

**Any other comments:** None

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:</p>
<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding:</p>
<p>E: If any part of the business is UK based or registered there &amp; has a</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

turnover over £36m, is there a published a 'modern day slavery statement'?	<input checked="" type="checkbox"/> Not applicable E1: Please describe finding:
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:
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: Facility has maintained policy against forced/trafficking/bounded labour. Same is forwarded to supply chain. Facility also ensuring that there is no modern slavery in their business or supply chains with regular visits and training.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: Facility has maintained policy against forced/trafficking/bounded labour. Same is forwarded to supply chain. Facility also ensuring that there is no modern slavery in their business or supply chains with regular visits and training.

Non-compliance:	
<p><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</p> <p><b>Local law and/or ETI requirement</b>                      Not applicable</p> <p><b>Recommended corrective action:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)                      Not applicable</p>

Observation:	
<p><b>Description of observation:</b>                      None observed</p> <p><b>Local law or ETI requirement:</b>                      Not applicable</p> <p><b>Comments:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>                      Not applicable</p>

Good Examples observed:	
Description of Good Example (GE): None observed	<b>Objective evidence observed:</b> Not applicable

**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:**

Based on the review of company policies, interaction with facility management and employees and tour of the facility, it was noted that:

- 1. Facility encourages and respects all employees' rights to join union freely.
- 2. Facility recognizes and encourages the right to freedom of association and collective bargaining under the law provision.
- 3. The facility does not restrict employee on organizing trade unions and has an open approach to get associated with trade unions and their organizational activities without management interference.
- 4. Facility has open door policy wherein employees can directly walk into the management for any kind of grievances.
- 5. There was no evidence of suppression of employees' rights.
- 6. Facility has formed Works Committee

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

Details:

- 1 Facility Policy and Procedures.
- 2 Suggestion Box.
- 3 Interaction with Management and Interview with employees.
- 4. Works Committee

**Any other comments:** None

A: What form of worker representation/union is there on site?

- Union (name)
- Worker Committee
- Other (specify)
- 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 type="checkbox"/> Yes <input checked="" 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 open door policy wherein employees can directly walk into the management for any kind of grievances. Facility has formed Works committee. Last meeting was conducted 18/12/2020. Last election was conducted on 16/10/2020  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: Facility provide room to carry out works committee meeting.	
F: Name of union and union representative, if applicable:	No union exists in the 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?	Facility has formed works committee.	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	
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 16/10/2020
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: 01	
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Facility has formed Works committee. Last meeting was conducted 18/12/2020. Minutes were noted. Awareness on COIVID-19 was discussed.	

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 Not applicable	

Non-compliance:	
<p><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</p> <p><b>Local law and/or ETI requirement:</b>                      Not applicable</p> <p><b>Recommended corrective action:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i>                      Not applicable</p>

Observation:	
<p><b>Description of observation:</b>                      None observed</p> <p><b>Local law or ETI requirement:</b>                      Not applicable</p> <p><b>Comments:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>                      Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE):                      None Observed</p>	<p><b>Objective evidence observed:</b>                      Not applicable</p>

### 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. Parmeshwar Raul – Production Manager is responsible for Health & Safety aspects for the site. Potable water was freely available in all areas and test certificates were up to date. Sufficient clean toilets were available at all times to workers - Ventilation, temperature and lighting were adequate for the production processes
2. Fire Safety - There were at least 2 exits from each work area and these were clearly marked. - Firefighting equipment such as 10 fire extinguishers, 01 Fire alarms, 01 fire alarm call point, 05 emergency lights with battery back up, 23 Smoke detectors and 01 fire panel. 02 Hydrants and Hose reels were also available but under the control of society authorities, being in shared premises. Evacuation fire drill was conducted in every 6 months. Last fire drill was conducted on 15.03.2021. Facility has marked all the exits and emergency exits in understood by majority of the employees.
3. Machine & Electrical safety - All machine and electrical equipment was maintained in good condition - Facility has arrangement of competent mechanic & electricians on call to do the electrical work -
4. Chemical safety - No chemicals used by the facility.
5. Medical services -Facility has provided well equipped 01 first aid box as required by law.
6. Facility has formed Health and Safety Committee. Last meeting conducted on 23/12/2020
7. First aid training conducted on 19/03/2021 to 02 employees through Indian Red Cross Society
8. Last fire-fighting training conducted on 0.04.2021 for live demonstration to 34 employees and training to 02 employees.
9. Last drinking water potability test conducted on 05.04.2021

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

##### Details:

- 1 Factory License – Valid till 31/12/2023
- 2 Approved Building Plan dated 29.04.2021
- 3 Industrial accident records – Updated till March 2021
- 4 Evacuation fire drill was conducted in every 6 months. Last fire drill was conducted on 15.03.2021
- 5 Interaction with Management and Interview with employees.
- 6 Health and Safety Committee meeting on 23.12.2020

7 Structural Stability of building dated 30.04.2021  
 8 Last fire-fighting training conducted on 09.04.2021 for live demonstration to 34 employees and training 02 employees  
 9 First aid training conducted on 19/03/2021 to 02 employees through Indian Red Cross Society.  
 10 Last drinking water potability test conducted on 05/4/2021

Any other comments:  
 None

<p>A: Does the facility have general and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <b>A1: Please give details:</b> Facility has framed Health &amp; Safety and occupational Health &amp; Safety policies and procedures.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <b>B1: Please give details:</b> Facility had included the social compliance policies in worker's manual.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  <b>C1: Please give details:</b> Facility does not make any structural changes in past twelve months</p>
<p>D: Are visitors to the site informed on H&amp;S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <b>D1: Please give details:</b> Facility visitors are informed on H&amp;S and provided with appropriate personal protective equipment.</p>
<p>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.</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                  Not applicable  <b>E1: Please give details:</b> Not applicable</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                  Not applicable  <b>F1: Please give details:</b> Not applicable</p>
<p>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?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  <b>G1: Please give details:</b></p>

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: Not Applicable 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 Health and Safety risk assessment.
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. Facility has obtained consent from concerned authority
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 chemicals.

**Non-compliance:**

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

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

It was noted from review of records that facility has not obtained Fire NOC as on day. However, facility maintained Form B for period June-December 2020 and this Form B is not submitted to fire department.

**Local law and/or ETI requirement**

In accordance with Section 21 of "Maharashtra Fire Prevention and Life Safety Measures Act, 2006". The responsibility of maintaining fire and emergency service is of planning authorities' i.e. local authority or planning authority. In the state of Maharashtra the subject of Fire Services is the basic responsibility of Urban Local Bodies such as Municipal Corporation & Municipal Councils. For the Developments beyond the municipal areas such as MIDC, CIDCO, SEZ's, Private Town Ships etc. In accordance with Maharashtra Fire Prevention and life safety measures Act 2006, Section 4. Certificate to be issued by license agency -1) A certificate regarding the compliance of the fire prevention and life safety measures in a building or part of there of as required by or under the provision of the act to be issued by a Licensed agency shall be in Form -A (2) A certificate which is to be issued by a Licensed Agency twice a year in the month of January & July regarding the maintenance of fire prevention and life safety measures in a building or premises being in a good repair and efficient as specified in sub section (1) of section 3 of the Act shall be in Form -B.

**Recommended corrective action:**

It is recommended facility to obtain fire NOC and thereafter submit the form B to fire authority

**Action By:** - Mr. Parmeshwar Raul – Production Manager

**Time Scale:** - 30 days

**Verification Method:** - Desktop

**Objective evidence observed:**

*(where relevant please add photo numbers)*

Document review

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

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

It was noted from facility tour that 01 out of 03 evacuation plan posted is not matched with existing layout of the floor.

NC photo # -

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

In accordance with Factories Act 1948 ,Chapter IV safety, section 38.Precapution in case of Fire 1) In every factory ,all practicable measures shall be taken to prevent outbreak of fire and its spread ,both internally and externally , and to provide and maintain-(a) safe means of escape for all persons in the event of a fire and (b) the necessary equipment and facilities for extinguisher fire.(2) effective measure shall be taken to ensure that in every factory all the works 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 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 facility to post evacuation plan as per existing layout of the floor.

**Action By:** - Mr. Parmeshwar Raul – Production Manager

**Time Scale:**- 30 days

**Verification Method:-** Desktop

NC photo # -

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

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

It was noted from facility tour that 02 out of 04 exits door found opening inwards direction

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

In accordance with the Maharashtra Factories Rules, 1963, Chapter IV, SAFETY, SECTION 70– (Fire Protection) 9t-Fire Exit-Exit doorways shall opened outwards that is away from room but shall not obstruct the travel along any exit. No door when opened shall reduce the required width of stairways or landing to less than 90 cm. Overhead or sliding door shall not be installed for this purpose.

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 facility to ensure that all exits door should open in outward direction.

NC photo # -

<p><b>Action By:</b> - Mr. Parmeshwar Raul – Production Manager  <b>Time Scale:</b>- 30 days  <b>Verification Method:-</b> Desktop</p> <p><b>4. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input checked="" type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:          It was noted from facility tour that facility has not installed eye protecting guards to 02 out of 04 overlock stitching machine</p> <p><b>Local law and/or ETI requirement:</b>          In accordance with the Factories Act 1948, Section 26 (1) All machinery driven by power and installed in any factory (a) every set screw, bolt, or key on any revolving shall, spindle, wheel or pinion shall be so sunk, encased or otherwise effectively guarded as to prevent danger.</p> <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><b>Recommended corrective action:</b>          It is recommended facility to install eye protecting guards to all overlock machines.</p> <p><b>Action By:</b> - Mr. Parmeshwar Raul – Production Manager  <b>Time Scale:</b>- 30 days  <b>Verification Method:-</b> Desktop</p>	
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Observation:	
<p><b>Description of observation:</b> None observed  <b>Local law or ETI requirement:</b> Not applicable  <b>Recommended corrective action:</b> Not applicable</p>	<p><b>Objective evidence observed:</b> Not applicable</p>

Good Examples observed:	
<p><b>Description of Good Example (GE):</b> None observed</p>	<p><b>Objective Evidence Observed:</b> Not applicable</p>

**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. Facility has displayed Child Labour policy in Local Language which states that "No Child labour allowed in the factory".
- 2. Facility has established Child labour policy.
- 3. Based on the review of age proof records, physical appearance of employees during walk through and Interviews with employees, there was no evidence of child labour or young labour observed / reported.

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

Details:

- Company's Hiring Policy
- Employees Personnel Files
- Age proof records – Voter Id Card, Pan Card, Aadhar Card & School Leaving Certificate

**Any other comments:**

None

A: Legal age of employment:	Legal minimum: 14 years completed
B: Age of youngest worker found:	30 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)	0 %
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 checked="" type="checkbox"/> No E1: If yes, give details Not applicable



Non-compliance:	
<p><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</p> <p><b>Local law and/or ETI requirement:</b>                      Not applicable</p> <p><b>Recommended corrective action:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)                      Not applicable</p>

Observation:	
<p><b>Description of observation:</b>                      None observed</p> <p><b>Local law or ETI requirement:</b>                      Not applicable</p> <p><b>Comments:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>                      Not applicable</p>

Good Examples observed:	
<p><b>Description of Good Example (GE):</b>                      None observed</p>	<p><b>Objective Evidence Observed:</b>                      Not applicable</p>

**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. It was noted from review of wage records and interaction with employees and management that: Employees are extended the benefit of Employee State Insurance Corporation.
2. No fines / illegal deductions are made from the wages of the employees as disciplinary measures.
3. All employees are paid on or before 7th of every month.
4. All employees are provided with clear, written and understandable pay slip in local language.
5. Legal minimum wage is paid to all the employees. Minimum wages paid by the facility is INR 13000 per month.

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

- 10 Records to show wages were taken for 3 months from the period of April 2020 to March 2021. Wages records were reviewed for March 2021 (current month) - 10 samples, October 2020 (Random month)-10 samples. And August 2020 (Random month)-10 samples and
- Facility has Biometric attendance system for company employees working in production and non-production related activities.
- Based on the available records of Standard hours on site were on an average 42.20 per week.
- Latest legal minimum wages notification issued by state government
- List of National and Festival Holidays.
- Interaction with management and Employees

Any other comments:  
None

**Non-compliance:**

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

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

It was noted from the review of records and management interaction that there is miscalculation in employees provident fund for 08 out 10 sampled individual employees in the month of October 2020 and August 2020. For e.x. employees provident fund is remitted INT 1242 and INR 1274 instead of INR 1500 and INR 1680.

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

In accordance with The Employees Provident Funds Scheme, 1952, Section 38 (1), the employer shall, before paying the member his wages in respect of any period or part of period for which contributions are payable, deduct the employee's contribution from his wages which together with his own contributions as well as an administrative charge of such percentage (of the pay (basic wages, dearness allowance, retaining allowance, if any, and cash value of food concession admissible thereon) for the time being payable to the employees other than an excluded employee, and in respect of which provident fund contributions are payable as the Central Government may fix, he shall within fifteen days of the close of every month pay the same to the Fund by separate bank drafts or cheques on account of contributions and administrative charge.

**Recommended corrective action:**

It is recommended facility to review the actual employees provident fund to be remitted and currently paid. The difference has to be remitted in the forthcoming provident fund remittance

**Action By:** - Mr. Parmeshwar Raul – Production Manager

**Time Scale:**- 60 days

**Verification Method:**- Follow up

**Objective evidence observed:**

*(where relevant please add photo numbers)*  
Document review

**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 observed

**Objective Evidence Observed:**  
**Not applicable**

**Summary Information**

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 8 hours per day and 48 Hours per week	A1: 8 hours per day and 48 Hours per week	A2: <input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 2 hours / Day, 12 hours / Week / 50 hours per quarter	B1: 2 hours per day & 10 hours per month	B2: <input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: The legal minimum wages applicable to the facility in Maharashtra State, Zone I including 5 % HRA are as under: Unskilled - INR 12475 per month. Semi-Skilled – INR 12975 per month. Skilled – INR 13675 per month. The wages are applicable with the effect from January 01, 2021 to June 30, 2021.	C1: Minimum wages paid by the facility INR 13000 per month	C2: <input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable
D: Overtime wage:	Legal minimum: 200% of the ordinary rates of	D1: Overtime hours compensated	D2: <input type="checkbox"/> Yes <input type="checkbox"/> No

(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	wages for overtime work performed	at 200% of the ordinary rates of wages for overtime work performed	Not applicable
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<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 <i>(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)</i>	10 Records to show wages were taken for 3 months from the period of April 2020 to March 2021. Wages records were reviewed for March 2021 (current month) - 10 samples, October 2020 (Random month)-10 samples and August 2020 (Random month)-10 samples and.
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If <b>Yes</b> , please give details: Not applicable
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: Not applicable
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>
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>
H: What deductions are required by law e.g. social insurance? Please state all types:	Provident fund and Employee State Insurance

I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that <b>have</b> been made.	1. Provident fund 2. Employee state insurance  Please describe: Provident fund Employee state insurance
		I2: Please list all deductions that <b>have not</b> been made.	1. Not applicable 2. Not applicable  Please describe: Not applicable
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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
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: All meetings are conducted within working hours only.	
M: Is there a defined living wage: <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>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	M1: Please specify amount/time: Facility checked and ensured legal Minimum wages after every six months in the month of July and January month.	
M2: If yes, what was the calculation method used.	<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"/> Fairtrade Foundation Other – please give details: Not applicable		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: Please give details: Maharashtra Government revise the minimum wages on the month of June and January every year and the same will be paid to the employees accordingly.	
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	P1: Please give details: It was noted during worker interaction that all workers with same skill are paid the same wages and no discrimination noted	

Q: How are workers paid:

- Cash
- Cheque
- Bank Transfer
- Other

Q1: If other, please explain:

**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:**

Facility has Biometric face reader system for company employees working in production and non-production related activities and Punch Card recording system for security.

It was noted during the review of records that facility has maintained the working hours record 10 out of 10 sampled employees.

Working hours analysis of the sampled period:

- For March 2021 (Current Month) the average working hours of 10 out of 10 selected samples were 38.10 hours/week including overtime hours. Maximum working hours per week were 48 hours (2 out of 10 selected samples).
- For October 2020 (Random Month) the average working hours of 10 out of 10 selected samples were 46 hours/week including overtime hours. Maximum working hours per week were 48 hours (10 out of 10 selected samples).



- For August 2020 (Random Month) the average working hours of 01 out of 10 selected samples were 42.90 hours/week including overtime hours. Maximum working hours per week were 48 hours (02 out of 10 selected samples).

Maximum working hours/week for 10 sampled employees for the month March 2021 – 48.00 hours

Maximum working hours/week for 10 sampled employees for the month August 2020 – 48.00 hours

Maximum working hours/week for 10 sampled employees for the month October 2020 – 50.00 hours

No Overtime hours performed in the sampled month of August 2020.

Maximum 01-03 hours per month overtime hours was performed for 02 out of 10 sampled employee in the sampled month of March 2021.

Maximum 01-02 hours per month overtime hours was performed for 02 out of 10 sampled employee in the sampled month of October 2020

The employees work for 6 days a week in Single shift.

The normal working hours are as follows:

General Shift: 10:00 am to 07:00 pm Lunch Break: 30 minutes (Staggered) Tea break: 15 minutes 2 breaks

But due to lockdown facility was operating from 08:30 am to -4:30 pm.

Weekly Off: Sunday

Employees' wages are calculated on monthly basis and paid on or before 07th day of the wage period

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

Details:

Review of IN/OUT time records from April 2020 to March 2021

Working Hours policy

Any other comments:

None

Non-compliance:	
<p><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</p> <p><b>Local law and/or ETI requirement:</b>                      Not applicable</p> <p><b>Recommended corrective action:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)                      Not applicable</p>

Observation:	
<p><b>Description of observation:</b>                      None observed</p> <p><b>Local law or ETI requirement:</b>                      Not applicable</p> <p><b>Comments:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>                      Not applicable</p>

Good Examples observed:	
<p><b>Description of Good Example (GE):</b>                      None observed</p>	<p><b>Objective Evidence Observed:</b>                      Not applicable</p>

<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: Facility has implemented maintained biometric attendance system for recording attendance of all employees. Facility has maintained the working hours record 10 out of 10 sampled employees.				
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:			
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			
	Maximum number of days worked without a day off (in sample):				
	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:
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:
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: No Overtime hours performed in the sampled month of August 2020.  Maximum 01-03 hours per month overtime hours was performed for 02 out 10 sampled employees in the sampled month of March 2021.  Maximum 01-02 hours per month overtime hours was performed for 02 out 10 sampled employees in the sampled month of October 2020.	
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:	__0__%	
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 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% of the ordinary rate of wage
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: Overtime hours at paid at 200% of the ordinary wage

<p>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.</p>	<p> <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                  Not applicable             </p> <p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p> <p>Not applicable</p>
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<p> <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)             </p> <p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> <p>Total hours per week (normal + Overtime) found within 60 hours per week</p>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p> <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  Q1: If yes, please give details: Facility had recruited adequate number of workers according to their order volumes and avoids working high overtime hours.             </p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p> <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> N             </p>

**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 System**

It was noted from review of wage records and employees' interview that,

1. Facility does not discriminate its employees in terms of hiring, compensation, access to training, promotion, termination or retirement on the basis of caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation or any others thereof which could lead to discrimination.
2. It was noted from wage records review, the facility provides the same pay for employees performing work of similar nature.

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

**Details:**

- Anti-discrimination policy
- Training records
- The hiring and termination procedure

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: ___85_ % A2: Female ___15_ %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	Facility engaged 04 female workers in skill or technical roles.
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: Not applicable

**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 & involvement in various 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: All promotions and training has been given on skill of the employees
--	--

Non-compliance:	
<p><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</p> <p><b>Local law and/or ETI requirement:</b>                      Not applicable</p> <p><b>Recommended corrective action:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)                      Not applicable</p>

Observation:	
<p><b>Description of observation:</b>                      None observed</p> <p><b>Local law or ETI requirement:</b>                      Not applicable</p> <p><b>Comments:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>                      Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE):                      None observed</p>	<p><b>Objective Evidence Observed:</b>                      Not applicable</p>

**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. Facility does not employ any migrant workers.
2. Based on interaction with employees, no recruitment fee is required at any stage of the recruitment process.
3. It was noted from review of records that employment contract (appointment letter) was maintained / issued to 10 out of 10 selected sampled employees.
4. No apprentices or trainees were employed in the facility.
5. The facility pays benefits to the employees which they are legally entitled to like PF, ESIC, leaves and Bonus.

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

**Details:**

- Appointment letter maintained/issued for 10 out of 10 selected samples.
- Salary and other benefit records.
- Interaction with management and Employees.

**Any other comments:** None



Non-compliance:	
<p><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</p> <p><b>Local law and/or ETI requirement:</b>                      Not applicable</p> <p><b>Recommended corrective action:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)                      Not applicable</p>

Observation:	
<p><b>Description of observation:</b>                      None observed</p> <p><b>Local law or ETI requirement:</b>                      Not applicable</p> <p><b>Comments:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>                      Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE):                      None observed</p>	<p><b>Objective Evidence Observed:</b>                      Not applicable</p>

### Responsible Recruitment

All Workers	
<p>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?</p>	<p><input checked="" type="checkbox"/> Terms &amp; Conditions presented  <input checked="" type="checkbox"/> Understood by workers  <input checked="" type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:</p>
<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>B1: If yes, please describe details and specific category(ies) of workers affected:</p>

<p>C: If yes, check all that apply:</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Recruitment / hiring fees</li> <li><input type="checkbox"/> Service fees</li> <li><input type="checkbox"/> Application costs</li> <li><input type="checkbox"/> Recommendation fees</li> <li><input type="checkbox"/> Placement fees</li> <li><input type="checkbox"/> Administrative, overhead or processing fees</li> <li><input type="checkbox"/> Skills tests</li> <li><input type="checkbox"/> Certifications</li> <li><input type="checkbox"/> Medical screenings</li> <li><input type="checkbox"/> Passports/ID's</li> <li><input type="checkbox"/> Work / resident permits</li> <li><input type="checkbox"/> Birth certificates</li> <li><input type="checkbox"/> Police clearance fees</li> <li><input type="checkbox"/> Any transportation and lodging costs after employment offer</li> <li><input type="checkbox"/> Any transport costs between work place and home</li> <li><input type="checkbox"/> Any relocation costs after commencement of employment</li> <li><input type="checkbox"/> New hire training / orientation fees</li> <li><input type="checkbox"/> Medical exam fees</li> <li><input type="checkbox"/> Deposit bonds or other deposits</li> <li><input type="checkbox"/> Any other non-monetary assets</li> <li><input type="checkbox"/> Other –</li> </ul> <p>C1: If other, please give details:</p>
<p>D: If any checked, give details:</p>	<p>Not applicable</p>

<p><b>Migrant Workers:</b></p> <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>			
<p>A: Type of work undertaken by migrant workers:</p>	<p>Facility does not employ any national migrant workers However inter-state migrants workers are employed and are working in production areas</p>		
<p>B: Please give details about recruitment agencies for migrant workers:</p>	<p>B1: Total number of (in country recruitment agencies) used: Not applicable</p> <p>B2: Total number of (outside of local country) recruitment agencies used: Not applicable</p>		
<p>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?</p>	<table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <ul style="list-style-type: none"> <li><input type="checkbox"/> Yes</li> <li><input type="checkbox"/> No</li> </ul> <p>C1: Please describe finding: Not Applicable</p> </td> <td style="width: 50%; vertical-align: top;"> <p>C2: Observations: Not Applicable</p> </td> </tr> </table>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Yes</li> <li><input type="checkbox"/> No</li> </ul> <p>C1: Please describe finding: Not Applicable</p>	<p>C2: Observations: Not Applicable</p>
<ul style="list-style-type: none"> <li><input type="checkbox"/> Yes</li> <li><input type="checkbox"/> No</li> </ul> <p>C1: Please describe finding: Not Applicable</p>	<p>C2: Observations: Not Applicable</p>		
<p>D: Are Any migrant workers in skilled, technical, or management roles</p> <p><i>Migrant Workers (this should include all migrant workers including permanent</i></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Yes</li> <li><input type="checkbox"/> No</li> </ul> <p>D1: If yes, number and example of roles: Not Applicable</p>		

<i>workers, temporary and/or seasonal workers)</i>	
--	--

**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  B1 – If other, please give details:
C: If any checked, give details:	Not Applicable

Agency Workers (if applicable)	
<i>(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.)</i>	
A: Number of agencies used (average):	A1: Names if available: Facility has not engaged agency workers
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable

<p>D: Is there a legal contract / agreement with all agencies?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No  D1: Please give details: Not applicable</p>
<p>E: Does the site have a system for checking labour standards of agencies?  If yes, please give details.</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No  E1: Please give details: Not applicable</p>

<p><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></p>	
<p>A: Any contractors on site?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  A1: If yes, how many contractors are present, please give details: Facility does not engage contract workers</p>
<p>B: If <b>Yes</b>, how many workers supplied by contractors?</p>	<p>Not applicable</p>
<p>C: Do all contractor workers understand their terms of employment?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No  C1: Please describe finding: Not applicable</p>
<p>D: If <b>Yes</b>, please give evidence for contractor workers being paid per law:</p>	<p>Not applicable</p>

**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:**

At present, one subcontractor is used for embroidery purpose.

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

- Verified production records
- Interaction with management & staff

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

<i>Process Subcontracted</i>	<i>Embroidery</i>	<i>Process 2</i>
<i>Name of factory</i>	<i>Sapan Sasmal</i>	
<i>Address</i>	<i>Jijamata Nagar, Worli, Mumbai-400018</i>	

<i>Process Subcontracted</i>	<i>Process 3</i>	<i>Process 4</i>
<i>Name of factory</i>		
<i>Address</i>		

<i>Process Subcontracted</i>	<i>Process 5</i>	<i>Process 6</i>
<i>Name of factory</i>		
<i>Address</i>		

Details: For embroidery purpose factory sends fabric for sub contracting which is located at approx.. 15 kms from site. Sub contractor has 08 male workers.

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

Observation:	
<p><b>Description of observation:</b>                      None observed</p> <p><b>Local law or ETI/Additional elements requirement:</b>                      Not applicable</p> <p><b>Comments:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>                      Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE):                      None observed</p>	<p><b>Objective Evidence Observed:</b>                      Not applicable</p>

Summary of sub-contracting – if applicable	
<input type="checkbox"/> Not Applicable please x	
<p>A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      A1: Please describe: Very small quantities &amp; specific orders of goods are sent for sub contracting.</p>
<p>B: If sub-contractors are used, is there evidence this has been agreed with the main client?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                      B1: If <b>Yes</b>, summarise details: Self reference audit, hence not applicable</p>

C: Number of sub-contractors/agents used:	01
D: Is there a site policy on sub-contracting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If <b>Yes</b> , summarise details: Policy is in line with SMETA guidelines
E: What checks are in place to ensure no child labour is being used and work is safe?	Regular visits are conducted by designated person at site

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&amp;S or any other grievances to a 3<sup>rd</sup> party?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  A1: Please give details:</p>
<p>B: If <b>Yes</b>, are workers aware of these channels and have access? Please give details.</p>	<p>Facility has open door policy and workers can be approached to management for any grievances.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Facility has open door policy and workers can be approached to management for any grievances.                  Facility has formed works committee</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><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 &amp; suppliers can express their grievance through phone and e-mail</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                    E1: If yes, please give details : Not applicable</p>
<p>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)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                    F1: If no, please give details Not applicable</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                    G1: If no, please explain Facility has certified standing order which were displayed on notice board.</p>
<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>



	<p>H1: If no, please give details : Facility has certified standing order which were displayed on notice board.</p>
<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>I1: If yes, please give details:</p>

**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 evidence of harsh or inhumane treatment of employees.
2. All employees are treated with respect and dignity.
3. Facility's disciplinary policies are explained to all employees and all employees are well aware about their rights.
4. No evidence of physical abuse, sexual or any other harassment / verbal abuse is observed / reported.
5. Facility has formed Prevention of Sexual Harassment committee (POSH) to discuss and resolve the issues. Facility has not engaged external member as third-party member in the committee. Last meeting was conducted on 17.10.2020

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

**Details:**  
 Disciplinary policies  
 POSH Meeting dated 17.10.2020

**Any other comments:**  
 None

**Non-compliance:**

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

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

It was noted from review of the records that facility has formed anti-sexual harassment committee 17/10/2020 with 4 members. However facility has not appointed External members during the formation of committee.

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

In accordance to Sexual Harassment of women at work place (Prevention, Prohibition and Redressal) Act 2013, Chapter II, Constitution of Internal Complaints committee Section 4, (1) Every employer of a workplace shall, by an order in writing, constitute a committee to be known as the "Internal Complaints Committee". Provided that where the offices or administrative units of the workplace are located at different places or divisional or sub-divisional level, the internal committee shall be constituted at all administrative units or offices. (2) the internal committee shall consist of the following members to be nominated by the employer, namely: (a) a presiding officer who shall be a women employed at a senior level at work place from other offices or administrative units of the work place referred to in sub section(1); provided further that in case the other offices or administrative units of the workplace do not have senior level women employee, The presiding officer shall be nominated from any other workplace of the same employer or other department or organization. (b) Not less than two members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge. (c) One member from amongst non – governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment. Provided at least one half of the total members so nominated shall be women. (3) The presiding officer and every member of the internal committee shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer. (4) The member appointed from amongst the non-governmental organizations or associations shall be paid such fees or allowances for holding the proceedings of the internal committee, by the employer, as may be prescribed. (5) Where the presiding officer or any member of the internal committee, (a) contravenes the provisions of section 16, or (b) has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him, or (c) he has been found guilty in any disciplinary proceeding or a disciplinary proceeding is pending against him, or (d) has so abused his position as to render his continuance in official prejudicial to the public interest, Such presiding officer or member, as the case may be, shall be removed from the committee and the vacancy shall be filled by fresh nomination in accordance with the provisions of this section.

**Recommended corrective action:**

It is recommended facility to appoint external member in anti-sexual committee.

**Objective evidence observed:**

*(where relevant please add photo numbers)*

Document review

<p><b>Action By:</b> - Mr. Parmeshwar Raul – Production Manager  <b>Time Scale:</b>- 30 days  <b>Verification Method:-</b> Desktop</p>	
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Observation:	
<p><b>Description of observation:</b> None observed  <b>Local law or ETI requirement:</b> Not applicable  <b>Comments:</b> Not applicable</p>	<p><b>Objective evidence observed:</b> Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p><b>Objective Evidence Observed:</b> Not applicable</p>

**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. Facility has not employed any foreign employees
2. Facility engaged domestically migrant employees.
3. Facility has engaged security guard hired on company payroll
4. Based on the review of personal files of employees (10 out of 10), all of them are holding the legal rights to work.

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

**Details:**

Recruitment policies/ Procedure.

**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:**

Not applicable

**Recommended corrective action:**

Not applicable

**Objective evidence observed:**

*(where relevant please add photo numbers)*

Not applicable

Observation:	
<b>Description of observation:</b> None observed <b>Local law or ETI/Additional Elements requirement:</b> Not applicable <b>Comments:</b> Not applicable	<b>Objective evidence observed:</b> Not applicable

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

**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. Mr. Parmeshwar Raul – Production Manager is responsible for all environmental issues.
2. Facility is aware of the legal environmental requirements.
3. Facility is not involved in any hazardous process
4. Facility has obtained all necessary permits from pollution control board.

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

- Environmental Policy
- Facility has not obtained air water and hazardous consent.

- Facility has not conducted environmental test like ambient air, noise level, etc.

**Non-compliance:**

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

- NC against ETI/Additional Elements  NC against Local  
 NC against customer code:

It was noted interaction with facility management that facility has not obtained consent to establish and operate for air, water and disposal of hazardous waste from pollution control board.

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

In accordance with the Air (Prevention and control of pollution) Act 1981, Section 21 (1), subject to the provision of this section, no person shall without the previous consent of the state board established or operate any industrial plant in an Air pollution control area. In accordance with Water (Prevention of control of pollution) Act 1974, Section 25 (a), subject to the provision, no person shall, without the previous consent of the state board – established or take any steps to establish any industry, operation or process or any treatment and disposal system or any extension or addition thereto, which is likely to discharge sewages or trade effluent in to a stream or well or sewer or an land

**Recommended corrective action:**

It is recommended facility to obtain consent to establish and operate for air, water and disposal of hazardous waste from pollution control board.

**Action By:** - Mr. Parmeshwar Raul – Production Manager

**Time Scale:**- 60 days

**Verification Method:**- Desktop

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

- NC against ETI/Additional Elements  NC against Local  
 NC against customer code:

It was noted interaction with facility management that facility has not conducted ambient air monitoring in the facility

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

In Accordance with the AIR (PREVENTION AND CONTROL OF POLLUTION) ACT, 1981 22. Persons carrying on industry, etc., and to allow emission of air pollutants in excess of the standard laid down by State Board. No person 20 operating any industrial plant, in any air pollution control area shall discharge or cause or permit to be discharged the emission of any air pollutant in excess of the standards laid down by the State Board under clause (g) of sub-section (1) of section 17. In accordance with Environment (Protection) Act, 1986, Section 9(1), Where the discharge of any environmental pollutant in excess of the prescribed standards occurs or is apprehended to occur due to any accident or other unforeseen act or event, the person responsible for such discharge and the person in charge of the place at which such discharge occurs or is apprehended to occur shall be bound to prevent or mitigate the environmental pollution caused as a result of such discharge and shall also forthwith- (a) intimate the fact of such occurrence; and (b) be bound if called

**Objective evidence observed:**

(where relevant please add photo numbers)

Interaction with facility management

Interaction with facility management

<p>upon to render all assistance to such authorities or agencies as may be prescribed</p> <p><b>Recommended corrective action:</b> It is recommended facility to conduct ambient air monitoring in the facility</p> <p><b>Action By:</b> - Mr. Parmeshwar Raul – Production Manager <b>Time Scale:-</b> 60 days <b>Verification Method:-</b> Desktop</p> <p><b>3. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI/Additional Elements      <input checked="" type="checkbox"/> NC against Local  <input type="checkbox"/> NC against customer code:                  It was noted interaction with facility management that facility has not conducted ambient noise monitoring in the facility</p> <p><b>Local law and/or ETI/Additional elements requirement:</b>                  In accordance with The Noise Pollution(Regulation &amp; Control) Rules 2000,4.Responsibility as to enforcement of noise pollution control measures-                  (1)The noise levels in any area/zone shall not exceed the ambient air quality standards in respect of noise as specified in the schedule                  (2)The authority shall be responsible for the enforcement of noise pollution control measures and the due compliance of the ambient air quality standards in respect of noise.                  (3)The respective state pollution control boards of pollution control committees in consultation with the central pollution control boards shall collect, compile and publish technical and statistical data relating to noise pollution and measures devised for its effective prevention, control and abatement.</p> <p><b>Recommended corrective action:</b> It is recommended facility to conduct ambient noise monitoring in the facility.</p> <p><b>Action By:</b> - Mr. Parmeshwar Raul – Production Manager <b>Time Scale:-</b> 60 days <b>Verification Method:-</b> Desktop</p>	<p>Interaction with facility management</p>
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Observation:	
<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI/Additional elements requirements:</b> Not applicable</p> <p><b>Comments:</b> Not applicable</p>	<p><b>Objective evidence observed:</b> Not applicable</p>



Good examples observed:	
Description of Good Example (GE): None observed	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. Parmeshwar Raul – Production Manager
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: facility has conducted risk assessment on environmental impact.
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:
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
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: Policy addresses key areas of environmental impact from their operations
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:
H: Have all legally required permits been shown? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: Factory has not obtained pollution consent order
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A I1: Please give details: No chemicals used
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No J1: Please give details: No chemicals used, hence not applicable
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: Facility set the target in place on environmental aspect such as waste consumption and Energy by creating awareness and displayed water and energy saving posters in the production area

L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Not applicable, as not waste recycling
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: facility has maintained consumption records of water & electricity
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 type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Not applicable since facility does not used contracting agencies operating on premises.

**Usage/Discharge analysis**

Criteria	Previous year: Please state period: 01.04.2020 to 31.12.2020	Current Year: Please state period: 01.01.2021 to 30.04.2021
Electricity Usage: <i>Kw/hrs</i>	16800	3245
Renewable Energy Usage: <i>Kw/hrs</i>	Nil	Nil
Gas Usage: <i>Kw/hrs</i>	Nil	Nil
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	Not applicable	Not applicable
Water Sources: <i>Please list all sources e.g. lake, river, and local water authority.</i>	<ul style="list-style-type: none"> <li>Local municipal corporation</li> </ul>	<ul style="list-style-type: none"> <li>Local municipal corporation</li> </ul>
Water Volume Used: <i>(m<sup>3</sup>)</i>	10,000 to 12,000 litres	3,000 to 4,000 litres
Water Discharged: <i>Please list all receiving waters/recipients.</i>	<ul style="list-style-type: none"> <li>Municipal drainage</li> </ul>	<ul style="list-style-type: none"> <li>Municipal drainage</li> </ul>
Water Volume Discharged: <i>(m<sup>3</sup>)</i>	Not applicable	Not applicable
Water Volume Recycled: <i>(m<sup>3</sup>)</i>	Not applicable	Not applicable
Total waste Produced <i>(please state units)</i>	130 kg	22 kg

Total hazardous waste Produced: <i>(please state units)</i>	Nil	Nil
Waste to Recycling: <i>(please state units)</i>	Nil	Nil
Waste to Landfill: <i>(please state units)</i>	Nil	Nil
Waste to other: <i>(please give details and state units)</i>	Nil	Nil
Total Product Produced <i>(please state units)</i>	30,000 pieces	9,000 pieces

**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:**

1. Parmeshwar Raul – Production manager is responsible for compliance to this section.
2. The SAQ was completed by the site and reviewed prior to the audit.
3. It was noted from the interaction with the facility management, the facility has verbally communicated business code of conduct to all employees.

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

- Anticorruption & Anti bribery policy
- Based on interaction with facility management

Any other comments: None

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

Observation	
<p><b>Description of observation:</b>                      None observed</p> <p><b>Local law or ETI/Additional elements requirement:</b>                      Not applicable</p> <p><b>Comments:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>                      Not applicable</p>

Good examples observed:	
<p>Description of Good Example (GE):                      None observed</p>	<p><b>Objective Evidence Observed:</b>                      Not applicable</p>

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 A1: Please give details: Yes
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: Facility give training to employees
C: Is the policy updated on a regular (as needed) basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Facility has updated policy

D: Does the site require third parties including suppliers to complete their own business ethics training

- Yes
- No

D1: Please give details: Facility does include suppliers

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>	
<p><b>ETI 1. Forced Labour</b></p>	<p><b>ETI 1. Forced Labour</b></p>
<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>	
<p><b>ETI 2. Freedom of association and the right to collective bargaining are respected</b></p>	<p><b>ETI 2. Freedom of association and the right to collective bargaining are respected</b></p>
<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>	
<p><b>ETI 3. Working conditions are safe and hygienic</b></p>	<p><b>ETI 3. Working conditions are safe and hygienic</b></p>
<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>	
<p><b>ETI 4. Child labour shall not be used</b></p>	<p><b>ETI 4. Child labour shall not be used</b></p>
<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>	
<p><b>ETI 5. Living wages are paid</b></p>	<p><b>ETI 5. Living wages are paid</b></p>
<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>	
<p><b>ETI 6. Working Hours are not excessive</b></p>	<p><b>ETI 6. Working Hours are not excessive</b></p>
<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>	
<p><b>ETI 7. No discrimination is practised</b></p>	<p><b>ETI 7. No discrimination is practised</b></p>
<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>	
<p><b>ETI 8. Regular employment is provided</b></p>	<p><b>ETI 8. Regular employment is provided</b></p>
<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>              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.</p>	
<p><b>8A: Sub-Contracting and Homeworking</b></p>	<p><b>8A: Sub-Contracting and Homeworking</b></p>
<p>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.</p>	
<p><b>ETI 9. No harsh or inhumane treatment is allowed</b></p>	<p><b>ETI 9. No harsh or inhumane treatment is allowed</b></p>
<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.              Additional elements:              9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<p><b>10. Other Issue areas: 10A: Entitlement to Work and Immigration</b></p>	
<p><b>Additional Elements</b>              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.</p>	
<p><b>10. Other issue areas 10B2: Environment 2-Pillar</b></p>	

<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.          10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.  <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>            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.  <b>B4. Guidance for Observations</b>            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.</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**

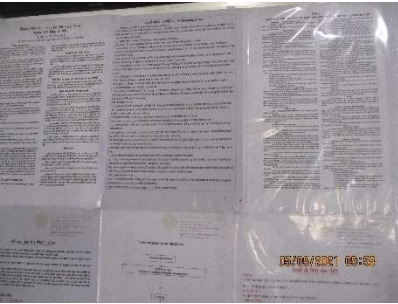
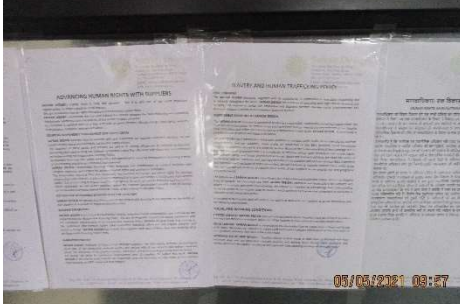

10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.

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

<p>Facility main gate and name board</p>	<p>Biometric attendance system</p>	<p>Suggestion / complaint box</p>
<p>No child labor displayed</p>	<p>Factory main entrance</p>	<p>Fire extinguisher</p>
<p>Emergency lights</p>	<p>Fire alarm call point</p>	<p>ETI Base code displayed</p>











		
<p>Policies &amp; Abstracts 1</p>	<p>Policies &amp; Abstracts 2</p>	<p>Aisles &amp; arrow marking</p>

		
<p>Drinking water centre</p>	<p>Lunch &amp; Tea sitting area</p>	<p>First aid box</p>

		
<p>First aid box</p>	<p>Gender wise toilets &amp; Signages</p>	

		
<p>Smoke detector</p>	<p>Factory building</p>	<p>Assembly area</p>

		
Exit signage	Fire alarm panel	Thread store
		
Raw Material store	Cutting section	Sewing section
		
Buttoning section	Pressing section	Final Checking Section

		
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NC photo # 1 - Evacuation maps layout not matching existing layout.	NC photo # 2 - Exit door opening inward.	NC photo # 3 - Eye protecting guards missing on over lock machine.
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For more information visit: [Sedexglobal.com](https://www.sedexglobal.com)

Your feedback on your experience of the SMETA audit you have observed is extremely valuable. It will help to make improvements to future versions.

You can leave feedback by following the appropriate link to our questionnaire:

**[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](#)**

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