




# Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 1003703	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 1073706
Business name (Company name):	Nam Exports India		
Site name:	Nam Exports India		
Site address: <i>(Please include full address)</i>	Plot No. 150, Sector 37, Udyog Vihar Phase VI, Gurugram, Haryana 122001.	Country:	India
Site contact and job title:	Mr. Sanjay Saini – Proprietor		
Site phone:	0091 9560429777	Site e-mail:	<a href="mailto:sanjay@namexports.com">sanjay@namexports.com</a>
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:	07 July 2021		

<b>Audit Company Name &amp; Logo:</b>  <b>SGS India Pvt Ltd</b> 	<b>Report Owner (payer):</b> <i>(If paid for by the customer of the site please remove for Sedex upload)</i> <b>Nam Exports India</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): Audited site has only 5 workers hence document and interview sample size is 5.

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

Lead auditor: Ramesh Bantupalli	APSCA number: RA 21701587
Lead auditor APSCA status: RA	
Team auditor: None	APSCA number: NA
Interviewers: Ramesh Bantupalli	APSCA number: RA 21701587

Report writer: Ramesh Bantupalli  
Report reviewer: Shobha Tandel

Date of declaration: 07 July 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	• None
0B <a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	• None
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	• None
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	• None
3. <a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	04	00	00	<p><u>Findings:</u></p> <ol style="list-style-type: none"> <li>It was noted during factory tour that handrail not provided to one emergency stairs leading from basement floor to ground floor at rear side exit.</li> <li>It was noted during factory tour that one fire extinguisher at periphery was blocked with material.</li> <li>During factory tour dampness observed on building wall at two locations. One</li> </ol>

									at outer wall of the building and one at accessories store. 4 It was noted during the factory tour that emergency light missing at one emergency exit at ground floor.
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	• None
5	<u>Living Wages and Benefits</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	01	00	00	<u>Finding:</u> 1. Systemic occurrence of late remittance of legally required EPF and ESIC contribution. (Feb 2021 contribution was paid on 11.05.2021, March, April and May 2021 contribution were paid on 05.07.2021.
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	• None
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	• None
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	• None
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	• None
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	• None
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	• None
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	• None



10B4	Environment 4-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	• NA
10C	Business Ethics		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	• NA

General observations and summary of the site:

- The products manufactured at the site are leather garments and accessories.
- Main activities carried out at the site is leather storage, cutting, sewing, finishing, packing and Despatch.
- Overall responsibility for meeting the standards is taken by Mr. Sanjay Saini – Proprietor
- There are total of 5 workers on site (4 male and 1 female), all workers were present on the day of audit.
- The youngest worker on site was 29 years old
- There is no union at this factory.
- No process is sub-contracted.
- 05 workers were selected for interview (4 male and 1 female), they were interviewed as 1 group of 4 and the balance of 1 worker was interviewed individually.
- All workers said they were satisfied with their employment at the factory.
- They also said they could make suggestions to their Managers.
- The factory was closed from March 2020 to January 2021 (during the Covid-19 pandemic period) and reopened from 1<sup>st</sup> February 2021.
- 05 records to show wages and working hours were taken for 3 months from the period Feb 2021 – May 2021
- Standard hours on site were on average 48 hours/week with 1 day off in every 7-day-period.
- Legal minimum wage was paid to all workers.
- Overtime hours in sample was: No overtime hours in sampled month of May 2021 (Current month), March 2021 and February 2021 (random months)

*\*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:	Nam Exports India																			
B: Site name:	Nam Exports India																			
C: GPS location: (If available)	GPS Address: Plot No. 150, Sector 37, Udyog Vihar Phase VI, Gurugram, Haryana 122001.	Latitude: 28.4322 Longitude: 77.0012																		
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 Number: GGN-Online-GGN-N-47 for 140 workers valid till 31.12.2022  Fire NOC No. FS/2021/2809 Dated 10.01.2021 valid till 09.01.2022																			
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Leather Garments and accessories manufacture																			
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Nam Exports India is located at own building at Plot No. 150, Sector 37, Udyog Vihar Phase VI, Gurugram, Haryana 122001, India. The total land area occupied was approx. 450 Square metres and covered area was 9000 square feet. With regards to facilities, there is one production building with four floors.</p> <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor 1: Basement</td> <td>Store, cutting</td> <td>None</td> </tr> <tr> <td>Floor 2: Ground</td> <td>Sewing, Finishing</td> <td>None</td> </tr> <tr> <td>Floor 3: First</td> <td>Sampling, Office, Showroom</td> <td>None</td> </tr> <tr> <td>Floor 4: Second</td> <td>Colouring, Finishing</td> <td>None</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>NA</td> </tr> </tbody> </table> <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:</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: Form 1-B, Dated 26.02.2018</p>		Production Building no	Description	Remark, if any	Floor 1: Basement	Store, cutting	None	Floor 2: Ground	Sewing, Finishing	None	Floor 3: First	Sampling, Office, Showroom	None	Floor 4: Second	Colouring, Finishing	None	Is this a shared building?	No	NA
Production Building no	Description	Remark, if any																		
Floor 1: Basement	Store, cutting	None																		
Floor 2: Ground	Sewing, Finishing	None																		
Floor 3: First	Sampling, Office, Showroom	None																		
Floor 4: Second	Colouring, Finishing	None																		
Is this a shared building?	No	NA																		



<p>G: Site function:</p>	<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>
<p>H: Month(s) of peak season: (if applicable)</p>	<p>None</p>
<p>I: Process overview: <i>(Include products being produced, main operations, number of production lines, main equipment used)</i></p>	<p>The products manufactured at this production unit are leather garments and accessories. The main production process includes storage of leather, cutting, sewing, finishing, packing, storage and despatch. Sewing machine, Metal detection machine, DG set etc were used.</p>
<p>J: What form of worker representation / union is there on site?</p>	<p> <input type="checkbox"/> Union (name)  <input type="checkbox"/> Worker Committee  <input type="checkbox"/> Other (specify)  <input checked="" type="checkbox"/> None         </p>
<p>K: Is there any night production work at the site?</p>	<p> <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No         </p>
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p> <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No            L1: If yes, approx. % of workers in on site accommodation         </p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<p> <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No            M1: If yes, approx. % of workers         </p>
<p>N: Were all site-provided accommodation buildings included in this audit</p>	<p> <input type="checkbox"/> Yes  <input type="checkbox"/> No            N1: If no, please give details            NA since no accommodation building provided by the factory         </p>

Audit Parameters			
A: Time in and time out	Day 1 Time in: 10:05 Day 1 Time out: 18:00	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:	1 Man day (one auditor in one day)		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic Audit <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define		
D: Was the audit announced?	<input type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail:    weeks <input checked="" 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. Sanjay Saini – Proprietor		
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:	20.06.2019		
J: Previous audit type:	Unannounced		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <input 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>	NA		
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		

## 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	00	00	00	00	04
Worker numbers – female	01	00	00	00	00	00	00	01
Total	05	00	00	00	00	00	00	05
Number of Workers interviewed – male	04	00	00	00	00	00	00	04
Number of Workers interviewed – female	01	00	00	00	00	00	00	01
Total – interviewed sample size	05	00	00	00	00	00	00	05



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



**Worker Interview Summary**

Worker Interview Summary	
A: Were workers aware of the audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <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>	4 Workers in 1 Group (Male)
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 00      D1: Female: 01
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?	All workers interviewed had a positive attitude to management and site.
I: What did the workers like the most about working at this site?	Good compensation
J: Any additional comment(s) regarding interviews:	Nothing
K: Attitude of workers to hours worked:	Positive
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:	
M: Attitude of workers: <i>(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</i>	

05 workers were selected for interview (4 male and 1 female), they were interviewed as 1 group of 4 (male) and the balance of 1 female worker was interviewed individually.

The workers were assured of confidentiality and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory and that they were satisfied with the current wages which in their view were in line with legal minimum wages. They felt free to leave this employer and understood the notice period required. They had good relationships with factory management who treated them with respect. They could make suggestions to the owner and sometimes they had seen these suggestions used. They said they can approach directly to Factory owner for any 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*

Note applicable

**O: Attitude of managers:**

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

Factory management was co-operative during the audit. Further, he was receptive to the observations during the audit and showed keen interest to improve the conditions.



## Audit Results by Clause

### 0A: Universal Rights covering UNGP

#### 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:

The facility management has drafted human right policy statement and health and safety policy and implemented ETI base code.

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

Details: ETI base code  
Health & Safety policy and Human right policy

##### Any other comments:

None

A: Policy statement that expresses commitment to respect human rights?

Yes  
 No

AT: Please give details: Human rights policy in place

B: Does the business have a designated person responsible for implementing standards concerning Human Rights?

Yes  
 No

Please give details:  
Name: Sanjay Saini

	Job title: Proprietor
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Factory has open door policy.
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: All employee information and personnel files are kept with owner himself

Findings		
<b>Finding: Observation</b> <input type="checkbox"/> <b>Company NC</b> <input type="checkbox"/> <b>Description of observation:</b> None  <b>Local law or ETI/Additional elements / customer specific requirement:</b> NA  <b>Comments:</b> NA		<b>Objective evidence observed:</b> NA

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

# Measuring Workplace Impact

## Measuring Workplace Impact Table

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: NA _____ %	A2: This year <u>0%</u>
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]	0%	
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: NA _____ %	C2: This year <u>25%</u>
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	20%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Accident register maintained, none reported till date	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: NA Number:	F2: This year: Number: <u>0</u>
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]	0	
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: NA	H2: This year: 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months <u>0%</u> workers	I2: 12 months <u>0%</u> workers

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

<p><b>0B: Management system and Code Implementation</b>  <a href="#">(Click here to return to summary of findings)</a></p>
<p>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.</p>

<p><b>Current Systems and Evidence Examined</b></p> <p><i>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.</i></p>
<p><b>Current systems:</b></p> <ul style="list-style-type: none"> <li>• The facility has posted local law in local language on notification board.</li> <li>• MR. Sanjay Saini – Proprietor is responsible for implementing standard concerning universal standards.</li> <li>• The factory has communicated universal right policy to their relevant stake holders</li> <li>• Facility has formulated Social policies</li> <li>• No system in place to monitor the site's own suppliers against social standards</li> </ul> <p><b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b></p> <p>Details:</p> <ul style="list-style-type: none"> <li>• LHR and Health &amp; Safety Policies</li> <li>• Business License No. GGN-ONLINE—GGN-N-47 valid till 31.12.2022</li> <li>• Land ownership documents.</li> <li>• Management interaction</li> <li>• Workers interaction</li> <li>• Training records</li> </ul> <p>Any other comments: None</p>

<b>Management Systems:</b>	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details:
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	B1: Please give details: Policies exist for Forced labour, Child labour, non-discrimination, Health and Safety, Minimum Wage, Working Hours, No harsh treatment, Environment.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	All these policies are communicated to employees during induction training. it was confirmed during the employee interview and document review.
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: All the employees received training in the standards for forced labour, child labour, discrimination, harassment and abuse on regular basis.
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: latest training was given on 24.05.2021.
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:
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: The facility does not have HR Manager. Mr. Sanjay Saini Owner himself is responsible for all HR and Admin
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. Sanjay Saini – Proprietor
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: Information related to workers are kept as highly confidential within the safe custody with owner.
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: Information related to workers are kept as highly confidential within the safe custody with owner
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	K1: Please give details: Factory has conducted risk assessment to evaluate policy and procedure effectiveness
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1 Please give details: Risk assessment is reviewed on annual basis.
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: The site has communicated the ETI code to its own suppliers
<b>Land rights</b>	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The factory has valid land rights. The land was purchased by factory owner from Mr. Padam Singh.
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: These are performed by the company's legal advisor.
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC:
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: The land was purchased by factory owner from Mr. Padam Singh.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: NA
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: No such evidence found

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:                      No non-compliance was observed on the day of audit</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</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</p>	<p><b>Objective evidence observed:</b>                      Not applicable</p>



**1: Employment is Freely Chosen**

**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:**  
 The factory has a policy which prohibits forced labour, and this was available for review. There was a formalised application procedure which states that workers must present their ID's for proof of age but that only copies must be kept in the personnel files and the original given back to the workers. The above was confirmed in management and worker interview. The company rule book states that workers can resign from the factory with one month's prior written notice, given to their supervisor or the personnel office. The rule book also states that they will be given their full wages on their last day of work. The terms and conditions of employment in the rule book state that the workers are free to leave the workplace at the end of the shift. The above was confirmed in management and worker interview.

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

- Personnel files (all samples were checked)
- Resignation records
- Factory rules
- Management and worker interview

Any other comments:  
None

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

<p>E: If any part of the business is UK based or registered there &amp; has a turnover over £36m, is there a published a 'modern day slavery statement'?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  <input type="checkbox"/> Not applicable  E1: Please describe finding:</p>
<p>F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  F1: Please describe finding: Workers are free to leave the site at the end of the shift/workday.</p>
<p>G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><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:  The factory management is aware of the risk of forced/ trafficked/ bonded labour in its supply chain.</p>
<p>H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  H1: Please describe finding:  The factory does due diligence verification of their supplier to reduce the risk of forced/trafficked labour in its supply chain.</p>

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:  No non-compliance observed on the day of audit.</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</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

**Objective evidence observed:**  
Not applicable

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

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

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

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**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:**

- No union is functioning in the factory.
- Facility has established policy on Freedom of Association and Right to Collective Bargaining
- Workers interviews confirmed that workers have access to meet senior personals for any issue.
- Workers interviews confirmed that management does not interfere in their rights.
- Factory had provided suggestion box which is easily accessible to all the employees where employees can drop their grievances/suggestions.

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

Details:  
 Site policy on freedom of association  
 Interview with workers  
 Interview with management representatives

Any other comments:  
 None:

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input checked="" type="checkbox"/> None
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&amp;S, sexual harassment)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  D1: Please give details: POSH Committee</p> <p>D2: Is there evidence of free elections?  <input type="checkbox"/> Yes  <input type="checkbox"/> No  NA</p>	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  E1: Please give details: There is a room available for the worker's to meet.</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>Not applicable</p>	<p>F1: Is there evidence of free elections?  <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p>	<p>NA</p>	<p>G1: Is there evidence of free elections?  <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<p>H: Are all workers aware of who their representatives are?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No  NA</p>	<p>NA</p>
<p>I: Were worker representatives freely elected?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No  NA</p>	<p>I1: Date of last election: NA</p>
<p>J: Do workers know what topics can be raised with their representatives?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No  NA</p>	
<p>K: Were worker representatives/union representatives interviewed?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No  If <b>Yes</b>, please state how many: NA</p>	
<p>L: Please describe any evidence that union/worker's committee is effective?  Specify date of last meeting; topics covered; how minutes were communicated etc.</p>	<p>No union or workers committee in the facility as there are only 5 workers. Factory has open door policy. Workers can approach the factory owner directly for any of their grievances.</p>	
<p>M: Are any workers covered by Collective Bargaining Agreement (CBA)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>If <b>Yes</b>, what percentage by trade Union/worker representation</p>	<p>M1: ___% workers covered by Union CBA</p>	<p>M2: ___% workers covered by worker rep CBA</p>
<p>M3: If <b>Yes</b>, does the Collective Bargaining Agreement (CBA) include rates of pay?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>	

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:                      No non-compliance observed on the day of audit.</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</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</p>	<p><b>Objective evidence observed:</b>                      Not applicable</p>

### 3: Working Conditions are Safe and Hygienic

#### 3: Working Conditions are Safe and Hygienic

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#### 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.*

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

- Mr. Sanjay Saini - Proprietor is responsible for the site.
- Potable water was freely available and test certificates were up to date
- Sufficient toilets were available always to workers.
- Ventilation, temperature and lighting were adequate for the production processes.

#### 2. Fire Safety

- There were exits from each work area.
- Fire-fighting equipment was available and checks were up to date
- Evacuation diagrams were posted and understood by all workers interviewed
- Fire drills were organised and recorded.
- Training had been given by the fire department approved agency and fire marshals had been specially selected for extra training.

#### 3. Medical services

- There were adequate first aid kits in each production area.

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

Details:

- Health and safety policy
- Training records
- Fire equipment maintenance records
- Fire drill records
- Potable water testing certificates
- Interviews with workers.

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  A1: Please give details: The facility has Health &amp; Safety policies and procedures that are fit for purpose and these are communicated to workers</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  B1: Please give details:</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  C1: Please give details:</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  D1: Please give details:</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  E1: Please give details: Not applicable to this site  Factory has provided first aid kits.</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 checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  F1: Please give details: No doctor or nurse on site. First aiders were available on each floor.</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  G1: Please give details: Facility has not provided worker transport.</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No  H1: Please give details: Not applicable</p>
<p>I: Are H&amp;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?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  I1: Please give details: Factory has conducted Health &amp; safety Risk assessment for each area on 20.02.2021</p>
<p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  J1: Please give details: Factory has obtained all legally required licenses on environmental requirements.</p>
<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  K1: Please give details: No banned chemical are used</p>

**Non-compliance:**

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

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

It was noted during factory tour that handrail not provided to one emergency stairs leading from basement floor to ground floor at rear side exit.

**Local law and/or ETI requirement**

In accordance with the Haryana Factories Rules 1950, Rule 66 (1) (e) Every stairway in a factory which affords a means of escape in case of fire shall be provided with a substantial hand rails which if the stairway has an open side shall be on that side , and if the stairway has two open sides such handrails shall be provided on both sides. And handrails shall be provided with a minimum height of 100 cm.

In accordance with ETI code 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:**

Factory should provide handrail to all stairs.

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

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

It was noted during factory tour that one fire extinguisher at periphery was blocked with material.

**Local law and/or ETI requirement**

In accordance with Haryana Factories Rules 1952, Rule 66 (10) (f) all first-aid firefighting equipment shall be placed in a conspicuous position and shall be readily and easily accessible for immediate use. Generally, these equipment's shall be placed as near as possible to the exits or stair landing or normal routes of escape.

In accordance with ETI code 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:**

Factory should ensure that all firefighting equipment are always kept freely accessible.

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

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

**Objective evidence observed:**

*(where relevant please add photo numbers)*

1. Site tour

2. Site tour

3. Site tour

During factory tour dampness observed on building wall at two locations. One at outer wall of the building and one at accessories store.

**Local law and/or ETI requirement**

In accordance with Factories Act 1948, Section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include-

- (a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health,
- (b) the arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances,
- (c) the provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.

In accordance with ETI code 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:**

Factory should ensure that building is maintained in good condition.

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

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

It was noted during the factory tour that emergency light missing at one emergency exit at ground floor.

**Local law and/or ETI requirement**

In accordance with the Factories Act 1948, Section 38  
 (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 measures of escape for all persons in the event of fire and (b) the necessary equipment and facilities for extinguishing fire.  
 (2) Effective measures shall be taken to ensure that all workers are familiar with the measures of escape in case of fire and the routine to be followed in such cases.

In accordance with ETI code 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:**

Factory should provide emergency lighting at exit.

4. Site tour

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

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

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

<p><b>4: Child Labour Shall Not Be Used</b>  <a href="#">(Click here to return to summary of findings)</a>  <a href="#">(Click here to return to Key Information)</a></p>
<p><b>ETI</b></p>
<p>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.</p>

<p><b>Current Systems and Evidence Examined</b></p> <p><i>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.</i></p>
<p><b>Current systems:</b>                  There is formal procedure for checking ages of workers at application stage, and this includes checking ID's, however, this is not written down, and there are no formal checks of validity of ID's. Once workers have joined their original ID's are copied and given back to them whilst copies only are kept in their personnel file.                  Checks of all worker's files showed that the youngest worker present was age 29 years old.                  No young worker or child labour observed in the facility.</p> <p><b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b></p> <p>Details:                  - Personnel files of all 05 sampled workers.                  - Child labour policy                  - Workers interview</p> <p>Any other comments:                  None</p>

A: Legal age of employment:	14 years completed
B: Age of youngest worker found:	29 years Completed
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

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:                      No non-compliance was observed on the day of audit.</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</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</p>	<p><b>Objective Evidence Observed:</b>                      Not applicable</p>

**5: Living Wages are paid**

<p><b>5: Living Wages are Paid</b>  <a href="#">(Click here to return to summary of findings)</a>  <a href="#">(Click here to return to Key information)</a></p>
<p style="text-align: center;"><b>ETI</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>Current Systems and Evidence Examined</b></p> <p><i>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.</i></p>
<p><b>Current systems:</b></p> <p>The local legal minimum wage is INR 9458.20 per month from 1st July 2020.</p> <p>All workers' wages were calculated by monthly rate. The lowest wage paid by the factory was INR 9500.00 per month as per the wage records.</p> <p>All workers are provided with written and understandable information about the particulars of their wages for the pay period concerned each time that they are paid.</p> <p>Benefits of paid annual leave was given to all workers.</p> <p>Each worker was given a pay slip and signed for their wages.</p> <p><b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b></p> <p>Details:</p> <ul style="list-style-type: none"> <li>• Worker interview</li> <li>• Wages and benefits policy</li> <li>• Local legal minimum wage documents</li> <li>• Payroll records from Feb 2021 to May 2021</li> <li>• Leave records</li> <li>• Labour contracts for sampled employees (to examine agreed wage rates)</li> <li>• Resignation records</li> <li>• Payslips of all sampled workers</li> <li>• Working hours records to check hourly rates and any overtime premiums</li> </ul> <p>Any other comments: None:</p>

<b>Non-compliance:</b>	
<p><b>1. Description of non-compliance:</b></p> <p><input checked="" type="checkbox"/> NC against ETI      <input checked="" type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer</p> <p>code:</p>	<p><b>Objective evidence observed:</b> (where relevant please add photo numbers)</p>

<p>Systemic occurrence of late remittance of legally required EPF and ESIC contribution. (Feb 2021 contribution was paid on 11.05.2021, March, April and May 2021 contribution were paid on 05.07.2021)</p> <p><b>Local law and/or ETI requirement:</b> In accordance with Employees Provident funds Scheme, 1952, Paragraph 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 contribution as well as an administrative charge shall be deposited within fifteen days of the close of every month.</p> <p>In accordance with ETI Code 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><b>Recommended corrective action:</b> Factory should ensure that EPF and ESIC contribution are remitted in time.</p>	<p>1. Document review</p>
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<b>Observation:</b>	
<p><b>Description of observation:</b> None</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>

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

**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 No CBA
B: Overtime hours:	Legal maximum:	B1: No overtime in the sampled months of	B2: <input type="checkbox"/> Yes <input type="checkbox"/> No



(Maximum legal and actual overtime hours, please state if possible per day, week, and month)	2 hours per day, 12 hours per week and 50 hours per quarter year	Feb, Mar, and May 2021.	No CBA																								
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	<p>Legal minimum:</p> <table border="1"> <tr><td>Unskilled</td><td>9458.20</td></tr> <tr><td>Semi-skilled – A</td><td>9931.08</td></tr> <tr><td>Semi-skilled – B</td><td>10427.62</td></tr> <tr><td>Skilled - A</td><td>10949.01</td></tr> <tr><td>Skilled - B</td><td>11496.47</td></tr> <tr><td>Highly Skilled</td><td>12071.29</td></tr> </table> <p>Per month from 1<sup>st</sup> July 2020.</p>	Unskilled	9458.20	Semi-skilled – A	9931.08	Semi-skilled – B	10427.62	Skilled - A	10949.01	Skilled - B	11496.47	Highly Skilled	12071.29	<p>C1:</p> <table border="1"> <tr><td>Unskilled</td><td>9500.00</td></tr> <tr><td>Semi-skilled – A</td><td>10000.00</td></tr> <tr><td>Semi-skilled – B</td><td>10500.00</td></tr> <tr><td>Skilled - A</td><td>11000.00</td></tr> <tr><td>Skilled - B</td><td>11500.00</td></tr> <tr><td>Highly Skilled</td><td>15500.00</td></tr> </table> <p>Per month</p>	Unskilled	9500.00	Semi-skilled – A	10000.00	Semi-skilled – B	10500.00	Skilled - A	11000.00	Skilled - B	11500.00	Highly Skilled	15500.00	<p>C2:</p> <input type="checkbox"/> Yes <input type="checkbox"/> No No CBA
Unskilled	9458.20																										
Semi-skilled – A	9931.08																										
Semi-skilled – B	10427.62																										
Skilled - A	10949.01																										
Skilled - B	11496.47																										
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Semi-skilled – B	10500.00																										
Skilled - A	11000.00																										
Skilled - B	11500.00																										
Highly Skilled	15500.00																										
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 200% of gross wages on all days	D1: As per their compensation policy it is 200% of gross wages on all days.	<p>D2:</p> <input type="checkbox"/> Yes <input type="checkbox"/> No No CBA																								

**Wages analysis:**

<p><b>Wages analysis:</b>  <a href="#">(Click here to return to Key Information)</a></p>													
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?	NA												
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	05 samples were reviewed for the month of Feb'2021 and Mar 2021 (random months) May 2021 (Current Month)												
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>C1: If <b>Yes</b>, please give details:</p> <table border="1"> <tr><td>Unskilled</td><td>9458.20</td></tr> <tr><td>Semi-skilled – A</td><td>9931.08</td></tr> <tr><td>Semi-skilled – B</td><td>10427.62</td></tr> <tr><td>Skilled - A</td><td>10949.01</td></tr> <tr><td>Skilled - B</td><td>11496.47</td></tr> <tr><td>Highly Skilled</td><td>12071.29</td></tr> </table>	Unskilled	9458.20	Semi-skilled – A	9931.08	Semi-skilled – B	10427.62	Skilled - A	10949.01	Skilled - B	11496.47	Highly Skilled	12071.29
Unskilled	9458.20												
Semi-skilled – A	9931.08												
Semi-skilled – B	10427.62												
Skilled - A	10949.01												
Skilled - B	11496.47												
Highly Skilled	12071.29												

<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>D1: If <b>No</b>, please give details:</p>	
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i></p> <p>INR 9500.00 per month</p>	
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: ___% of workforce earning under minimum wage            F2: ___% of workforce earning minimum wage            F3: <u>100</u>% of workforce earning above minimum wage</p>		
<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found: NA</p> <p><i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i></p>		
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>EPF 12% on basic wages            ESIC 0.75% on gross wages</p>		
<p>I: Have these deductions been made?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Please list all deductions that <b>have</b> been made.</p>	<p>1. EPF 12% on basic wages            2. ESIC 0.75% on gross wages</p> <p>Please describe:</p>
		<p>I2: Please list all deductions that <b>have not</b> been made.</p>	<p>1. Nil            2. Nil</p> <p>Please describe:</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type</p> <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
<p>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)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>L1: Please give details:</p>		
<p>M: Is there a defined living wage: <i>This is <b>not normally</b> minimum legal wage. If answered yes, please state amount and source of info:</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>M1: Please specify amount/time:</p>		

<p>Please see SMETA Best Practice Guidance and Measurement Criteria.</p>	
<p>M2: If yes, what was the calculation method used.</p>	<p> <input type="checkbox"/> ISEAL/Anker Benchmarks  <input type="checkbox"/> Asia Floor Wage  <input type="checkbox"/> Figures provided by Unions  <input type="checkbox"/> Living Wage Foundation UK  <input type="checkbox"/> Fair Wear Wage Ladder  <input type="checkbox"/> Fairtrade Foundation            Other – please give details:         </p>
<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<p> <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No            N1: Please give details: there is a review when government minimum wage rates are revised.         </p>
<p>O: Are workers paid in a timely manner in line with local law?</p>	<p> <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No         </p>
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p> <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No            P1: Please give details: Through payroll records review and employee's interview, it was confirmed that equal rates are being paid for equal work         </p>
<p>Q: How are workers paid:</p>	<p> <input type="checkbox"/> Cash  <input type="checkbox"/> Cheque  <input checked="" type="checkbox"/> Bank Transfer  <input type="checkbox"/> Other            Q1: If other, please explain:         </p>

**6: Working Hours are not Excessive**

**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:**

- Factory operates in one general shift of 8 hours from 09:00 to 18:00 with 30 minutes lunch break and 30 minutes tea break.
- Factory provides lunch break as per legal requirement.
- Through employees' interview, overtime is voluntary.
- Manual system used to calculate working hours
- Maximum overtime in sampled months: No overtime in the sampled months.

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

Details:

- Employee interview
- Management interview
- local and national laws

- factory policy on working hours
- sample pay slips with recorded hours of all workers interviewed
- workers' contracts
- Working hours records to establish highest and lowest hours over all employees,

Any other comments:  
None

**Non-compliance:**

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

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

No non-compliance was observed on the day of audit

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

Not applicable

**Recommended corrective action:**

Not applicable

**Objective evidence observed:**

*(where relevant please add photo numbers)*  
Not applicable

**Observation:**

**Description of observation:**

None

**Local law or ETI requirement:**

Not applicable

**Comments:**

Not applicable

**Objective evidence observed:**

Not applicable

**Good Examples observed:**

Description of Good Example (GE): None

**Objective Evidence Observed:**

Not applicable

**Working hours' analysis**

**Working hours' analysis**

Please include time e.g. hour/week/month  
*(Go back to Key information)*

**Systems & Processes**

A. What timekeeping systems are used: time card etc.

*Describe: Manual timecards*

<p>B: Is sample size same as in wages section?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  B1: If no, please give details</p>				
<p>C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?</p>	<p><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:</p>				
<p>D: Are there any other types of contracts/employment agreements used?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  D1: If YES, please complete as appropriate:</p> <table border="1" data-bbox="687 712 1493 801"> <tr> <td><input type="checkbox"/> 0 hrs</td> <td><input type="checkbox"/> Part time</td> <td><input type="checkbox"/> Variable hrs</td> <td><input type="checkbox"/> Other</td> </tr> </table> <p>If "Other", Please define:                  NA</p>	<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other		
<p>E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?</p>	<p><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:</p>				
<p>F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?</p>	<p>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:</p> <p>F3: Is this allowed by local law?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>Maximum number of days worked without a day off (in sample):                  Six days</p>				
<p><b>Standard/Contracted Hours worked</b></p>					
<p>G: Were standard working hours over 48 hours per week found?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  G1: If yes, % of workers &amp; frequency:</p>				
<p></p>	<p><input type="checkbox"/> Yes                  H1: If yes, please give details:</p>				

H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input checked="" type="checkbox"/> No	
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: No overtime hours in the sampled months of Feb, March, and May 2021	
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	<i>L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:</i>  As per employment agreement overtime is voluntary
<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	<i>M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages: No overtime hours in the sampled months however as per company compensation policy the overtime rate is 200% of gross wages</i>
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<i>N1: If yes, please describe % of workers &amp; frequency: No overtime hours in the sampled months however as per company compensation policy the overtime rate is 200% of gross wages to all workers on monthly basis.</i>
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input checked="" 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	<i>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</i>

	Not Applicable
<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 checked="" type="checkbox"/> <b>Overtime is voluntary</b></p> <p><input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week</p> <p><input type="checkbox"/> Safeguards are in place to protect worker's health and safety</p> <p><input type="checkbox"/> Site can demonstrate exceptional circumstances</p> <p><input type="checkbox"/> Other reasons (please specify)</p> <hr/> <p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> <hr/> <p>NA</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</p> <p><input checked="" type="checkbox"/> No</p> <p>Q1: If yes, please give details:</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 type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>



**7: No Discrimination is practiced**

<p><b>7: No Discrimination is Practiced</b>  <a href="#">(Click here to return to summary of findings)</a></p>
<p><b>ETI</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>Current Systems and Evidence Examined</b></p> <p><i>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.</i></p>
<p><b>Current systems:</b></p> <ul style="list-style-type: none"> <li>The facility does not discriminate 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.</li> <li>Workers interviews confirmed that they receive equal pay for equal work.</li> <li>Factory has displayed a policy on non-discrimination in local language for workers' reference. Workers are made aware of this policy as well.</li> </ul> <p><b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b></p> <p>Details:          The hiring and termination procedure,          leave application records and employee handbook.          Payroll records          Attendance records          Termination records          Training records</p> <p>Any other comments:          None</p>

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 90% A2: Female: 10%
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	0
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:
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Professional Development	
A: What type of training and development are available for workers?	Workers are given LHR and H&S training on regular basis.

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:
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Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: No non-compliance observed on the day of audit  <b>Local law and/or ETI requirement:</b> Not applicable  <b>Recommended corrective action:</b> Not applicable	<b>Objective evidence observed:</b> (where relevant please add photo numbers) Not applicable

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

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

**8: Regular Employment Is Provided**

**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:**

- All employees were recruited by the factory directly. No agency was used to hire workers. No temporary worker, apprenticeship schemes or home worker was identified by the auditors.
- All workers had received a signed labour contract.

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

Details:

The hiring and termination policy

Personal files

Payroll records were provided for review.

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:                      No non-compliance observed on the day of audit</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</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</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>

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

<b>Migrant Workers:</b>	
<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>	
A: Type of work undertaken by migrant workers:	No migrant workers in the factory
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used:  B2: Total number of (outside of local country) recruitment agencies used:
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:  C2: Observations:
D: Are Any migrant workers in skilled, technical, or management roles  <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: If yes, number and example of roles:

## NON-EMPLOYEE WORKERS

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

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: No agency workers used.
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No

	D1: Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No  E1: Please give details:

<b>Contractors:</b> <i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details:
B: If <b>Yes</b> , how many workers supplied by contractors?	
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:
D: If <b>Yes</b> , please give evidence for contractor workers being paid per law:	

**8A: Sub-Contracting and Homeworking:**

**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:**

- No process is sub-contracted
- No home worker engaged by the factory.

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

- Site tour
- Currently factory does not have any orders (Only sampling)
- Management interview
- Worker interview

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

Process Subcontracted	NA	NA
Name of factory		
Address		

Process Subcontracted	NA	NA
Name of factory		
Address		

Process Subcontracted	NA	NA
Name of factory		
Address		

Details:

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 Law  <input type="checkbox"/> NC against customer code:</p> <p>No non-compliance observed on the day of audit.</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</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>                      None</p>

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

Summary of sub-contracting – if applicable	
<input checked="" 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 type="checkbox"/> Yes  <input type="checkbox"/> No                      A1: Please describe:</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:</p>
<p>C: Number of sub-contractors/agents used:</p>	
<p>D: Is there a site policy on sub-contracting?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                      D1: If <b>Yes</b>, summarise details:</p>

E: What checks are in place to ensure no child labour is being used and work is safe?	
---	--

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

**9: No Harsh or Inhumane Treatment is allowed**

<p>9: No Harsh or Inhumane Treatment is Allowed  <a href="#">(Click here to return to summary of findings)</a></p>
<p><b>ETI</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>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: Open channels such as (Reporting to local labour officer)</p>
<p>B: If <b>Yes</b>, are workers aware of these channels and have access? Please give details.</p>	<p>Workers confirmed during the interview that they are aware of these channels and have access.</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>Open channel</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers  <input type="checkbox"/> Communities  <input type="checkbox"/> Suppliers  <input type="checkbox"/> Other              D1: Please give details: Open door policy, Workers confirmed during the interview that they can approach the owner of the factory or local labor officer for any grievance.</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</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 type="checkbox"/> Yes  <input checked="" type="checkbox"/> No            F1: If no, please give details: this matter is not discussed with the site's business partners</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</p>
<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No              H1: If no, please give details</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>II: If yes, please give details</p>
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**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:**

- In accordance with the document review, the factory management had established a disciplinary procedure for workers' misbehaviour which included oral warning, written warning and finally termination and the site, had developed a training program for all employees on the procedure. Worker interview confirmed that workers were aware of the disciplinary procedure.
- As per management interview, document review and workers interview, there was a policy on Harsh Treatment.
- The factory has open door policy, where workers can report any grievances (harassment, bullying, discrimination etc.) the owner directly; any received complaint will be handled by the owner without any reprisal for the worker in question.

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

Details:  
 The relevant policy on prevention of harassment and abuse  
 Internal grievance procedure documentation.  
 Training records  
 Worker interview

Any other comments:  
 None

<b>Non-compliance:</b>	
<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:                  No non-compliance observed on the day of audit</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:	
<b>Description of observation:</b> None  <b>Local law or ETI requirement:</b> Not applicable  <b>Comments:</b> Not applicable	<b>Objective evidence observed:</b> None

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

**10 A: Entitlement to Work and Immigration**

**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:**

- As per document review, factory management interaction and worker interview, all workers in the factory were Indian, no migrant workers, all are local workers.
- All workers had the proper legal rights to work in this region.
- All of them were recruited directly by the factory and no agency was involved in factory's recruitment processes.
- No foreign worker was used by the factory.

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

Details:  
 Hiring procedure  
 Personnel files

Any other comments:  
 None

**Non-compliance:**

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

NC against ETI/Additional Elements  NC against Local Law

NC against customer code:

No non-compliance observed on the day of audit.

**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  <b>Local law or ETI/Additional Elements requirement:</b> Not applicable  <b>Comments:</b> Not applicable	<b>Objective evidence observed:</b> None

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

**10 B 2: Environment 2-pillar**

**10. Other issue areas 10B2: Environment 2-Pillar**

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

To be completed for a 2-Pillar SMETA Audit, and remove the following page which is 10B4 environment 4 pillar

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. Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

**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:**

- Environment policy
- Ambient air and noise, work zone air and noise monitoring
- Diesel generator stack emission monitoring.
- General wastes were collected on site.
- Based on worker's interview, they were trained on environmental protection.

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

Details:

- State pollution control board white category classification letter No. HSPCB/GRS/2018/1591 dated 17.07.2018.
- Ambient air and work zone air quality test report dated 13.01.2021
- Ambient noise and Work zone noise monitoring test report dated 13.01.2021
- Stack emission test report dated 13.01.2021

Any other comments:

None:

**Non-compliance:**

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

NC against ETI/Additional Elements       NC against Local Law  
 No non-compliance observed on the day of audit.

**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:	
<p><b>Description of observation:</b> None</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</p>	<p><b>Objective Evidence Observed:</b> Not applicable</p>

Other findings

**Other Findings Outside the Scope of the Code**

None

**Community Benefits**

*(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)*

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 checked="" 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:
<p><b>Environment Section</b></p>	<p><b>Environment Section</b></p>
<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>	
<p><b>Business Practices Section</b></p>	



**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>Factory main entrance and overview</p>	<p>Factory name board</p>	<p>Child labour prohibition board</p>
<p>Notice board</p>	<p>Working hours details posted</p>	<p>Company policies posted</p>
<p>Covid-19 safety guidelines</p>	<p>Emergency assembly area</p>	<p>Fire-fighting equipment's</p>

<p>Fire extinguisher</p>	<p>Evacuation map</p>	<p>Marked emergency exit</p>
<p>Sprinklers at basement floor</p>	<p>Handrail provided to stairs</p>	<p>Marked aisles</p>
<p>First aid box</p>	<p>Manual fire alarm call point</p>	<p>Toilets</p>
<p>Diesel Generator Area</p>	<p>Smoke detector</p>	<p>Drinking water point</p>





Colour storage rack (not in use)

Eye wash station

Emergency light



Raw material store

Accessories store

Cutting section



Sewing section (No work)

Finishing/Packing section

Finishing/Packing section



Sampling section

Finishing section (milling process)

Finishing section (Tumble dry process)

<p>Compressor room</p>	<p>Waste storage area</p>	<p>Emergency stairs</p>
<p>NC: Handrail not provided to emergency stairs leading from basement floor to ground floor</p>	<p>NC: Fire extinguisher blocked with material</p>	<p>NC: Dampness on outer wall of the building</p>
		<p>NA</p>
<p>NC: Dampness on inner wall (Accessories store area)</p>	<p>NC: Emergency light missing at emergency exit.</p>	<p>NA</p>



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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:

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