

# Sedex Members Ethical Trade Audit Report

Version 7



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## Audit content

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Minimum Requirements were applied and the SMETA Auditor Manual was followed. 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.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the following Code Areas:

### Included in a 2-Pillar audit:

1. Labour Standards Code Areas:
  - 0: Enabling accurate Assessment
  - 1: Employment is Freely Chosen
  - 1.A: Responsible Recruitment & Entitlement to Work
  - 2: Freedom of Association and Right to Collective Bargaining are Respected
  - 4: Child Labour Shall Not be Used
  - 5: Legal Wages are Paid
  - 5.A: Living Wages are Paid
  - 6: Working Hours are Not Excessive
  - 7: No Discrimination is Practiced
  - 8: Regular Employment is Provided
  - 8.A: Sub-contracting and Homeworkers are Used Responsibly
  - 9: No Harsh or Inhumane Treatment is Allowed
2. Health & Safety Code Area:
  - 3: Working Conditions are Safe and Hygienic
3. Environment Code Area:
  - 10.A: Environment 2-Pillar

### Included in a 4-Pillar audit:

1. Labour Standards Code Areas
  - As 2-pillar
2. Health & Safety Code Area
  - As 2-pillar
3. Environment Code Area:
  - 10.A: Environment 2-Pillar
  - 10.B: Environment 4-Pillar
4. Business Ethics Code Area:
  - 10.C: Business Ethics

- (2) Where appropriate, non-compliances or non-conformances were raised where either local law or the Base Code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.
- (3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

# Audit and site details

## Audit details

<b>Sedex company reference</b>	ZC405585842	<b>Auditor company name</b>	Intertek Bangladesh
<b>Date of audit</b>	2024-12-17	<b>Audit conducted by</b>	Sedex member
<b>Audit pillars</b>	Labour Standards   Health and safety		

## Site details

<b>Sedex site reference</b>	ZS405586317	<b>Site name</b>	Space Sweater Ltd
<b>Business name</b>	Space Sweater Ltd	<b>Site address</b>	1700 Holding Number: Shi-145/1, Jugitala, Joydevpur,, Gazipur, BD
<b>Site phone</b>	+88-02-9298880-2	<b>Site email</b>	rafiq@zaastex.com

# Audit parameters

Time in and out	Day 1	
	In	09:01
	Out	17:05
Audit type	Periodic	
Was the audit announced?	Semi announced	
Was the Sedex SAQ available for review?	Yes	
Who signed and agreed CAPR?	Md. Siddiqur Rahman / Assistant General Manager (HR, Admin & Compliance)	
Any conflicting information SAQ/Pre-Audit Info	No	
Is further information available?	No	

# Audit attendance

	Senior management	Worker representative	Union representative
<b>A: Present at the opening meeting?</b>	Yes	Yes	No
<b>B: Present at the audit?</b>	Yes	Yes	No
<b>C: Present at the closing meeting?</b>	Yes	Yes	No
<b>Reason for absence at the opening meeting</b>	There is no trade union in this facility, and it is not mandated by law. However, the representative of the Participation Committee was present during the opening meeting.		
<b>Reason for absence during the audit</b>	There is no trade union in this facility, and it is not mandated by law. However, the representative of the Participation Committee was present during the audit.		
<b>Reason for absence at the closing meeting</b>	There is no trade union in this facility, and it is not mandated by law. However, the representative of the Participation Committee was present during the closing meeting.		

# SMETA declaration

## Auditor team

<b>SMETA declaration</b>	<p>I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.</p> <ol style="list-style-type: none"> <li>Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.</li> <li>Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.</li> </ol> <p>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.</p>		
<b>Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)</b>	Nil		
<b>Lead auditor</b>	Md. Tarequzzaman	<b>APSCA Number</b>	21704534
<b>Additional auditor</b>	Rabeka Sultana	<b>APSCA Number</b>	21700951
	Md. Kamrul Hasan	<b>APSCA Number</b>	21700579
	Nasrin Munny	<b>APSCA Number</b>	21703703
<b>Date of declaration</b>	2024-12-17		

## Site representation

<b>Declaration</b>	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
<b>Full name</b>	Md. Siddiqur Rahman
<b>Title</b>	Assistant General Manager (HR, Admin & Compliance)
<b>Date of declaration</b>	2024-12-17

## Summary of findings





































Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...		GE <a href="#">ZAF600745549</a>
5.A. Living wages are paid	5.A.A Review workers' total pay including ben...		NC <a href="#">ZAF600745550</a>
	5.A.B Put in place a wage improvement plan th...		NC <a href="#">ZAF600745551</a>
9. No harsh or inhumane treatment is allowed	9.H Implement a formal process for workers to...		GE <a href="#">ZAF600745552</a>
3. Working conditions are safe and hygienic	3.H Where identified as necessary to reduce r...	§1	NC <a href="#">ZAF600745553</a>
	3.M Ensure all machinery is installed, mainta...	§2	NC <a href="#">ZAF600745555</a>
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	§3	NC <a href="#">ZAF600745554</a>


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## Local law issues


- |    |   |
|----|---|
| §1 | In accordance with Bangladesh Labor Rules 2015, Rule 67 (2): In addition to the arrangement of safety and health protection measures mentioned in Subsection (1), the concerned manufacturing institute must provide necessary equipment's, including safety shoes, helmets, goggles, masks, hand gloves, earmuffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage.    |
| §2 | In accordance with The Bangladesh Energy Regulatory Commission Act, 2003, Section 27(1): No person shall engage himself in the following business unless he is empowered by a license or exempted from having it under this Act or any other Act, such as: - (a) power generation; (b) energy transmission; (c) energy distribution and marketing; (d) energy supply; and (e) energy storage.   |
| §3 | In accordance with The Environment Conservation Rules, 2023, Rule 20 (1, 2 & 3): The validity of the Environmental Clearance Certificate (ECC) for the applicable projects/ industrial units will be as per stated: (1) For Green categorized units: 05 years from date of issuance, (2) For Yellow categorized units: 02 years from date of issuance & (3) For Orange & Red categorized units: 01 years from date of issuance. (unofficial translation). |


# Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen				
1.A. Responsible recruitment and entitlement to work				
2. Freedom of association and right to collective bargaining are respected				
3. Working conditions are safe and hygienic				
4. Child labour shall not be used				
5. Legal wages are paid				
6. Working hours are not excessive				
7. No discrimination is practiced				
8. Regular employment is provided				

 Not addressed

 Fundamental improvements required

 Some improvements recommended

 Robust management systems

	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly				
9. No harsh or inhumane treatment is allowed				
10.A. Environment 2-Pillar				

Not addressed

Fundamental improvements required

Some improvements recommended

Robust management systems

# Site details

## Company and site details

Sedex company reference	ZC405585842	
Sedex site reference	ZS405586317	
Company name	Space Sweater Ltd	
Business ownership type	GOODS	
Site name	Space Sweater Ltd	
Site name in local language	Space Sweater Ltd	
GPS location	GPS address	Shi-145/1, Jogitala, Gazipur, Bangladesh
	Coordinates	Latitude: 23°58'25.67"N Longitude: 90°24'18.27"E
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Md. Siddiqur Rahman
	Job title	Assistant General Manager (HR, Admin & Compliance)
	Phone number	+8801958486148
	Email	siddique@spacebd.biz
Applicable business and other legally required business license numbers and documents	<p>Factory License: 18575/Gazipur, 'I' category, issued by Deputy Inspector General, Department of Inspection for Factories and Establishments (Govt. of the People's Republic of Bangladesh), which is valid till 16th January 2025.</p> <p>Fire License No: DD/Dhaka/27981/2018, issued by Bangladesh Fire Service &amp; Civil Defence Authority, which is valid till 30th June 2025.</p> <p>Trade License No.: 246, issued by Gazipur City Corporation which is valid till 30th June 2025.</p>	

## Site activities

Site function	Factory Processing/Manufacturer Finished Product Supplier
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## Site activities

<b>Site activities</b>	<p><b>Primary</b></p> <p>Manufacture of wearing apparel (clothing), except fur apparel</p> <p><b>Secondary</b></p> <p><b>Other</b></p>
<b>Product type</b>	All kinds of sweater item
<b>Process overview</b>	<p>Product manufactured: All kinds of sweater item</p> <p>Main production process: Winding-Knitting- Linking-Trimming -Mending-Washing- Sewing-Iron-Finishing- Packing.</p> <p>Monthly production capacity: 500,000 pieces per month</p> <p>No. of production line: Not applicable</p> <p>Machines used: Soft Winding, Part Winding, Lassa Winding, Placket Machine, Drawstring Machine, Jacquard Machine, Sample Knitting Machine, Linking Machine, Super Linking, Over Lock Machine, Sewing Machine, Fled Lock Machine, Iron, Fled Lock Machine, Ilet Machine, Bartech Machine, Hole Stitch Machine, Button Stitch Machine, Button Stitch Machine, Generator, Boiler, Dryer Machine, Pull Test Machine, Fire Pump, Dust Cleaner etc.</p> <p>Chemicals used: Softener. Detergent, Jet Powder, Silicon, Spot Lifter-833, Machine Oil, Diesel etc.</p>
<b>What level of mechanization best describes the work at this site?</b>	Fair mechanisation / manual Labour

## Site scope

<b>Is the audited site a physically continuous area?</b>	Yes
<b>What is the area of audited site to its boundary?</b>	7703m <sup>2</sup>

## Site scope

<b>Building 1</b>	<b>Last construction works on site</b>	2018
	<b>If building is shared, provide details</b>	No
	<b>Number of floors</b>	7
	<b>Description of floor activities</b>	<p>Ground floor: Jacquard Section, Winding Section, Bonded Warehouse, Yarn Office, UPS Room-02</p> <p>1st Floor: Jacquard Section, Jacquard Distribution Yarn Issue / Receive, Needle Control Room-01, UPS Room-1</p> <p>2nd Floor: Jacquard Section, Finished Goods Area, Moisture Control Room-02</p> <p>3rd Floor: Finishing, PQC Section, Packing Section, Wash Section, Iron Section, Sewing Section, Light Check Area, Packing Area/Metal Free Zone, Moisture Control Room-01, Hard Tag Room, Production Office, Accessories Sub Store, Spot Removing Room, Board Cutting Room</p> <p>4th Floor: Zipper Attachment, Quality Assurance Room, Needle Control Room-02, Production Office, Auto Placket, Part Winding, Knitting Part Inspection</p> <p>5th Floor: Linking Section, Overlock, Super Linking, Linking Distribution Room, Production Office, Technician Room, In charge Room, Trimming Section, Bartek M/C Area, Light check, Mending Section.</p> <p>6th Floor: Sample Section, Dining Room, Canteen, Mosque, Office, Inspection Room (1-6), Accessories Store, Hall Room, Meeting Room-3, Meeting Room-4, IT Room, Laboratory (Lab)</p> <p>Rooftop: Vacant</p>

## Site scope

Building 2	Last construction works on site	2018
	If building is shared, provide details	No
	Number of floors	2
	Description of floor activities	Ground floor: Power Sub- Station Room, Generator Room, Boiler Room 1st Floor: Compressor Room, Maintenance Store, General Store, General Store Office, Finishing Yarn Room. Rooftop: Vacant
Building 3	Last construction works on site	2018
	If building is shared, provide details	No
	Number of floors	1
	Description of floor activities	Ground floor: Medical Center, Childcare Center Rooftop: Vacant
Building 4	Last construction works on site	2018
	If building is shared, provide details	No
	Number of floors	1
	Description of floor activities	Under Ground floor: Pump Room Ground floor: Fire Command Room Rooftop: Vacant
Building 5	Last construction works on site	2021
	If building is shared, provide details	No
	Number of floors	1
	Description of floor activities	Ground floor: ETP (Effluent Treatment Plant)
Building 6	Last construction works on site	2018
	If building is shared, provide details	No
	Number of floors	1
	Description of floor activities	Shed-1: Wastage House

## Site scope

Building 7	Last construction works on site	2018
	If building is shared, provide details	No
	Number of floors	1
	Description of floor activities	Shed-2: Chemical Storage
Building 8	Last construction works on site	2018
	If building is shared, provide details	No
	Number of floors	1
	Description of floor activities	Shed-3: PRS (Pressure Reducer System) Room
Building 9	Last construction works on site	2018
	If building is shared, provide details	No
	Number of floors	1
	Description of floor activities	Shed-4: Workshop
Building 10	Last construction works on site	2018
	If building is shared, provide details	No
	Number of floors	1
	Description of floor activities	Shed-5: Common Room
Building 11	Last construction works on site	2018
	If building is shared, provide details	No
	Number of floors	1
	Description of floor activities	Shed-6: LPG (Liquefied Petroleum Gas) Station
Is there any difference between the site scope of the audit and the Sedex site profile?	No	

## Site scope

Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site? No

Is any activity conducted onsite not included within the scope of the audit? No

## Worker accommodation and transport

Are there any site-provided worker accommodation buildings? No

Does the site organise worker transport to the worksite? Not provided  
The facility does not provide transport facility to the employee.

## Work patterns

Approximate workers on site per month (% of peak)	January	25-50%	February	25-50%
	March	25-50%	April	95-100%
	May	95-100%	June	95-100%
	July	95-100%	August	95-100%
	September	95-100%	October	25-50%
	November	25-50%	December	25-50%

Is there any night or back shift work at the site? Yes  
Only for Jacquard section 02 shift 8 am to 5 pm and 8 pm to 5 am with 1 hour break.

What percentage of the workforce, including temporary and agency workers, work during the night/ back shift? 20%

Was the audit conducted across all shift times, and did it include a representative sample of workers from each shift time in interviews and sampling? No  
The audit was not conducted across all shift times; however, a representative sample of workers from each shift was included in the interviews and sampling.

## Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? ISO 14001 (Environmental management), Other management system certification  
ISO 9001:2015 (Quality management systems)

Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community? No  
No such assessment was conducted.

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site? No  
No such assessment was conducted.

# Worker analysis

Gender disaggregated data available

Men and women

## Worker totals

	Men	Women	Other	Total
Number of workers	859 (59.2%)	591 (40.8%)	- -	1450 (100%)

## Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	859 (59.2%)	591 (40.8%)	- -	1450 (100%)
Temporary or fixed term employees	0 (0%)	0 (0%)	- -	0 (0%)
Agency or subcontracted workers	0 (0%)	0 (0%)	- -	0 (0%)
Seasonal workers	0 (0%)	0 (0%)	- -	0 (0%)
Self-employed workers	0 (0%)	0 (0%)	- -	0 (0%)
Informal workers including home workers	0 (0%)	0 (0%)	- -	0 (0%)
Apprentices, trainees or interns	0 (0%)	0 (0%)	- -	0 (0%)

\* % of total workforce

## Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	515 (35.5%)	355 (24.5%)	- -	870 (60%)
International migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
<b>Total migrant workers</b>	<b>515 (35.5%)</b>	<b>355 (24.5%)</b>	<b>- -</b>	<b>870 (60%)</b>

\* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from

Mymensingh, Netrokona, Jamalpur

## Workers by age

	Men	Women	Other	Total
18 - 24 years old	435 (30%)	310 (21.4%)	- -	745 (51.4%)
15 - 17 years old	0 (0%)	0 (0%)	- -	0 (0%)
Under 15 years old	0 (0%)	0 (0%)	- -	0 (0%)

\* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit? Yes

Please list the nationalities of all workers, with the three most common nationalities listed first Bangladeshi

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Bangladeshi	60%	40%	-	100%

## Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	309 (21.3%)	206 (14.2%)	- -	515 (35.5%)
Workers paid based on a mix of 'piece work' and hourly rate	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid hourly / daily rate	0 (0%)	0 (0%)	- -	0 (0%)
Salaried workers	550 (37.9%)	385 (26.6%)	- -	935 (64.5%)

\* % of total workforce

## Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 (0%)	0 (0%)	- -	0 (0%)
Paid weekly	0 (0%)	0 (0%)	- -	0 (0%)
Paid monthly	859 (59.2%)	591 (40.8%)	- -	1450 (100%)
Other	0 (0%)	0 (0%)	- -	0 (0%)

\* % of total workforce

If other payment cycle entered, please provide details      Not applicable

## People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	35 (2.4%)	5 (0.3%)	- -	40
Supervisors or team leaders	30 (2.1%)	4 (0.3%)	- -	34
Administrative staff	117 (8.1%)	78 (5.4%)	- -	195

# Worker interview summary

Gender disaggregated data available      Men and women

Which methods of worker engagement were used?      Individual interviews  
Group interviews

## Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?

Was the interview sample representative of all types of nationality and employment types of workers?      Yes

Was the interview sample representative of the gender composition of the workforce?      Yes

Number and size of group interviews      8 groups of 4 & 20 individual employee

Did workers understand the purpose of the audit?      Yes

Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?      Yes

Was there any indication that workers had been 'coached' in how they should respond to questions?      No

What was the general attitude of the workers towards their workplace?      Favorable

## Attitude of workers

<b>In which areas did workers raise significant concerns or complaints?</b>	Other (provide details)  No such concerns were raised
<b>What did the workers like the most about working at this site?</b>	Social activities and events Work atmosphere (e.g. treatment by supervisors) Hours worked, rest days or breaks Overtime Equal opportunities Freedom of movement Training and development Work environment – comfort (e.g. temperature, noise or dust levels) Grievance mechanisms Job security Pay Social benefits & insurance (e.g. ability to book annual leave, maternity leave, pensions etc.) Facilities (e.g. rest area, recreation, canteen) Social dialogue (e.g. freedom to associate)
<b>Additional comments</b>	<p>The employees were generally positive about their workplace, they got on well fellow workers and managers. They found the management team positive and approachable. 52 employees were selected for interview including 30 male and 22 female employees, they were interviewed as 04 groups of 08 and the balances of 20 workers were interviewed individually. The employees were assured of confidentiality, and they spoke freely of their views of the factory. All employees said they were satisfied with their employment at the facility and they are provided wages as per their agreement. They felt free to leave this employer and understood the notice period required. Their facility management treated them with respect. They can complain directly to their supervisors or line manager and also felt free to give their general concerns to the Representative of their Participation Committee who would take it to the meeting of the Committee.</p>
<b>Attitude of workers' committee/union representatives</b>	<p>The Members of Participation Committee were positive about the facility and looking forward to developing relationships with the management team. Interview with the Members of the Participation Committee were conducted privately in a separate place. They replied logically regarding their responsibilities and informed that they can easily carryout their daily job without any difficulties.</p>
<b>Attitude of managers</b>	<p>The facility management showed a positive attitude to this audit and during the whole audit process Md. Siddiqur Rahman – Assistant General Manager (HR, Admin &amp; Compliance) along with his team was present though the audit process and co-operated the whole audit. The facility management respects the client's requirements and allows auditor to take photographs of all production process, best practices and also nonconformities. They also provide the required documents to photocopy and allow auditors to interact with the employees confidentially. At the closing meeting, the facility management agreed with all the findings and suggested corrective actions. The factory management had a system in place to check their current practices against their clients' requirements and the local law, and they took notice of the findings of the internal audit team and also have a Health &amp; Safety committee to take care of health and safety concerns.</p>

## Workers interviewed by type

Total

## Workers interviewed by type

Permanent workers	52
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
<b>Total number of workers interviewed</b>	<b>52</b>

## Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	18	14	-	32
Workers interviewed individually	12	8	-	20

## Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	18	12	-	30
International migrant workers interviewed	0	0	-	0
<b>Total migrant workers interviewed</b>	<b>18</b>	<b>12</b>	<b>-</b>	<b>30</b>

# Measuring workplace impact

Gender disaggregated data available      Men and women

## Annual worker turnover (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	0.47%	0.38%	-	0.85%
Last full calendar year (2023)	1.05%	0.86%	-	1.91%
Previous full calendar year (2022)	0.99%	0.58%	-	1.57%

\* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

## Rate of absenteeism (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	0.25%	0.17%	-	0.42%
Last full calendar year (2023)	1.19%	0.84%	-	2.03%
Previous full calendar year (2022)	1.16%	0.79%	-	1.95%

\* Number of days lost through job absence in the year, calculated as (the number of employees on 1st day of the year + number employees on the last day of the year) / 2)\* number available workdays in the year\*100

Are accidents recorded?      Yes

All the injuries are recorded in an injury register. The last injury occurred on 20 November 2024, which was a minor finger injury by the cutter in the Jacquard section.

## Annual number of work related accidents and injuries (per 100 workers)\*

	Men	Women	Other	Total
--	-----	-------	-------	-------

### Annual number of work related accidents and injuries (per 100 workers)\*

Last full quarter (90 days)	0.24%	0.19%	-	0.43%
Last full calendar year (2023)	1.54%	1.36%	-	2.9%
Previous full calendar year (2022)	1.08%	0.98%	-	2.06%

\* Calculated as (number of work related accidents and injuries \* 100) / number of total workers.

### Lost day work cases (per 100 workers)\*

	Men	Women	Other	Total
Last full quarter (90 days)	0.97%	0.82%	-	1.79%
Last full calendar year (2023)	1.67%	1.23%	-	2.9%
Previous full calendar year (2022)	1.47%	1.11%	-	2.58%

\* Calculated as (number of lost days due to work accidents and work related injuries \* 100) / number of total workers.

### Percentage of workers that work on average more than 48 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

### Percentage of workers that work on average more than 60 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 standard hours in a given week

Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

# 0. Enabling accurate assessment

## Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
<b>Systems and evidence examined to validate this code section</b>	<p>Current systems:</p> <ul style="list-style-type: none"> <li>•The facility allowed the auditors to conduct and complete the audit without any obstructions and no bribes were offered.</li> <li>•All requested documents were provided timely to the auditors.</li> <li>•The facility's site declaration and Sedex site profile found matched with current situation.</li> <li>•The facility maintains a written human rights policy which is approved by top management.</li> <li>•The facility ensures regular communication of the human rights policy through orientation and mid-level management training programs.</li> </ul> <p>Evidence examined:</p> <ul style="list-style-type: none"> <li>•Policy on Human rights</li> <li>•Training records.</li> </ul>		

0. Enabling accurate assessment

## Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment? No

Did any workers selected by the auditor decline to be interviewed? No

Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review? No

# 1. Employment is freely chosen

## Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The facility developed and maintained appropriate policies and procedures to ensure the requirements of the code are fulfilled. A person was designated for implementing the procedures. Periodic training and awareness programs were ensured for all relevant employees and workers on the procedures. The facility monitors effectiveness of the procedures through regular monitoring and internal audit. During the audit, the management system was found to be robust.

## Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

**Systems and evidence examined to validate this code section**

**Current Systems:**

The facility has a policy which prohibits forced labour, and this was also available for review.

•Age verification documents (National ID card copy, educational certificate, nationality certificates) were available in employee personal files.

•Service book is provided to every employee.

•Overtime is voluntary.

•The terms and conditions of employment state that the employees are free to leave the workplace outside of their working hours. The facility also has a written policy regarding this.

•The facility did not require any payment for work tools, PPE, IC/staff card, training, etc.

•The facility does not use any prison labour.

•The above was confirmed in management and employee interview.

•Only employees with a legal right to work shall be employed or used by the factory.

•The youngest age was 20 years old.

**Evidence examined:**

Facility rules.

•Policy on No-Forced labour and prison labour.

•Sample employee personal files.

•Service book.

•Time record.

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1. Employment is freely chosen

## Data points

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If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
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Does the site utilise any workers who are prisoners?	No
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Does the site use the labour of persons required to work under any government scheme?	No
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# 1.A. Responsible recruitment and entitlement to work

## Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The facility developed and maintained appropriate policies and procedures to ensure the requirements of the code are fulfilled. A person was designated for implementing the procedures. Periodic training and awareness programs were ensured for all relevant employees and workers on the procedures. The facility monitors effectiveness of the procedures through regular monitoring and internal audit. During the audit, the management system was found to be robust.

## Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

**Systems and evidence examined to validate this code section**

**Current Systems:**

The facility has a policy which prohibits forced labour, and this was also available for review.

•Age verification documents (National ID card copy, educational certificate, nationality certificates) were available in employee personal files.

•Service book is provided to every employee.

•Overtime is voluntary.

•The terms and conditions of employment state that the employees are free to leave the workplace outside of their working hours. The facility also has a written policy regarding this.

•The facility did not require any payment for work tools, PPE, IC/staff card, training, etc.

•The facility does not use any prison labour.

•The above was confirmed in management and employee interview.

•Only employees with a legal right to work shall be employed or used by the factory.

•The youngest age was 20 years old.

**Evidence examined:**

Facility rules.

•Policy on No-Forced labour and prison labour.

•Sample employee personal files.

•Service book.

•Time record.

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## 1.A. Responsible recruitment and entitlement to work

### Data points

#### Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (including dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

#### Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	60%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	Yes
List the sending states/provinces/regions	Mymensingh, Netrokona, Jamalpur

## Recruitment fees

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Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process? Not Applicable

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Were recruitment fees or costs identified during worker interviews? No

There are no recruitment fees.

## 2. Freedom of association and right to collective bargaining are respected

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The facility developed and maintained appropriate policies and procedures to ensure the requirements of the code are fulfilled. A person was designated for implementing the procedures. Periodic training and awareness programs were ensured for all relevant employees and workers on the procedures. The facility monitors effectiveness of the procedures through regular monitoring and internal audit. During the audit, the management system was found to be robust.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

**Systems and evidence examined to validate this code section**

**Current systems:**

- All the employees are allowed to form or join the trade union of their choice.
- There is a Participation Committee in the facility formed by election.
- Participation Committee formed by election on 17 November 2024 .
- There are 14 members in Participation Committee 07 are from employee side & 07 are from management side who arranges meeting as per legal requirement.
- Last meeting of Participation Committee was held on 18 November 2024.
- Participation Committee members are not treated less favorably than other workers and are allowed to carry out their duties within working hours without affecting their remuneration.

**Evidence examined:**

- Freedom of association policy review.
  - Participation Committee formation records
  - Participation Committee member list
  - Participation Committee meeting register
  - Participation Committee meeting minutes
  - Participation Committee meeting attendance register.
-

## 2. Freedom of association and right to collective bargaining are respected

### Data points

Are trade unions allowed by law in the national context? Yes

Are there any registered trade unions in the workplace? No

Are they active?

Does the employer recognise the trade union? Not Applicable

Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)? Yes

Are the worker representatives freely elected by the workforce as a whole? Yes

Does union/worker committee membership reflect the gender composition of the workforce? Yes

Does the membership reflect the nationality composition of the workforce? Not Applicable

Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years? No

## 3. Working conditions are safe and hygienic

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	The facility developed and maintained appropriate policies and procedures to ensure the requirements of the code are fulfilled. A person was designated for implementing the procedures. Periodic training and awareness programs were ensured for all relevant employees and workers on the procedures. The facility monitors effectiveness of the procedures through regular monitoring and internal audit, but some deviations were found in implementation. Some improvements are recommended to turn it into an effective management system.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.H Where identified as necessary to reduce r...	§1	NC <a href="#">ZAF600745553</a>
	3.M Ensure all machinery is installed, mainta...	§2	NC <a href="#">ZAF600745555</a>

**Systems and evidence examined to validate this code section**

**Current systems:**

**1. General Health and Safety management**

- Md. Siddiquir Rahman – AGM (HR, Admin & Compliance) looks after Health & Safety issues for the site.
- Potable water was freely available in all areas and the Potable water tested last on 25 January 2024 from Department of Public Health Engineering.
- Sufficient clean toilets (59 for male and 33 for female) were available at all times for employees in the site.
- Ventilation, temperature and lighting were adequate for the production processes.
- Meeting of Health & Safety Committee held as per requirement. Last meeting held on 24 November 2024.

**2. Fire Safety**

- There was minimum 02 or more exit in production floor.
- Enough assembly area was found in front of the facility building.
- Firefighting equipment was adequate, and checks were up to date. Fire equipment last checking was done on 01 December 2024.
- The facility management posted the evacuation plans on every production floors/shed with local language.
- Public Address System and fire alarm were available in all areas.
- Facility has total 252 members in emergency preparedness team all of them were trained from Fire Service and Civil Defence.
- Facility has designated fire warden for all the fire doors of the facility.

**Fire Drill information:**

The last day fire drill (Internal) was conducted on 26 September 2024 by Fire Safety Officer. This fire drill was conducted on an unannounced basis. It took 02 minutes 10 seconds. A total of 1140 employees were present in the fire drill. No injuries were found.

The last evening fire drill (Internal) was conducted on 27 June 2024 by Fire Safety Officer. This fire drill was conducted on an unannounced basis. It took 01 minutes 10 seconds. A total of 103 employees were present in the fire drill. No injuries were found.

The last day fire drill (External) was conducted on 05 December 2024 by Asst. Director (FS&CD). This fire drill was conducted on an unannounced basis. It took 02 minutes. A total of 1401 employees were present in the fire drill. No injuries were found.

**Facility firefighting equipment details:**

Fire extinguisher, Fire hook, Fire Alarm switch, Visual Fire Alarm, Smoke detector, Gas mask, Lock cutter, Heat Detector, Public address system, Fire Suit, Fire Door, Fire Equipment, Stretcher, Fire gum boot, Fire Gloves, bucket, Helmet, Fire gong bell, Fire beater, Fire water drum, Fog light, Blanket, Fire Hose reel, Emergency exit light etc.

**Facility provides bellow training to employees:**

The last Orientation training was conducted on 12 December 2024 by the Welfare Officer with 24 employees.

The last Fire Fighting Training (Internal) was conducted on 12 November 2024 by the Fire Safety Officer with 27 employees.

The last Fire Fighting Training (External) training was conducted on 23 & 24 November 2024 by FS&CD with 40 employees.

The last First Aid training was conducted on 04 November 2024 by the Medical Officer with 11 employees.

The last PPE (Personal Protective Equipment) training was conducted on 12 December 2024 by the Welfare Officer with 24 employees.

The last Mid-level management training was conducted on 09 November 2024 by the AGM (HR, Admin & Compliance) with 26 employees.

The last Health & Safety training course was conducted on 11 December 2024 by the H & S Officer with 25 employees.

The last Grievance Handling training was conducted on 17 November 2024 by the Welfare Officer with 30 employees.

The last Chemical Handling training was conducted on 06 November 2024 by Sr. Executive- Compliance with 12 employees.

The last Electrical safety training was conducted on 05 October 2024 by Manager-Maintenance with 10 employees.

### 3. Electrical, Machine & fire safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- The facility has 05 licensed electricians who check and do inspection, roster wise for whole facility.
- The facility checks all electric channels, distribution board and electric connection daily and monthly schedule wise.
- The facility maintains a scheduled maintenance plan for doing maintenance of all machines.
- Generator last check – 04 December 2024
- Compressor last check – 07 December 2024
- Boiler last check– 05 December 2024
- MDB last check – 03 December 2024
- Machine last check- 17 December 2024

### 4. Chemical safety:

- The facility has a safety measure for their chemical uses.

### 5. Medical services:

- There were 16 first aid boxes with enough kits in the full facility.
- The facility has a medical room and appoints 01 registered physician, 01 Nurse and 01 medical assistant who are available during working time of the facility.

6. Dormitory: The facility didn't provide dormitory facilities for any employees.

7. Transportation: The facility does not provide transport facilities to the worker.

### Evidence examined:

- Health and Safety Policy
- Risk Assessment
- License review (Fire license, Environment License, Boiler License, etc.)
- Building approval plan and layout approval plan
- Group insurance
- Clinic Logs, Accident/Injury Register
- Health and Safety Training Records (First Aid, Fire Fighting, Rescue, use of PPE, machine safety, Chemical handling, MSDS, etc.)
- Fire Drill Records, Fire Safety Plan, Inspection Records for firefighting equipment (Fire Extinguishers and Hosepipe)
- Canteen Committee Records
- Childcare Register
- First Aid Box item list
- Health Checkup Reports
- List of Health & Safety Committee members
- Health & Safety Committee Meeting Minutes
- Machine Maintenance Schedule and Record Register
- Drinking Water Test Report

# Findings: non-compliances

ZAF600745553

Non-compliance

Due 2025-01-22

**Code area**

3 Working conditions are safe and hygienic

**Status**

Open\*

**Workplace requirement**

3.H Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).

**Time given to resolve**

30 days

**Issue title**

278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate

**Verification method**

Desktop audit

**Description**

It was noted through the facility visit that employees were not using the required Personal Protective Equipment (PPE) as outlined below:  
 a) Approximately 15% long standing workers of finishing section located at 3rd floor of building - 1 were not using rubber mat/slipper. b) Approximately 10% of workers of the washing section located at 3rd floor of building - 1 were not using hand gloves, masks c) Approximately 10% workers of jacquard section were not using ear plug located at ground floor and 2nd floor of building -1.

**Area of non-compliance/non-conformance**

Local law  
Base code

**Corrective and preventative actions**

It is recommended that the facility should provide awareness training regarding proper usage of PPE for the employees mentioned.

**Local law reference**

In accordance with Bangladesh Labor Rules 2015, Rule 67 (2): In addition to the arrangement of safety and health protection measures mentioned in Subsection (1), the concerned manufacturing institute must provide necessary equipment's, including safety shoes, helmets, goggles, masks, hand gloves, earmuffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage.

**Evidence**



[Worker of washing section is not wearing personal protective equipment.JPG](#)



[Worker of jacquard section is not wearing ear plug.JPG](#)



[Long standing workers of finishing section are not using rubber matslipper.JPG](#)



\* PDF generated at 06:36 (UTC) on 23 Dec 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600745555

Non-compliance

Due 2025-01-22

**Code area**

3 Working conditions are safe and hygienic

**Status**

Open\*

**Workplace requirement**

3.M Ensure all machinery is installed, maintained, and used in a safe manner.

**Time given to resolve**

30 days

**Issue title**

267 - No/inadequate certificates for inspections of machinery, or machines not registered as required by law

**Verification method**

Desktop audit

**Description**

It was noted through document review and management interview that facility's generator license (02 out of 02 generators) was found expired on 10 July 2024 having capacity of (400+400) KW. Facility has applied for the renewal on 29 March 2024 but the updated certificate is not received yet.

**Area of non-compliance/non-conformance**

Local law  
Base code

**Corrective and preventative actions**

It is recommended that the facility management should ensure updated permit for all the generators.

**Local law reference**

In accordance with The Bangladesh Energy Regulatory Commission Act, 2003, Section 27(1): No person shall engage himself in the following business unless he is empowered by a license or exempted from having it under this Act or any other Act, such as: - (a) power generation; (b) energy transmission; (c) energy distribution and marketing; (d) energy supply; and (e) energy storage.

\* PDF generated at 06:36 (UTC) on 23 Dec 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

### 3. Working conditions are safe and hygienic

## Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable  Structural Design (Building Approval): The construction project of the facility's building was approved by Gazipur City Corporation and the approval date is 07 June 2018. The Approval is taken for Industrial Purposes.  Floor Layout Plan: The Floor Layout Plan of the facility was approved by The Chief Inspector of the Factories and Establishments Inspection on 26 May 2024.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

## 4. Child labour shall not be used

### Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met** Robust Management Systems

**Appoint a manager with sufficient seniority who is responsible for implementing procedures** Robust Management Systems

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures** Robust Management Systems

**Monitor the effectiveness of procedures to meet policy and workplace requirements** Robust Management Systems

**Explanation for management systems grades** The facility developed and maintained appropriate policies and procedures to ensure the requirements of the code are fulfilled. A person was designated for implementing the procedures. Periodic training and awareness programs were ensured for all relevant employees and workers on the procedures. The facility monitors effectiveness of the procedures through regular monitoring and internal audit. During the audit, the management system was found to be robust.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

**Systems and evidence examined to validate this code section**

Current systems:

- The facility has established a practice that they will never employ and use any child labour.
- The facility verifies all workers' original national ID card, birth certificate, school certificate etc. at the time of recruitment and keeps the photocopies of workers' ID cards, birth certificate in their personal files.
- Factory verifies the workers age through registered doctors.
- Sampling basis employees' personal files was taken for review. Each employee file included a bio-data sheet, recent photo, birth registration certificate / photocopied national identification card and other documents.
- There was no child or young employee observed in the facility.

Evidence examined:

- Recruitment policy.
  - Policy on No-Child labour.
  - Personal file including Birth certificate, primary/secondary education certificate, National ID card, etc. of sample employees.
  - Age verification documents.
-

4. Child labour shall not be used

## Data points

Percentage of workers that are age 24 or younger	51%
Enter the legal age of employment	14
Enter the age of the youngest worker identified	20
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

## 5. Legal wages are paid

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The facility developed and maintained appropriate policies and procedures to ensure the requirements of the code are fulfilled. A person was designated for implementing the procedures. Periodic training and awareness programs were ensured for all relevant employees and workers on the procedures. The facility monitors effectiveness of the procedures through regular monitoring and internal audit. During the audit, the management system was found to be robust.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...		GE <a href="#">ZAF600745549</a>

**Systems and evidence examined to validate this code section**

**Current systems:**

- The facility is providing local legal minimum wage BDT 12500/month for all the employees.
- Time keeping system is electronic (finger punch & face detection)system.
- All employees are 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.
- Each employee was given a pay slip and signed for their wages.
- Employees are aware of their minimum wage.
- Wages have been recorded according to documents checked.
- There are good practices by the facility; see below GE section.
- Salary sheet and timecard review from December 2024 (Running month, only job card), November 2024 (1st current paid month), October 2024 (2nd current paid month) & April 2024 (Peak paid month)..

**Evidence examined:**

- Salary sheet review
- Pay slip review
- Attendance register review
- Production record review
- Maintenance register review
- Maternity benefit register review
- Leave record review
- Final settlement record review
- The time frame for record reviewed are as follows

## Findings: good examples

ZAF600745549

Good example

### Code area

5 Legal wages are paid

### Workplace requirement

5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.

### Description

Facility provides monthly attendance bonus to all the employees as per company policy

## 5. Legal wages are paid

### Data points

What is the basic wage paid to workers?	The legal minimum wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Does not use digital payments (give details) Payment Method: Cash
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

### Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Not applicable
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### Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	48.0
	Max hours per month	Non applicable
Actual required working hours	Required hours per day	8.0
	Required hours per week	48.0
	Required hours per month	Non applicable
Maximum legal overtime hours	Max hours per day	4.0
	Max hours per week	24.0
	Max hours per month	Non applicable

<b>Actual overtime hours</b>	<b>Max hours per day</b>	2.0
	<b>Max hours per week</b>	12.0
	<b>Max hours per month</b>	Non applicable
<b>Minimum legal wage</b>	<b>Min per hour</b>	Non applicable
	<b>Min per day</b>	Non applicable
	<b>Min per week</b>	Non applicable
	<b>Min per month</b>	12500.0
<b>Actual minimum wage</b>	<b>Actual per hour</b>	Non applicable
	<b>Actual per day</b>	Non applicable
	<b>Actual per week</b>	Non applicable
	<b>Actual per month</b>	12500.0
<b>Minimum legal overtime wage</b>	<b>Min per hour</b>	Non applicable
	<b>Min per day</b>	Non applicable
	<b>Min per week</b>	Non applicable
	<b>Min per month</b>	Non applicable
<b>Actual minimum overtime wage</b>	<b>Actual per hour</b>	Non applicable
	<b>Actual per day</b>	Non applicable
	<b>Actual per week</b>	Non applicable
	<b>Actual per month</b>	Non applicable

## Wage analysis

<b>Number of workers' records checked</b>	52
<b>Provide the date and details of the records</b>	52 samples from December 2024 (Running month, only job card) 52 samples from November 2024 (1st current paid month) 52 samples from October 2024 (2nd current paid month) 52 samples from April 2024 (Peak paid month).

<p><b>Are there different legal minimum/ legally recognised CBAs wage grades?</b></p>	<p>Yes</p> <p>The minimum wage is BDT 12500/ for the readymade garments industrial sector in Bangladesh. As per Bangladesh Government Gazette published on 20 December 2023: Schedule (a)- Grade 01: Basic salary Tk. 8390, House rent Tk. 4195, Medical Tk. 750, Conveyance allowance 450, food allowance 1250, Total Tk. 15035. Grade 02: Basic salary Tk. 7882, House rent Tk.3941, Medical Tk. 750, Conveyance allowance 450, food allowance 1250 Total Tk.14273. Grade 03: Basic salary Tk. 7400, House rent Tk.3700, Medical Tk. 750, Conveyance allowance 450, food allowance 1250, Total Tk.13550. Grade 04: Basic salary Tk. 6700, House rent Tk. 3350, Medical Tk. 750, Conveyance allowance 450, food allowance 1250, Total Tk. 12500.</p>
<p><b>For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?</b></p>	<p>Above legal minimum</p>
<p><b>Indicate the breakdown of workforce per earnings</b></p>	<p>0.0% of workforce earning under minimum wage 10.0% of workforce earning minimum wage 90.0% of workforce earning above minimum wage</p>
<p><b>Are there any bonus schemes used?</b></p>	<p>Yes</p> <p>Bonus Scheme found: •Festival bonus as per company policy. •Facility provides attendance bonus to all employees as per company policy.</p>
<p><b>Were accurate records shown at the first request?</b></p>	<p>Yes</p>
<p><b>Were any inconsistencies found?</b></p>	<p>No</p>

## 5.A. Living wages are paid

### Summary of findings

Code area	Workplace requirement	Local law	Finding
5.A. Living wages are paid	5.A.A Review workers' total pay including ben...		NC <a href="#">ZAF600745550</a>
	5.A.B Put in place a wage improvement plan th...		NC <a href="#">ZAF600745551</a>
Systems and evidence examined to validate this code section	<p>Current Systems:</p> <ul style="list-style-type: none"> <li>•The facility ensures that all payments including benefits are done as per legal requirements.</li> <li>•The facility didn't conducts living wage gap calculation and did not have any plan to implement living wage.</li> </ul> <p>Evidence examined:</p> <ul style="list-style-type: none"> <li>•Living wage calculation record</li> <li>•Salary sheet review.</li> <li>•Overtime payment record review.</li> <li>•Pay slip review.</li> <li>•Final settlement record review.</li> </ul>		

# Findings: non-compliances

ZAF600745550

Non-compliance

**Code area**

5.A Living wages are paid

**Status**

Open\*

**Workplace requirement**

5.A.A Review workers' total pay including benefits and compare it with a credible 'living wage' to calculate a 'living wage gap', and understand what proportion of the workforce has a gap.

**Time given to resolve**

**Verification method**

Collaborative action required

**Issue title**

903 - CAR: A living wage gap analysis has not been completed

**Area of non-compliance/non-conformance**

Base code

**Description**

It was noted through employee's wage documents review, management and employees' interviews that the facility has not identified and completed the gap analysis for living wage.

**Corrective and preventative actions**

It is recommended that the facility should take necessary actions to meet the living wage gap.

\* PDF generated at 06:36 (UTC) on 23 Dec 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600745551

Non-compliance

**Code area**

5.A Living wages are paid

**Status**

Open\*

**Workplace requirement**

5.A.B Put in place a wage improvement plan that aims to pay workers a living wage within a stated timeframe.

**Time given to resolve**

**Verification method**

Collaborative action required

**Issue title**

905 - CAR: A wage improvement plan (with Living Wage as the goal) has not been completed

**Area of non-compliance/non-conformance**

Base code

**Description**

It was noted through documents review and management interviews that the facility has not completed gap analysis for living wage and did not prepare any wage improvement plan that aims to pay workers a living wage within a stated timeframe.

**Corrective and preventative actions**

It is recommended that the facility should take the necessary actions to pay employees living wage.

\* PDF generated at 06:36 (UTC) on 23 Dec 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

## 6. Working hours are not excessive

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The facility developed and maintained appropriate policies and procedures to ensure the requirements of the code are fulfilled. A person was designated for implementing the procedures. Periodic training and awareness programs were ensured for all relevant employees and workers on the procedures. The facility monitors effectiveness of the procedures through regular monitoring and internal audit. During the audit, the management system was found to be robust.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

**Systems and evidence examined to validate this code section**

**Current Systems:**

- Md. Siddiqur Rahman – Assistant General Manager (HR, Admin & Compliance) is responsible for the management of this code.
- The working hour policy was displayed on company notice board in local language and also included in the worker handbooks. Further, workers are provided with training on working hours during orientation.
- During document review and worker interview it was found that the factory does not operate on holidays or weekly days off. Further it was found that overtime is voluntary, and workers are free to leave after regular working hours.
- The factory operates six days a week, providing 1 day off every Friday. The facility operates 8 hours per day and 48 hours per week as regular working hours.
- The time frame of the records reviewed is as follows:  
52 samples from December 2024 (Running month, only job card)  
52 samples from November 2024 (1st current paid month)  
52 samples from October 2024 (2nd current paid month)  
52 samples from April 2024 (Peak paid month).
- The facility operates one general working shift from 8:00 a.m. to 5:00 p.m., including a one-hour break from 1:00 p.m. to 2:00 p.m. For the Jacquard section, there are two shifts: 8:00 a.m. to 5:00 p.m. and 8:00 p.m. to 5:00 a.m., each with a one-hour break. The security team operates in three shifts: 6:00 a.m. to 2:00 p.m., 2:00 p.m. to 10:00 p.m., and 10:00 p.m. to 6:00 a.m.

**Evidence examined:**

- Working Hour Policy Review
- Local and national laws Review
- Workers' appointment letter in personal file
- Workers' interview
- Management interview
- Production Plan
- Attendance records
- Computerized time login and logout system
- Salary sheet review
- Overtime record
- Leave register
- Sample pay slip and with recorded hours all worker interview
- Quality and production records cross-checked with working hours record.

## 6. Working hours are not excessive

### Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	200%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	Not applicable
Excluding overtime, what are the regular working hours per week for workers at this site?	48.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	56.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	60.0
Maximum number of days worked without a day off in sample	6

## 7. No discrimination is practiced

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The facility developed and maintained appropriate policies and procedures to ensure the requirements of the code are fulfilled. A person was designated for implementing the procedures. Periodic training and awareness programs were ensured for all relevant employees and workers on the procedures. The facility monitors effectiveness of the procedures through regular monitoring and internal audit. During the audit, the management system was found to be robust.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

**Systems and evidence examined to validate this code section**

Current systems:

- 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.
- Gender discrimination was also absent in the facility; both female and male workers were distributed in all types of work.
- There was no evidence of sexual harassment.
- There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
- The factory provides the same wage amount to male/female employees of the same rank.
- There is no restriction for formation of trade union in the factory.

Evidence examined:

- Policy of Anti-Discrimination.
  - Recruitment policy.
  - Training record.
  - Termination records.
  - Female employee rights
-

7. No discrimination is practiced

## Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	0%
Representation of women in managerial roles (ratio of women workers to women managers)	0%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	0%
Three most common nationalities in managerial and supervisory roles	Bnagladeshi

## 8. Regular employment is provided

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The facility developed and maintained appropriate policies and procedures to ensure the requirements of the code are fulfilled. A person was designated for implementing the procedures. Periodic training and awareness programs were ensured for all relevant employees and workers on the procedures. The facility monitors effectiveness of the procedures through regular monitoring and internal audit. During the audit, the management system was found to be robust.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Current systems:</p> <ul style="list-style-type: none"> <li>•All employees were recruited by the facility directly.</li> <li>•No temporary worker, apprenticeship schemes or home worker was identified by the auditors.</li> <li>•No subcontracted workers were used.</li> <li>•All employees are getting signed labour contract and ID card during their recruitment.</li> <li>•Facility maintains service books for all employees.</li> </ul> <p>Evidence examined:</p> <ul style="list-style-type: none"> <li>•Recruitment policy.</li> <li>•Employees personal file.</li> <li>•Appointment letter.</li> <li>•Employee service book.</li> <li>•New employee joining register.</li> </ul>		



8. Regular employment is provided

## Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

## 8.A. Sub-contracting and homeworkers are used responsibly

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The facility developed and maintained appropriate policies and procedures to ensure the requirements of the code are fulfilled. A person was designated for implementing the procedures. Periodic training and awareness programs were ensured for all relevant employees and workers on the procedures. The facility monitors effectiveness of the procedures through regular monitoring and internal audit. During the audit, the management system was found to be robust.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	Current systems: •No Sub-contracting and homeworking were used by this facility. Evidence examined: •Shipment record •Goods in and out register •Production record •Goods in and out gate pass / records		

## 8.A. Sub-contracting and homeworkers are used responsibly

### Data points

Are homeworkers employed directly or engaged through an agent? Not applicable

Gender disaggregated data available

#### Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No  
Not applicable as no homeworkers are used.

#### Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No  
Not Applicable

Are any sub-contractors used? No

## 9. No harsh or inhumane treatment is allowed

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The facility developed and maintained appropriate policies and procedures to ensure the requirements of the code are fulfilled. A person was designated for implementing the procedures. Periodic training and awareness programs were ensured for all relevant employees and workers on the procedures. The facility monitors effectiveness of the procedures through regular monitoring and internal audit. During the audit, the management system was found to be robust.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
9. No harsh or inhumane treatment is allowed	9.H Implement a formal process for workers to...		GE <a href="#">ZAF600745552</a>
Systems and evidence examined to validate this code section	<p>Current systems:</p> <ul style="list-style-type: none"> <li>•The facility has established anti-harassment or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.</li> <li>•Through the factory management and employees' interview, it was noted that no physical abuse happened in the factory.</li> <li>•There is an internal process for grievance, which is through grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, any received complaint will be handled by management, without any reprisal for the worker in question.</li> </ul> <p>Evidence examined:</p> <ul style="list-style-type: none"> <li>•Anti-Harassment policy</li> <li>•Grievance box open register</li> <li>•Orientation training record.</li> </ul>		



# Findings: good examples

ZAF600745552

Good example

## Code area

9 No harsh or inhumane treatment is allowed

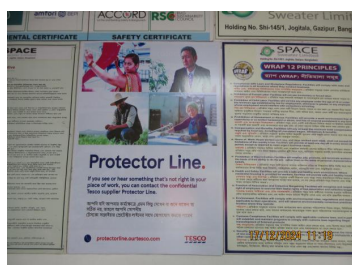
## Workplace requirement

9.H Implement a formal process for workers to be able report grievances (concerns, complaints, or problems) without fear of retaliation. The grievance mechanism should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, continuously improving and based on engagement and dialogue.

## Description

It was noted through facility visit and management interview that the facility management has posted Supplier Protector Line in a common place for easy visualization for the employees.

## Evidence



[Supplier Protector Line.JPG](#)



9. No harsh or inhumane treatment is allowed

## Data points

<p><b>Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?</b></p>	<p>Yes, there is a formal grievance process          The grievance process is available to all workers          The grievance process is available to members of the local community</p>
<p><b>What type of grievance mechanism(s) are available?</b></p>	<p>The facility has grievance mechanism policy procedure to resolve all grievances fast. They have grievance boxes in confidential area. The facility communicates grievances which has resolved with their employee. The facility posted grievance box outside the gate for local community.</p>
<p><b>Number of grievances raised in the last 12 months</b></p>	<p>5</p>
<p><b>Number of grievances resolved in the last 12 months</b></p>	<p>5</p>

## 10.A. Environment 2-Pillar

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	The facility developed and maintained appropriate policies and procedures to ensure the requirements of the code are fulfilled. A person was designated for implementing the procedures. Periodic training and awareness programs were ensured for all relevant employees and workers on the procedures. The facility monitors effectiveness of the procedures through regular monitoring and internal audit, but some deviations were found in implementation. Some improvements are recommended to turn it into an effective management system.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	§1	NC <a href="#">ZAF600745554</a>

#### Systems and evidence examined to validate this code section

Current systems:

- The facility prepared an environmental policy and procedure.
- The facility disposes all solid waste in a segregated area with proper level and identification.
- The facility also provides awareness training to all related personnel.
- Solid waste has been handover to licensee vendor as per local legislation who recycled that wastage.
- Facility conducts air emission and noise level test.

Evidence examined:

- Environment policy
- Wastage management policy.
- Air emission and noise level test reports
- Environmental clearance certificate



# Findings: non-compliances

ZAF600745554

Non-compliance

Due 2025-01-22

## Code area

10.A Environment 2-Pillar

## Status

Open\*

## Workplace requirement

10.A.B Comply with relevant local, regional and national laws or regulations, and have the correct documentation or permits, including for resource use (e.g. water, energy, material) and waste disposal.

## Time given to resolve

30 days

## Issue title

606 - Environmental certifications or environmental management systems documentation were not available to review

## Verification method

Desktop audit

## Area of non-compliance/non-conformance

Local law  
Base code

## Description

It was noted through document review and management interview that facility's environment clearance certificate was found expired on 27 October 2024. Facility management has applied for the renewal on 17 October 2024 but the updated certificate is not received yet.

## Corrective and preventative actions

It is recommended that the facility management should ensure an updated ECC (Environmental Clearance Certificate) from the concern authority.

## Local law reference

In accordance with The Environment Conservation Rules, 2023, Rule 20 (1, 2 & 3): The validity of the Environmental Clearance Certificate (ECC) for the applicable projects/ industrial units will be as per stated: (1) For Green categorized units: 05 years from date of issuance, (2) For Yellow categorized units: 02 years from date of issuance & (3) For Orange & Red categorized units: 01 years from date of issuance. (unofficial translation).

\* PDF generated at 06:36 (UTC) on 23 Dec 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

10.A. Environment 2-Pillar

## Data points

<p>Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?</p>	<p>No</p>
<p>Does the site have any valid environmental or energy management certificates?</p>	<p>The facility has ISO14001:2015 certification.</p>
<p>Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?</p>	<p>No</p>
<p>Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?</p>	<p>Yes The site has implemented adaptive measures to protect workers from the impact of climate change, including improved ventilation systems, heat stress management protocols, and plans for emergency response during extreme weather conditions. These measures are regularly reviewed and updated to ensure worker safety.</p>

# Attachments



[Facility Name.JPG](#)



[Facility main Gate.JPG](#)



[Facility building.JPG](#)



[Security room.JPG](#)



[Assembly point.JPG](#)



[Stairway.JPG](#)



[Chemical store.JPG](#)



[Finished goods store.JPG](#)



[Accessories store.JPG](#)



[Yarn store.JPG](#)



[Winding section.JPG](#)



[Trimming section.JPG](#)



[Mending section.JPG](#)



[Packing section.JPG](#)



[Linking section.JPG](#)



[Wash Section.JPG](#)





[Jacquard section.JPG](#)



[Finishing section.JPG](#)



[No smoking.JPG](#)



[Toilet area.JPG](#)



[Visual Fire Alarm.JPG](#)



[Medical Room.JPG](#)



[Rescuer.JPG](#)



[Hose pipe demonstration.JPG](#)



[Smoke detractor.JPG](#)



[Public Addressable system.JPG](#)



[First Aid Box.JPG](#)



[Fire Fighter.JPG](#)



[First Aider.JPG](#)



[Fire hose cabinet.JPG](#)



[Fire alarm switch.JPG](#)



[Exhaust fan.JPG](#)



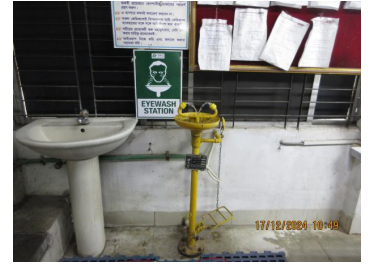
[Exit sign.JPG](#)



[Fire extinguisher.JPG](#)



[Fire Equipment.JPG](#)



[Eye wash station.JPG](#)



[Fire Exit Door.JPG](#)



[Evacuation plan.JPG](#)



[Drinking water area.JPG](#)



[Dining area.JPG](#)



[Childcare room.JPG](#)



[Emergency Light.JPG](#)



[Canteen.JPG](#)



[Complain Box.JPG](#)



[Compressor.JPG](#)



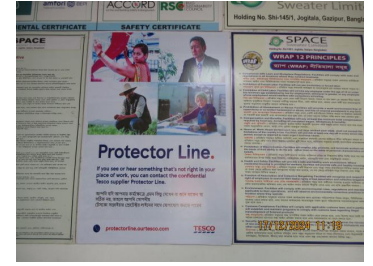
[Fire control panel.JPG](#)



[Generator.JPG](#)



[Sub-station.JPG](#)



[ETP\(Effluent treatment plant\).JPG](#)



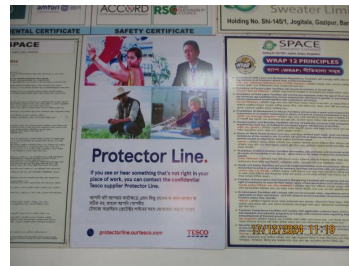
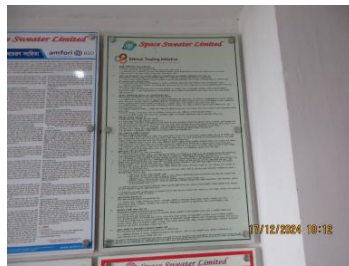
[Fire Pump room.JPG](#)



[Boiler.JPG](#)



[Supplier Protector Line.JPG](#)



[Policy Board.jpg](#)



[ETI Base Code.jpg](#)



[Supplier Protector Line.JPG](#)



[NC - Photo Worker of washing section is not wearing personal protective equipment.JPG](#)



[NC - Photo Long standing workers of finishing section are not using rubber matslippers.JPG](#)



[NC - Photo Worker of jacquard section is not wearing ear plug.JPG](#)





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