

Sedex Members Ethical Trade Audit Report





Audit Details								
Sedex Compani Reference: (only available on System)		ZC: 405585842			Sedex Site Re (only available System)		ZS: 405586317	
Business name (name):	Company	Space	e Sweater Ltd.					
Site name:		Space	e Sweater Ltd.					
Site address: (Please include fu	ll address)	Shi-14. Gazip	5/1, Jogitola, ur.		Country:		Bangl	adesh
Site contact and	d job title:	Md. Si	ddiqur Rahmo	n – A	GM (HR, Adm	in & Complic	ince)	
Site phone:		+8801	958486119		Site e-mail:		siddiq	ue@spacebd.biz
SMETA Audit Pillars:			Labour andards		Health & Health & ronment 2- r)	Environr 4-pillar	nent	Business Ethics
Date of Audit:		15 & 1	6 February 20	23				
Audit Company Name & Logo: ITS Labtest Bangladesh Ltd. intertek Total Quality, Assured.					Report Own Space Swe			
			Audit	Cond	ucted By			
Affiliate Audit Company			Purchaser			Retailer		
Brand owner			NGO			Trade U	nion	
Multi– stakeholder			<u> </u>		Combined Au	dit (select al	that a	pply)

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact grievance@sedex.com.

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



Audit Content:

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.



SMETA Declaration

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

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

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

Auditor Team (s) (please list all including all interviewers): Md. Kamrul Hasan- Assistant Supervisor (RA 21700579), Syeda Rabeka Sultana - Senior Auditor (RA 21700951) and Anis Zaman- Manager (RA 21700677)

Lead auditor: Md. Kamrul Hasan APSCA number: RA 21700579

Lead auditor APSCA status: In good standing

Team auditor: Syeda Rabeka Sultana and Anis Zaman

APSCA number: RA 21700951 and RA 21700677

Interviewers: Md. Kamrul Hasan, Syeda Rabeka Sultana and Anis Zaman

APSCA number: RA 21700579, RA 21700951 and RA 21700677

Report writer: Md. Kamrul Hasan

Report reviewer: Mazharul Anwar

Date of declaration: 16 February 2023

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

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



Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing		Area of Non-Conformity (Only check box when there is a non- conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)		
	e audit report, hyperlinks are retained.	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE			
0A	Universal Rights covering UNGP						0	0	None Observed		
ОВ	Management systems and code implementation					0	0	01	GE: • Facility management has posted Supplier Protector Line.		
1.	Freely chosen Employment					0	0	0	None		
2	Freedom of Association					0	0	0	• None		
3	Safety and Hygienic Conditions					04	0	0	 NCs: Linking machine operators were not using the safety cover of the machine guard while leaving the workstation. Aisles were found faded. Unattended irons were not kept on the non-combustible brackets. Finished goods were kept at excessive height. 		
4	Child Labour					0	0	0	None Observed		
5	Living Wages and Benefits	\boxtimes				01	0	01	GE: • Facility provides attendance bonus.		



							NC:	Resigned employees did not get final settlement payment within maximum 30 (thirty) working days after cancellation of the job.
6	Working Hours			0	01	0	OBs:	Maximum of 12 consecutive days were found in one of the sample months
7	<u>Discrimination</u>			0	0	0	•	None Observed
8	Regular Employment			0	0	0	•	None Observed
8A	Sub-Contracting and Homeworking			0	0	0	٠	None Observed
9	<u>Harsh or Inhumane Treatment</u>			0	0	0	•	None Observed
10A	Entitlement to Work			0	0	0	•	None Observed
10B2	Environment 2-Pillar			0	0	0	•	None Observed
10B4	Environment 4–Pillar			N/A	N/A	N/A	•	Not applicable
10C	Business Ethics			N/A	N/A	N/A	•	Not applicable
<u> </u>								

General observations and summary of the site:

- Space Sweater Ltd. is located at Shi-145/1, Jogitola, Gazipur.
- The product manufactured at this site is sweater.
- Overall responsibility for meeting the standards is taken by Md. Siddiqur Rahman AGM (HR, Admin & Compliance).
- The main production processes are Winding, Knitting, Linking, Trimming, Mending, Washing, Sewing, Iron, Finishing and Packing.
- A total of 1192 employees are currently working in the facility where 414 are female employees and 778 are male employees. There are 217 non-production employees in the facility. All the employees are local (Bangladeshi).

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- The youngest worker on site was 20 years old.
- There is a Participations committee in the facility. Participations committee member were present during the audit. Moreover, management informed that they would communicate the outcome of the audit to the workers through notice board and would discuss at next Participations committee meeting.
- There is no union and collective bargaining at this factory. It is also not mandatory by Local Law.
- Site has peak season from April to October.
- Facility uses no sub-contractors.
- Facility has 777 fixed-rated employees and 415 piece-rate employees.
- Generally, the facility operates in one shift starting from 8:00 am to 5:00 pm including one-hour intervals for meal and rest starting from 1.00 pm to 2.00 pm. However, for Jacquard section facility operates in 2 shifts starting from 8:00 am to 5:00 pm and 8:00 pm to 5:00 am including one-hour interval for meal and rest break.
- Generally, the employees work for 6 days (Saturday to Thursday) in a week.
- Standard working hours in the facility is 208 hours/month with 1 day off in every 7-day-period.
- Employee's wages are calculated on a monthly basis. The payment method of the salary is cash, and facility follow the calendar moth for payment cycle.
- Legal minimum wage BDT 8000 was paid to all employees.
- Correct OT hours were paid; Employees were paid 200% of minimum hourly wage for OT hours.
- 52 employees were selected for interview including 33 male and 19 female employees, they were interviewed as 8 groups of 4 and the balances of 20 employees were interviewed individually.
- 52 Records to show wages and working hours were taken from January 2023 (1st Current paid month), December 2023 (2nd Current paid month), and April 2022 (Peak month).

Audit Process:

This Annual 2-Pillar audit was conducted by ITS Labtest Bangladesh Ltd. 2 auditors in consecutive two days (4 Man-days) assessed and verified the facility's operations based on the ETI Base Code, local legislations and client code of conduct. The whole process of the audit was sample based.

Overview of opening meeting, facility management responses:

Audit team entered the facility first day at 9:20 am and then started an opening meeting according to the SMETA best practice guideline with the facility management. The facility management representatives Md. Siddigur Rahman - AGM (HR, Admin & Compliance) along with his team were present at the opening meeting. They agreed with ETI requirement, local legislation, client code of conduct and Intertek policy and informed that they would be cooperative with this audit.

Summary of Findings:

Positive: No non-compliance was found in the areas of Management systems and code implementation, Employment is freely chosen, Freedom of Association and Right to Collective Bargaining are Respected, Child Labour, working hours are not excessive, Discrimination, harsh or Inhumane Treatment, Regular Employment Sub-contracting and environment.



<u>Negative</u>: Non-compliance was found in the areas of working conditions are safe and hygienic, and Wages and benefits.

*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 Detai	ils					
A: Company Name:	Space Sweate	r Ltd.					
B: Site name:	Space Sweater Ltd.						
C: GPS location: (If available)	GPS Address: S Jogitola, Gazip	Address: Shi-145/1, Latitude: 24.006473 Longitude: 90.315773					
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Inspector Gen of Bangladesh Fire License: [Factory license:18575/Gazipur 'I' category, issued by Chief Inspector General of Industries (Govt. Of the People's Republic of Bangladesh), which is valid till 30 th June 2023. Fire License: DD/Dhaka/27981/2018 issued by Bangladesh Fire Service & Civil Defence Authority which is valid till 30 th June 2023.					
	Trade License: Ward No: 17, Issue No 246, issued by Gazipur City Corporation, which is valid till 30 th June 2023.						
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Sweater Items						
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	Space Sweater Ltd. is located at Shi-145/1, Jogitola, Gazipur, Bangladesh. The facility has started its operation in 2018. Total land area of the facility premises 43920 square feet, production area is 125792 Square feet and warehouse area is 20801 Square feet. There are no other facilities (sister concern) located at this premises.						
		mises consist of to description provic	otal 5 RCC buildings led as below:	and 5			
	Production Building /shed	Desc	cription	Remark, if any			
	Building 01 (0	7 Storied)					
	Ground Floor	Section, Bonder machine room Security Room.	ection, Winding d Warehouse, Idle n, Pump Room,	None			
	1 st Floor	Jacquard Section Distribution Room, L	m, Needle	None			

	2 nd Floor	Finished Goods Area, Carton & hanger store.	None
		PQC Section, Packing Section, Washing Section, Iron Section,	None
	3 rd Floor	Sewing section, Spot Removing	
		Room, Light Check Area, Office	
		Room, Moisture control room.	
		Trimming Section, Mending	None
		Section, Dumping Area, Overlock Section, Needle Control Room,	
	4 th Floor	Zipper Attached Machine, Light	
		check Area, Inspection room,	
		Auto placket and part winding.	
		Linking Section, Linking	None
	5 th Floor	Distribution Room, Needle Control	
		Room, Overlock Machine, Office	
		Room	None
		Dining Room, Canteen, Male Prayer Room, Office Room,	None
	=	Inspection Area, Sample Section,	
	6 th Floor	Accessories Store, Hall Room,	
		Meeting Room, IT Room, Lab	
		Room	
	Rooftop	Vacant	None
	Building-2		
	Ground	Power Sub- Station Room,	None
	Floor	Generator Room, Boiler Room.	
	1st Floor	Compressor Room	None
	Building 3	Medical room & Childcare room	None
	Building 4 Building 5	Hydrant room & Fire control room Effluent treatment plant area	None None
	Shed 1	PRS room, wastage room	None
	Shed 2	Chemical store	None
	Shed 3	PRS room	None
	Shed 4	Workshop	None
	Shed 5	Common room	None
	For helow, plea	ase add any extra rows if appropriat	Α
	. o. o.o., pioc	are add arry oxila forms if appropriat	.
	F1: Visible struc	tural integrity issues (large cracks) ol	oserved?
	Yes		
	⊠ No		
	F2: Please give	details: No such cracks were found	during audit.
	F3: Does the sit	e have a structural engineer evalua	tion?
	Yes	o navo a sinociolai onginoci ovaloa	110111
	□ No		
	E (B)		
		details: Site have a structural engine	
	ana approve 25.07.2022.	d by Mayor Gazipur City Cor	poralion on
	_		
G: Site function:	Agent		



	☐ Factory Processing/Manufacturer ☐ Finished Product Supplier ☐ Grower ☐ Homeworker ☐ Labour Provider ☐ Pack House ☐ Primary Producer ☐ Service Provider ☐ Sub-Contractor
H: Month(s) of peak season: (if applicable)	April to October
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Product manufactured: Sweater Items. Main production process: Winding, Knitting, Linking, Trimming, Mending, Washing, Sewing, Iron, Finishing and Packing.
	Monthly production capacity: 400000 pieces.
	Machine list: 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.
	Chemical list: Softener. Detergent, Jet Powder, Silicon, Spot Lifter-833, Machine Oil, Diesel
J: What form of worker representation / union is there on site?	☐ Union (name) ☐ Worker Committee (Participating Committee) ☐ Other (specify) ☐ None
K: Is there any night production work at the site?	Yes No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	Yes No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	Yes No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	Yes No N1: If no, please give details Not Applicable



	Addit i didifferen	•					
A: Time in and time out	A1: Day 1 Time in: 09.1 hrs. A2: Day 1 Time out: 16 hrs.		A3: Day 2 Time 09.10 hrs. A4: Day 2 Time out: 17.40 hrs.		A5: Day 3 Time in: NA A6: Day 3 Time out: NA		
B: Number of auditor days used:	Four Man-days Day 01: Two auditors Day 02: Two auditors						
C: Audit type:	Full Initial Periodic Full Follow–up Partial Follow–Up Partial Other If other, please define	Periodic Full Follow-up Partial Follow-Up					
D: Was the audit announced?	☐ Announced ☐ Semi – announced: Window detail: 04 weeks ☐ Unannounced						
E: Was the Sedex SAQ available for review?	Yes No If No, why not						
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes ☐ No If Yes , please capture detail in appropriate audit by clause						
G: Who signed and agreed CAPR (Name and job title)	Md. Siddiqur Rahmar	ı – AGI	M (HR, Admin &	Com	pliance)		
H: Is further information available (if yes, please contact audit company for details)	☐ Yes ☑ No						
I: Previous audit date:	23 February 2022						
J: Previous audit type:	Periodic (2P)						
K: Were any previous audits reviewed	☐ Yes ☒ No						
for this audit	□ N/A						
A d!4 a . H a a d a u a a	Manager 1	VA/	an Damus van L. III				
Audit attendance	Management	Work	er Representati	ves			
	Senior management		er Committee sentatives	Unio	n representatives		

A: Present at the opening meeting?

☐ Yes ⊠ No



B: Present at the audit?	⊠ Yes □ No	⊠ Yes □ No	☐ Yes ⊠ No			
C: Present at the closing meeting?	⊠ Yes □ No	⊠ Yes □ No	☐ Yes ⊠ No			
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Not Applicable					
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	There is no trade union at this facility, and it is not mandated by law.					



Worker Analysis

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

Worker Analysis									
	Local				Migrant*		Total		
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	1014	
Worker numbers – Male	576	0	0	0	0	0	0	576	
Worker numbers – female	399	0	0	0	0	0	0	399	
Total	975	0	0	0	0	0	0	975	
Number of Workers interviewed – male	33	0	0	0	0	0	0	33	
Number of Workers interviewed – female	19	0	0	0	0	0	0	19	
Total – interviewed sample size	52	0	0	0	0	0	0	52	



A: Nationality of Management	Bangladeshi	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. Please add more nationalities as applicable to site. Add more rows if required.	Nationalities: B1: Nationality 1: Bangladeshi B2: Nationality 2: B3: Nationality 3:	Was the list completed during peak season? ☐ Yes ☐ No If no, please describe how this may vary during peak periods: The site has peak season April to October.
C: Please provide more information for the three most common nationalities.	C: approx 100% total workforce: Nationality 1100 C1: approx % total workforce: Nationality 2 C2: approx % total workforce: Nationality 3	9%
D: Worker remuneration (management information)	D: 34% workers on piece rate D1:% hourly paid workers D2: 66% salaried workers Payment cycle: D3:% daily paid D4:% weekly paid D5: 100% monthly paid D6:% other D7: If other, please give details	



Worker Interview St	ummary		
A: Were workers aware of the audit?	⊠ Yes □ No		
B: Were workers aware of the code?	⊠ Yes □ No		
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	8 Groups of 4		
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 12	D2: Female: 08	
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	∑ Yes ☐ No If no, please give details	5	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	⊠ Yes □ No		
G: In general, what was the attitude of the workers towards their workplace?	☐ Favourable☐ Non-favourable☐ Indifferent		
H: What was the most common worker complaint?	None		
I: What did the workers like the most about working at this site?	Wages are paid on time, working condition is hygienic, Benefits are provided more than law requirement and management are very supportive and well behaved.		
J: Any additional comment(s) regarding interviews:	Most employees enjoyed working at this facility, they felt they had sufficient wage and had a good relationship with management in general.		
K: Attitude of workers to hours worked:	Very favourable as tota their limit and overtime i		
L. Is there any worker survey information available?			



Yes		
☐ Yes ☑ No		
L1: If yes, please give details:		

M: Attitude of workers:

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

The employees were generally positive about their workplace; they got on well with workers and managers. They found management team positive and approachable. 52 employees were selected for interview including 33 male and 19 female employees, they were interviewed as 8 groups of 4 and the balances of 20 employees were interviewed individually.

The employees were assured of confidentiality and they spoke freely of their views of the factory. Selected employees for interview were spontaneous and shared their views feely and they 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. They facility management treated them with respect.

Employees can complain using grievance mechanism viz. complain box and they can also directly to their compliance responsible person or line manager and also felt free to give their general concerns to their management representative.

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

The Participation Committee members were positive about the facility and looking forward to developing relationships with the management team.

The Participation Committee member's interview was conducted privately in a separate place. The Participation Committee members replied naturally regarding their responsibilities as Participation Committee Member, and they also informed that they can easily carryout their daily job without any difficulties

O: Attitude of managers:

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

The facility management showed a positive attitude to this audit and during the whole audit process. Md. Siddiqur Rahman – AGM (HR, Admin & Compliance) along with his team was present throughout the audit process and co-operated the whole audit. Facility management respected client's requirements and allowed auditor(s) to take photographs of all production process, best practices and also non-conformities. They also provided the required documents' photocopy and allowed 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 client's requirements and the local law, and they took notice of the findings of the internal audit team and also have a Health & Safety committee to take care of health and safety concerns.



Audit Results by Clause

0A: Universal Rights covering UNGP

(Click here to return to summary of findings)

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The facility had a policy, endorsed at the highest level, covering human rights impacts and issues, and it is communicated to all appropriate parties, including its own suppliers.
- The responsible person for implementation and monitoring is Md. Siddiqur Rahman AGM (HR, Admin & Compliance).
- The facility measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- Where businesses have an adverse impact on human rights within any of their stakeholders, they address these issues and enable effective remediation.
- The facility had a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the report.
- The facility has policy and procedures for human rights.
- The facility communicates this code of conduct to the employees through notice board and orientation training.
- It is communicated to all appropriate parties, including suppliers through the responsible person.

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

Details:

- Written policies and procedure that being provided individually to employees.
- Facility code of conduct
- All policies of facility.



• Employees' training records showed the facility conducted training for employees about the social compliance when they enter the facility. Last orientation training was held on 13 February 2023 with 25 participants.

Any other comments: None

A: Policy statement that expresses commitment to respect human rights?		y applicable for the paren s a social compliance polic respect human rights.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	Yes No Please give details: The facility has a designated perso who responsible for implementing standard concerning Human Rights. Name: Md. Siddiqur Rahman Job title: AGM - HR, Admin & Compliance	
C: Does the businesses have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	compliance team for re	facility has an independen eporting and dealing with out fear and it is a completel
D: Does grievance mechanism meet with UNGP requirement of e.g. (Legitimate, Accessible, Predictable, Equitable, Transparent, Rightscompatible, a source of continuous learning and based on stakeholder engagement)?	X YesNoIf no, please give details:	
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?		cility uses worker register and acy of workers information policy for data safety.
Fine	lings	
Finding: Observation Company NC Description	-	Objective evidence observed:
Local law or ETI/Additional elements / customer specific requirement: Not Applicable		None Observed
Comments: None		

Good examples observed:



Description of Good Example (GE): None Observed

Objective Evidence
Observed:
None Observed



Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 6.2% A2: This year 3.5 %	
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 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	4.1%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(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	C1: Last year: 5.2%	C2: This year 4.3 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	4.1	
E: Are accidents recorded?	Yes No E1: Please describe: Last injury occurred on 23 January 2023 which was a minor finger injury by scissor in linking section.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total worke rs]	F1: Last year: Number: 1.07%	F2: This year: Number:0.76
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]	0.72%	
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: 0%	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 0% workers	I2: 12 months 0% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 0% workers	J2: 12 months 0% workers



0B: Management system and Code Implementation

(Click here to return to summary of findings)

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code. 0.B.2 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with 0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.

0.B.4 Suppliers are expected to communicate this Code to all employees.

0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

Current Systems and Evidence Examined

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

Current systems:

- Responsibility for meeting the legal and client code requirements is taken by Md. Siddiqur Rahman-AGM (HR, Admin & Compliance).
- The facility communicates this code of conduct (COC) to the employees through notice board and orientation training.
- The facility management is conducting internal social compliance audit regularly and take necessary corrective action based on report.
- Supplier communicates ETI code of conduct to their suppliers and where reasonably practicable extends the principles of this ethical code through their supply chain.
- The facility arranged mid-level management training for all mid-level management employees such as supervisors, quality in charge, production officers, etc.
- Implementation of any necessary changes is then given to the individual department heads after agreement with the facility manager.
- Facility conducts periodic assessments of its social compliance system to identify improvement opportunities.

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

Details:

- Employee handbook.
- Facility Code of Conduct (COC).
- All policies of facility.
- Legal license (Factory, Fire, Trade)
- Internal audit records.
- · Meeting records.
- All policies of facility.
- Internal audit records
- Management, employee training / meeting records

Any other comments: None



Management Systems:		
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	Yes No A1: Please give details: In the last 12 months the site has not been subjected to any fines or prosecutions for noncompliance to any regulations.	
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	Yes No B1: Please give details: It was noted through documentation review, facility has policies and procedures for forced labour, child labour, discrimination, harassment & abuse.	
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	It was noted through the management and workers interview that overtime is voluntary for all employees. No child labour was found in the facility during the facility tour and age verification certificate found in all the reviewed personal files.	
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	Yes No D1: Please give details: All the employees in the facility have received orientation training where standards for forced labour, child labour, discrimination, harassment & abuse are covered.	
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	Yes No E1: Please give details: Training records were found including a picture and attendance sheet.	
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).	Yes No F1: Please give details: There are no certifications at the site, such as ISO 14000, ISO 9000 etc.	
G: Is there a Human Resources manager/department? If Yes, please detail.	Yes No G1: Please give details: Facility has a dedicated Human Resources department consisting of 07 members and is headed by Md. Siddiqur Rahman – AGM (HR, Admin & Compliance).	
H: Is there a senior person / manager responsible for implementation of the code	Yes No H1: Please give details: Responsibility for meeting the legal and client code requirements is taken Md. Siddiqur Rahman – AGM (HR, Admin & Compliance).	
I: Is there a policy to ensure all worker information is confidential?	∑ Yes □ No	



	I1: Please give details: The facility has an IT security policy which ensures worker information is confidential.
J: Is there an effective procedure to ensure confidential information is kept confidential?	Yes No J1: Please give details: The facility has an effective key control procedure to keep the information confidential.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	Yes No K1: Please give details: Facility conducts risk assessment which evaluates effectiveness of every policy and procedure department wise.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	Yes No L1Please give details: The facility has an internal system to raise the issue found in risk assessment and to implement the way of reduction it.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	Yes No M1: Please give details: Facility has a supplier selection policy which ensures labour standard of its own supplier.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	Yes No N1: Please give details: The facility has all required land rights licenses and permissions from local authority.
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?	Yes No O1: Please give details: The facility has anti-corruption committee, anti-bribery policy to support due diligence in applying national laws and practices relating to land title.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	Yes 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.	Yes No Q1: Please give details: Not Applicable as facility owner owns the facility building and land.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	Yes No R1: Please give details: The facility has all legal procedure and specific land acquisition were considered to avoid or minimize adverse impacts.



S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.

Yes

No

S1: Please give details: No illegal appropriation of land for facility building or expansion of footprint

Non-compliance:	
1. Description of non-compliance: NC against ETI/Additional Elements NC against Local Law NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)
None observed	None observed
Local law and/or ETI requirement: Not Applicable	None observed
Recommended corrective action: None	

Observation:	
Description of observation: None Observed	Objective evidence observed:
Local law or ETI requirement: Not applicable	observed.
Comments: None	None Observed

Good Examples observed: Description of Good Example (GE): It was noted through the facility visit and management interview that, the facility management has displayed Supplier Protector Line in common places for easy visualization of the employees. Objective evidence observed: Facility visits and management interview for easy visualization of the employees.



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 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. 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.

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

Details:

- Facility rules.
- Policy on No-Forced labour and prison labour.
- Sample employee personal files.
- Service book.
- Time record.

Any other comments: None

A: Is there any evidence of retention of original documents, e.g. passports/ID's	Yes No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	Yes No B1: If yes, please give details and category of worker affected:



D: Are there any restrictions on workers' freedom to terminate employment?	Yes No D1: Please describe finding: The facility does culture to violate the rights of employees.	not practise this kind of
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	☐ Yes☐ No☐ No☐ Not applicable E1: Please describe finding: 22 million USD	
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	Yes No F1: Please describe finding: The employees can leave their workplace after their respective duties.	
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	 Yes No Not applicable G1: If yes, please give details and category of workers affected: The facility has its policy and procedures on forced labour, bonded labour, trafficked labour and the facility provides a sharp idea about all those things on internal audit, orientation training and notice board. 	
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	Yes No H1: Please describe finding: The facility has policy on forced /trafficked labour. The facility maintains it through notice board on production floor. Overtime is totally voluntary. Employees can leave their workplace freely after their respective jobs.	
Non-compliance:		
_	cal Law 🗌 NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)
None observed Local law and/or ETI requirement: Not applicable		None observed
-		
Recommended corrective action: 1	None	



Observation: **Description of observation:** None observed Objective evidence observed: Local law or ETI requirement: Not applicable None observed Comments: None

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



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

(Click here to return to summary of findings) (Click here to return to Key Information)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- All the employees are allowed to form or join the trade union of their choice.
- There is no trade union in the facility but there is a Worker's Participation Committee formed by election. Last election held on 12 November 2022.
- Participation Committee meeting is held on every 2 months (Last meeting was held on 09 January 2023). Last meeting topics were:
 - Discussion on uses of PPE on the production floor.
 - Discussion on aisles mark faded.
 - Discussion on previous meeting minutes.
 - Others.
- They also stated that they could give suggestions on all parts of the site's practices.
- Meeting minutes are posted in notice board and informed through public address system.
- There are 07 members from employee side and 07 from management side. Total Participation Committee member is 14.
- Participation committee members are not treated less favourably than other workers.
- Participation committee members are allowed to carry out their duties within working hours without affecting their pay.

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

Details:

- 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.

Any other comments: None



A: What form of worker representation/union is there on site?	☐ Union (name) ☑ Worker Committee (Participation Committee) ☐ Other (specify) ☐ None		
B: Is it a legal requirement to have a union?	☐ Yes ☑ No		
C: Is it a legal requirement to have a worker's committee?	∑ Yes □ No		
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	 Yes No D1: Please give details: Facility has an effective grievance handling procedure. Workers can submit their grievance verbally or in written through welfare officer or complain box. D2: Is there evidence of free elections? Yes No 		
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	Yes No E1: Please give details: Facility has a policy regarding Freedom of Association.		
F: Name of union and union representative, if applicable:	Not Applicable F1: Is there evidence of free elections? ☐ Yes ☐ No ☒ N/A		
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Participation committee consists of 14 members, where 07 members on behalf of employee side and 07 members on behalf of facility management.		
H: Are all workers aware of who their representatives are?	⊠ Yes □ No		
I: Were worker representatives freely elected?	Yes No II: Date of last election: 12 November 2022.		
J: Do workers know what topics can be raised with their representatives?			
K: Were worker representatives/union representatives interviewed?	∑ Yes □ No If Yes , please state how many: 2 (1 Male and 1 Female)		



L: Please describe any evidence that union/worker's committee is	Participation committee meeting every 2 months (Last meeting wa	9	
effective? Specify date of last meeting; topics	meeting topics were: - Discussion on uses of PPE on the production floor.		
covered; how minutes were communicated etc.	 Discussion on aisles mark faded. Discussion on previous meeting minutes. 		
		111110163.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	Yes No		
If Yes , what percentage by trade Union/worker representation	M1:% workers covered by Union CBA	M2:% workers covered by worker rep CBA	
M3: If Yes , does the Collective Bargaining Agreement (CBA)	☐ Yes ☐ No		
include rates of pay?	Not Applicable		
	Non–compliance:		
Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None Observed		Objective evidence de: observed: (where relevant please add photo numbers)	
Local law and/or ETI requirement: Not Applicable		None Observed	
Recommended corrective action: None			
		<u> </u>	
	Observation:		
Description of observation: None Obs	served	Objective evidence observed:	
Local law or ETI requirement: Not App	blicable	None Observed	
Comments: None		110110 00301100	
Good Examples observed:			
Description of Good Example (GE): None Observed		Objective evidence observed:	
		None Observed	



3: Working Conditions are Safe and Hygienic

(Click here to return to summary of findings)
(Click here to return to Key Information)

ETI

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined

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

Current systems:

1. General Health and Safety management

- Md. Siddiqur Rahman AGM (HR, Admin and compliance) looks after Health & Safety issues for the site.
- Potable water was freely available in all areas and last test was done on 06-02- 2023 by Department of Public Health Engineering.
- Enough clean toilets (59 for male and 33 for female) segregated by gender were always available for workers.
- Ventilation, temperature and lighting were adequate for the production processes.
- Facility had a Health and Safety Committee, and regular Health and Safety meeting were held. Last meeting was conducted on 17 November 2022.

2. Fire Safety

- 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 15 February 2023.
- 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.
- Aisles exit way and employees were found free from any blockage.
- Facility has a combined 225 trained emergency response team members were trained by Fire Service and Civil Defence.

Fire Drill information:

Last fire drill	Date	Time took	Employee was present	Fire drill monitored by
Day (internal)	01 -02- 2023	02 minute	1159	Fire Safety Officer
Night (internal)	05 -11- 2022	01 min 05 sec	96	Fire Safety Officer
Day (External)	01-12-2022	02 min 05 sec	1074	Fire service and Civil Defense



Facility has below firefighting equipment:

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, box Blanket, etc.

Facility provides bellow training to employees:

Training Type	Last Date of training	Participa nt	Trainer Designation	Frequency of training
Orientation	13-02-2023	25	Welfare Officer	As required
Fire Fighting Training (Internal)	10-01-2023	30	Fire Safety Officer	As required
First Aid	05-12-2022	11	Medical Officer	As required
PPE Training	08-02-2023	30	Welfare Officer	As required
Mid-level management	09-01-2023	20	Asst. General Manager- (HR, Admin & Compliance)	As required
Health & Safety	08-02-2023	31	Sr. Compliance Executive	As required
Chemical Handling	06-02-2023	11	Sr. Compliance Executive	As required

3. Electrical & Machine:

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- Facility has 04 licensed electricians who check and do inspection, roster wise for whole facility.
- Facility checks all electric channels, distribution board and electric connection daily and monthly schedule wise.
- Facility maintains a scheduled maintenance plan for doing maintenance of all machines.

(Name) Inspection record	Last inspection date	Done by (designation)	Frequency of inspection
DB/SDB/MDB	15-02-2023	Electrical Engineer	As required
Boiler maintenance	15-02-2023	Electrical Engineer	As required
Machine maintenance	15-02-2023	Manager – Mechanical	As required
Generator Maintenance	15-02-2023	Electrical Engineer	As required
Compressor	15-02-2023	Electrical Engineer	As required

4. Chemical safety

Facility has chemical store for the keeping chemical and use the MSDS, labelling and secondary containment appropriately.

5. Medical services

- There were 15 first aid boxes in the facility and there are 34 first aiders.
- Facility has appointed 1 doctor, 1 nurse & 1 medical assistant who were available in working time of the facility. They also arranged monthly first aid training with first aider.
- Facility has a medical room.

6. Building safety

Facility building was constructed for industrial purpose.

7. Dormitory

Facility didn't provide dormitory facilities to any employees.



8. Covid-19 Precautions

- Facility measures temperature of all employees and visitors in the entrance.
- Facility set up a hand washing arear before entering the facility.
- Social distancing marks were given in the entrance.
- With disinfecting spray is used for vehicles before entering the premises.

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

Details:

- License review: Fire license
- Building approval plan
- Group insurance
- Water test report
- Injury records and analysis report
- Machine and electric maintenance record
- Risk assessment report
- Training record: Fire training, First aid training, PPE training, MSDS training, Health and safety training
- Fire drill records
- Health and safety committee records
- Electric installation checking records
- Training records and certificates
- Fire equipment maintenance records
- Accident reports
- Chemical list and MSDS for each chemical
- Health and safety policy
- Potable water testing certificates

Any other comments: None

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	Yes No A1: Please give details: The facility has general health & safety and Occupational health & safety policy and procedures which are fit for purposes and these policies are communicated through orientation training.
B: Are the policies included in workers' manuals?	Yes No B1: Please give details: The facility provides workers manual to the workers where all the policies and applicable government law are included.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	Yes No C1: Please give details: No additional structures were found with building construction approval.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	Yes No D1: Please give details: All the visitors to the site are informed on Health and Safety and personal protective equipment were provided to the visitor where necessary.



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.	Yes No E1: Please give details: The facility has a medical room for the employees. Equipment is provided as per legal requirements.			
F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?	 ∑ Yes No F1: Please give details: Facility has appointed 01 doctor, 1 nurse & 1 medical assistant who are available all the time. They also arranged monthly first aid training with first aider. 			
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?	Yes No G1: Please give details: Facility does employees.	not provide transport to		
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	Yes No H1: Please give details: The facility provides personal storage space for all the employees, and they are fit for purposes.			
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	Yes No			
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	Yes No J1: Please give details: The facility meets all legal obligations on environmental requirements including required permits for use and disposal of natural resources like gas, water etc.			
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	Yes No K1: Please give details: The facility does not use banned chemicals and follows the entire customer requirement on environmental standard.			
	Non-compliance:			
Description of non–compliance: NC against ETI	Objective evidence observed: (where relevant please add photo numbers)			
It was noted through facility visit that app operators were not using the safety cover workstation located at 5th floor of building linking machine were in operation in that	1. Facility visit NC Photo: 1			
Local law and/or ETI requirement In accordance with ETI base code 3.1: A safe and hygienic working environment prevailing knowledge of the industry and steps shall be taken to prevent acciden				



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. In accordance with Bangladesh Labour Law 2006, Section 63(1) D (3): (1) In every establishment the following shall be securely fenced by the safeguards of substantial construction which shall be kept in position while machinery required to be fenced are in mention or in use, namely-(d) unless they are in such position or of such construction as to be as safe to every person employed in the establishment as they would be if they were securely fenced-(iii) every dangerous part of any machinery. Recommended corrective action: It is recommended that facility should have a monitoring system that machine guards are used by the employees in the mentioned area. 2. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: 2. Facility visit NC Photo: 2 It was noted through facility visit that randomly checked 02 out 05 aisles marking were found faded in trimming & mending section located at 4th floor of building-01. Local law and/or ETI requirement In accordance with ETI base 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. In accordance with Bangladesh Labour law 2006, rule 72 (c): Passages and stairways shall be clean, wide and clear of all obstructions. Recommended corrective action: It is recommended that facility should mark the mentioned aisles clearly. 3. Description of non-compliance: NC against ETI ■ NC against Local Law NC against customer 3. Facility Visit code: NC Photo: 3 It was noted through facility visit that randomly checked 05 out of 15 unattended irons were not kept on non-combustible bracket at finishing section located at 3rd floor of building-01. Local law and/or ETI requirement

Audit company: ITS Labtest Bangladesh Ltd. Report reference: A5048322 Date: 15 & 16 February 2023

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

In accordance with ETI base code 3.1:



reasonably practicable, the causes of hazards inherent in the working environment.	
In accordance with Client's fire safety requirement: All unattended irons should be placed in brackets.	
Recommended corrective action: It is recommended that facility should ensure unattended irons are always kept on brackets/non-combustible ledge.	
4. Description of non-compliance: ☑ NC against ETI ☐ NC against Local Law ☑ NC against customer code: It was noted through facility visit that finished goods were kept above 2 metres height in the finished goods store located at 2nd floor of building-01.	
Local law and/or ETI requirement In accordance with ETI base 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.	4. Facility Visit NC Photo: 4
In accordance with Client's fire safety requirement: Loose piles of storage or boxed products, unless stored properly in solid shelves, must not be higher than 2 metres.	
Recommended corrective action: It is recommended that facility should maintain height limit at the mentioned area as per client expectation.	

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

Good Examples observed:	
Description of Good Example (GE):	Objective Evidence Observed: None observed
None observed	None observed



4: Child Labour Shall Not Be Used

(Click here to return to summary of findings) (Click here to return to Key Information)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

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

Details:

- 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

A: Legal age of employment:	18
B: Age of youngest worker found:	20
C: Are there children present on the work floor but not working at the time of audit?	☐ Yes ☐ No
D: % of under 18's at this site (of total workers)	0 %



Non-compliance:				
Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)			
None observed	None observed			
Local law and/or ETI requirement: Not applicable				
Recommended corrective action: None				

Observation:				
Description of observation: None observed	Objective evidence observed:			
Local law or ETI requirement: Not applicable	None observed			
Comments: None	Thoric objerved			

Good Examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:
None observed	None observed



5: Living Wages are Paid

(Click here to return to summary of findings)
(Click here to return to Key information)

ETI

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Current Systems and Evidence Examined

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

Current systems:

- The facility is providing local legal minimum wage BDT 8000/month for all the employees.
- Time keeping system is electronic (face detection).
- All workers 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.
- All social insurance payments were passed on to the relevant authorities in a timely manner.
- Each employee was given a pay slip and signed for their wages.
- All employees were paid within 7 working days of the following month by cash.
- Employees are aware of their minimum wage.
- Wages have been recorded according to documents checked.
- All employees are getting 200% premium rate/ overtime rate based on basic wage.
- Based on documents review (salary sheet, employee appointment letter) facility ensured minimum wage to all employees as per grade/job description.
- Facility deducted from wage for unauthorised purpose e.g. deduction was found for absent from work, revenue stamp. No illegal deduction was found.
- Wages have been recorded according to documents checked.
- There are some good practices by the facility; see below GE section.

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

Details:

- Salary sheet review
- Overtime payment record review
- Payslip review
- Attendance register review
- Production record review
- Maintenance register review
- Maternity benefit register review
- Leave record review
- Final settlement record review



Non-compliance:

1. Description of non-compliance:

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

It was noted through document review and management interview that, randomly checked 04 out of 07 resigned employees did not get final settlement payment within maximum 30 (thirty) working days after cancellation of the job as per legal requirements. Note that during audit day auditors found the concern employees got the payment within 35 to 55 days.

For example, one resigned employee's released date was found on 07 December 2022, but received the final settlement payment on 31 January 2023.

Local law and/or ETI requirement In accordance with Living wages are paid 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.

In accordance with Bangladesh Labour Rules 2015, Rule 112 (4):

If a worker's job is scrapped/cancelled due to layoff, discharge, termination, expel, resignation by the worker or for any other reasons, the arrear wages of the worker have to be paid within 7 (seven) working days after cancellation of the job and the compensation and other dues must be paid within maximum 30 (thirty) working days after cancellation of the job.

Recommended corrective action:

It is recommended that the facility should provide final settlement payment to all eligible employees within maximum 30 (thirty) working days after cancellation of the job as per legal requirements.

Objective evidence observed:

(where relevant please add photo numbers)

1. Document review and management interview

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

Good Examples observed:

Description of Good Example (GE):

Facility provides attendance bonus to employees as per company policy.

Objective evidence observed:

1. Documents review and management interview



Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: maximum: 08 hours per day 48 hours per week.	A1: 08 hours per day 48 hours per week 208 hours per month (For all sample months)	A2: Yes No (Not mandatory by Local Law)
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 04 hours per day 24 hours per week. (With legal waiver of 02 hours per day	B1: 2 hours/day, 12 hours/week in January 2023 (1st Current paid month) 2 hours/day, 12 hours/week in December 2022 (2nd Current paid month) 2 hours/day, 12 hours/day, 12 hours/day, 12 hours/week in April 2022 (Peak month)	B2: Yes No (Not mandatory by Local Law)
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: BDT 8000.00 per month	C1: BDT 8000.00 per month	C2: Yes No (Not mandatory by Local Law)
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible, per hr, day, week, and month)	Legal minimum: Per hour 200% of basic hourly rate	D1: 200% of basic hourly rate.	D2: Yes No (Not mandatory by Local Law)

Wages analysis: (Click here to return to Key Information)				
A: Were accurate records shown at the first request?	∑ Yes □ No			
A1: If No , why not?	Not applicable			
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please	52 samples from January 2023 (1st Current paid month) 52 samples from December 2022 (2nd Current paid month) 52 samples from April 2022 (Peak month)			



see SMETA Best Practice Guidance and Measurement Criteria)								
C: Are there different legal minimum wage grades? If Yes , please specify all.	⊠ Yes □ No	· · · · · · · · · · · · · · · · · · ·						
		Grades	Basic wage (BDT)	House rent (50% × basic) (BDT)	Meal (BDT)	Medical (BDT)	Travel (BDT)	Gross monthly wage (BDT)
		Grade 1	10938	5469	900	600	350	18257
		Grade 2	9044	4522	900	600	350	15416
		Grade 3	5330	2665	900	600	350	9845
		Grade 4	4998	2499	900	600	350	9347
		Grade 5	4683	2342	900	600	350	8875
		Grade 6	4380	2190	900	600	350	8420
		Grade 7	4100	2050	900	600	350	8000
		Apprentice	2750	1375	900	600	350	5975
D: If there are different legal minimum grades, are all workers graded and paid correctly?	⊠ Yes □ No □ N/A	lo l						
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	Below legal min Meet Mour / week / month etc. Lowest gross salary is 8000.00 BDT which Meets minimum legal wage (As per new pay structure announced on 24th January 2019).							
F: Please indicate the breakdown of workforce per earnings:	F1:% of workforce earning under minimum wage F2: 5% of workforce earning minimum wage. F3: 95% of workforce earning above minimum wage.							
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc. Bonus Scheme found: • Festival bonus: 100% of basic wage twice per year who have completed 1 year. • Attendance Bonus: Facility provides attendance bonus to all employees as per company policy.							



H: What deductions are required by law e.g. social insurance? Please state all types:	 As per section 125 of the Bangladesh Labour Law, 2006, facility may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc. As per Bangladesh Finance Act 2022, factory may deduct BDT 20 for Government Revenue Stamp. 			
I: Have these deductions been made?	Yes No	I1: Please list all deductions that have been made.		1. Un-authorized absence 2. Revenue Stamp Please describe: As per section 125 of the Bangladesh Labour Law, 2006 and as per Bangladesh Finance Act 2022.
		I2: Please list all deductions that have not been made.		 For fines, housing facility Advance payments loans, income tax
				Please describe: Facility does not deduct the above as they are not required.
J: Were appropriate records available to verify hours of work and wages?	⊠ Yes □ No			
K: Were any inconsistencies found? (if yes describe nature)	☐ Yes ☐ No ☐ Poor record keeping ☐ Isolated incident ☐ Repeated occurrence:			
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	Yes No L1: Please give details: The facility shows all real records which reflect all scenarios.			
M: Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	Yes No M1: Please specify amount/time: Facility did not define living wages as it is not required by law.			
M2: If yes, what was the calculation method used.	□ISEAL/Anker Benchmarks □Asia Floor Wage □Figures provided by Unions			



	Living Wage Foundation UK Fair Wear Wage Ladder Fairtrade Foundation Other – please give details: Not applicable
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	Yes No N1: Please give details: There are no periodic reviews of wages.
O: Are workers paid in a timely manner in line with local law?	∑ Yes □ No
P: Is there evidence that equal rates are being paid for equal work:	Yes No P1: Please give details: Through payroll records review and employees' interviews, it was confirmed that equal rates are being paid for equal work.
Q: How are workers paid:	 ☐ Cash ☐ Cheque ☐ Bank Transfer ☐ Other Q1: If other, please explain:



6: Working Hours are not Excessive

(Click here to return to summary of findings)
(Click here to return to Key Information)

ETI

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub–clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where <u>all</u> 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:

- In this audit, auditor had randomly selected production record, such as: material in/out records, daily production reports, and crosschecked these records with payroll records and attendance records, no inconsistency was noted. In addition, through employees' interviews, no inconsistency was noted either.
- Through employees' interview, overtime is voluntary.
- Time record system is maintained by electronic (face detection).
- All overtime is compensated at a premium rate for all employees.
- Facility remains closed on Friday as weekly holiday.

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

Details:



- Employees' interviews
- Management interview
- local laws
- Facility policy on working hours
- Job card
- Attendance register
- Production record
- Quality and production records to cross check hours
- Salary sheet
- Payslip
- 52 Records to show wages and working from January 2022 (1st Current paid month), December 2021 (2nd Current paid month), and May 2021 (Peak month).
- Based on the provided records, working hour statistics are as follows:

Working section	No. of workers in the section	No. of Sampled workers in the section	Records of which month	% of workers worked continuously 7 days without rest day	Highest number of days worked consecutively	Highest number of OVERTIME hours worked in a day	Highest number of total hours worked in a
Winding	30	2	January 2023	0%	06 Days	2 Hour	day 10 Hour
Knitting	201	9	January 2023	0%	06 Days	2 Hour	10 Hour
Linking	273	14	January 2023	0%	06 Days		
			, ,		-	2 Hour	10 Hour
Trimming	101	5	January 2023	0%	06 Days	2 Hour	10 Hour
Mending	80	4	January 2023	0%	06 Days	2 Hour	10 Hour
Washing	14	2	January 2023	0%	06 Days	2 Hour	10 Hour
Sewing	42	2	January 2023	0%	06 Days	2 Hour	10 Hour
Finishing	175	8	January 2023	0%	06 Days	2 Hour	10 Hour
Packing	59	3	January 2023	0%	06 Days	2 Hour	10 Hour
Others	217	3	January 2023	0%	06 Days	2 Hour	10 Hour
Winding	30	2	December 2022	0%	06 Days	2 Hour	10 Hour
Knitting	201	9	December 2022	0%	06 Days	2 Hour	10 Hour
Linking	273	14	December 2022	0%	06 Days	2 Hour	10 Hour
Trimming	101	5	December 2022	0%	06 Days	2 Hour	10 Hour
Mending	80	4	December 2022	0%	06 Days	2 Hour	10 Hour
Washing	14	2	December 2022	0%	06 Days	2 Hour	10 Hour
Sewing	42	2	December 2022	0%	06 Days	2 Hour	10 Hour
Finishing	175	8	December 2022	0%	06 Days	2 Hour	10 Hour
Packing	59	3	December 2022	0%	06 Days	2 Hour	10 Hour
Others	217	3	December 2022	0%	06 Days	2 Hour	10 Hour
Winding	30	2	April 2022	90%	12 Days	2 Hour	10 Hour
Knitting	201	9	April 2022	90%	12 Days	2 Hour	10 Hour
Linking	273	14	April 2022	90%	12 Days	2 Hour	10 Hour
Trimming	101	5	April 2022	90%	12 Days	2 Hour	10 Hour
Mending	80	4	April 2022	90%	12 Days	2 Hour	10 Hour
Washing	14	2	April 2022	90%	12 Days	2 Hour	10 Hour
Sewing	42	2	April 2022	90%	12 Days	2 Hour	10 Hour
Finishing	175	8	April 2022	90%	12 Days	2 Hour	10 Hour
Packing	59	3	April 2022	90%	12 Days	2 Hour	10 Hour
Others	217	3	April 2022	90%	12 Days	2 Hour	10 Hour



Non–compliance:	
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: None	Objective evidence observed: (where relevant please add photo numbers) None observed
Observation:	
Description of observation:	Objective evidence observed:
It was noted through salary sheet & job card review, management, and employee interview that a maximum of 12 consecutive days were found in one of the sample months as follows: - 45 out of 52 randomly selected employees in all section had worked on their holidays (08 April 2022) resulting in a maximum of 07 to 12 days consecutively in the month of April 2022. (Peak month) which was compensated with festival leave (Eid-ul-fitr) & it is allowed by local law.	1. Salary sheet & job card review
Note that, no holiday work was found in the other sample months	
Local law or ETI requirement:	
In accordance with Working hours are not excessive: 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.	
In accordance with client's specific requirement: The facility should ensure employees have at one day off after 6 consecutive days.	
Comments: It is recommended that the facility should ensure weekly holidays comply with the client-specific requirements.	
Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed:

None observed



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: Electronic (fo	ace detect	ion)		
B: Is sample size same as in wages section?	∑ Yes □ No B1: If no, please give details				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	 ∑ Yes ☐ No C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: 				
D: Are there any other types of	☐ Yes ☑ No	D1: If YES, please complete as appropriate:			
contracts/employment agreements used?		0 hrs	Part time	☐ Variable hrs	Other
		If "Other"	If "Other", Please define:		
		Not applicable			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	☐ Yes ☑ No				
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: 1 in 7 days 2 in 14 days No If 'No', please explain:	days No			
	Maximum number of days worked without a day off (in sample):				
	12 Days				
Standard/Contracted Hours worked					



G: Were standard working hours over 48	☐ Yes ☑ No	G1: If yes, % of workers & frequency:	
hours per week found?	MO NO	Not applicable	
H: Any local	Yes	H1: If yes, please give details:	
waivers/local law or permissions which allow averaging/annualised hours for this site?	⊠ No	Not applicable	
Overtime Hours worked			
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 2 hours in a day, 12 ho	urs in a week in January 2023 (1st Current paid month).	
per day/week/moninj	2 hours in a day, 12 ho month).	urs in a week in December 2023 (2 nd Current paid	
	2 hours in a day, 12 ho	urs in a week in April 2023 (Peak month).	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	☐ Yes ☐ No		
K: Approximate percentage of total workers on highest overtime hours:	85%		
L: Is overtime voluntary?	Yes No Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Based on employees' interviews, employee can do overtime as per their willingness and it's not mandatory. Facility management never forces employees to do overtime.	
Overtime Premiums			
M: Are the correct legal overtime premiums paid?	Yes No N/A – there is no legal requirement to Ovet time premium	M1: Please give details of normal day overtime premium as a 200% of <u>standard</u> wages:	
N: Is overtime paid at a premium?	⊠ Yes □ No	N1: If yes, please describe % of workers & frequency: Overtime payments for employees are as per legal requirement	



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	 No □ Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) □ Collective Bargaining agreements □ Other
where relevant.	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other
	Not applicable
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please	Overtime is voluntary Onsite Collective bargaining allows 60+ hours/week Safeguards are in place to protect worker's health and safety Site can demonstrate exceptional circumstances Other reasons (please specify)
complete the boxes where relevant.	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:
	Not Applicable
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ☐ No Q1: If yes, please give details:
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	☐ Yes ☑ No



7: No Discrimination is Practiced

(Click here to return to summary of findings)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

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

Details:

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

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 85 % A2: Female 15%
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	#: 0 No women found who are in skilled or technical roles
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	 ☐ Hiring ☐ Compensation ☐ Access to training ☐ Promotion ☐ Termination or retirement ☒ No evidence of discrimination found



	C1: Please give details: No such evid	ence was found
Professional Development		
A: What type of training and development are available for workers?	The facility provides on job training for After completion of training the worke exams.	
B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	Yes No No	
	If no, please give details:	
	Non-compliance:	
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: None		Objective evidence observed: (where relevant please add photo numbers) None observed
	Observation:	
Description of observation: None observe	d	Objective evidence observed:
Local law or ETI requirement: Not applicate	ble	None observed
Comments: None		110110 00301100
G	ood Examples observed:	
Description of Good Example (GE): None	observed	Objective evidence observed:
		None observed



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 labour agency was used to hire workers. No temporary worker, apprenticeship schemes or home worker was identified by the auditors.
- No subcontractors were used.
- All workers getting signed labour contract and ID card during their recruitment.
- Factory maintains service books for all workers.

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

Details:

- Recruitment policy.
- Employees personal file.
- Appointment letter.
- Employee service book.
- New employee joining register.



	Non-compliance:	
Description of non-compliance: NC against ETI NC against I None observed	Local Law NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI requirement:	Not applicable	None observed
Recommended corrective action:	None	
	Observation:	
Description of observation: None o	bserved	Objective evidence observed:
Local law or ETI requirement: Not applicable		None observed
Comments: None		None observed
	Good Examples observed:	
D : 1: (O 15 1 (O5)	· · · · · · · · · · · · · · · · · · ·	
Description of Good Example (GE): None observed		Objective evidence observed:
		None observed
Responsible Recruitment		
All Workers		
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions? A: Were all workers presented Conditions presented		inding and specific

☐ Yes ☐ No

affected:

B: Did workers' pay any fees,

recruitment/placement?

purpose of

taxes, deposits or bonds for the

B1: If yes, please describe details and specific category(ies) of workers



	Any transport costs betw	odging costs after employment offer veen work place and home er commencement of employment tation fees
D: If any checked, give details:	ot Applicable	
country of which they are not a nation	al and where they do not int	been engaged in a remunerated activity in a end to remain permanently or has purposely eek and engage in a remunerated activity
A: Type of work undertaken by migrant workers:	Not Applicable	
B: Migrant worker recruitment	Total number of (in country recruitment agencies) used: Not Applicable. Total number of (outside of local country) recruitment agencies used: Not Applicable.	
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?		Observations Not Applicable.
D: Are any migrant workers in skilled, technical, or management roles Migrant Workers (this should include all migrant workers including permanent	Yes No If yes number and exa	imple of roles:



workers, temporary and/or seasonal workers)	Not Applicable.
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NON-EMPLOYEE WORKERS

Recruitment Fees:			
A: Are there any fees?	☐ Yes ☐ No		
B: If yes, check all that apply:	Recruitment / hiring fees Service fees Application costs Recommendation fees Placement fees Administrative, overhead or processing fees Skills tests Certifications Medical screenings Passports/ID's Work / resident permits Birth certificates Police clearance fees Any transportation and lodging costs after employment offer Any transport costs between work place and home Any relocation costs after commencement of employment New hire training / orientation fees Medical exam fees Deposit bonds or other deposits Any other non-monetary assets Other B1 - If other, please give details: Not Applicable		
C: If any checked, give details:	Not Applicable		
(workers sourced from a loc	Agency Workers (if applicable) cal agent who are not directly paid by the site, but paid by the agency, Usually the		

Agency Workers (if applicable) (workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)		
A: Number of agencies used (average):	A1: Names if available: Not Applicable	
B: Were agency workers' age / pay / hours included within the scope of this audit?	☐ Yes ☐ No Not Applicable	
C: Were sufficient documents for agency workers available for review?	☐ Yes ☐ No Not Applicable	



D: Is there a legal contract / agreement with all agencies?	☐ Yes ☐ No
	D1: Please give details: Not applicable, site does not use agencies
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	Yes No E1: Please give details: Not applicable, site does not use agencies
	Contractors: erally individuals who supply several workers to a site. Usually the contractors e workers are paid by the contractor. Common terms include, gang bosses, labor provider,
A: Any contractors on site?	Yes No A1: If yes, how many contractors are present, please give details:
B: If Yes , how many workers supplied by contractors?	Not applicable. There are no contractors in the facility.
C: Do all contractor workers understand their terms of employment?	Yes No C1: Please describe finding: Not applicable. There are no contractors in the facility.
D: If Yes , please give evidence for contractor workers being paid per la	w: Not applicable. There are no contractors in the facility.



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 Sub-contracting and homeworking were used by this facility.

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

- Shipment record
- Goods in and out register
- Production record
- Goods in and out gate pass / records

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

Not applicable

Details: None

Non–compliance:			
1. Description of non–compliance: NC against ETI/Additional Elements NC against customer code:	☐ NC against Local Law	Objective evidence observed: (where relevant please add photo numbers)	
None observed		None observed	
Local law and/or ETI requirement: Not applicable			
Recommended corrective action: None			



Observation:				
Description of observation: None observed			Objective evidence observed:	
Local law or ETI requirement: Not applicable				
Comments: None				None observed
	Good Examples obs	served:		
Description of Good Example (GE):	None observed			Objective evidence observed:
				None observed
Sum	nmary of sub-contracting Not Applicable p		ble	
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	Yes No A1: Please describe:			
B: If sub–contractors are used, is there evidence this has been agreed with the main client?	☐ Yes ☐ No B1: If Yes , summarise de	ətails:		
C: Number of sub- contractors/agents used:				
D: Is there a site policy on sub- contracting?	Yes No D1: If Yes , summarise details:			
E: What checks are in place to ensure no child labour is being used and work is safe?				
Summary of homeworking – if applicable Not Applicable please x				
A: If homeworking is being used, is there evidence this has been agreed with the main client?	there evidence this has been No			
B: Number of homeworkers	B1: Male:	B2: Female	:	Total:
C: Are homeworkers employed direct or through agents?	☐ Directly ☐ Through Agents		C1: If thro agents:	ough agents, number of



D: Is there a site policy on homeworking?	☐ Yes ☐ 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?	Yes No G1: Please give details:	
H: Are full records of homeworkers available at the site?	☐ Yes ☐ No	



9: No Harsh or Inhumane Treatment is Allowed (Click here to return to summary of findings)

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	∑ Yes ☐ No A1: Please give details: Facility has an open channel for reporting any violations of labour standard which is posted in the notice board. Facility provided complain box in every washroom for receiving complain. Workers can report any violations directly to the compliance manager. Facility also has a grievance handling procedure in place.
B: If Yes , are workers aware of these channels and have access? Please give details.	All the workers are aware of these channels and have full access to these channels. Facility also has a grievance handling procedure posted with every complain box.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Facility has posted hotline & provided complain box in washroom.
D: Which of the following groups is there a grievance mechanism in place for?	 ✓ Workers ☐ Communities ☐ Suppliers ☐ Other D1: Please give details: Workers can place their grievance verbally or in written. Workers can also keep their identity confidential if required.
E: Are there any open disputes?	Yes No E1: If yes, please give details
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) G: Is there a published and transparent disciplinary procedure?	 X Yes No F1: If no, please give details X Yes No
	G1: If no, please explain



H: If yes, are workers aware of these the disciplinary procedure?	∑ Yes □ No
	H1: If no, please give details
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages	☐ Yes ☑ No
section)?	11: If yes, please give details

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 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.
- Through the factory management and employees' interview, it was noted that no physical abuse happened in the factory.
- 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.

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

Details:

- Anti-Harassment policy
- Grievance box open register
- Orientation training record

Non-compliance:			
Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	Objective evidence observed: (where relevant please		
None observed	add photo numbers)		
Local law and/or ETI requirement: Not applicable	None observed		
Recommended corrective action: None			



Description of observation: None observed
Local law or ETI requirement: Not applicable

Comments: None

Objective evidence observed:

None observed

Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed:
	None observed



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:

- Only employees with a legal right to work shall be employed or used by the facility.
- The youngest age was 20 years old.

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

Details:

- Factory recruitment policy.
- Employees personal file.

Non-compliance:			
1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code: NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)		
None observed			
Local law and/or ETI /Additional Elements requirement: Not applicable	None observed		
Recommended corrective action: None			
	•		
Observation:			



Description of observation: None observed

Local law or ETI/Additional Elements requirement: Not applicable

Comments: None

Objective evidence observed:

None observed

Good examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: None observed



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:

- 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.
- Facility collected environmental clearance certificate from Department of Environment.

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

Details:

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

Non-compliance:		
Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	Objective evidence observed: (where relevant please	
None observed	add photo numbers)	
Local law and/or ETI requirement: Not applicable	None observed	
Recommended corrective action: None		



Observation:	
Description of observation: None observed	Objective evidence observed:
Local law or ETI requirement: Not applicable	None observed
Comments: None	110110 00301760

Good examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed:
	None observed



Other findings

Other Findings Outside the Scope of the Code

None observed

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 observed



Appendix 1

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." Not Applicable please x		
NOTE: 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.	Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.	
ETI Code / Additional Elements	Customer's Supplier Code equivalent	
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP	
 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. 		
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation	
0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.	The facility should display Supplier Protector Line in common places for easy visualization of the employees.	



0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code. 0.3 Suppliers are expected to communicate this Code to all employees. 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. ETI 1. Forced Labour	ETI 1. Forced Labour
 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. 	
ETI 2. Freedom of association and the right to collective bargaining are respected	ETI 2. Freedom of association and the right to collective bargaining are respected
 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. 	
ETI 3. Working conditions are safe and hygienic	ETI 3. Working conditions are safe and hygienic
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.	 Loose piles of storage or boxed products, unless stored properly in solid shelves, must not be higher than 2 metres. All unattended irons should be placed in brackets.



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.	
ETI 4. Child labour shall not be used	ETI 4. Child labour shall not be used
 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. 	
ETI 5. Living wages are paid	ETI 5. Living wages are paid
5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income. 5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.	
ETI 6. Working Hours are not excessive	ETI 6. Working Hours are not excessive
 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. 	The facility should ensure employees have at one day off after 6 consecutive days.

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. ETI 7. No discrimination is practised ETI 7. No discrimination is practised 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. ETI 8. Regular employment is provided ETI 8. Regular employment is provided 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.	
8A: Sub-Contracting and Homeworking	8A: Sub-Contracting and Homeworking
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.	
ETI 9. No harsh or inhumane treatment is allowed	ETI 9. No harsh or inhumane treatment is allowed
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	
9.2 companies should provide access to a	
9.2 companies should provide access to a confidential grievance mechanism for all workers10. Other Issue areas: 10A: Entitlement to Work and	
 9.2 companies should provide access to a confidential grievance mechanism for all workers 10. Other Issue areas: 10A: Entitlement to Work and Immigration 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 	



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.

B.4. Compliance Requirements 1084.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards. 1084.2 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. 1084.3 Businesses shall be aware of their end client's environmental standards/code requirements 1084.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers. 1084.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 1084.6 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). 1084.7 Businesses shall make continuous improvements in their environmental performance. 1084.8 Businesses should have a anolinated individual responsible for co-ordinating the site's efforts to improve environmental performance. 84. Guidance for Observations 1084.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor. 1084.11 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.
1084.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards. 1084.2 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. 1084.3 Businesses shall be aware of their end client's environmental standards/code requirements 1084.4 Suppliers should have an environmental poplicy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers. 1084.5 Puppliers shall be aware of the significant environmental impact of their site and its processes. 1084.6 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). 1084.7 Businesses shall make continuous improvements in their environmental performance. 1084.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation 1084.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance. 84, Guidance for Observations 1084.11 Has the site recently been subject to (or pending) any fines/prosecutions for
noncompliance to environmental regulations.



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 noncompliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented.



Photo Form

Non-Compliance photos:

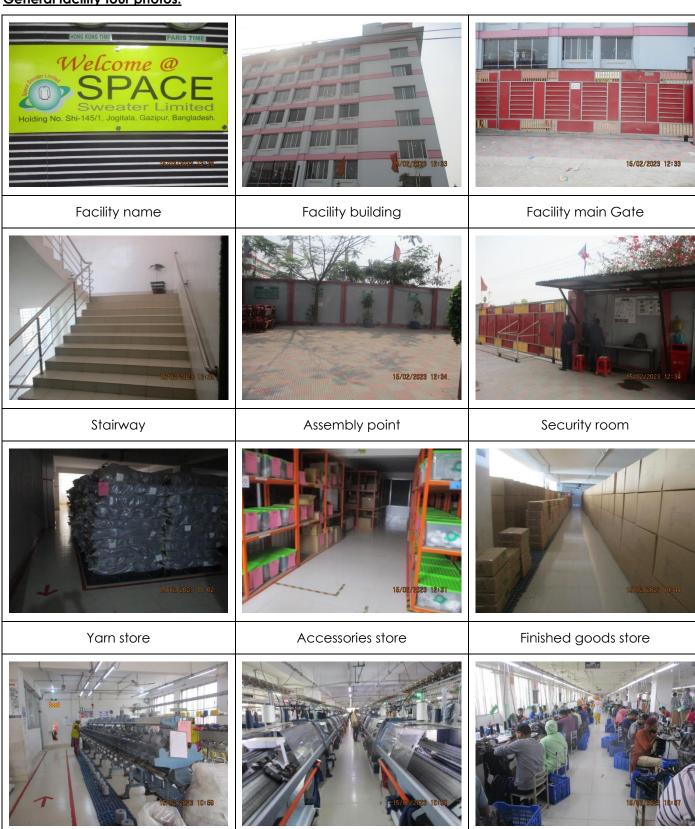


Good example photos:

	Nil	Nil
Protector Line For the two warming from the grade of the control		
Posted supplier protector line	NA	NA



General facility tour photos:



Jacquard section

Winding section

Linking section















Boiler









Roof top Exhaust fan





Effluent treatment plant

COVID-19 awareness poster

COVID-19 Temperature measurement device





For more information visit: <a>Sedexglobal.com

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

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

Click here for Buyer (A) & Buyer/Supplier (A/B) members:

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d

Click here for Auditors:

https://www.surveymonkey.co.uk/r/BRTVCKP