



# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 406346107	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 406349386
Business name (Company name):	RAJ OVERSEAS		
Site name:	RAJ OVERSEAS UNIT 4		
Site address: <i>(Please include full address)</i>	Plot No, 8, Sector-25, Part I, HUDA, Panipat	Country:	India
Site contact and job title:	Mr. Vinod Chhoker – Sr. Manager Compliance		
Site phone:	+91-7419603002	Site e-mail:	<a href="mailto:compliance2@rajgroup.in">compliance2@rajgroup.in</a>
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	28 June 2023		

<b>Audit Company Name &amp; Logo:</b> Bureau Veritas Consumer Products Pvt Ltd 	<b>Report Owner (payer):</b> <i>(If paid for by the customer of the site please remove for Sedex upload)</i> <b>RAJ OVERSEAS</b>
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

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

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

## Audit Content:

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

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

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size):

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

Lead auditor: Navdeep Chandel APSCA number: RA 21703810

Lead auditor APSCA status: RA

Team auditor: Aman Yadav, Nitin Gandas APSCA number: RA21705654, ASCA 32200038

Interviewers: Aman Yadav and Ishikaa Sharma APSCA number: RA21705654, ASCA21704380

Report writer: Ishikaa Sharma

Report reviewer: Arbaz Khan

Date of declaration: 28 June 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 <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> <b>Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</b>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A <a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>			01	Observation: Based on interaction with management and review of records, it was noted that facility does not identify their stakeholders and salient issues.
0B <a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None
3. <a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	01	01	00	NC: Based on the facility tour, it was noted that lower & upper pulley guard was found missing on 01 out of 01 hand embroidery machine in sampling section located at mezzanine floor of the building.  Observation: Based on the facility tour, it was noted that the facility has provided the platform to the exit door at third floor located on packing section of the building, however the platform was not provided with handrail as the platform has open ends and the elevation of platform is inclined to approx. 15 degrees, which triggers risk of falling /tripping in case of emergency evacuation.

									However, facility has understood the risk and immediately provided the hand rail to the platforms
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Not Applicable
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None

General observations and summary of the site:

This audit was an announced periodic audit was conducted by Bureau Veritas CPS India. Four auditors in One day assessed and verified the factory operations against the ETI Base Code, Local Law, National Legislations and Environment. The method used for the selection of samples was on random sampling basis. The facility maintains a bio-metric time recording system for marking the attendance. The salary of the workers are paid through bank transfer, on or before 7th day of the month for the previous month. The factory management and the Committee Members assured the auditor of their complete co-operation during the entire audit process. The auditor explained the scope and the purpose of the audit to the management and the key areas that would be assessed. The auditor then assessed the Health &

Safety requirements that were provided by the factory management in the factory. A total of 42 samples were randomly selected as per the SMETA Guidelines and the Time records, Wage Records / Payroll Records were reviewed for the Months of May 2023 (Recent), January 2023 (Random) and August 2022 (Random) . Site constitutes enhanced manpower under the permitted license limit operate in the general shift only. Workmen associated in work on site express favourable and co-operative view towards management. The basic requirement of site for the workers are met as per the legal standards. Manager was co-operative and proactive throughout the entire the audit process. The facility was well maintained and has an established management system to take care of legal compliance and supplier code of conduct.

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



## Site Details

Site Details																	
A: Company Name:	Raj Overseas																
B: Site name:	Raj Overseas Unit 4																
C: GPS location: (If available)	GPS Address: Plot No, 8, Sector-25, Part I, HUDA, Panipat	Latitude: 29.370007 Longitude: 76.977729															
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Factory License: PPT-ONLINE-CHD-R-117 FOR 900 WORKERS AND 450 HP VALID TILL 31/12/2026. Fire NOC No. FS/2023/219 dated 25/04/2023 valid for 3 years																
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturing of Kilims, Bath mat, Pouf, Cushion, Scatter Durries & Pillows, Carpets Production Process: Finishing & Packaging, Dispatch.																
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>The facility has a one building which was constructed on August 2017. The total area of the facility is 5000 sq.mt. and the covered area is 15190 sq.mt. The details of the building are given below;</p> <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground floor</td> <td>Admin Office, semi-finished goods store, Carpet finishing &amp; Medical room</td> <td>None</td> </tr> <tr> <td>Mezzanine floor</td> <td>Office, Inspection room Trim material storage, sample store and canteen</td> <td>None</td> </tr> <tr> <td>First floor</td> <td>Used for carpets- Carpet Packaging, Accessories store, packing material store, rest room</td> <td>None</td> </tr> <tr> <td>Second Floor</td> <td>Used for Rugs- Rugs finishing, passing, Semi finished rugs storage, Rugs</td> <td>None</td> </tr> </tbody> </table>		Production Building no	Description	Remark, if any	Ground floor	Admin Office, semi-finished goods store, Carpet finishing & Medical room	None	Mezzanine floor	Office, Inspection room Trim material storage, sample store and canteen	None	First floor	Used for carpets- Carpet Packaging, Accessories store, packing material store, rest room	None	Second Floor	Used for Rugs- Rugs finishing, passing, Semi finished rugs storage, Rugs	None
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		packaging & Label stitching	
	Third Floor	Used for Home Textiles- Fabric store, Cutting, stitching, Finishing/clipping, Packing, Dispatch	None
	Periphery	Genset, STP, Security room, crèche, chemical room, waste storage area, Fire Pump	None
	Is this a shared building?	No	None
<p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: None Observed</p> <p>F3: Does the site have a structural engineer evaluation?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>F4: Please give details: The facility has a valid structural engineer evaluation available (Form No. 1-B Dated 02/12/2020)</p>			
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor		
H: Month(s) of peak season: (if applicable)	Consistent throughout the year		
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	The main products manufactured by the factory Kilims, Bathmat, Pouf, Cushion, Scatter Durries & Pillows, Carpets,		

<p>J: What form of worker representation / union is there on site?</p>	<p><input type="checkbox"/> Union (name)  <input checked="" type="checkbox"/> Worker Committee  <input type="checkbox"/> Other (specify)  <input type="checkbox"/> None</p>
<p>K: Is there any night production work at the site?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  L1: If yes, approx. % of workers in on site accommodation</p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  M1: If yes, approx. % of workers</p>
<p>N: Were all site-provided accommodation buildings included in this audit</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  N1: If no, please give details: Not applicable as no accommodation facility is provided</p>

Audit Parameters			
A: Time in and time out	Day 1 Time in: 10:00 Day 1 Time out: 18:10	A3: Day 2 Time in: A4: Day 2 Time out:	A5: Day 3 Time in: A6: Day 3 Time out:
B: Number of auditor days used:	3.5 Man Day (4 auditors in 1 day)		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other  If other, please define		
D: Was the audit announced?	<input type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail:    weeks <input checked="" type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Vinod Chhoker – Sr. Manager Compliance		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	21 Feb 2020		
J: Previous audit type:	Periodic		
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> N/A		

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

A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	Worker committee representative member participate opening & closing meeting, he didn't not present in the audit process due to workload of production.		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	No Union at Site		

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	442	0	0	0	0	0	0	442
Worker numbers – female	10	0	0	0	0	0	0	0
Total	452	0	0	0	0	0	0	452
Number of Workers interviewed – male	40	0	0	0	0	0	0	40
Number of Workers interviewed – female	02	0	0	0	0	0	0	02
Total – interviewed sample size	42	0	0	0	0	0	0	42

A: Nationality of Management	Indian	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: ___Indian___</p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p>	<p>Was the list completed during peak season?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: Consistent throughout the year.</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 ___100%___</p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: _____% workers on piece rate</p> <p>D1: _____% hourly paid workers</p> <p>D2: ___100___% salaried workers</p> <p>Payment cycle:</p> <p>D3: _____% daily paid</p> <p>D4: _____% weekly paid</p> <p>D5: ___100___% monthly paid</p> <p>D6: _____% other</p> <p>D7: If other, please give details</p>	

Worker Interview Summary	
A: Were workers aware of the audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	06 groups of 05 worker each
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 10      D2: Female: 02
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	No complaints from workers
I: What did the workers like the most about working at this site?	On time salary, Management Behaviour
J: Any additional comment(s) regarding interviews:	NONE
K: Attitude of workers to hours worked:	Satisfied
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:	
M: Attitude of workers: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>	



A total of 46 employees (42 Workers + 2 Interviews for Environment + 2 Interview for Business Ethics) were selected for interviews (present on the day of audit). These employees were selected from various workstations. All the interviews were conducted privately without management presence, in group and individual. Workers stated that they are aware of their working hours and overtime if asked to perform were purely on voluntary purpose. Further it was also noted that the employees had worked overtime and paid 200 % of the total wages required by law.

Employees are paid wages on a monthly basis. Payment is disbursed on or before 07th of every month for all employees. Moreover, all the employees reported that they are covered under mandatory benefits such as leave with wages and bonus. This was further verified with the provided records.

**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*

Work's committee representative was interviewed. The representative was comfortable with the working conditions and management support and stated could give suggestions freely to the facility management. The management has a collaborative approach with them and takes their suggestions for improvement. He stated that the representatives from workers are selected by the workers themselves.

**O: Attitude of managers:**

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

The factory management had been fully transparent, very receptive about the audit process and they were dedicated to ensuring the compliance in the factory. They had ensured the full co-operation to the auditor during the entire audit process and were very welcoming to the audit results. They were maintaining very positive attitude and had a proactive approach to follow compliances in their factory campus and meet the client expectations. They took all the discussions in notice for future references.

## Audit Results by Clause

### 0A: Universal Rights covering UNGP

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

#### 0.A. Guidance for Observations

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

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

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

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

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

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

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

#### Current Systems and Evidence Examined

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

#### Current systems:

1. No discrimination related to human rights observed regardless of gender, nationality, place of residency, sex, ethnicity, religion, colour or and other categorization and all are treated equally.
2. No Slavery forced labour and human trafficking observed. All employees are of Indian nationality.
3. Employees are free to quit if they are not willing to work.
4. The facility has formed policy on "Human Rights".
5. Facility has designated person responsible for implementing standards concerning Human rights

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

Details:

- Risk Analysis
- List of stake holder
- Rules and regulations of the facility
- Appointment letter

Any other comments: None

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  A1: Please give details: The facility have a policy on Human Rights and Procedures are developed by facility</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please give details:                  Name: Mr. Vinod Chhoker                  Job title: Sr. Manager Compliance</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  C1: Please give details:                  The business does have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter</p>
<p>D: Does the grievance mechanism meet UNGP expectate? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  D1: If no, please give details                  The grievance mechanism meet UNGP expectations</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  E1: Please give details: Factory has data privacy policy and procedure.</p>

Findings	
<p><b>Finding: Observation</b> <input checked="" type="checkbox"/>      <b>Company NC</b> <input type="checkbox"/></p> <p><b>Description of observation:</b>                      Based on interaction with management and review of records, it was noted that facility does not identify their stakeholders and salient issues.</p> <p><b>Local law or ETI/Additional elements / customer specific requirement:</b>                      A.3 Businesses shall identify their stakeholders and salient issues.</p> <p><b>Comments:</b>                      NOT APPLICABLE</p>	<p><b>Objective evidence observed:</b>                      Document review</p>

Good examples observed:	
Description of Good Example (GE): NONE OBSERVED	<b>Objective Evidence Observed:</b> Not Applicable

## Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: __10__ %	A2: This year __7__ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	5 %	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: __10__ %	C2: This year __6__ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	10%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Factory has maintained accident register as per legal requirement. As per register No Accident has been observed.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: December 2022 Number: 00 (Minor Injuries)	F2: This year: Up to May 2023 Number: 00 (Minor Injuries)
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]	00 (Minor Injuries)	
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: December 2022  0 Cases	H2: This year: Up to May 2023 0 Cases
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months __0__% workers	I2: 12 months __0__% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months __0__% workers	J2: 12 months __0__% workers
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**0B: Management system and Code Implementation**  
*(Click here to return to summary of findings)*

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. Based from interaction with the factory management, it was understood that factory management has developed management system for implementing & maintaining social compliance code.
2. Factory has developed its own policies and procedures related to child labour, forced labour, discrimination, harassment and freedom of association.
3. The managers are well aware of the compliance requirements and have adequate knowledge on the legal requirements.
4. The factory has obtained legal business licenses to operate. And also have a system in place to monitor the compliance.
5. The factory has appropriate land rights.

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

Details:

- Policy on forced labour, child labour, discrimination, Harassment, general human rights, freedom of association
- Training records
- Licenses – Factory license.
- Personal files
- Committee records
- Land documents
- Construction permits

Any other comments: NONE

<b>Management Systems:</b>	
<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                      Please describe: No fines were implemented on the factory.</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      Please describe: The factory has its own policies and procedures on forced labour, child labour, discrimination, harassment &amp; abuse and the policies are posted for workers reference. The factory conducts training to the workers on legal requirements. The factory does not maintain any original documents of the employees and checks with a valid age proof document at the time of hire.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>On the day of assessment, no traces of forced labour, child labour, discrimination, harassment &amp; abuse was observed. All interviewed employees reported that they are treated with dignity and respect. The factory conducts training to all employees related to health and safety, legal requirements etc. and maintains all training records.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      Please describe: The factory conducts training to all employees on the social policies on regular basis and at the time of joining the factory.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      Please describe: Standards on forced labour, child labour, discrimination, harassment &amp; abuse were communicated to workers though posters and such topics were discussed on training</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits).                      Please detail (Number and date).</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      Please describe:                      SA 8000:2014 Valid till 14.10.2024                      ISO 9001:2015 Valid till 01.03.2024                      ISO 14001:2015 Valid till 01.03.2024                      ISO 45001:2018 Valid till 01.03.2024</p>
<p>G: Is there a Human Resources manager/department?                      If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      Please describe: Factory has Human resource responsible person who maintain Payroll, Time</p>



	records, statutory records, Personnel records of employees.
H: Is there a senior person / manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Responsible person name: Mr. Vinod Chhoker – Sr. Manager Compliance
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Yes. Factory has HR policy as per which the document and employee's information are kept confidential.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: As per the factory procedures, the data received from the employees are kept confidential. The data will not be disclosed to others without workers consent.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Factory has conducted risk assessment for the departments, operations in the factory.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The factory has a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Facility has framed the policy / code which require labour standards of its own suppliers.
<b>Land rights</b>	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility is operating in a rented building
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Yes, Site has compliance officer internally to check this requirement.
P: Does the site have a written policy and procedures specific to land rights.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, how does the company obtain FPIC:

<p>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</p>	<p>The factory has formed a written procedure specific to land rights.</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Details: The premises is on lease and is rented by the factory.</p>
<p>R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Details: Yes, the factory demonstrates that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts through proper legal sale deed made between the owner and the buyers.</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  Details: No illegal appropriation of land for factory building or expansion of footprint.</p>

Non-compliance:	
<p><b>Description of non-compliance:</b></p> <p>None observed</p>	<p><b>Objective evidence observed:</b></p> <p>Not Applicable</p>

Observation:	
<p><b>Description of observation:</b></p> <p>None observed</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>

Good Examples observed:	
<p><b>Description of Good Example (GE):</b></p> <ol style="list-style-type: none"> <li>1. Site has comprehensive labour policies in place</li> <li>2. Elected workers discuss with management any implementation of the standards the company upholds at the workplace.</li> </ol>	<p><b>Objective evidence observed:</b></p> <p>Document Review</p> <p>Regular meetings with work's committee, grievance committee</p>

<p>3. Presence of internal audits to support site's performance and continual improvement</p>	<p>and health and safety committee members.</p>
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<p><b>1: Freely Chosen Employment</b>  <a href="#">(Click here to return to summary of findings)</a></p>
<p><b>ETI</b>            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.</p>

<p><b>Current Systems and Evidence Examined</b>  <i>To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.</i></p>
<p><b>Current systems:</b></p> <ol style="list-style-type: none"> <li>The factory does not appear to have any signs of forced, bonded, or involuntary labour; there were also no signs of subcontracting to a prison.</li> <li>All interviewed employees reported that there are no such illegal deposits to be deposited to the facility for recruitment and they are free to resign from the facility at any time.</li> <li>The factory has a policy which prohibits forced labour and this was available for review. There was a formalised application procedure which states that workers must present their ID's for proof of age but that only copies must be kept in the personnel files and the original given back to the workers.</li> </ol> <p><b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b></p> <p>Details:</p> <ul style="list-style-type: none"> <li>Factory Hiring policy</li> <li>Payrolls records to check for any illegal deposits.</li> <li>42 Personal files (to check for original documentation held by factory)</li> <li>Resignation records</li> <li>Factory rules, Standing orders</li> <li>Management and worker interview</li> <li>Appointment letter of workers</li> </ul> <p>Any other comments: NONE</p>

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No            If Yes please give details and category of workers affected : NA</p>
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B: Is there any evidence of a loan scheme in operation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes please give details and category of worker affected: NA
C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes please give details and category of worker affected: NA
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding: No restrictions were found.
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: <input checked="" type="checkbox"/> Not applicable
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding: As confirmed by the interviewed employees there is no such restrictions to leave the site after completion of their shift.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes please give details and category of workers affected: The factory does not use any sort of forced / trafficked or bonded labour in the factory nor in its supply chain. Therefore, no workers are affected. <input type="checkbox"/> Not applicable
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: All workers were engaged from local locality and were trained on the policies.

<b>Non-compliance:</b>	
<b>Description of non-compliance:</b>	<b>Objective evidence observed:</b>
None apparent on the day of assessment.	Not applicable

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

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

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

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- 1. Facility encourages and respects all employees' rights to join union freely.
- 2. Factory recognizes and encourages the right to freedom of association and collective bargaining under the law provision.
- 3. The factory does not restrict employees on organizing trade unions and has an open approach to get Associated with trade unions and their organizational activities without management interference.
- 4. Factory has formed Work's Committee and latest election was conducted on 30/05/2022.
- 5. Factory has posted suggestion box at accessible location where employees can share their concerns Anonymously.
- 6. There was no evidence of suppression of employees' rights.

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

**Details:**

- Factory Policy and Procedures.
- Suggestion Box.
- Interaction with Management and Interview with employees.
- Works Committee Meeting Minutes.

**Any other comments:** None

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

C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Internal Complaint's Committee; Health and Safety Committee, Machine Maintenance Committee  D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Factory has provided adequate facilities to committee members.	
F: Name of union and union representative, if applicable:	NA	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Work's Committee	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 30/05/2022
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: 01	
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Last committee meeting was conducted on 13/06/2023	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If <b>Yes</b> , what percentage by trade Union/worker representation	M1: <u>00</u> % workers covered by Union CBA	M2: <u>00</u> % workers covered by worker rep CBA



<p>M3: If <b>Yes</b>, does the Collective Bargaining Agreement (CBA) include rates of pay?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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Non-compliance:	
<p><b>Description of non-compliance:</b></p> <p>None apparent on the day of assessment.</p>	<p><b>Objective evidence observed:</b></p> <p>Not Applicable</p>

Observation:	
<p><b>Description of observation:</b></p> <p>None observed</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>

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

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

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**ETI**

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

**1. General Health and Safety management**

- Mr. Vinod Chhoker – Sr. Manager Compliance is responsible for health and safety for the site
- Potable water was freely available in all areas and test certificates were up-to-date
- Sufficient clean toilets segregated by gender were available at all the time to workers
- Ventilation, temperature and lighting were adequate for the production processes
- Minutes of meetings showed monthly meetings between the H&S committee (workers) and the H&S manager, and each point was acted on.

**2. Fire Safety**

- There were at least 2 exits for most work areas and most of the exits were clearly marked
- Fire-fighting equipment was adequate and checks were up-to-date
- Evacuation diagrams were posted in all areas and understood by all workers interviewed
- Fire drills were organised and recorded every 2 months for production and no dormitory units provided by facility
- Training had been given by the local fire department and fire marshals selected for extra training.

**3. Electrical safety**

- All electrical equipment was in good condition such as sockets, plugs, switches and main fuse boards.
- There were competent electricians at the site and their training certificates were available for review.

**4. Chemical safety**

- All chemicals were correctly labelled.
- Material Safety Data Sheets were available and there were hazard diagrams on any chemicals which needed careful handling.
- Workers in the chemical store confirmed that they had been trained on correct handling procedures as well as what to do in an emergency.

**5. Medical services**

- There were adequate first aid kits in each production area and they were well stocked.
- There were 43 workers trained from ST. JOHN'S AMBULANCE DATED 13/07/2022 and certification was found valid for 3 years.

<p>A: Does the facility have general and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: Factory had established general Health &amp; Safety, occupational Health &amp; Safety policies and procedures that are fit for purpose and these are communicated to workers during induction training.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: Factory had included the social compliance policies in worker's manual.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Details: Factory had maintained the building plant layout as per the current setup of the building.</p>
<p>D: Are visitors to the site informed on H&amp;S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: Yes. Factory has displayed the H&amp;S instructions on the notice board for the visitors and employees. Further factory also provides relevant personal protective equipment to the visitors before allowing them to enter the production area.</p>
<p>E: Is a medical room or medical facility provided for workers?</p> <p>If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: Facility has provided a medical room with full time medical practitioner.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: Facility has trained First Aid Trainers.</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Details: Facility does not provide transport facilities to the workers. The reason being they live in nearby areas and the maximum distance which a worker travel from his place to factory is 10-15 kms through road and railways.</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: Personal storage space is provided to the workers to put their belonging before entering the production area.</p>
<p>I: Are H&amp;S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: Facility has identified most of parameters and conducted H&amp;S risk assessment. Further controls are there to</p>

and are there controls to reduce identified risk?	reduce identified risk. The said assessment is recorded in Health and Safety Manual.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Facility has obtained an exemption under pollution white category dated 12/03/2021
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Based on the interaction with factory management it was noted that they do not use any banned chemicals.

<b>Non-compliance:</b>	
<p><b>1. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input checked="" type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p>Based on the facility tour, it was noted that lower &amp; upper pulley guard was found missing on 01 out of 01 hand embroidery machine in sampling section located at mezzanine floor of the building.</p> <p><b>Local Law:</b> The Punjab Factory Rules, 1952 (As applicable in the State of Haryana), Rule 23. Casing of new machinery (Section 26).—In all machinery driven by power and installed in any factory after 1st April, 1949, every set screw, bolt or key on any revolving shaft, spindle wheel or pinion shall be so sunk, encased or otherwise effectively guarded as to prevent danger; all spur worm and other toothed or friction gearing which does not require frequent adjustment while in motion shall be completely encased, unless it is so situated as to be safe as it would be if it were completely encased.</p> <p><b>ETI CODE:</b> 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Recommended corrective action:</b>                  It is recommended that the facility shall provide pulley guards to all the machines and regular maintenance of machines shall be monitored.</p> <p><b>Action By:</b> - Mr. Vinod Chhoker – Sr. Manager Compliance  <b>Time Scale:</b> - 30 days  <b>Verification Method:</b> - Desktop</p>	<p><b>Objective evidence observed:</b>                  NC#1</p>

**Observation:**

<p><b>Description of observation:</b></p> <p>Based on the facility tour, it was noted that the facility has provided the platform to the exit door at third floor located on packing section of the building, however the platform was not provided with handrail as the platform has open ends and the elevation of platform is inclined to approx. 15 degrees, which triggers risk of falling /tripping in case of emergency evacuation.</p> <p>However, facility has understood the risk and immediately provided the hand rail to the platforms.</p>	<p><b>Objective evidence observed:</b></p> <p>Factory Tour</p>
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<p align="center"><b>Good Examples observed:</b></p>	
<p>Description of Good Example (GE):</p> <ol style="list-style-type: none"> <li>1. Clear postings of emergency notices including pictures / languages for understanding where appropriate</li> </ol>	<p><b>Objective evidence observed:</b></p> <p>Factory tour</p>

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

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**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. There are no apparent concerns related to child labour at the facility.
2. The facility has a policy in place to participate in and contribute to programmes that provide for the transition of a child found to performing child labour in order to enable the child to attend and remain in quality education until no longer a child.
3. No juvenile workers (under the age of 18) are employed at the facility.
4. All practices regarding youth employment at the facility appear to be in line with ILO conventions.
5. The facility maintains a copy of valid age proof document in the form of Voter ID, Aadhar Card and Pan Card in the personal files of the respective employees of the sampled 42 personal files reviewed.

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

**Details:**

- Recruitment notices
- Policy on child labour and remediation
- 42 personal files for a valid age proof document

**Any other comments:** None

A: Legal age of employment:	15-18 years with restrictions and 18 year and above without restrictions
B: Age of youngest worker found:	19 years
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

D: % of under 18's at this site (of total workers)	0%
E: Are workers under 18 subject to hazardous work assignments? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Y give details Not Applicable. No under 18 worker working in the facility

Non-compliance:	
<b>Description of non-compliance:</b>  None apparent on the day of assessment.	<b>Objective evidence observed:</b>  Not applicable

Observation:	
<b>Description of observation:</b>  None observed	<b>Objective evidence observed:</b>  Not applicable

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



**5: Living Wages are Paid**

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

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

**ETI**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. It was noted from review of wage records and interaction with employees and management that:
2. All eligible employees are covered under Provident Fund and Employee State Insurance Corporation.
3. No fines / illegal deductions are made from the wages of the employees as disciplinary measures.
4. All employees are paid on or before 07th of every month.
5. All employees are provided with clear, written and understandable pay stub in local language.
6. All 42 out of 42 sampled employees were paid the legal minimum wage.
7. Facility has also extended Leave with benefits to all applicable company employees as per the legal requirement.

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

**Details:**

- Labour contracts
- Payrolls records (for 42 employees)
- Time records (for 42 employees)
- Production records (from work floors to check for discrepancies)
- Leave records (Company and Contract Employees)
- Settlement records
- Employees State Insurance and Employees Provident Fund receipts

**Non-compliance:**

<b>Description of non-compliance:</b>  None apparent on the day of assessment.	<b>Objective evidence observed:</b> Not applicable
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Observation:	
<b>Description of observation:</b>  None observed	<b>Objective evidence observed:</b> Not applicable

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

**Summary Information**

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 48 hours/week	48 hours per week/ 8 hours per day	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 2 Hours a Day/12 Hours a week/50 Hours per quarter	2 Hours a Day/12 Hours a week/14 Hours per quarter.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	The Minimum wages as per Haryana INR 10532.84	Minimum wage paid by the facility to Unskilled INR 10540	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 200% the ordinary rate of wages	200% the ordinary rate of wages	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<b>Wages analysis:</b> <i>(Click here to return to Key Information)</i>			
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
A1: If <b>No</b> , why not?	Not Applicable		
B: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	42 sampled employees from May 2023 (Current Month) 42 sampled employees from January 2023 (Random Month) 42 sampled employees from August 2022 (Random Month)		
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If Yes, please give details: (INR ) Un-Skilled: 10532.84 Semi-Skilled A: 11059.44 Semi-Skilled B: 11612.40 Skilled A: 12193.03 Skilled B: 12802.69 H. Skilled : 13442.82	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	D1: If <b>No</b> , please give details:	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> Unskilled INR 10540.00	
F: Please indicate the breakdown of workforce per earnings:	F1: ___% of workforce earning under minimum wage F2: ___% of workforce earning minimum wage F3: 100 % of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: Bonus paid @11% before Diwali festival. <i>Note: full time employees and please state hour / week / month etc.</i>		
H: What deductions are required by law e.g. social insurance? Please state all types:	Employees Provident Fund, Employee State Insurance Corporation, Professional Tax		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that <b>have</b> been made.	1. ESIC 2.EPF 3.LWF

			Please describe:
		I2: Please list all deductions that <b>have not</b> been made.	1. Not Applicable 2. Please describe:
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Records reflect all time worked.		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time:		
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details:		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The local government revises the minimum wage once in six months which the facilities have to comply.		
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: From the review of available records it was noted that equal pay is given for same nature of work.		
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque		

	<input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other If other explain:
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**6: Working Hours are not Excessive**  
[\(Click here to return to summary of findings\)](#)  
[\(Click here to return to Key Information\)](#)

**ETI**

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

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

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**  
 Based from the In/Out time records, interaction with the employees and management,

1. There is no compulsion on overtime work. It is purely voluntary.
2. The employees work for 6 days a week in 1 shift:  
 09:00 AM TO 06:00 PM  
 LUNCH TIME – 01:00 PM– 02:00 PM  
 W/O- SUNDAY
3. Employees' wages gets calculated on monthly basis and paid on or before 7th of each month for all employees.

4. Facility had implemented Biometric Finger Scan Recording System to record IN/OUT Time of all employees.

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

**Details:**

- Labour contracts
- Payrolls (for 42 employees each of the month May 2023 (recent month), January 2023 (Random Month) and August 2022 (Random Month).
- Time records (for 42 employees each of the month May 2023 (recent month), January 2023 (Random Month) and August 2022 (Random Month).
- Production records (from work floors to check for discrepancies)
- Leave records

**Any other comments:** None

**Non-compliance:**

**Description of non-compliance:**

None apparent on the day of assessment.

**Objective evidence observed:**

Not applicable

**Observation:**

**Description of observation:**

None observed

**Objective evidence observed:**

Not applicable

**Good Examples observed:**

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

None observed

**Objective evidence observed:**

Not applicable

**Working hours' analysis**

Please include time e.g. hour/week/month

[\(Go back to Key information\)](#)

**Systems & Processes**

<p>A. What timekeeping systems are used: time card etc.</p>	<p>Describe: <i>Biometric Attendance System</i></p>				
<p>B: Is sample size same as in wages section?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  B1: If no, please give details</p>				
<p>C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>	<p>C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.                  Please give details:</p>			
<p>D: Are there any other types of contracts/employment agreements used?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>	<p>D1: If YES, please complete as appropriate:</p>			
		<p><input type="checkbox"/> 0 hrs</p>	<p><input type="checkbox"/> Part time</p>	<p><input type="checkbox"/> Variable hrs</p>	<p><input type="checkbox"/> Other</p>
		<p>If "Other", Please define:</p>			
		<p></p>			
<p>E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>	<p>E1: If <b>yes</b>, please detail hours, %, types of workers affected and frequency                  Please give details:</p>			
<p>F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?</p>	<p>F2: Please select all applicable:  <input checked="" type="checkbox"/> 1 in 7 days  <input type="checkbox"/> 2 in 14 days  <input type="checkbox"/> No                  If 'No', please explain:</p>	<p>F3: Is this allowed by local law?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>			
	<p>Maximum number of days worked without a day off (in sample):</p>				
	<p>06 days</p>				
<p><b>Standard/Contracted Hours worked</b></p>					
<p>G: Were standard working hours over 48 hours per week found?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>	<p>G1: If yes, % of workers &amp; frequency:</p>			

H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 14	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	_7_%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:
<b>Overtime Premiums</b>		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages:200%
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: 200%
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input checked="" type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other



	No Overtime workers
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<p><input checked="" type="checkbox"/> <b>Overtime is voluntary</b></p> <p><input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week</p> <p><input type="checkbox"/> Safeguards are in place to protect worker's health and safety</p> <p><input type="checkbox"/> Site can demonstrate exceptional circumstances</p> <p><input type="checkbox"/> Other reasons (please specify)</p> <hr/> <p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> <hr/> <p>Overtime not worked more than 60 hours per week.</p>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Q1: If yes, please give details:</p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>

**7: No Discrimination is Practiced**

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. From review of documentation and interviews with employees, there was no case of discrimination based on gender, religion etc. in hiring, compensation, access to training, promotion, termination or retirement.
2. Facility had provided suggestion boxes, which is opened on regular basis (every week).
3. The factory provides equal access to employment as well as equal pay for equal work.

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

**Details:**

- Labour contracts
- Payrolls (42 sample employees to check for equal remuneration is paid for equal work done)
- Time records (42 employees payroll records checked for equal opportunities to work overtime, If any)
- Policy on Discrimination
- Notice board

**Any other comments:** None

<p>A: Gender breakdown of Management + Supervisors (Include as one combined group)</p>	<p>A1: Male: <u>95</u> % A2: Female <u>05</u> %</p>
<p>B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:</p>	<p>00</p>
<p>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?:</p>	<p> <input type="checkbox"/> Hiring  <input type="checkbox"/> Compensation  <input type="checkbox"/> Access to training  <input type="checkbox"/> Promotion  <input type="checkbox"/> Termination or retirement  <input checked="" type="checkbox"/> No evidence of discrimination found         </p>

	C1: Please give details:
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Professional Development	
A: What type of training and development are available for workers?	The facility provides training on safety like fire fighter training, first aid training and also on job training skill training to the unskilled workers if they are willing to develop their skills.

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details:
------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------

Non-compliance:	
<b>Description of non-compliance:</b> None apparent on the day of assessment.	<b>Objective evidence observed:</b> Not applicable

Observation:	
<b>Description of observation:</b> None observed	<b>Objective evidence observed:</b> Not applicable

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

**8: Regular Employment Is Provided**

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

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

**ETI**

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

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

**Additional Elements: Responsible Recruitment**

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. Employees have letters of appointment which are equivalent to labour contracts as they outline their rights as employees, their remuneration, etc.
2. All interviewed employees have informed the assessment team that they have a received copy of appointment letter. There were no apparent concerns on the day of assessment.

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

**Details:**

1. Labour contracts (for 42 employees)
2. Payrolls (for 42 employees)
3. Leave records

**Any other comments:** None

**Non-compliance:**

<b>Description of non-compliance:</b>  None apparent on the day of assessment.	<b>Objective evidence observed:</b> Not applicable
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**Observation:**

<b>Description of observation:</b>  None observed	<b>Objective evidence observed:</b> Not applicable
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**Good Examples observed:**

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

**All Workers**

<b>A:</b> Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions  If any are unchecked, please describe finding and specific category (ies) of workers affected: Not applicable
<b>B:</b> Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes Please describe details and specific category (ies) of workers affected

C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other Not Applicable
D: If any checked, give details:	Not Applicable

<b>Migrant Workers:</b> <i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>	
A: Type of work undertaken by migrant workers:	No Migrant Workers
B: Please give details about recruitment agencies for migrant workers:	Total number of (in country recruitment agencies) used: Total number of (outside of local country) recruitment agencies used
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding: Not Applicable Observations: NONE
D: Are Any migrant workers in skilled, technical, or management roles  <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes number and example of roles: Not Applicable

### NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other  B1 – If other, please give details: NA
C: If any checked, give details:	Not Applicable

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

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

<p style="text-align: center;"><b>Contractors:</b></p> <p><i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i></p>	
<p>A: Any contractors on site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, how many contractors are present, please give details: No Labor Contractor on-site</p>
<p>B: If <b>Yes</b>, how many workers supplied by contractors?</p>	<p>00</p>
<p>C: Do all contractor workers understand their terms of employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding: Not Applicable</p>
<p>D: If <b>Yes</b>, please give evidence for contractor workers being paid per law:</p>	<p>Not Applicable</p>



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

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

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

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

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

*Note to auditor on homeworking:*

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

The facility was using 07 sub-contractors for various processes which are sister concern units of the same facility.

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

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

<i>Process Subcontracted</i>	<i>Process 1</i>	<i>Process 2</i>
<i>Name of factory</i>	NA	NA
<i>Address</i>	NA	NA

Details:

- Factory Tour & Document Review

**Non-compliance:**

**Description of non-compliance:**

None apparent on the day of assessment.

**Objective evidence observed:**

Not applicable

**Observation:**

**Description of observation:**

None observed

**Objective evidence observed:**

Not applicable

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

Summary of sub-contracting – if applicable <input type="checkbox"/> Not Applicable please x	
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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe: Auditor has cross checked the production capacity with the processes and capacity installed for production.
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If <b>Yes</b> , summarise details: All sub-contractors are approved vendors.
C: Number of sub-contractors/agents used:	07
D: Is there a site policy on sub-contracting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If <b>Yes</b> , summarise details: Facility has a policy on subcontracting and the same has been communicated to all sub-contractors
E: What checks are in place to ensure no child labour is being used and work is safe?	Annual on-site evaluation and social audits were conducted at all sites.

Summary of homeworking – if applicable <input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If <b>Yes</b> , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

<p>E: How does the site ensure worker hours and pay meet local laws for homeworkers?</p>	
<p>F: What processes are carried out by homeworkers?</p>	
<p>G: Do any contracts exist for homeworkers?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>G1: Please give details:</p>
<p>H: Are full records of homeworkers available at the site?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>

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

**ETI**

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.  
 Additional elements:  
 9.2 companies should provide access to a confidential grievance mechanism for all workers

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 <sup>rd</sup> party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Facility has formed a Work's and grievance committee.
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	Facility's grievance committee representative will Communicate the details to their employees in their respective section and workers are aware of these channels and have access to the same.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	1. Open Door Policy- Direct communication during meeting 2. Suggestion Box
D: Which of the following groups is there a grievance mechanism in place for?	<input type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Other- Open Door policy, Grievance committee Details Please give Details: As per the facility management they have an open door policy and workers are free to contact the higher management for any sort of grievances without any fear. Further, the facility has provided suggestion / complain box and any employees what to drop, his complaint or suggestions are free to drop. The facility has its own grievance handling procedures. Further, facility has works committee having members from workers side as well as management side. The responsibility of grievance committee is resolve workplace disputes.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  F1: If no, please give details:
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  G1: If no, please explain :

<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>H1: If no, please give details :</p>
<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>I1: If yes, please give details: Not Applicable</p>

<p><b>Current Systems and Evidence Examined</b></p> <p><i>To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.</i></p>
<p><b>Current systems:</b></p> <ol style="list-style-type: none"> <li>As per the interviewed employee's testimony, all employees are treated with dignity and respect and there were no signs of physical abuse, sexual or other harassment and verbal abuse.</li> <li>Grievance mechanism is posted in the notice board for workers reference.</li> <li>All interviewed workers were found to be aware of the grievance procedures.</li> </ol> <p><b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b></p> <p><b>Details:</b></p> <ul style="list-style-type: none"> <li>Disciplinary Policy</li> <li>Personal files</li> <li>Grievance handling policy</li> </ul> <p><b>Any other comments:</b> None</p>

Non-compliance:	
<p><b>Description of non-compliance:</b></p> <p>None apparent on the day of assessment.</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>

Observation:	
<p><b>Description of observation:</b></p> <p>None observed</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: Not applicable

10. Other Issue areas: 10A: Entitlement to Work and Immigration <i>(Click here to return to NC-table)</i>
<p><b>Additional Elements</b></p> <p>10A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>

Current Systems and Evidence Examined
<p><i>To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.</i></p>
<p><b>Current systems:</b></p> <ol style="list-style-type: none"> <li>There are no foreign nationals employed onsite.</li> <li>All sampled 42 employees' personal data files are found to be well maintained with photocopies of documentation showing that they have local citizenship and do not need special permission to work in the factory.</li> <li>The facility does not have agency employees and all employees are treated equally and covered under social benefits.</li> <li>All employees are eligible for trainings.</li> </ol> <p><b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b></p> <p><b>Details:</b></p> <ol style="list-style-type: none"> <li>Employee muster roll</li> <li>Personal data files (42 personnel files were checked for proof of identity documentation)</li> </ol> <p><b>Any other comments:</b> None</p>

Non-compliance:	
Description of non-compliance: None apparent on the day of assessment.	Objective evidence observed: Not applicable

Observation:

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

**10. Other issue areas 10B4: Environment 4–Pillar**  
[\(Click here to return to summary of findings\)](#)  
*To be completed for a 4–Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar*

**B.4. Compliance Requirements**

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

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

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

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

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

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

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

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

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

**B4. Guidance for Observations**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. The facility has drafted an environmental policy.
2. The facility has a system to provide environmental awareness through notice board post to relevant employees.
3. The facility has not disposed its hazardous waste to the authorized waste handler and non-hazardous waste through an appropriate scrap dealer.
4. Facility had conducted necessary air ambient test and work place noise monitoring test once in a period of 06 months through competent authority.

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

**Details:**

- Policy on environment.
- Training records
- Test Records of Air Ambient and Workplace Noise Monitoring.
- Test Records of Stack Emission Test DG Set

**Any other comments:** None

**Non-compliance:**

**Description of non-compliance:**

None apparent on the day of assessment.

**Objective evidence observed:**

Not applicable

**Observation:**

**Description of observation:**

None observed

**Objective evidence observed:**

Not applicable

**Good Examples observed:**

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

None Observed

**Objective evidence observed:**

Not Applicable



<b>Environmental Analysis</b> <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Mr. Shafqat Kazmi-Environment Manager
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility has conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: None
D: Does the site have an Environmental policy? (For guidance, please see Measurement criteria)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? The site has an environment policy which is publicly available.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The environment policy of the site address the key impacts from their operations and their commitment to improvement.
F: Does the site have a Biodiversity policy? (For guidance, please see Measurement criteria)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. (For guidance, please see Measurement criteria)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: There is no sustainability systems present.
H: Have all legally required permits been shown? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: The facility shown all the legally required permits during the audit process.
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A I1: Please give details: Not applicable
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The facility has system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues
K: Facility has reduction targets in place for environmental aspects e.g. water consumption	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

and discharge, waste, energy and green-house gas emissions:	K1: Please give details: The facility has reduction targets in place for environmental aspects.	
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: The facility has shown evidence of waste recycling and is monitoring volume of waste that is recycled	
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Water – water flow meter, Energy – Energy meter, LPG – LPG meter flow	
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: Please give details: Not Applicable	
Usage/Discharge analysis		
Criteria	Previous year: Please state period: Jan 2022 – Dec 2022	Current Year: Please state period: Jan 2023 to May 2023
Electricity Usage: <i>Kw/hrs</i>	379482	66981
Renewable Energy Usage: <i>Kw/hrs</i>	163890	109253
Gas Usage: <i>Kw/hrs</i>	9085.5 Ltrs	220 Ltrs
Has site completed any carbon Footprint Analysis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If <b>Yes</b> , please state result	304	56
Water Sources: <i>Please list all sources e.g. lake, river, and local water authority.</i>	<ul style="list-style-type: none"> <li>Bore well</li> </ul>	<ul style="list-style-type: none"> <li>Bore well</li> </ul>
Water Volume Used: <i>(m<sup>3</sup>)</i>	2310.84	910
Water Discharged: <i>Please list all receiving waters/recipients.</i>	<ul style="list-style-type: none"> <li>Sewer</li> </ul>	<ul style="list-style-type: none"> <li>Sewer</li> </ul>
Water Volume Discharged: <i>(m<sup>3</sup>)</i>	1412.33	819
Water Volume Recycled: <i>(m<sup>3</sup>)</i>	Nil	Nil

Total waste Produced <i>(please state units)</i>	8273.5 kg	6904 kg
Total hazardous waste Produced: <i>(please state units)</i>	448.4 kg	140 kg
Waste to Recycling: <i>(please state units)</i>	7825 kg	2440 kg
Waste to Landfill: <i>(please state units)</i>	0	0
Waste to other: <i>(please give details and state units)</i>	0	0
Total Product Produced <i>(please state units)</i>	6867329 sq mtr	4611220 sq mtr

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

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

To be completed for a 4-Pillar SMETA Audit

**10C. Compliance Requirements**

- 10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
- 10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.
- 10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.
- 10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.
- 10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,
- 10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics
- 10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

**10C. Guidance for Observations**

- 10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.
- 10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- 1. Business ethics policy maintained by factory.
- 2. Training provided to employees on business ethics and corruption.

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

Details:  
Training Records.

Any other comments: NONE

Non-compliance:	
<b>Description of non-compliance:</b> None apparent on the day of assessment.	<b>Objective evidence observed:</b> Not applicable

Observation	
<b>Description of observation:</b> None observed	<b>Objective evidence observed:</b> Not applicable

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

A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	<input checked="" type="checkbox"/> Internal Policy <input type="checkbox"/> Policy for third parties including suppliers A1: Please give details: Policy and Procedure are in place.
B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Training provided quarterly to all relevant personnel
C: Is the policy updated on a regular (as needed) basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Annually
D: Does the site require third parties including suppliers to complete their own business ethics training	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please give details: Not Applicable

Other findings

Other Findings Outside the Scope of the Code
NONE

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

## Appendix 1

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

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

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



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

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

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

<p><b>10C. Compliance Requirements</b></p> <p>10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.</p> <p>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.</p> <p>10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.</p> <p>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.</p> <p>10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,</p> <p>10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics</p> <p>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.</p> <p><b>10C. Guidance for Observations</b></p> <p>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.</p> <p>10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented.</p>	
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## Photo Form




 <p>A photograph of a white wall with a blue and white sign that reads "RAJ OVERSEAS UNIT-4 PLOT NO.-8, SEC - 26, (I) HUDA PANIPAT - 132103 (HR)". To the right, a vertical blue sign contains text in Hindi, including "FORCED LABOR".</p>	 <p>A photograph showing the exterior of a modern industrial building with a black metal gate. A person is visible near the gate.</p>	 <p>A photograph of a paved area with potted plants and a building in the background.</p>
<p>Facility name &amp; Address board Posted</p>	<p>Facility Overview</p>	<p>Periphery area</p>
 <p>A photograph of a security room with a person standing near a desk and a computer monitor.</p>	 <p>A photograph of a fire control panel with a red fire alarm pull station and a fire extinguisher.</p>	 <p>A photograph of a white first-aid box with a red cross symbol and a sign above it that reads "FIRST-AID BOX" and "1".</p>
<p>Security Room</p>	<p>Fire Control Panel</p>	<p>First-aid Box</p>
 <p>A photograph of a wall covered with numerous posters and notices, including one titled "Social Policy".</p>	 <p>A photograph of a blue and white sign posted on a wall, which is a "No Child Labor" board.</p>	 <p>A photograph of a large board with multiple notices and documents pinned to it.</p>
<p>Social Policy posted</p>	<p>No Child Labor Board posted</p>	<p>Company Noticed Board</p>









Assembly point	Fire Hydrant & Fire Extinguisher	ETI COC Posted
		
Employees Entrance Gate -2	Employees Parking	Transformer
		
Fire Alarm	Diesel generator	Electrical panel
		
Safety Poster Posted	Suggestion Box	Hand Wash Area






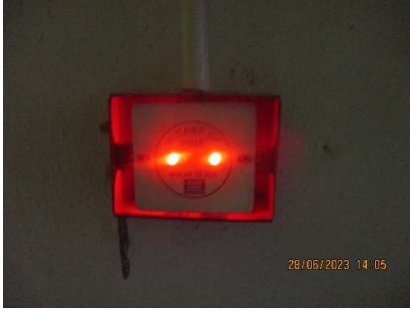








		
<p>Urinal facility provided for workers</p>	<p>Toilet</p>	<p>Fire Modular &amp; Smoke Detector</p>

		
<p>Emergency light installed with exit sign board</p>	<p>Medical Room</p>	<p>Lift</p>

		
<p>Handrail Installed at staircase</p>	<p>Directional Arrow Marked</p>	<p>Lunch Area</p>

		
<p>Legal Abstract Posted</p>	<p>Drinking Water Point</p>	<p>Canteen</p>




		
<p>STP Plant</p>	<p>Time Recording Machine</p>	<p>Emergency Light Tested at audited Site</p>
		
<p>Fire alarm Tested at audited Site</p>	<p>Hydrant system Tested at audited Site</p>	<p>Trims Store</p>
		
<p>Store</p>	<p>Checking Section</p>	<p>Sewing section &amp; labelling section</p>
		
<p>Sewing section &amp; labelling section</p>	<p>Checking Section</p>	<p>Store</p>

Metal Detector checking area	Packing section	Finished Goods Area
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**Non \_Compliance Finding Photo**

		N/A
NC photo-1 Safety Guard Missing	NC Photo -2 _ hand rail not Installed	N/A

**Corrected Photo**

		
Corrected Photo # 2 _Handrail Installed		



For more information visit: [Sedexglobal.com](https://www.sedexglobal.com)

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

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

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

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**[Click here for Supplier \(B\) members:](#)**

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\\_2brg\\_3d\\_3d](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

**[Click here for Auditors:](#)**

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

