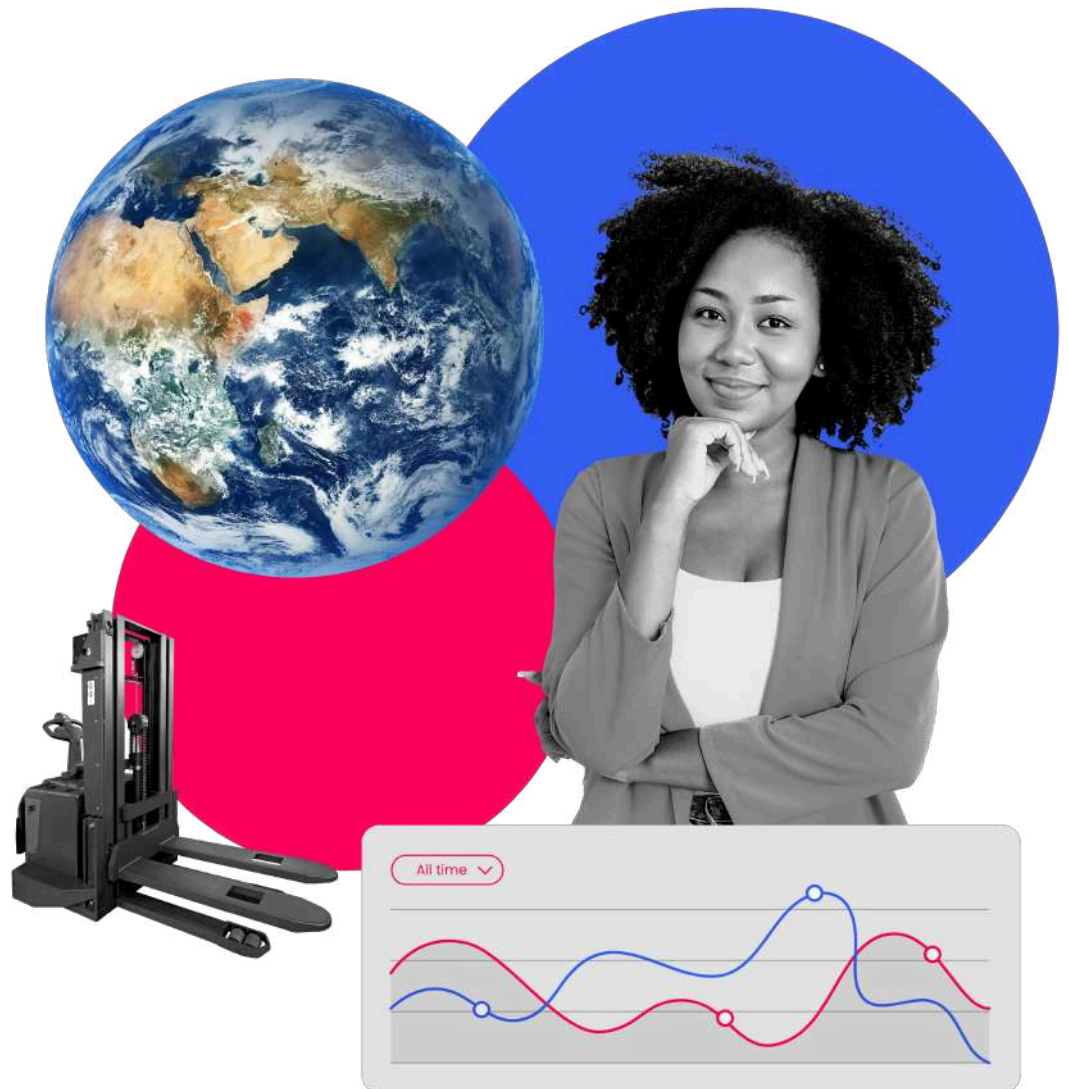


Sedex Members Ethical Trade Audit Report

Version 7



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Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA methodology are stated (with reasons for deviation) in the SMETA declaration.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the code areas below.

2-pillar audits include:

- Labour standards:
 - 0. Enabling accurate assessment
 - 1. Employment is freely chosen
 - 1.A. Responsible recruitment and entitlement to work
 - 2. Freedom of association and right to collective bargaining are respected
 - 4. Child labour shall not be used
 - 5. Legal wages are paid
 - 5.A. Living wages are paid
 - 6. Working hours are not excessive
 - 7. No discrimination is practiced
 - 8. Regular employment is provided
 - 8.A. Sub-contracting and homeworkers are used responsibly
 - 9. No harsh or inhumane treatment is allowed
- Health and safety:
 - 3. Working conditions are safe and hygienic
- Environment:
 - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
 - 10.B. Environment 4-pillar
- Business ethics:
 - 10.C. Business ethics

(2) Where appropriate, non-compliances or non-conformances were raised where either local law or the base code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

(3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit details

Site details

Sedex site reference	ZS406349386	Site name	RAJ OVERSEAS UNIT 4
Business name	RAJ OVERSEAS"	Site address	PLOT NO 8, SECTOR-25, HUDA, PART-I PANIPAT IN 132103

Audit details

Sedex company reference	ZC406346107	Auditor company name	BUREAU VERITAS CPS - ASIA
Audit company address	7th Floor. Octa Tower. 8 Lam Chak Street, Kowloon Bay, Kowloon, HONG KONG, CN, -		
Date of audit	2026-02-16	Audit conducted by	Kumari Kanchan
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		
Time in and out	Day 1	Day 2	
	In 09:30	In	09:05
	Out 17:00	Out	15:50
Audit type	Periodic		
Was the audit announced?	Unannounced		

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Was the Sedex SAQ available for review? Yes

Who signed and agreed CAPR? Mr. Vinod Chhoker / Sr. Manager Compliance

Any conflicting information SAQ/Pre-Audit Info No

Is further information available? No

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	No	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	Union does not exist in the facility.		
Reason for absence during the audit	Union does not exist. And worker representative was busy with the production work.		
Reason for absence at the closing meeting	Union does not exist in the facility.		

SMETA declaration

Auditor team

SMETA declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.
2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

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.

Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)

Unannounced Audit

Lead auditor

Kumari Kanchan

APSCA Number

32200818

Additional auditor

DIPANKAR RAY

APSCA Number

32400956

Date of declaration

2026-02-17

[← Contents](#)

[Findings →](#)

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Mr. Vinod Chhoker
Title	Sr. Manager Compliance
Date of declaration	2026-02-17

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.N Ensure that all hazardous substances (e.g...	Local law	NC ZAF601314734
	3.N Ensure that all hazardous substances (e.g...	Local law	NC ZAF601314735

Management systems

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

Not addressed

Fundamental improvements required

Some improvements recommended

Robust management systems

[← Summary of findings](#)

[Site details →](#)

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

Not addressed

Fundamental improvements required

Some improvements recommended

Robust management systems

Site details

Company and site details

Sedex company reference	ZC406346107	
Sedex site reference	ZS406349386	
Company name	RAJ OVERSEAS"	
Business ownership type	GOODS	
Site name	RAJ OVERSEAS UNIT 4	
Site name in local language	RAJ OVERSEAS UNIT 4	
GPS location	GPS address	lot No 8, 25 Sector Part 1, Sector 25 Phase 1, Huda, Panipat, Haryana 132103
	Coordinates	29.380737482409202, 76.97278809655302
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Mr. Vinod Chhoker
	Job title	Senior Manager Compliance
	Phone number	8684800240
	Email	compliance2@rajgroup.in

[← Management systems](#)

[Worker analysis →](#)

Company and site details

Applicable business and other legally required business license numbers and documents

1. Factory License No: #PPT-ONLINE-CHD-R-117 to employ maximum 900 workers and 450 HP valid up to 31-12-2026.
2. Approved Building Layout Plan 25-05-2024.
3. Building Stability Certificate issued on dated: 10/04/2024.
4. Certified Standing Order No: Dated: 06/05/2005. Modified and included plot 08 as on 16/08/2017
5. Non- IBR Boiler - pressure vessel- tested on 09/06/2025, Next due 08/07/2026.
6. Fire NOC: Dated: 08/12/2025 and valid till 3 years.
7. Diesel Generator: 500 KVA& 380 KVA approved. Dated: 10/06/2025.
8. Lift Test - 09-06-25 to 08-07-26.
9. FSSAI - 03-11-25 TO 02-11-26.

[← Management systems](#)

[Worker analysis →](#)

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	Primary	Manufacture of carpets and rugs
	Secondary	
	Other	
Product type	Manufacturing of Kilims, Bathmat, Pouf, Cushion, Scatter Durries & Pillows, Carpets and other floor covering items.	
Process overview	Product - Kilims, Bath mat, Pouf, Cushion, Scatter Durries & Pillows, Carpets. No. Of Production Lines - Labeling- 02, Packing- 06 Finishing - 06 Main Equipment's - Stitching - 25, Boiler- 01, Cutting Machine -01, Interlock - 03.	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes
What is the area of audited site to its boundary?	5000m ²

[← Site details](#)

[Worker analysis →](#)

Site scope

Building 1	Last construction works on site	2017
	If building is shared, provide details	NA
	Number of floors	5
	Description of floor activities	<p>Ground Floor- Admin Office, semi-finished goods store, Carpet finishing & Medical room</p> <p>Mezzanine- Office, Inspection room Trim material storage, sample store and canteen</p> <p>First Floor - Used for carpets- Carpet Packaging, Accessories store, packing material store, rest room</p> <p>Second Floor - Used for Rugs- Rugs finishing, passing, Semi- finished rugs storage, Rugs packaging & Label stitching</p> <p>Third Floor - Used for Home Textiles Fabric store, Cutting, stitching, Finishing/clipping, Packing, Dispatch Boiler & Compressor</p> <p>Periphery - Genset, STP, Security room, Creche, Chemical room, Waste storage area, Fire Pump</p>

Is there any difference between the site scope of the audit and the Sedex site profile? No

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

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

[← Site details](#)

[Worker analysis →](#)

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No
Does the site organise worker transport to the worksite?	Not applicable
	Not Applicable

Work patterns

Approximate workers on site per month (% of peak)	January	90-100%	February	90-100%
	March	90-100%	April	90-100%
	May	90-100%	June	90-100%
	July	90-100%	August	90-100%
	September	90-100%	October	90-100%
	November	90-100%	December	90-100%

Is there any night shift work at the site? No

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? ISO 45001 (OHS), ISO 14001 (Environmental management), Other certification
ISO 9001:2015

[← Site details](#)

[Worker analysis →](#)

Site assessments

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

No such site assessment done by any government or non-government body so far. However, facility has policy to respect human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.

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

No. However, facility has done internal risk assessment on dated 01/12/2025

[← Site details](#)

[Worker analysis →](#)

Worker analysis

Gender disaggregated data available Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	297 (96.4%)	11 (3.6%)	- -	308 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	297 (96.4%)	11 (3.6%)	- -	308 (100%)
Temporary or fixed term employees	0 -	0 -	- -	0 (0%)
Agency or subcontracted workers	0 -	0 -	- -	0 (0%)
Seasonal workers	0 -	0 -	- -	0 (0%)
Self-employed workers	0 -	0 -	- -	0 (0%)
Informal workers including home workers	0 -	0 -	- -	0 (0%)
Apprentices, trainees or interns	0 -	0 -	- -	0 (0%)

* % of total workforce

[← Site details](#)

[Worker interviews →](#)

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	99 (95.2%)	5 (4.8%)	- -	104 (33.8%)
International migrant workers	0 -	0 -	- -	0 (0%)
Total migrant workers	99 (95.2%)	5 (4.8%)	- -	104 (33.8%)

* % of total workforce

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

Uttar Pradesh, Bihar, West Bengal, Delhi

Workers by age

	Men	Women	Other	Total
18 - 24 years old	25 (86.2%)	4 (13.8%)	- -	29 (9.4%)
15 - 17 years old	0 -	0 -	- -	0 (0%)
Under 15 years old	0 -	0 -	- -	0 (0%)

* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

Is the worker analysis data relevant for peak season and current to the audit? No

Describe how this may vary during peak periods No peak season, consistent work throughout the year.

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

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Indian	96%	4%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	106 (100%)	0 (0%)	- -	106 (34.4%)
Workers paid based on a mix of 'piece work' and hourly rate	0 -	0 -	- -	0 (0%)
Workers paid hourly / daily rate	0 -	0 -	- -	0 (0%)
Salaried workers	191 (94.6%)	11 (5.4%)	- -	202 (65.6%)

* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 (0%)
Paid weekly	0 -	0 -	- -	0 (0%)
Paid monthly	297 (96.4%)	11 (3.6%)	- -	308 (100%)
Other	0 -	0 -	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details

Wages for all employees are calculated and paid once on or before 7th of every month by bank transfer.

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	3 (60%)	2 (40%)	- -	5
Supervisors or team leaders	35 (100%)	0 (0%)	- -	35
Administrative staff	75 (90.4%)	8 (9.6%)	- -	83

[← Worker analysis](#)

[Worker interviews →](#)

Worker interview summary

Gender disaggregated data available Men and women

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

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?

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

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

Number and size of group interviews 04 Group of 05 workers

Did workers understand the purpose of the audit? Yes

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

Was there any indication that workers had been 'coached' in how they should respond to questions?

No

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

Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?

Other (provide details)
No Complaints has been raised.

What did the workers like the most about working at this site?

Freedom of movement
Work atmosphere (e.g. treatment by supervisors)
Work environment – comfort (e.g. temperature, noise or dust levels)

Additional comments

None.

Attitude of workers' committee/union representatives

The attitude of the works committee members was positive towards social management system. They reported that they have free access to works committee related activities without any negative action. All issues of concerns raised in committee meetings are addressed and resolved by management in timely manner.

Attitude of managers

The facility management showed a positive attitude to this audit during the whole process and was transparent. All documentation requested for review was provided timely. At the end of the audit, all the non-compliances were accepted by the facility. No negative information reported

Workers interviewed by type

	Total
Permanent workers	26
Temporary or fixed-term employees	0

[← Worker analysis](#)

[Measuring workplace impact →](#)

Workers interviewed by type

Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	26

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	15	5	-	20
Workers interviewed individually	6	0	-	6

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	21	5	-	26
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	21	5	-	26

Measuring workplace impact

Gender disaggregated data available Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	10.0%	2.0%	-	12.0%
Last full calendar year (2025)	9.0%	1.0%	-	10.0%
Previous full calendar year (2024)	10.0%	1.0%	-	11.0%

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

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	9.0%	2.0%	-	11.0%
Last full calendar year (2025)	8.0%	2.0%	-	10.0%
Previous full calendar year (2024)	9.0%	2.0%	-	11.0%

Number of days lost through job absence in the year, calculated as: $(\text{Number of days lost through job absence in the year}) / [(\text{Number of employees on 1st day of the year} + \text{Number of employees on the last day of the year}) / 2] * (\text{Number of available workdays in the year})$.

Are accidents recorded? Yes

Facility maintains an accident record and no accident occurred in last one year.

[← Worker interviews](#)

[Code area 0 →](#)

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

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

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

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

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

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

	Men	Women	Other	Total
Last full quarter (90 days)	30.0%	0.0%	-	30.0%
Last full calendar year (2025)	30.0%	0.0%	-	30.0%

[← Worker interviews](#)

[Code area 0 →](#)

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

Previous full calendar year (2024)	35.0%	0.0%	-	35.0%
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Percentage of workers that work on average more than 60 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> •Facility has conducted business ethics/Anti bribery training and however they follow policy which states that they shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice. •Facility has formed the policy considering it in compliance with the legal requirements and the compliance manager and team always update it as required. <p>Evidence Examined:</p> <ul style="list-style-type: none"> •Document review. •Management interview. •Employee interview. 		

0. Enabling accurate assessment

Data points

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

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

Were any external stakeholders such as consultants, customer representatives, industry experts etc. present during the audit? No

1. Employment is freely chosen

Management systems

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

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

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

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

Explanation for management systems grades

- The facility has well-developed policies and procedures related to forced labor.
- The facility does not appear to have any signs of forced, bonded, or involuntary labor.

there were also no signs of a prison.

- The workers are not required to lodge any original documents or any monetary deposits during employment.
- Workers are free to move from workplace after standard working hours.
- All employees can relieve themselves from duty after giving reasonable notice time.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

[← Code area 0](#)

[Code area 1.A →](#)

Systems and evidence examined to validate this code section

The facility has developed its own policies and procedures related to all social principles.

- The facility has obtained all relevant legal licenses to operate and have a system in place to monitor compliance, and all the legal document was found valid with compliance.
- Internal audits were conducted on a regular basis.
- Mr. Vinod Chhoker – Senior Compliance Manager is responsible for the implementation of the code.
- Regular training is conducted and documented.

Evidence examined:

- Policy on forced labour, child labour, discrimination, Harassment, general human rights, freedom of association
- Training records
- Licenses
- Personal files
- Committee records
- Land documents
- Internal audits

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement? No

Does the site utilise any workers who are prisoners? No

Does the site use the labour of persons required to work under any government scheme? No

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The facility has nominated Compliance person (Mr. Vinod Chhoker – Senior Compliance Manager) for the implementation of the Code. The facility management was found to be aware of the legal and requirement. The facility has well developed policy and procedures in place. Regular training is conducted and documented. Risk assessment and internal audit conducted to check the effective implementation of policies and procedures.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 1](#)

[Code area 2 →](#)

Systems and evidence examined to validate this code section

There are no foreign nationals employed onsite.

- All sampled 26 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.
- All eligible employees are treated equally and covered under social security benefits.
- Training is conducted on regular basis for all employees.

Evidence Examined:

- Policy and procedures
- Employee muster roll
- Personal data files (26 personnel files were checked for proof of identity documentation)
- Training records

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

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

Migrant workers

Do any workers migrate across international borders to work at this site?	No
---------------------------------------------------------------------------	----

[← Code area 1.A](#)

[Code area 2 →](#)

Percentage of workers that are migrant 34%

Do any workers migrate from other states, provinces or regions within the country to work at this site? Yes

List the sending states/provinces/regions Uttar Pradesh, Bihar, West Bengal & Delhi.

Recruitment fees

Have any workers who started at this site in the last 12 months (new workers) paid any recruitment fees or associated costs, such as visas or travel, which have not been fully repaid? No - there are no new workers

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

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The facility has designated person for the implementation of the code and legal requirements. The facility has well developed policy and procedures in place related to freedom of association. The facility does not have a union in the facility and has formed different committees like the works committee and Internal complaint committee. The facility informed their workers about the member of the workers committees for easy approach for the worker's reference. Risk assessment and internal audit conducted to check the effective implementation of policies and procedures.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 1.A](#)

[Code area 3 →](#)

Systems and evidence examined to validate this code section

The facility has developed its own policy and procedures related to Freedom of association and collective bargaining.

- The policy is being communicated to all employees.
- Workers reported that there are no restrictions on forming a union in the facility or bargaining collectively, although employees were not very clear on these concepts.
- Employees stated that they have worker representatives and has formed different committees like works & grievance redressal committee, EHS committee etc. and meetings were held on regular basis.
- All interviewed employees stated that they are happy with the current environment and the facility is taking care of all their requirements.
- Facility has provided suggestion box through which employees can report grievances. Further, employees can also approach management with their grievance and adequate actions are taken.
- There was no evidence of suppression of employees' rights.

Evidence Examined:

- Facility Policy and Procedures.
- Interaction with Management and Interview with employees.
- Grievance committee meeting conducted on 27/10/25 & 27/01/2026

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

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are there alternative worker representative bodies in place?	Yes, worker committee
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Yes
Does the membership reflect the nationality composition of the workforce?	Not Applicable

[← Code area 2](#)

[Code area 3 →](#)

Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years? Yes, as part of a general strike

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	Based on the review of records and audit process it was observed that the facility has defined policies and procedure on health and safety. Facility dedicated person to implement the policies and procedures. Further they have imparted the training to all the employees on this parameter, and the effectiveness of the training was checked by the facility management based on the assessment after the training. Further the internal audit was also done by the facility to ensure that they are meeting with all the requirement and complying with the system. A few deviations were found, and non-compliances have been raised in respective sections, factory is recommended to increase its monitoring to obtain the full compliance.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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[← Code area 2](#)

[Code area 4 →](#)

3. Working conditions are safe and hygienic	3.N Ensure that all hazardous substances (e.g...	Local law	NC ZAF601314734
	3.N Ensure that all hazardous substances (e.g...	Local law	NC ZAF601314735

Systems and evidence examined to validate this code section

1. General Health and Safety management
 - Potable water was freely available in the facility and test certificate was up to date.
 - Sufficient number of toilets were available at all times to workers.
 - Ventilation, temperature and lighting were adequate in all section of the facility.
 - Housekeeping found acceptable throughout the facility.
 - Facility building found structurally in safe condition.
 2. Fire Safety
 - Facility has installed fire extinguishers covering all departments of the facility.
 - Facility has installed Fire alarm call point, Smoke Detector, Sprinkler points, Fire Bucket, Hydrant, Hose Reel at audited site covering all section of the facility. Fire alarm system found operational on the day of audit.
 - Emergency lights are provided with secondary power source back-up to ensure adequate illumination is available in case of normal power failure.
 - Adequate evacuation plans posted in the production sheds.
 - Fire drills were organized for day on 14/02/2026 & 16/12/2025.
 - Facility has marked exits of facility in local language for employee's reference.
 - Fire safety training provided to sufficient number of employees through competent agency.
 3. Machine & Electrical safety
 - All machines and electrical equipment's found maintained in good condition. Some machines were found without safety guards.
 4. Chemical safety and use of PPEs.
 - Appropriate PPEs were issued to workers.
 - It was noted that the factory has not displayed MSDS in local language in the domestic chemical room located in the periphery.
 - It was noted that the factory has not labeled some chemicals in the domestic chemical room located in the periphery.
 5. Medical services
 - Facility had provided 13 first aid box with adequate contents.
- Evidence Examined:
- Health and Safety Policy.
 - Industrial accident records – Updated and no accident occurred in last one year.
 - Drinking Water Test obtained on 27/01/2026 & 25/07/2025.
 - Firefighting equipment inspection conducted on daily and monthly basis.
 - Fire training provided on 15/11/2025 & 10/05/2026.

Findings: non-compliances

ZAF601314734

Non-compliance

Due 2026-04-24

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.N Ensure that all hazardous substances (e.g. chemicals and pesticides) are officially registered where possible, Material Safety Data Sheets are used, and they are managed appropriately at all times in line with registration and safety instructions, including storage, use and disposal.

Time given to resolve

60 days

Verification method

Desktop audit

Issue title

231 - Material safety data sheet (MSDS) is incomplete/inaccurate/not in worker language/not understood by workers

Area of non-compliance/non-conformance

Local law

Description

It was noted through the factory tour that, the factory has not display the MSDS sheet in Local language in the domestic chemical room located in the periphery.

Corrective and preventative actions

It is recommended to the factory to display the MSDS in local language.

Local law reference

In accordance with Punjab Factory rules (applicable in the state of Haryana), Section 67 (J), the occupier or every factory on a hazardous process shall arrange to obtain or develop details information in the form the Material Safety Data Sheet (MSDS) include in from (C) in respect of the hazardous substance or material handled in manufacturer, transportation and storage in the factory.

Evidence

[← Code area 3](#)

[Code area 4 →](#)



[MSDS not posted in local language.jpg](#)



[Domestic Chemical Store.jpg](#)



* PDF generated at 07:17 (UTC) on 23 Feb 2026. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF601314735

Non-compliance

Due 2026-04-24

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.N Ensure that all hazardous substances (e.g. chemicals and pesticides) are officially registered where possible, Material Safety Data Sheets are used, and they are managed appropriately at all times in line with registration and safety instructions, including storage, use and disposal.

Time given to resolve

60 days

Issue title

232 - Non-hazardous chemicals are stored unlabelled or labelling is incorrect

Verification method

Desktop audit

Description

It was noted through factory tour that, the factory has not labeled some chemicals in the domestic chemical room, located in the periphery.

Area of non-compliance/non-conformance

Local law

Corrective and preventative actions

It is recommended to the factory to label all containers of chemicals appropriately.

[← Code area 3](#)

[Code area 4 →](#)

Local law reference

In accordance with Hazardous Chemical Rules, 1989

These Rules have been framed under the Environment Protection Act, 1986 by the Government of India, Ministry of Environment.

Applicability :- These Rules apply to all workplaces in which the hazardous chemicals are manufactured or stored.

Salient Features of this legislation are:-

- (i) Labelling of Containers containing hazardous substances.

Evidence



[Chemicals not labelled.jpg](#)



* PDF generated at 07:17 (UTC) on 23 Feb 2026. [View this finding on the Sedex platform](#) for live updates and closure details.

[← Code area 3](#)

[Code area 4 →](#)

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Workers organise their own transport
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes Yes, the site was found to be compliant with the approved building plan as approved on dated 27-05-2024.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No

[← Code area 3](#)

[Code area 4 →](#)

Does the site have a structural engineer evaluation? Yes

[← Code area 3](#)

[Code area 4 →](#)

4. Child labour shall not be used

Management systems

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

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

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

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

Explanation for management systems grades The facility has designated person Mr. Vinod Chhoker – Senior Compliance Manager for the implementation of the code and legal requirements. The facility has well developed policy and procedures in place related to Child labor. As per the policy and procedures the minimum age requirement to work in the facility is 18 years and above. The facility regularly conducted the training to its employees on child labor and documents the same. No traces of child labor or historical child labor noticed. All employees seem well mature and above the age of 18 years. The facility has also had child remediation plan in place. The youngest age of the worker is found to be 20 years.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 3](#)

[Code area 5 →](#)

Systems and evidence examined to validate this code section

Facility has displayed Child Labor policy in Local Language, which states “No Child labor allowed in the factory”.

- Facility has established Child labor policy.
- Based on the physical appearance of employees during walk through and Interviews with employees, there was no evidence of child labor or young labor observed /reported.
- Facility has maintained valid age proof documents.
- Based on tour of the facility, employees interview physical appearance of workers, interview with the employees there was no evidence of child /young worker. As per the employee interview, minimum age was found to be 20 years.
- Based on record review facility has maintained valid age proof records for 26 out of 26 selected Employees.

Evidence Examined:

- Facility hiring policy.
- No Child labor policy.
- Review of Age proof records- Aadhar card.
- Review of Personnel files

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	9%
Enter the legal age of employment	15
Enter the age of the youngest worker identified	20
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	No

[← Code area 4](#)

[Code area 5 →](#)

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The facility has designated person for the implementation of the code and legal requirements. The facility has well developed policy and procedures in place related to wages and benefits. The facility ensures that all employees are guaranteed with legal minimum wage. All eligible employees are covered under the social security benefits like Employees Provident Fund. Leaves are guaranteed to all employees. A copy of pay slip is issued to the employees. The wages are remitted to individual bank account of the employees till 07th of every month.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 4](#)

[Code area 5.A →](#)

Systems and evidence examined to validate this code section

Based on review of wage records, it was noted that the facility has paid more than applicable minimum wages to the workers.

- Based on worker interview, wages fixed on monthly basis and paid once in a month.
- Wages paid to all the employees through bank transfer on or before 7th of every month.
- Based on employee's interview, wage slips provided to all the workers and are aware of their wage calculations.
- Based on audit process and wage record review, social security benefits like Employee Provident Fund (EPF) and Employee State Insurance (ESIC) were provided to all eligible workers employed at site.
- Deductions from wages as a disciplinary measure and any other illegal deductions not permitted as per the facility rules.
- Full and final payment for left employee verified.

Evidence Examined:

- Facility Policy.
- Wage records, Pay slip and Time records for selected samples for 03 months i.e. January 2026 (Recent), October 2025 (Non-Peak) & April 2025 (Non-Peak).
- Bank transfer proof of wages.
- List of National and Festival Holidays.
- Full and Final Settlement Records.
- Interaction with management and workers.

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Only digital payments
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None
Where the site has undertaken a Living Wage gap analysis against a credible Benchmark which Benchmark have they used?	Anker Reference Value Methodology

Worker remuneration

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

Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly
Is actual wage data available on site for any of these options?	Monthly

Maximum legal working hours	Max hours per day	8.0
	Max hours per week	48.0
	Max hours per month	Non applicable
Actual required working hours	Required hours per day	8.0
	Required hours per week	48.0
	Required hours per month	Non applicable
Maximum legal overtime hours	Max hours per day	2.0
	Max hours per week	12.0
	Max hours per month	Non applicable
Actual overtime hours	Max hours per day	1.0
	Max hours per week	6.0
	Max hours per month	15.0
Minimum legal wage	Min per hour	54.2
	Min per day	433.63
	Min per week	Non applicable
	Min per month	11274.6
Actual minimum wage	Actual per hour	56.7
	Actual per day	453.84
	Actual per week	Non applicable
	Actual per month	11800.0

Minimum legal overtime wage	Min per hour	108.4
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	113.4
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	78
Provide the date and details of the records	26 Sample Records verified for the months of January 2026, October 2025 & April 2025, all overtime hours (weekly & week off days both) are compensated at the rate of 200% of normal rate of wages if worked and paid once with the salary on or before 7th of every month.
Are there different legal minimum/legally recognised CBAs wage grades?	Yes The legal minimum wages applicable in the State of Haryana as applicable to this facility are as under: Unskilled- INR 11274.60/-, Semi- Skilled- INR 11838.29/-, Skilled- INR 13501.71
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Above legal minimum
Indicate the breakdown of workforce per earnings	All workers were paid at least minimum wages as per their skills. workers are paid above minimum wage - 100%

[← Code area 5](#)

[Code area 5.A →](#)

Are there any bonus schemes used? Yes

The facility pays annual bonus at 8.33% of the annual income which is legally accepted.

Were accurate records shown at the first request? Yes

Were any inconsistencies found? No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Based on review of wage records, it was noted that the facility has paid more than applicable minimum wages to the workers.</p> <ul style="list-style-type: none"> •Based on worker interview, wages fixed on monthly basis and paid once in a month. •Wages paid to all the employees through bank transfer on or before 7th of every month. •Based on employee’s interview, wage slips provided to all the workers and are aware of their wage calculations. •Based on audit process and wage record review, social security benefits like Employee Provident Fund (EPF) and Employee State Insurance (ESIC) were provided to all eligible workers employed at site. •Deductions from wages as a disciplinary measure and any other illegal deductions not permitted as per the facility rules. •Full and final payment for left employee verified. <p>Evidence Examined:</p> <ul style="list-style-type: none"> •Facility Policy. •Wage records, Pay slip and Time records for selected samples for 03 months i.e. January 2026 (Recent), October 2025 (Non-Peak) & April 2025 (Non-Peak). •Bank transfer proof of wages. •List of National and Festival Holidays. •Full and Final Settlement Records. •Interaction with management and workers. 		

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The facility has designated person for the implementation of the code and legal requirements. The facility has well developed policy and procedures in place related to working hours. The facility has production and capacity planning in place and is found to be implemented.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

Systems and evidence examined to validate this code section

Facility has maintained Biometric IN/OUT time recording for all the employees employed at site.

Shift Timing –G- 09:00 Am – 06:00 PM & Lunch- 1:00 PM - 2:00 PM through Monday to Saturday and Sunday is declared weekly off.

- IN/OUT time record maintained for all 26 out of 26 employees.
- As per available IN/OUT time record, weekly rest after 6 days of working was provided to all the employees in all sampled months.
- Based on tour of the facility, it was noted that the working hours and weekly rest day are displayed on notice board.

Evidence Examined:

- Facility Policy.
- In/Out time records for 26 samples for 03 months.

Different samples verified in different months as only above-mentioned employees employed at worker level in respective months.

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	200%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	Not applicable as the facility is paying the overtime at double the ordinary rate of wages as per the legal requirement.
Excluding overtime, what are the regular working hours per week for workers at this site?	48.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	52.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	54.0
Maximum number of days worked without a day off in sample	6

[← Code area 6](#)

[Code area 7 →](#)

7. No discrimination is practiced

Management systems

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

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

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

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

Explanation for management systems grades The facility has designated person for the implementation of the code and legal requirements. The facility has well developed policy and procedures in place related to no discrimination. Regular trainings are conducted to the workers, supervisors and management to implement No discrimination in the facility. All workers are found to be treated equally with dignity and respect. No traces of discrimination were noticed in the facility.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

[← Code area 6](#)

[Code area 8 →](#)

Systems and evidence examined to validate this code section

No discrimination reported / observed in hiring, compensation, promotion and termination based on race, caste, national origin, religion, age, disability, gender, marital status and sexual orientation.

- Facility Policy.
- All workers have fairly equal opportunity for training in their respective departments.
- Facility does not discriminate female workers at the time of hire.

Evidence Examined:

- Appointment letter with terms and conditions of employment for 26 of 26 selected sampled workers.
- Salary and other benefit records.
- Interaction with management and workers.

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)? 0%

Representation of women in managerial roles (ratio of women workers to women managers) 18%

Representation of women in supervisory roles (ratio of women workers to women supervisors) 0%

Three most common nationalities in managerial and supervisory roles Indian

[← Code area 7](#)

[Code area 8 →](#)

8. Regular employment is provided

Management systems

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

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

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

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

Explanation for management systems grades The facility has designated person for the implementation of the code and legal requirements. The facility has well developed policy and procedures in place related to regular employment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

Systems and evidence examined to validate this code section

- Employment contracts (appointment letters) were available and maintained for 26 of 26 selected workers.
- Facility does not follow the fixed term employment.
- Facility understands recruitment process. Facility has employed all staff members, workers on company payroll.
- Based on interaction with workers, no recruitment fee is required at any stage of the recruitment process.

Evidence Examined:

- Hiring Policy.
- Appointment letter with terms and conditions of 26 of 26 selected samples.
- Salary and other benefit records.
- Interaction with management and workers.

8. Regular employment is provided

Data points

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

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

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The facility has designated person for the implementation of the code and legal requirements. The facility has well developed policy and procedures in place related to sub- contracting and home workers. The facility does not use any home workers.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

Systems and evidence examined to validate this code section

- As confirmed by the facility management and as observed during the facility tour the facility is into manufacturing of Kilims, Bathmat, Pouf, Cushion, Scatter Durries & Pillows, Carpets.

- Further, facility is not engaged with sub-contractors.

- No home worker engaged by the factory.

Evidence Examined:

- Facility Policy.

- Production records.

- Interaction with management.

- Inward and Outward Challan.

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

Data points

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

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No
Facility does not buy products and services from suppliers who use home workers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No
There are no concerns surfaced during facility tour, interview and document review about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity.

[← Code area 8.A](#)

[Code area 9 →](#)

Are any sub-contractors used?

No

[← Code area 8.A](#)

[Code area 9 →](#)

Audit company:
BUREAU VERITAS CPS - ASIA

Audit reference:
ZAA600186429

Start Date:
2026-02-16

End Date:
2026-02-17

9. No harsh or inhumane treatment is allowed

Management systems

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

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

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

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

Explanation for management systems grades The facility has designated person for the implementation of the code and legal requirements. The facility has well developed policy and procedures in place related to no harsh and Inhuman treatment. All employees are found to be treated with dignity and respect. No cases of harsh and inhuman treatment noticed during the audit process.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

Systems and evidence examined to validate this code section

- There was no evidence of harsh or inhumane treatment of workers.
- All workers treated with respect and dignity.
- Facility's disciplinary policies explained to all workers, and all are well aware about their rights.
- No evidence of physical abuse, sexual or any other harassment / verbal abuse observed / reported.
- Facility had a written disciplinary procedure, which was well communicated to the workers.

Evidence Examined:

- Facility Policy
 - Interaction with management and workers.
-

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process
What type of grievance mechanism(s) are available?	Facility has established grievance committee where workers can raise their issues. In addition, factory has installed suggestion boxes to report any confidential issues (if any) and it is available for all workers.
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

[← Code area 9](#)

[Code area 10.A →](#)

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The facility has designated person for the implementation of the code and legal requirements. The facility has well developed policy and procedures in place related to Environment. The facility has obtained all legal licenses pertaining to environment. The facility has valid consents under Air, Water and Hazardous Waste and has a valid agreement with authorized vendors for disposal of hazardous waste. The facility has installed meters to monitor the consumption. Trainings provided to the relevant employees on environment. The facility has conducted environmental aspect and impact assessment.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 9](#)

[Code area 10.B →](#)

Systems and evidence examined to validate this code section

Facility has exempted pollution consent, Air & water consent from the concern authority.

- Facility has procedure and designated area to hazardous and non-hazardous waste.
- Facility is aware of environmental standards/code requirements.
- The facility has established and maintained environmental policy which it is communicated to relevant parties including suppliers.
- Facility has conducted environment impact assessment which was found as per the production operation.
- Facility regularly monitors use and discharge of resources regularly.
- Facility has documented plan to improve their environment performance.
- Facility has filled SAQ and it was available for review. No discrepancy was noted.
- Site has not been subjected to (or pending) any fines/ prosecutions for noncompliance to environmental regulations.

Evidence Examined:

- Facility's Environment Policy.
- Ambient Air quality test and Noise assessment conducted on 27/01/2026.
- Environment Impact Assessment records.
- Environmental training records.
- EHS committee records.

10.A. Environment 2–Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?

No

Does the site have any valid environmental or energy management certificates?

The facility has valid HIGG FEM 2024 certificate

Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?

No

Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?

Yes

Facility has done environmental risk assessment to adopt new changes as required by law. Also, they have environmental policy/ procedures to follow and also have responsible person to implement the requirements.

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Facility has exempted pollution consent, Air & water consent from the concern authority.</p> <ul style="list-style-type: none"> •Facility has procedure and designated area to hazardous and non-hazardous waste. •Facility is aware of environmental standards/code requirements. •The facility has established and maintained environmental policy which it is communicated to relevant parties including suppliers. •Facility has conducted environment impact assessment which was found as per the production operation. •Facility regularly monitors use and discharge of resources regularly. •Facility has documented plan to improve their environment performance. •Facility has filled SAQ and it was available for review. No discrepancy was noted. •Site has not been subjected to (or pending) any fines/ prosecutions for noncompliance to environmental regulations. <p>Evidence Examined:</p> <ul style="list-style-type: none"> •Facility's Environment Policy. •Ambient Air quality test and Noise assessment conducted on 27/01/2026. •Environment Impact Assessment records. •Environmental training records. •EHS committee records. 		

10.B. Environment 4-Pillar

Data points

<p>Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?</p>	<p>Yes</p>
<p>What additional specific environmental policies does the site capture?</p>	<p>Responsible use and management of water Circular economy and resource efficiency Switching to renewable energy sources Sustainable material sourcing Biodiversity and eco system impact management Packaging optimization Zero-waste and recycling protocols Prioritising local suppliers</p>
<p>Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?</p>	<p>Not Applicable</p>
<p>Does the site have reduction targets in place to manage climate related risks?</p>	<p>Yes, to reduce scope 2 greenhouse gases (GHGs)</p>
<p>Are any of these science-based targets?</p>	<p>Yes, they have been or will be reviewed by the Science Based Targets initiative (SBTi)</p>
<p>Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?</p>	<p>Yes The facility has reductions targets in place for Scope 1, Scope 2 and water consumption related sources. The targets are approved by Sustainability Head.</p>

[← Code area 10.B](#)

[Code area 10.C →](#)

Has the site 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?

Not Applicable

Usage/discharge analysis

	Last full calendar year (2025)	Previous full calendar year (2024)
Total electricity consumption from non-renewable sources (kWh)	302,898	328,635
Total electricity consumption from renewable sources (kWh)	185,600	228,200
Sources of renewable energy used	Onsite generated	Onsite generated
Types of renewable energy used	Solar	Solar
Total natural gas consumption (kWh)	6.6	10.7
Usage of other purchased fuels	Diesel- 912 litre	Diesel- 836 litre
Has the site completed any carbon footprint analysis?	Yes	Yes
	Scope 1: 14 (tCO ₂ e) Scope 2: 217 (tCO ₂ e) Scope 3: 0 (tCO ₂ e)	Scope 1: 18 (tCO ₂ e) Scope 2: 235 (tCO ₂ e) Scope 3: 0 (tCO ₂ e)
Water sources	Borewell and HUDA	Borewell and HUDA

[← Code area 10.B](#)

[Code area 10.C →](#)

Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	2,147	2,063
Water discharged	CETP	CETP
Water volume discharged (m3)	1,198	1,607
Water volume recycled (m3)	0	0
Total waste produced (mt)	11.9	28.8
Total hazardous waste produced (mt)	0.5	0.7
Waste to recycling (mt)	9.7	8.9
Waste to landfill (mt)	2.2	19.9
Waste to other (mt)	0	0
Total product produced (mt)	2,299,518	714,058

[← Code area 10.B](#)

[Code area 10.C →](#)

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The facility has designated person for the implementation of the code and legal requirements. The facility has well developed policy and procedures in place related to Business Ethics. No traces of bribery were noticed on the day of audit. All relevant employees are properly trained to business ethics.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 10.B](#)

Systems and evidence examined to validate this code section

- Facility has conducted business ethics/Anti bribery training, and they follow policy which states that they shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
 - Facility has formed the policy considering it in compliance with the legal requirements and the compliance manager and team always update it as required.
- Evidence Examined:
- Document review.
 - Management interview.
 - Employee interview.
-

[← Code area 10.B](#)

10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?

No

Provide any certified anti-bribery management systems for the site

Facility does not have such certificates.

[← Code area 10.C](#)

Attachments



[Biometric Machine.jpg](#)



[Carpet Passing Area.jpg](#)



[Chemical Storage Room.jpg](#)



[Clipping Area.jpg](#)



[Centralised Fire Control Panel.jpg](#)



[Checking Section.jpg](#)



[Boiler Room.jpg](#)



[Canteen.jpg](#)



[Aisle with Directional Mark.jpg](#)



[Chemicals not labelled.jpg](#)



[Compressor Room.jpg](#)



[Facility Main Gate.jpg](#)



[Domestic Chemical Store.jpg](#)



[Evacuation Map posted.jpg](#)



[Creche Room.jpg](#)



[Facility Name Board.jpg](#)



[DG Room.jpg](#)



[Emergency Light on Staircase.jpg](#)



[Drinking Water Point.jpg](#)



[Dining Hall.jpg](#)



[Fire Hydrant Tested.jpeg](#)



[First Aid Box.jpg](#)



[Fire Alarm Tested.jpg](#)



[Finishing Area.jpg](#)



[Functional Emergency Light.jpg](#)



[Facility Overview.jpg](#)



[Functional Eye Wash Station.jpg](#)



[Fire Extinguisher.jpg](#)



[FG Storage Area.jpg](#)



[Fire Hose Reel.jpg](#)



[Notice Board.jpg](#)



[MSDS not posted in local language.jpg](#)





[Hazardous Waste Storage Area.jpg](#)



[Label Sticking Area.jpg](#)



[MSDS Displayed.jpg](#)



[Passing Area.jpg](#)



[Medical Room.jpg](#)



[Packing Material Store.jpg](#)



[Non-Hazardous Waste Storage Area.jpg](#)



[Goods Lift.jpg](#)



[Quality Checking Area.jpg](#)



[RO Plant.jpg](#)



[Toilet Facility.jpg](#)



[Semi-Finished Goods Storage.jpg](#)



[Solar Electrical Panel Area.jpg](#)



[Raw Material Storage Area.jpg](#)



[PNG Connection.jpg](#)



[Unfinished Goods Area.jpg](#)





[Social Policy Displayed.jpg](#)

[Stitching Area.jpg](#)

[Visitor Room.jpg](#)

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