

Sedex Members Ethical Trade Audit Report





Audit Details										
Sedex Company Reference: (only available on S System)		ZC: 107368	36			lex Site Reference: y available on Sedex em)		ZS: 10	18927	
Business name (Company name	e):	Orange - I	nternati	ional						
Site name:		Orange - I	nternati	ional						
Site address: (Please include full address)		A-85, Sect Noida, UP-			Cou	ntry:		India		
Site contact and title:	job	Mr. Manoj	Kumar	(Mar	nager	er HR & Admin)				
Site phone:		+91 88265	58416		Site	Site e-mail:			oj@orangein	ternational.net
SMETA Audit Pilla	rs:	∑ Labour Standards		Safe	_			nment	Busines	s Ethics
Date of Audit:		13/08/2022	2							
Be	enchmo Audit F	ny Name & I arks Co., Ltd irm No.: 116 ICHMAR ner in the Supply	I. 300027) RKS						ner (payer): nternational	
				Audit	t Cond	ducted B	у			
Affiliate Audit Company			Purcho	aser				Retaile	er	
Brand owner			NGO					Trade	Union	
Multi- stakeholder				Combi	ned Audit (select o	all that appl	у)		

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

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



Audit Content:

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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



SMETA Declaration

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

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

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

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

Lead auditor: Ugrasen Kumar APSCA number: RA 21704628

Lead auditor APSCA status: In Good Standing

Team auditor: Nil APSCA number: Nil

Interviewers: Ugrasen Kumar APSCA number: RA 21704628

Report writer: Ugrasen Kumar Report reviewer: Ring Huang

Date of declaration: 13/08/2022

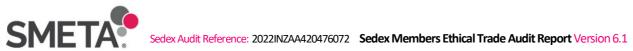
Note: The focus of this ethical audit is on the ETI Base Code and local law. The additional elements will not be audited in such depth or scope, but the audit process will still highlight any specific issues.

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



Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing		Area of Non–Conformity (Only check box when there is a non– conformity, and only in the box/es where the non–conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
	e audit report, hyperlinks are retained.	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Universal Rights covering UNGP								Nil
ОВ	Management systems and code implementation						01		OB During document review it was found that company has not communicated ETI Base Code to its supply chain.
1.	Freely chosen Employment								Nil
2	Freedom of Association								Nil
3	Safety and Hygienic Conditions					11			 During document review it was found that company has done the risk assessment but not cover the area of Covid-19 & Expectant mother. During factory tour it was found that partitions were not provided between urinals in worker's toilet.



	 During factory tour it was found that worker's toilet was found in filthy condition on ground floor. During factory tour it was found that PPE like facemask were not used by fabric checkers in fabric store. During factory tour it was found that sharp tools (cutters scissors) were not fastened with rope in finishing department. During factory tour it was found that Emergency evacuation plan was not matching with floor on ground floor. During factory tour it was found that Emergency light was not installed in ground floor to first floor stair case. During factory tour it was found that pulley guards were not installed in three embroidery machines out of eight in embroidery section. During factory tour it was found that proper aisles were not marked in stitching department.
	 During factory tour it was found that proper aisles were not marked in
	fusing machine operator. • During factory tour it was found that adequate secondary containers were not provided for chemical storage.



4	Child Labour								Nil	
5	Living Wages and Benefits								Nil	
6	Working Hours								Nil	
7	<u>Discrimination</u>								Nil	
8	Regular Employment								Nil	
8A	Sub-Contracting and Homeworking								Nil	
9	Harsh or Inhumane Treatment								Nil	
10A	Entitlement to Work								Nil	
10B2	Environment 2-Pillar								Nil	
10B4	Environment 4–Pillar								N/A	
10C	<u>Business Ethics</u>								N/A	
Gene	General observations and summary of the site:									

This is Full Initial semi- Announced 2 Pillar SEDEX audit conducted by Benchmarks. There was 01 auditor for 1 day, who assessed the facility. The scope of this audit was based on 2 Pillar SMETA system. The factory is established in 2012 itself and they manufacturer of Readymade Garments. Upon discussion with factory management, it was understood that they Majorly export to USA, etc.

On Viewing of payroll, the total strength of the factory was 92 workers (67 males & 25 females).

The factory operates in Single shift i.e., 09:00 to 17:30 with half an hour lunch break from 13:00 to 13:30. On the date of audit and interaction with Management noted that the main processes are Fabric Storage, Accessories Storage, Cutting, Stitching, Washing/Perk, Finishing, Checking, Packing & Dispatch. Main Equipment used like Cutting Machine, Stitching Machine, Overlock Machine, Pressing Machine, DG Set etc.



*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:	Orange - International						
B: Site name:	Orange - International						
C: GPS location: (If available)	GPS Address: A-85, Sector – 57, Noida, UP-201301	Latitude: N28.602322 Longitude: E77.353146					
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	B) Fire NOC: -UPFS/2022/57 NAGAR/16496/DD, as or 18/07/2025. C) Building Plan Lay Out: - N Asst. Dy Director of Factor D) Building Stability Certificor Chauhan (B.E. Civil), as of the consent: - A 85541/UPPCB/Noida(UPF) Issued from UPPCB as on Water Consent - 85542/UPPCB/Noida(UPF) Issued from UPPCB as on	4/01/2020, Valid till 31/12/2022. 001/GBN/GAUTAM BUDDH 15/07/2022, Valid up to No. 1905/F/Plan/Lic, Approved by ories as on 30/06/2017. ate: - Obtained from Er. Sandeep on 28/02/2017. ir Consent-PCBRO)/CTO/air/NOIDA/2020, 25/01/2020, Valid till 31/03/2023. PCBRO)/CTO/water/NOIDA/2020, 25/01/2020, Valid till 31/03/2023. I - 2312 e-46/2019-20, Issued from Asst. y as on 20/09/2019, Valid for					
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturer of Readymade Garments. The main processes are Fabric Storage, Accessories Store, Cutting, Stitching, Perk/Washing, Finishing, Checking, Packing & Dispatch.						
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	201301. The main processes are Cutting, Stitching, Perk/Washing Dispatch. The Company has a	factory has total area of 1216 Sq. Sq. Meter. The building has four					



	Production	Description	Remark, if any		
	Building no Ground Floor	Office Area, Fabric & Accessories Store, Finishing & Packing.	Nil		
	First Floor	Hand work, Embroidery & Office Area.	Nil		
	Second Floor	Cutting & Stitching.	Nil		
	Third Floor	Sampling, beading, Perk/Washing & Office Area.	Nil		
	Is this a shared building?	No	N/A		
	For below, please a	dd any extra rows if ap	ppropriate.		
	☐ Yes ⊠ No	integrity issues (large c			
	F3: Does the site have a structural engineer evaluation? Yes No				
		ails: Company has obto Sandeep Chauhan (B.E			
G: Site function:	Agent Factory Processir Finished Product Grower Homeworker Labour Provider Pack House Primary Produce Service Provider	Supplier			
H: Month(s) of peak season: (if applicable)	Consistent througho	out the year.			
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	The main processes	adymade Garments. are Fabric Storage, Ac erk/Washing, Finishing,			



	Main Equipment used like Cutting Machine, Stitching Machine, Overlock Machine, Pressing Machine, DG Set, Fusing Machine, Tumbler, Hydro & Boiler.
J: What form of worker representation / union is there on site?	☐ Union (name) ☐ Worker Committee ☐ Other (specify) ☐ None
K: Is there any night production work at the site?	☐ Yes ☐ No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	Yes No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	Yes No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	Yes No N1: If no, please give details: Company has not provided accommodation in the premises. All workers live in nearby area.



Audit Parameters								
A: Time in and time out	A1: Day 1 Tir A2: Day 1 Tir 17:30			2 Time in: N/A 2 Time out: N/A		Day 3 Time in: N/A Day 3 Time out: N/A		
B: Number of auditor days used:	01 Man Day	(01 Auditor*	01 Day)					
C: Audit type:	Partial Fo							
D: Was the audit announced?	☐ Announced ☑ Semi – announced: Window detail: 04 weeks ☐ Unannounced							
E: Was the Sedex SAQ available for review?	Yes No E1: If No, why not?							
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	Yes No If Yes , please capture detail in appropriate audit by clause							
G: Who signed and agreed CAPR (Name and job title)	Mr. Manoj K	umar (Manaç	ger HR & /	Admin)				
H: Is further information available (If yes, please contact audit company for details)	☐ Yes ☑ No							
I: Previous audit date:	N/A							
J: Previous audit type:	N/A							
K: Were any previous audits reviewed for this audit	☐ Yes☐ No☑ N/A							
Audit attendance		Manageme	nt	Worker Represer	ntative	es es		
		Senior manageme	nt	Worker Committee representatives		Union representatives		



A: Present at the opening meeting?	⊠ Yes	□No	⊠ Yes	□No	☐ Yes	⊠ No
B: Present at the audit?	⊠ Yes	□No	⊠ Yes	□No	☐ Yes	⊠ No
C: Present at the closing meeting?	⊠ Yes	□No	⊠ Yes	□No	Yes	⊠ No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	N/A					
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	Union does	not exist	in the factory			



Worker Analysis

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

Worker Analysis										
		Local			Migrant*			Total		
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	Total		
Worker numbers – Male	67	00	00	00	00	00	00	67		
Worker numbers – female	25	00	00	00	00	00	00	25		
Total	92	00	00	00	00	00	00	92		
Number of Workers interviewed – male	06	00	00	00	00	00	00	06		
Number of Workers interviewed – female	04	00	00	00	00	00	00	04		
Total – interviewed sample size	10	00	00	00	00	00	00	10		



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



Worker Interview Summary							
A: Were workers aware of the audit?	⊠ Yes □ No						
B: Were workers aware of the code?	∑ Yes □ No						
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	01 group, 04 workers pe workers.	er group, total 04					
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 04 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. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	∑ Yes ☐ No If no, please give detail	S					
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	⊠ Yes □ No						
G: In general, what was the attitude of the workers towards their workplace?	□ Favourable □ Non favourable □ Indifferent						
H: What was the most common worker complaint?	Not Anything						
I: What did the workers like the most about working at this site?	On Time Salary.						
J: Any additional comment(s) regarding interviews:	N/A						
K: Attitude of workers to hours worked:	Good						
L. Is there any worker survey information available?							
Yes No L1: If yes, please give details:							
M: Attitude of workers: (Include their attitude to management, workplace, and the interview pro included) Note: Do not document any information that could put workers		e information should be					



Most of the workers found happy with top management support and behaviour and for getting on time salary.

N: Attitude of worker's committee/union reps:

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

The works committee representatives confirmed that they were elected from workers. They confirmed that they could talk to the workers about their problems and workers brought forth their suggestions and problems if any, to the committee members. Meetings were conducted regularly once in 3 months and the members could put forth the complaints to the management who would then solve the problem. The representatives were very positive about the management and stated that the management took prompt action to rectify any problem.

O: Attitude of managers:

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

The factory management was cooperative and demonstrated a willingness to improve all issues found during the audit.



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:

Company has policy which is endorsed at the highest level, covering human rights impacts and issues and it is also communicated to all the employees.

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

Details:

Factory has derived the policy, endorsed at the highest level, covering human rights impacts and issues, and ensures it is communicated to all appropriate parties, including its own suppliers. And appointed a designated person responsible for implementing standards concerning Human rights, identified their stakeholders and salient issues and measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights. And procedure for the data privacy procedures for workers' information, which is implemented.

Any other comments:

Nil



A: Policy statement that expresses commitment to respect human rights?	 ☐ Yes☐ NoA1: Please give details: ConUNGP rights.	npany has policy of all
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	∑ Yes ☐ No Please give details: Name: Mr. Manoj Kumar Job title: Manager HR & Adı	min
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?	Yes No C1: Please give details: The place for confidentially reported human rights impacts witho towards the reporter; thus, a system. This can be circulated boxes/ circular/ emails etc.	orting and dealing with ut fear of reprisals committing transparent
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rightscompatible, a source of continuous learning and based on stakeholder engagement)	☐ Yes ☐ No D1: If no, please give details	s:
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	 ☐ Yes☐ NoE1: Please give details: All the keep in lock & key.	ne worker Information
Fin	dings	
Finding: Observation Company NC Description of observation: None Observed		Objective evidence observed:
Local law or ETI/Additional elements / customer specific requirement: Comments:		
Good exam	ples observed:	
Description of Good Example (GE): None Observed		Objective Evidence Observed:



Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 3.3 %	A2: This year 2.8 %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	5%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 6_ %	C2: This year 4 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	10%	
E: Are accidents recorded?	Yes No E1: Please describe: All major/ minor accidents are recorded in "Accident Register" Form-15 & Form-26.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total worke rs]	F1: Last year: Number: 0	F2: This year: Number: 0
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 0	H2: This year: 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months0% workers	I2: 12 months0% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	A1: Last year: 0 %	A2: This year 0 %



OB: 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
- 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. The facility has appointed a senior Person who is responsible for Code Implementation Mr. Manoj Kumar (Manager HR & Admin).
- 2. The facility has obtained all the consent to operate the factory (i.e., Factory Licence, ESIC, EPF etc).
- 3. The factory has policy that the any changes in the standards or in rules and regulations they will display in the notice board.

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

Details:

Document review (Company's Social Policy & Code of conduct and other documents)

Factory Tour (Notice board at factory entrance and at production area)

Interview (Management & workers)

Any other comments:

Nil

Management Systems:		
A: In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	Yes No A1: Please give details: No, the site had not been subject to any fines/prosecutions for noncompliance to any regulation.	
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	Yes No B1: Please give details: Yes, they have several such policies in place.	
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Through Training etc	



D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	Yes No D1: Please give details: The factory has imparted training on ETI based code to their workers and employees.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	Yes No E1: Please give details: Company has posted ETI Base Code on Notice Board in the factory all workers were aware About ETI Base Code.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	Yes No F1: Please give details: Company has not obtained this type of certificate.
G: Is there a Human Resources manager/department? If Yes, please detail.	Yes No G1: Please give details: Company has 01 Employee in HR Department.
H: Is there a senior person / manager responsible for implementation of the code	Yes No H1: Please give details: Mr. Manoj Kumar (Manager HR & Admin) is responsible for implementing code of conduct.
I: Is there a policy to ensure all worker information is confidential?	Yes No I1: Please give details: They have confidentiality policy in place.
J: Is there an effective procedure to ensure confidential information is kept confidential?	Yes No J1: Please give details: They have an effective procedure to ensure confidential information.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	Yes No K1: Please give details: Company has done Internal Audit 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?	Yes No L1: Please give details: Company has done risk assessment however not covered the area of covid-19 and expectant mother.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	Yes No M1: Please give details: The facility has a policy which requires labour standards of its own suppliers but that is not communicated with their own suppliers.



Land rights		
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?		The factory has obtained EPF, Factory Licence etc.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	∑ Yes ☐ No O1: Please give details: place to conduct lega recognize and apply no practices relating to lar	l due diligence to ational laws and
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	Yes No P1: If yes, how does the It is not applicable in In	e company obtain FPIC: dia.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	Yes No Q1: Please give details: building.	The facility has its own
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	 ∑ Yes NoR1: Please give details:	The Facility has one unit.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	∑ Yes ☐ No S1: Please give details: owned by the facility a date.	The entire building is nd proper taxes Paid till
Non-compl	iance:	
1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code: None Observed Local law and/or ETI requirement: Recommended corrective action:		Objective evidence observed: (where relevant please add photo numbers)
Observation:		
Description of observation: Objective evidence observed:		_



During document review it was found that company has not communicated ETI Base Code to its supply chain.

During Document review.

Local law or ETI requirement:

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.

Comments:

It is recommended to the factory to communicate ETI Base Code to its supply chain.

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



1: Freely Chosen Employment

(Click here to return to summary of findings)

ETI

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined

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

Current systems:

The factory does not engage any forced or bonded labour. In India no prison labour is engaged outside the prison according to the law. Nothing identified during audit. Factory also does not keep any original documents from the workers, confirmed by the interviewed workers. Workers are free to leave their employer at any time giving required notices.

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

Details: On site tour/verification/Worker interview. Nothing identified during audit. Factory also does not keep any original documents from the workers. Workers are free to leave their employer at any time giving required notices. Same has been verified during workers' interview.

Any other comments:

Nil

A: Is there any evidence of retention of original documents, e.g. passports/ID's	Yes No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	Yes No B1: If yes, please give details and category of worker affected:
C: Is there any evidence of retention of wages /deposits	Yes No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	Yes No D1: Please describe finding: There are no any restrictions on it
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	Yes No F1: Please describe finding: There is no evidence of any restrictions.



F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	Yes No F1: Please describe finding: There is no evide	ence of any restrictions
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	Yes No Not applicable G1: If yes, please give details and category of workers affected: Yes, the site understands the risk of forced/trafficked/Bonded labour in its supply chain, no workers (within company and its sub-chain) are affected.	
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	Yes No H1: Please describe finding: The factory had established antiforced/trafficked labour policy, communicated the policy with its employees, and conducted regular internal audit to assure that there was no forced/trafficked labour happened.	
	Non-compliance:	
□ NC against ETI□ NC against Local Law:□ NC against customerobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsectionobsect		Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI requirement		
Recommended corrective action:		
	Observation:	
	Observation:	
Description of observation: None Observed Local law or ETI requirement:		Objective evidence observed:
Comments:		
	Cood Eumander absorbed	
	Good Examples observed:	
Description of Good Example (GE): None Observed		Objective evidence observed:



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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

Workers Committee is available in the factory which meets quarterly, last meeting is done on 20/06/2022 and 01 complaint / suggestion box had been placed inside the factory. The workers could complain to their supervisors directly or through their worker representative, although the suggestion box was available in the factory for collecting workers' appeals. Workers had formed a committee. At present Mr. Brijesh Kumar is elected as Worker Representative. Workers can raise their voice through complaint box also.

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

Details: Personal files, Committee Records and Worker interview, on site tour/verification/Worker interview. Nothing identified during audit. Factory also does not keep any original documents from the workers. Workers are free to leave their employer at any time giving required notices. Same has been verified during worker's interview.

Any other comments: Nil

A: What form of worker representation/union is there on site?	☐ Union (name) ☐ Worker Committee ☐ Other (specify) ☐ None
B: Is it a legal requirement to have a union?	☐ Yes ☐ No
C: Is it a legal requirement to have a worker's committee?	☐ Yes ☐ No
D: Is there any other form of effective worker/management communication channel? (Other	∑ Yes □ No



than union/worker committee e.g. H&S, sexual harassment)	D1: Please give details: Company has form Grievance Committee in the factory.		
	D2: Is there evidence of free elections? Yes No		
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	Yes No E1: Please give details: Factory provided enough support to worker committee to have meeting.		
F: Name of union and union representative, if applicable:	N/A		re evidence of free elections? No N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Yes, worker committees	I — -	ere evidence of free elections? No N/A
H: Are all workers aware of who their representatives are?	⊠ Yes □ No	Mr. Brijes	h Kumar
I: Were worker representatives freely elected?	⊠ Yes □ No	II: Date	of last election: 20/03/2020.
J: Do workers know what topics can be raised with their representatives?	∑ Yes □ No Company Post works committee meeting record on notice board.		
K: Were worker representatives/union representatives interviewed?	Yes No If Yes , please state how many: 1 worker representative was interviewed.		
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	In packing department fan was not working, point raised to management through WR and the same was resolved after company replaced old fan with a new one.		
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ☐ No		
If Yes , what percentage by trade Union/worker representation	M1: _0% workers cove Union CBA	ered by	M2:0% workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	☐ Yes ☐ No		
Non-compliance:			



1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None Observed Local law and/or ETI requirement: Recommended corrective action:	Objective evidence observed: (where relevant please add photo numbers)
Observation:	
Description of observation: None Observed Local law or ETI requirement:	Objective evidence observed:
Comments:	
Good Examples observed:	
Description of Good Example (GE): None Observed	Objective evidence observed:



3: Working Conditions are Safe and Hygienic

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

FTI

- 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:

The factory has installed fire extinguisher, first aid facility, and working environment (lighting, ventilation, temperature etc.) were good. Based on workers and management interview, the factory had provided appropriate safety training to workers. And the factory provided relevant records for review. Mr. Deepak Kumar (Manager Production) is responsible for H&S issues in the factory. There were 04 trained first aiders at the factory. The factory had established health and safety policy. Factory has kept accident records in files. Last meeting of Health & Safety is done on 20/06/2022. First Aid Training was held by St. John Ambulance Association.

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

Details:

Factory tour & records of various training. (Meeting record/Water Test records/ Fire Training Records/ First aid training records etc).

Any other comments: Nil

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	Yes No A1: Please give details: Yes, the facility has communicated to workers like OHS and work-related training.
B: Are the policies included in workers' manuals?	Yes No B1: Please give details: Yes; the same is given to workers during training/induction.



	T			
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	☐ Yes ☐ No C1: Please give details: Not have			
D: Are visitors to the site informed on H&S and provided with personal protective equipment	 ☐ Yes☐ NoD1: Please give details: Informed aboauditor.	ut health & Safety to the		
E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	 ∑ Yes ☐ No E1: Please give details: Company has facility in the factory. 	Provided medical room		
F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?				
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	☐ Yes☑ NoG1: Please give details: No, CompanyTransportation to workers.	has not provided		
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	Yes No H1: Please give details: Company has to workers.	not provided dormitory		
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	Yes No II: Please give details: Company has done the Risk Assessment however not covered the Area of Covid-19 & Expectant Mother.			
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?		obtained Air & Water		
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	Yes No K1: Please give details: Yes, the company meets all environmental standards and they have also listed out details of "Banned Chemicals" should are forbidden by law.			
Non-compliance:				
code: During document review it was found the assessment but not cover the area of Co		Objective evidence observed: (where relevant please add photo numbers) During document Review.		
Local law and/or ETI requirement				



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.	
Local Law In accordance with Factories Act 1948, Chapter I, Section – 7A (1), every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include- (a) The provision and maintenance of plant and systems of work in the factory that are safe and without risks to health; (b) The arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances; (c) The provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work;	
Recommended corrective action: It is recommended to the factory to cover all the area in risk assessment.	
2. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: During factory tour it was found that partitions were not provided between urinals in worker's toilet.	Objective evidence observed: (See NC Photo # 01) During Factory Tour.
Local law and/or ETI requirement: 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.	
Local Law In accordance with uttar Pradesh factory rules 1950, Latrine & urinals: [43. Privacy of latrines Every Latrines shall be covered and so partitioned off as to secure privacy and each portion shall have a proper door and fastenings.	
Recommended corrective action: It is recommended to the factory to provide partition between urinals in worker's toilet.	
3. Description of non-compliance: NC against ETI NC against Local Law NC against customer	

Local law and/or ETI requirement:

code:

on ground floor.

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

During factory tour it was found that worker's toilet was found in filthy condition

Objective evidence observed:

(See NC Photo # 02) During Factory Tour.



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As per Chapter III of Factories Act 1948 11. Cleanliness. (1) Every factory shall be kept clean and free from effluvia arising from any drain, privy or other nuisance.

Recommended corrective action:

It is recommended to the factory to provide neat & clean toilet to workers.

4. Description of non-compliance:

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

During factory tour it was found that PPE like facemask were not used by fabric checkers in fabric store.

Local law and/or ETI requirement:

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.

Local Law

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

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

Recommended corrective action:

It is recommended to the factory to provide face mask to fabric checkers in fabric store.

5. Description of non-compliance:

 \boxtimes NC against ETI \boxtimes NC against Local Law \square NC against customer code:

During factory tour it was found that sharp tools (cutters scissors) were not fastened with rope in finishing department.

Local law and/or ETI requirement:

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.

Local Law

Objective evidence observed:

(See NC Photo # 03)
During Factory Tour.

Objective evidence observed:

(See NC Photo # 04)
During Factory Tour.



According to Section 7A (2b) of The Factories Act, 1948, Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances. Recommended corrective action: It is recommended to the factory to fasten sharp tools with rope.		
6. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: ☐ During factory tour it was found that Emergency evacuation plan was not matching with floor on ground floor.	Objective evidence	
Local law and/or ETI requirement: 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.	observed: (See NC Photo # 05) During Factory Tour.	
Local Law In accordance with Factories Act 1948, Section 38 (1) In every factory, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and to provide and maintain (a) safe means of escape for all persons in the event of a fire, and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory all the workers are familiar with the means of escape in case of fire and have been adequately trained in the routine to be followed in such cases.		
Recommended corrective action: It is recommended to the factory to change the emergency evacuation plan on first floor.		
7. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: During factory tour it was found that Emergency light was not installed in ground floor to first floor stair case.		
Local law and/or ETI requirement: 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.	Objective evidence observed: (See NC Photo # 06) During Factory Tour.	
Local Law In accordance with UP Factories Rules 1950 Section 61(10) (e) The exits shall be clearly visible and suitably illuminated with suitable arrangement whatever artificial lighting is to be adopted for this purpose, to maintain the required illumination in case of failure of the normal source of electric supply.		



be followed in such case.

Recommended corrective action:

Recommended corrective action: It is recommended to the factory to install emergency light in stair case.	
8. Description of non-compliance: ☑ NC against ETI ☑ NC against Local Law ☐ NC against customer code:	
During factory tour it was found that pulley guards were not installed in three embroidery machines out of eight in embroidery section.	
Local law and/or ETI requirement: 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.	Objective evidence observed: (See NC Photo # 07) During Factory Tour.
Local Law As per Factories Rules, 1950: Further precautions in respect of particular machinery [Section 21(2)] 52. Safety precautions.— (1) Without prejudice to the provision of Section 21(1) of the Factories Act, 1.948, in regard to the fencing of machinery, the following additional provisions specified in the schedules annexed hereto shall apply to machinery noted in each schedule, The provisions of this rule shall come into force from July 1, 1951, in the case of factories registered before April 1, 1949.	
Recommended corrective action: It is recommended to the factory to install pulley guard in embroidery machine.	
9. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: During factory tour it was found that proper aisles were not marked in stitching department.	
Local law and/or ETI requirement: 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.	Objective evidence observed: (See NC Photo # 08) During Factory Tour.
Local Law In accordance with Factories Act 1948, Chapter IV section 38 (1), in every factory all practicable measures shall be taken to prevent out break of fire and its spread both internally and externally and to provide and maintain – (a) safe means of escape in all persons in the event of a fire and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory, all the employees are familiar with means of escape in case of fire and have been adequately trained in the routine to	

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It is recommended to the factory to mark proper aisles in stitching department.



10. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: During factory tour it was found that rubber mat was not provided to fusing machine operator.	
Local law and/or ETI requirement: 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.	Objective evidence observed: (See NC Photo # 09) During Factory Tour.
In accordance with Factories Act 1948, Section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include- (a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, (b) the arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handing, storage and transport of articles and substances, (c) the provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.	
Recommended corrective action: It is recommended to the factory to provide rubber mat to fusing machine operator.	
11. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: During factory tour it was found that adequate secondary containers were not provided for chemical storage. Local law and/or ETI requirement: 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.	Objective evidence observed: (See NC Photo # 10) During Factory Tour.
In accordance with Factories Act 1948 Section 7-A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory (2) Without prejudice to the generality of the provisions of sub-section(1), the matters to which such duty extends, shall include-(a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, (b) The arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handing, storage and transport of articles	



and substances,

(c) The provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.

Recommended corrective action:

It is recommended to the factory to provide adequate secondary containers for chemical storage.

Observation:		
Description of observation: None Observed Local law or ETI requirement:	Objective evidence observed:	
Recommended corrective action:		

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



4: Child Labour Shall Not Be Used

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

- 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:

No child or young employees were found during audit. Factory does not engage workers below 18 years old and no child or young worker has been identified during audit. Factory checks the age before recruitment by the doctor and maintains age related documents in the workers' personnel files.

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

Details:

Personal files were checked and worker interview done. There is no recruitment of child labour. Company has made policies and procedures for not hiring "Child Labour" in the facility and its supply chain.

Any other comments:

Nil

A: Legal age of employment:	14 Years
B: Age of youngest worker found:	20 Years
C: Are there children present on the work floor but not working at the time of audit?	☐ Yes ☐ No
D: % of under 18's at this site (of total workers)	0%
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	Yes No E1: If yes, give details

E1: It yes, give details
Non–compliance:



1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None Observed Local law and/or ETI requirement: Recommended corrective action:	Objective evidence observed: (where relevant please add photo numbers)
Observation:	
Description of observation: None Observed Local law or ETI requirement:	Objective evidence observed:
Comments:	
Good Examples observed:	
Description of Good Example (GE): None Observed	Objective Evidence Observed:



5: Living Wages are Paid

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

- 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:

Company has provided wages record for last one year. Workers confirmed that overtime is applicable in the factory as per requirement, highest overtime found in the last month this year so far. Workers are paid on monthly basis. The factory disperses wages on or before 7th of every month through Bank Transfer. Company provides salary slips to workers for verifying their wages. The factory provided paid annual leave, paid holiday wage for workers. Wages and benefits paid for a standard working week meet. Wages are enough to meet basic needs and to provide some discretionary income.

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

Details: Wage records/Salary slips and leave with wage records of company workers.

Any other comments:

Non–compliance:	
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None Observed Local law and/or ETI requirement:	Objective evidence observed: (where relevant please add photo numbers)



Observation:				
Description of observation: None Observed Local law or ETI requirement: Comments:	Object observ	ive evidence ed:		
Good Examples observed:				
Description of Good Example (GE): None Observed			Objective Evidence Observed:	
Summary Information				
Criteria	Local Law (Please state legal requirement)	Actual (Site (Record results ago law	ed site ainst the	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal minimum: 8 hours per day 48 hours per week	A1: 8 hou day 48 hours ; week	•	A2: ☐ Yes ☑ No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal minimum: 2 hours per day 12 hours per week	B1: 0 hours p 0 hours p week		B2: ☐ Yes ☑ No
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: Rs. 9530.00 per month for unskilled worker. Rs. 10483 per month for semi- skilled worker. Rs. 11743 per month for skilled worker.	C1: Rs. 9530.0 month fo unskilled worker. Rs. 10483 month fo skilled wo Rs. 11743 month fo worker.	per r semi- orker. per	C2: Yes No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 200% of Legal Wages	D1: 200% Legal Wa		D2: Yes No
Wages analysis: (Click here to return to Key Information)				
A: Were accurate records shown at the first request?				



A1: If No , why not?	N/A			
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 Samples from August 2021 (random month). 10 Samples from February 2022 (random month). 10 Samples from current month July 2022.			
C: Are there different legal minimum wage grades? If Yes , please specify all.	☐ Yes ⊠ No		C1: If Yes , ple Legal minimu	ease give details: m:
D: If there are different legal minimum grades, are all workers graded and paid correctly?	☐ Yes ☐ No ☒ N/A		D1: If No , plea	ase give details:
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	Below legal min employees and please state hour / week / month etc. Rs. 45.81 Per Hour. Rs. 2565.76 Per Week. Rs. 9530 Per Month.		nd please state hour / week / Hour. er Week.	
F: Please indicate the breakdown of workforce per earnings:	F1:% of workforce earning under minimum wage F2:100% of workforce earning minimum wage F3:% of workforce earning above minimum wage			
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc. It has paid on yearly basis to all full-time workers on the occasion of Diwali @8.33% of Basic Salary.			
H: What deductions are required by law e.g. social insurance? Please state all types:	As per Factory Act & Minimum Wages Act 1948 of the India, factory may deduct wages for un-authorized absence, for fines, housing facility advance payments, loans, income tax, profession tax etc. However, factory is deducting un-authorized absence, Provident fund and ESI etc.			
I: Have these deductions been made?	Yes 11: Please list all deductions that have been made. 1. ESIC 2. EPF Please describe: ESIC			
		dedu	ase list all ctions that not been	1. N/A 2. N/A Please describe: N/A
J: Were appropriate records available to verify hours of work and wages?	⊠ Yes □ No			



K: Were any inconsistencies found? (if yes describe nature)	☐ Yes ☑ No	K1: Type Poor record keeping Isolated incident Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	∑ Yes☐ NoL1: Please give details	: Yes, Wages reflect all the time.	
M: Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	☐ Yes ☐ No M1: Please specify amount/time: N/A		
M2: If yes, what was the calculation method used.	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage ☐ Figures provided by Unions ☐ Living Wage Foundation UK ☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation N/A 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).	Yes No N1: Please give details: Periodic review of wages are done/ calculated twice per year during April & October month as per government notification for workers and calculated once per year during April month. All such increments etc. are done based on performances etc.		
O: Are workers paid in a timely manner in line with local law?	⊠ Yes □ No		
P: Is there evidence that equal rates are being paid for equal work:	Yes No P1: Please give details: Verified 12 months' Salary Sheet, Salary Pay Slip & Worker Interview.		
Q: How are workers paid:	Cash Cheque Bank Transfer Other Q1: If other, please ex	plain:	



6: Working Hours are not Excessive

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

ETI

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub–clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where <u>all</u> of the following are met:
 - this is allowed by national law;
 - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
 - appropriate safeguards are taken to protect the workers' health and safety; and
 - The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined

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

Current systems:

The Factory is running in single shift, start from 09:00 to 17:30 with half an hour lunch break13:00 to 13:30. Factory only engages workers for overtime work when there is an urgency of shipment. Workers also conformed during interaction that overtime is voluntary. Workers are getting day off on Sunday as weekly holiday. Factory maintains time records using Biometric Attendance Recording System. Working hours comply with national law.

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

Details: Wage Record/ Attendance/ Muster roll, ESIC & EPF Chalan, leave with wages record etc.

Any other comments:

Nil



Non-compliance:						
1. Description of non-com NC against ETI code: None Observed Local law and/or ETI requi	NC against Loca	ILaw 🗌	NC against custo	mer	observed	evant please
Recommended corrective	e action:					
		Observo	ation:			
Description of observation: None Observed Local law or ETI requirement: Comments:					Objective observed	e evidence :
	Goo	d Example	s observed:			
Description of Good Example (GE): None Observed					Objective Evidence Observed:	
Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)						
Systems & Processes						
A. What timekeeping systems are used: time card etc.	Describe: Biometric Attendance Recording System.					
B: Is sample size same as in wages section?	∑ Yes ☐ No B1: If no, please give details					
C: Are standard/contracted working hours defined in all contracts/employment agreements?	Yes No C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:					
D: Are there any other types of	☐ Yes ☑ No	D1: If YES, please complete as appropriate:				
contracts/employment agreements used?		0 hrs	Part time	☐ Vario	able hrs	Other



		If "Other", Please define:		
		N/A		
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	☐ Yes ☑ No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details:		
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: 1 in 7 days 2 in 14 days No If 'No', please explain:	F3: Is this allowed by local law? Yes No		
	Maximum numbe	er of days worked without a day off (in sample):		
	6 Days in a week			
Standard/Contracted Hours worked				
G: Were standard working hours over 48	☐ Yes ☒ No	G1: If yes, % of workers & frequency:		
hours per week found?		N/A		
H: Any local waivers/local law or	☐ Yes ☒ No	H1: If yes, please give details:		
permissions which allow averaging/annualised hours for this site?				
Overtime Hours worked				
I: Actual overtime hours worked in sample (State	Highest OT hours	: 0 hours/month		
per day/week/month)	10 out of 10 Sample from random month (August 2021): Daily OT: Maximum 0 Hours Weekly OT: Maximum 0 Hours Monthly OT: Maximum 0 Hours			
	10 out of 10 Sample from random month (February 2022): Daily OT: Maximum 0 Hours Weekly OT: Maximum 0 Hours Monthly OT: Maximum 0 Hours			
	10 out of 10 Sample from current month (July 2022): Daily OT: Maximum 0 Hours Weekly OT: Maximum 0 Hours Monthly OT: Maximum 0 Hours			



	T		
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	☐ Yes ⊠ No		
K: Approximate percentage of total workers on highest overtime hours:	0%		
L: Is overtime voluntary?	∑ Yes ☐ No ☐ Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: According to workers interview, they could choose to overtime working freely.	
Overtime Premiums			
M: Are the correct legal overtime premiums paid?	Yes No N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of <i>standard</i> wages: 200%	
N: Is overtime paid at a premium?	⊠ Yes □ No	N1: If yes, please describe % of workers & frequency: All (100%) workers are entitled for the 200 % premium of OT however no workers have performed OT consistently. As per factory policy OT is voluntary and is compensated @ 200% premium which is in line to Indian Labour Law.	
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.	No Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) Collective Bargaining agreements Other NA Site is paying 200% OT Premium which is verified from the salary sheet and OT record.		
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other		
	Yes No N/A – there is	no legal requirement to OT premium	
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please	Safeguards ar	cluntary tive bargaining allows 60+ hours/week re in place to protect worker's health and safety constrate exceptional circumstances s (please specify)	



complete the boxes where relevant.	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:
	N/A
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	Yes No Q1: If yes, please give details:
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	☐ Yes ☐ No N/A



7: No Discrimination is Practiced

(Click here to return to summary of findings)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

There was no evidence of discrimination in employment, promotion, compensation, welfare, dismissal, and retirement found. 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 found to be practised in the company.

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

Details: Personal files, Wage Records and Worker Interview.

Any other comments:

	••
N	
1 /	ш

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male:79 % A2: Female21 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	10 Female working in skilled & Technical roles.
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	Hiring Compensation Access to training Promotion Termination or retirement No evidence of discrimination found C1: Please give details: Discrimination was not found in the factory.

Professional	Development



A: What type of training and development are available for workers?	Skill Development Training	
B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	Yes No	
·	If no, please give details:	
	Non–compliance:	
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None Observed		Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI requirement:		
Recommended corrective action:		
	Observation:	
Description of observation: None Observed Local law or ETI requirement: Comments:		Objective evidence observed:
G	Good Examples observed:	
Description of Good Example (GE): None Observed		Objective Evidence Observed:



8: Regular Employment Is Provided

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

FTI

- 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:

There was no evidence of discrimination in employment, promotion, compensation, welfare, dismissal, and retirement found. 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 found to be practised in the company.

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

Details: Personal files, Wage Records and Worker Interview.

Any other comments:

Nil

N.					:		
IN	or	1-C	or	no	II CII	ıc	e:



1. Description of non-compliance: NC against ETI NC against ETI NC against ETI NC against ETI None Observed Local law and/or ETI requirement: Recommended corrective action:	ainst Local Law 🔲 NC against customer	Objective evidence observed: (where relevant please add photo numbers)	
	Observation:		
Description of observation: None Observed Local law or ETI requirement:		Objective evidence observed:	
Comments:			
	Cond Francisco de Constitución de		
	Good Examples observed:		
Description of Good Example (GE): None Observed Objective Evidence Observed:			
Responsible Recruitment			
All Workers			
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions? A: Were all workers presented			

☐ Yes ⊠ No

affected:

B: Did workers' pay any fees, taxes, deposits or bonds for the

recruitment/placement?

purpose of

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



C: If yes, check all that apply:		Any transport costs betw	odging costs after employment offer veen work place and home er commencement of employment tation fees
D: If any checked, give details:	N/A		
Migrant Workers: 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			
A: Type of work undertaken by migrant workers:		No Migrant worker wa	s working in the factory.
B: Please give details about recruitment agencies for migrant workers:		B1: Total number of (in country recruitment agencies) used: 0 B2: Total number of (outside of local country) recruitment agencies used: 0	
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?		Yes No C1: Please describe finding: N/A	C2: Observations: N/A
D: Are Any migrant workers in skilled, technical, or management roles Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)		Yes No D1: If yes, number and	d example of roles: N/A



NON-EMPLOYEE WORKERS

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

Agency Workers (if applicable) (workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)		
A: Number of agencies used (average):	A1: Names if available: Company did not have any agency in the factory.	
B: Were agency workers' age / pay / hours included within the scope of this audit?	☐ Yes ☐ No	
C: Were sufficient documents for agency workers available for review?	☐ Yes ☐ No	
D: Is there a legal contract / agreement with all agencies?	☐ Yes ☐ No	
	D1: Please give details: N/A	



E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	Yes No E1: Please give details: N/A

Contractors: 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,		
A: Any contractors on site?	Yes No A1: If yes, how many contractors are present, please give details: Company did not have any contractor.	
B: If Yes , how many workers supplied by contractors?	00 worker	
C: Do all contractor workers understand their terms of employment?	Yes No C1: Please describe finding: N/A	
D: If Yes , please give evidence for contractor workers being paid per law:		



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:

Company do not use any sub-contractor & home workers for production. Factory does not engage workers through Subcontractor and no in-migrant worker have been engaged by the factory. There should be no sub-contracting unless previously agreed with the client.

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

d.
Objective evidence observed: (where relevant please add photo numbers)
Objective evidence observed:



Good Examples observed:				
Description of Good Example (GE): None Observed				Objective Evidence Observed:
Sun	nmary of sub-contracting Not Applicable p		ıble	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	Yes No A1: Please describe:			
B: If sub–contractors are used, is there evidence this has been agreed with the main client?	Yes No B1: If Yes , summarise d	etails:		
C: Number of sub- contractors/agents used:				
D: Is there a site policy on sub- contracting?	Yes No D1: If Yes , summarise d	etails:		
E: What checks are in place to ensure no child labour is being used and work is safe?				
Summary of homeworking – if applicable Not Applicable please x				
A: If homeworking is being used, is there evidence this has been agreed with the main client?	Yes No A1: If Yes , summarise d	etails:		
B: Number of homeworkers	B1: Male:	B2: Female):	Total:
C: Are homeworkers employed direct or through agents?	☐ Directly ☐ Through Agents		C1: If throagents:	ough agents, number of
D: Is there a site policy on homeworking?	Yes No			
E: How does the site ensure worker hours and pay meet local laws for homeworkers?				



F: What processes are carried out by homeworkers?	
G: Do any contracts exist for homeworkers?	Yes No
	G1: Please give details:
H: Are full records of homeworkers available at the site?	☐ Yes ☐ No



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

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	Yes No A1: Please give details: Company maintains a grievance committee; last committee meeting was as on 20/06/2022.
B: If Yes , are workers aware of these channels and have access? Please give details.	Workers are aware because they are periodically trained on such topics.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Direct access to management/ Complaints can also be registered through suggestion box.
D: Which of the following groups is there a grievance mechanism in place for?	
E: Are there any open disputes?	Yes No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	Yes No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	☐ Yes ☐ No G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	 ☐ Yes ☐ No H1: If no, please give details



I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)? ☐ Yes ☐ No ☐ Yes ☐ No ☐ II: If yes, please give details			
·			
Current Systems and Evidence Examined To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.			
Current systems: Company maintains a grievance committee. Physical abuse or the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation not found practised within the company. Last committee meeting was held on 26/05/2022.			
Evidence examined – to support system description (Documents examined & reference renewal/expiry date where appropriate): Details: Records and worker interview.	evant comments. Include		
Any other comments: Nil			
Non–compliance:			
Non-compliance: 1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None Observed Local law and/or ETI requirement:	Objective evidence observed: (where relevant please add photo numbers)		
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None Observed	observed: (where relevant please		
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None Observed Local law and/or ETI requirement:	observed: (where relevant please		
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None Observed Local law and/or ETI requirement:	observed: (where relevant please		
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None Observed Local law and/or ETI requirement: Recommended corrective action:	observed: (where relevant please		
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None Observed Local law and/or ETI requirement: Recommended corrective action: Observation: Description of observation: None Observed	observed: (where relevant please add photo numbers) Objective evidence		
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None Observed Local law and/or ETI requirement: Recommended corrective action: Observation: Description of observation: None Observed Local law or ETI requirement: Comments:	observed: (where relevant please add photo numbers) Objective evidence		
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None Observed Local law and/or ETI requirement: Recommended corrective action: Observation: Description of observation: None Observed Local law or ETI requirement:	observed: (where relevant please add photo numbers) Objective evidence		



10. Other Issue areas: 10A: Entitlement to Work and Immigration

(Click here to return to NC-table)

Additional Elements

10A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined

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

Current systems:

The factory had policy on legal employment policy. Through document review, workers and management interviews, it was confirmed that all employees in the factory were Indian, there was no foreign employee hired in the factory. All workers would be reviewed and validated the original documentation before they employed. The factory recruited the new workers by the advertisements or the workers' recommendation.

the workers' recommendation.		
Evidence examined – to support system of renewal/expiry date where appropriate): Details: Records and worker interview. Any other comments: Nil		& relevant comments. Include
	Non-compliance:	
1. Description of non–compliance: NC against ETI/Additional Elements NC against customer code: None Observed Local law and/or ETI /Additional Elements Recommended corrective action:	☐ NC against Local Law s requirement:	Objective evidence observed: (where relevant please add photo numbers)
	Observation:	
Description of observation: None Observed Local law or ETI/Additional Elements requ Comments:	irement:	Objective evidence observed:
G	ood examples observed:	

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Description of Good Example (GE):
None Observed

Objective Evidence
Observed:



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

(Click here to return to summary of findings)

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

10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.

10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

Current Systems and Evidence Examined

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

Current systems:

Company has obtained Air & Water Consent from Uttar Pradesh State Pollution Control Board, and they have conducted test report like ambient air, Ambient noise, Drinking Water Test Report etc.

Evidence examined – to support system description (Documents examined & renewal/expiry date where appropriate): Details: Company has obtained Air & Water Consent from Uttar Pradesh State Any other comments: Nil	
Non-compliance:	
1. Description of non-compliance: NC against ETI/Additional Elements None Observed Local law and/or ETI/Additional Elements requirement: Recommended corrective action:	Objective evidence observed: (where relevant please add photo numbers)
Observation:	
Description of observation: None Observed Local law or ETI/additional elements requirement: Comments:	Objective evidence observed:
Good examples observed:	
Description of Good Example (GE): None Observed	Objective Evidence Observed:
Other findings	



Other Findings Outside the Scope of the Code

None Observed

Community Benefits

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

None Observed



Appendix 1

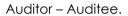
Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."

Not Applicable please x



Photo Form







Factory Name Board.



Factory Building.



Security Guard Room.



Biometric Attendance Machine.



Fire Pump.



Drinking Water Point.



Worker's Toilet Hand Wash Point.



Notice Board.









Worker's Toilet.

Fire Alarm.

Emergency Light.







Fire Hose reel.

Accessories Store.

Fire Extinguisher.







Fabric Store.

Finishing Department.

Finishing Department.







Packing Department.

Emergency Evacuation Plan.

Embroidery Department.









First Aid Box.

Stitching Department.







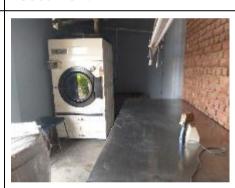
Cutting Department.

Fusing Machine

Beads Work.





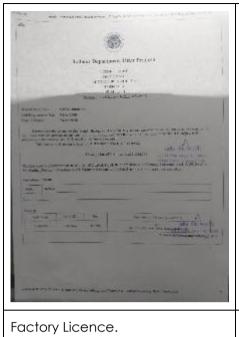


Sampling Department.

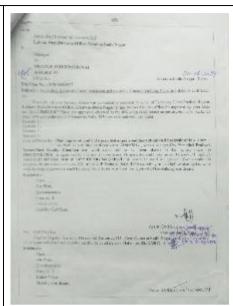
Chemical Store.

Tumbler Machine.





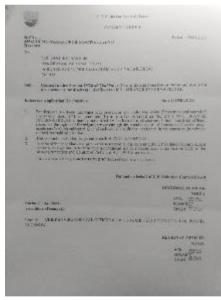


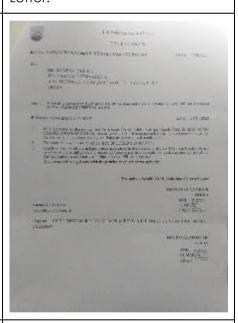


Fire NOC

Building Plan Lay Out Approval Letter.





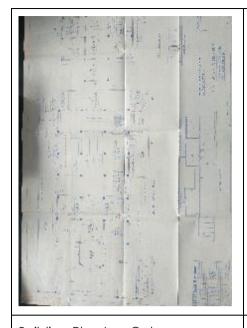


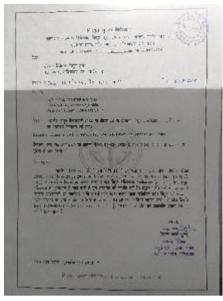
Building Stability certificate.

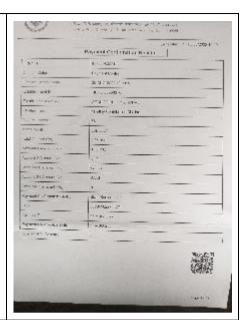
Air Consent

Water Consent





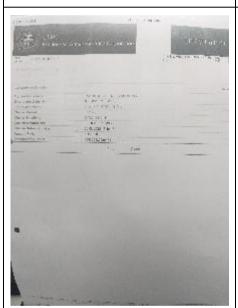




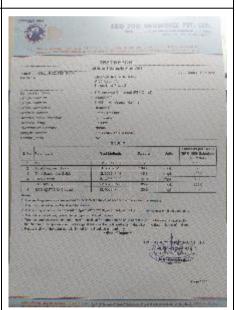
Building Plan Lay Out.

DG Installation Approval

EPF Chalan





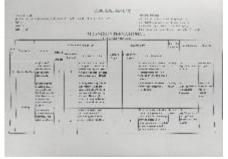


ESIC Chalan

Hazardous Waste Disposal Certificate.

ETP Outlet Test Report.





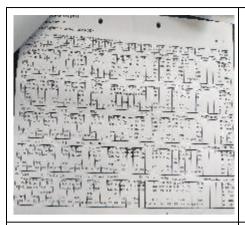


First Aid Training Certificate.

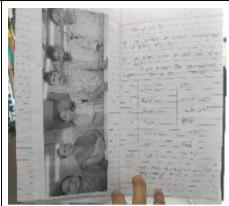
Risk Assessment

Wages Sheet









Attendance Sheet

Health & Safety Committee.

Works Committee

NCs. Photo







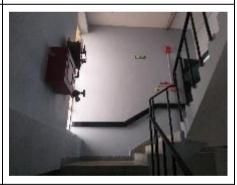
NC Photo # 01 – Partition not provided between urinals.

NC Photo # 02 – Worker's toilet found in filthy Condition.

NC Photo # 03 – Proper PPE not provided to fabric checkers.







NC Photo # 04 – Sharp tools were not fastened.

NC Photo # 05 – Evacuation Plan was not matching with floor.

NC Photo # 06 – Emergency light was not installed in stair case.









NC Photo # 07 - Pulley Guards were not installed in embroidery machines.	NC Photo # 08 – Proper aisles were not marked in stitching department.	NC Photo # 09 – Rubber mat not used by fusing machine operator.
	Nil	Nil
NC Photo # 10 – Adequate secondary containers were not provided for chemical storage.	Nil	Nil





For more information visit: Sedexglobal.com

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

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

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

 $http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5Iw_3d_3d$

Click here for Supplier (B) members:

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

Click here for Auditors:

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