Sedex Members Ethical Trade Audit (SMETA) Modified Version

Version 4.0.1 - Customer Code Version, Jun 2012

Supplier name:	REGISTAN EXPORTS			
Site country:	India			
Site name:	REGISTAN EXPORTS			
SMETA Audit Type:		4-Pillar		

Audit Content:

- (1) A SMETA 4-Pillar audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Practices. The SMETA Best Practice Methodology v.4.0 May 2012 was applied. 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
 - o Management systems and code implementation,
 - o Entitlement to Work & Immigration,
 - o Sub-Contracting and Home working,

4-Pillar SMETA Audit

- o 2-Pillar requirements plus
- o Additional Pillar assessment of Environment
- o Additional Pillar assessment of Business Practices

The Customer's Supplier Code (Appendix 1)

- (3) Where appropriate non compliances were raised against the ETI base-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.





ACCORDIA GLOBAL COMPLIANCE GROUP

Audit Comp	pany Name:	Report Owner (payee):			
ACCORDIA GLOBAL (COMPLIANCE GROUP	REGISTAN EXPORTS			
Sedex Company Reference: (only available on Sedex System):		S-			
Sedex Site Reference: (only available on Sedex System)		P-			
Audit Conducted By					
Commercial	\boxtimes	Purchaser			
NGO		Retailer			
Trade Union		Brand Owner			
Multi-stakeholder		Combined Audit (select all th	nat apply)		
Auditor Reference Number: (If applicable)		RGE/16.05.2013			

SMETA Declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA best practice guidance version 4.0. Any exceptions to this are recorded here:

- (1) A SMETA 2-Pillar audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Practices. The SMETA Best Practice Methodology v.4.0 May 2012 was applied.
- (2) The audit scope was against the following reference documents 2-Pillar SMETA Audit
 - ETI Base Code
 - SMETA Additions
 - Management systems and code implementation,
 - Entitlement to Work & Immigration,
 - Sub-Contracting and Home working,

4-Pillar SMETA

- o 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Practices

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.

Auditor Name(s): Pratap Das

Role: TEAM LEADER

Date: 16.05.2013



Audit Details

Audit Details	
A: Report #:	RGE/16.05.2013
B: Date of audit:	16/05/2013
C: Time in and time out:	Time in: 10.00am Time out: 06.00pm
D: Number of Auditor Days Used: (number of auditor x number of days)	01 (1 Day 01 persons)
E: Audit type:	□ Full Initial □ Periodic □ Full Follow-up Audit □ Partial Follow-Up □ Partial Other – Define
F: Was the audit announced?	
G: Was the Sedex SAQ available for review?	⊠ Yes □ No
If no, why not?	N/A
I: Auditor name(s) and role(s):	Pratap Das
J: Report written by:	Pratap Das
K: Report reviewed by:	N/A
L: Report issue date:	N/A
M: Supplier name:	RGE/16.05.2013
N: Site name:	REGISTAN EXPORTS
O: Site country:	REGISTAN EXPORTS
P: Site contact and job title:	MR.K.P.Singh (Factory Manager) - 09829444473
Q: Site address:	G-174,175,176, 205 , Garment Zone, EPIP Sitapura Industrial area, Tonk Road Jaipur-302022, India
Site phone:	+91-141 3004000
Site fax:	+91-141 3004100

Site e-mail:	shipping@re	shipping@registanexports.com					
R: Applicable business and other legally required licence numbers: for example, business license no, and liability insurance	1.Factory License :RJ28165/6284(Valid till 31 st March 2017) 2.Polution NOC: Air: Applied for the same, Water Consent: Applied for the same 3. IEC# 1390001971 4. PAN# AABFR5942F						
S: Products/Activities at site, for example, garment manufacture, electricals, toys, grower	Manufacturer an	Manufacturer and exporter of Ladies Apparels (Woven)					
T: Audit results reviewed with site management?	Yes - MR.K.P.Singh (Factory Manager)						
U: Who signed and agreed CAPR (Name and job title)	MR.K.P.Singh (Factory Manager)						
V: Did the person who signed the CAPR have authority to implement changes?	Yes						
W: Previous audit date:	N/A						
X: Previous audit type:		SMETA 2-pillar	SMETA 4-pillar	Other			
	Full Initial						
	Periodic						
	Full Follow-Up Audit						
	Partial Follow- Up						
	Partial Other*						
	*If other, please	define: This is the	initial audit				



Audit Scope

10B4: Environment 4-Pillar

10C: Business Practices

Local Law (Please state legal requirement)	
A: Standard work week: (total hours excluding overtime)	48 Hours
B: Maximum allowed overtime hours: (please state per day, week, month)	6 HOURS/WEEK & 150 HOURS PER YEAR
C: Minimum work age:	14 YEARS COMPLETED WITH RESTRICTED WORK FOR YOUNG WORKERS , 18 YEARS FOR ADULT WORKERS
D: Minimum legal wage for standard hours: (please state per day, week, month)	The stipulated minimum wages for the government of Rajasthan state is as follows: Un-Skilled —INR 4316/4500 per month Semi —Skilled —INR 4576/4800per month Skilled —INR 4836/5000per month
E: Minimum legal overtime wage: (please state per day, week, month)	200% of the rate of ordinary wages
Audit Scope (Please select the code and additional require	ments that were audited against during this audit)
2-Pillar Audit	

Note: The main 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.

□ N/A

□ N/A

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.



Non-Compliance Table

Issue		Area of Non-C	Record the number of issues by line*:				
		ETI Base Code	Local Law	Additional Elements	NC	Obs	GE
0	Management systems and code implementation				02		
1	Employment Freely Chosen						
2	Freedom of Association						
3	Safety and Hygienic Conditions	\boxtimes	\boxtimes				
4	Child Labour						
5	Wages and Benefits						
6	Working Hours						
7	Discrimination						
8	Regular Employment						
8A	Sub-Contracting and Homeworking						
9	Harsh or Inhumane Treatment						
10A	Entitlement to Work						
10B2	Environment 2-Pillar						
10B4	Environment 4-Pillar				N/A	N/A	N/A
10C	Business Practices					N/A	N/A

^{*}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.



Audit Overview

Audit Overview						
	Management		Worker Representatives			
Audit attendance	Senior mana	gement	Worker Cor representat		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 not present please explain reasons why	Worker's rep There is no w				he opening	meeting.
E: If Union Representatives not present please explain reasons why:	Worker's rep There is no w				he opening	meeting.
F: Site description: (Include size, location and age of site. Also include structure and number of buildings)		ress of the ra Industrial remise was endered found sate found sate a modern er etc. are involved in research for each found is: Fabric for egoing of Accessor Office, M	e factory is Gal area, Tonk as found to be tisfied with the navailable. In manufacture, and available. In manufacture alale:72,Femal and on in difference checking, Cunting the listed	-174, 175, 175, 175, 175, 175, 175, 175, 175	76, 205, Ga pur-302022, clean and per nent. cilities for ha corts Ladies on the building ning, Finishin collows: Cutting& thr asampling	arment Zone, India eople and wash, Apparels g, and ag, packing
G: Site function:	☐ Agent☐ Facility Pr☐ Facility Pr☐ Finished F☐ Grower☐ Home wo☐ Labour Pr☐	Product Soorker	Manufacturer upplier			



	☐ Pack House ☐ Primary Producer ☐ Service Provider ☐ Sub-Contractor
H: Month(s) of peak season: (if applicable)	Business is consistent throughout the year

I: Typical production level as a % of the total capacity by month (record below): Year 2013 Site declaration only – this has not been verified by auditor.

Jan	Feb	Mar	Apr	Мау	Jun	Jul	Aug	Sep	Oct	Nov	Dec
50%	45%	-	-	-	-	-	-	-	-	-	-

J: Process overview:

(Include products being produced, main operations, number of production lines, main equipment used)

The facility is into the manufacturing and exports of Ladies Apparels (Woven).

Main processes are fabric checking, cutting, stitching, checking and finishing, inspection, packing and dispatch.

The total capacity is around 150000pcs per month (as per management).

Process flow is as below:

Raw materials received----cutting----stitching ---checking ---finishing----packing—dispatch.

For all employees timing:

Morning Shift: 9.30 A.M to 18 .00PM including 30 minutes lunch break.

Security guards are posted at appropriate areas to safeguard the premises and it's property/manpower.

Weekly off is SUNDAY.

K: Attitude of workers:

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

Attitude of the workers was found positive/supportive towards the management of the establishment and workers are getting their wages on time and as per legal required minimum wages act.

It was observed that all the workers are freely working in the establishment.

10 workers were Interviewed (in group & individual) were taken in a private secured place in the absence of management. The workers informed that they are happy to work in this facility and are satisfied with the working culture.

No negative comments were received from the workers & staff against the management.

The most important things told by the workers that wages is distributed by the management on time.

L: Attitude of managers:

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

During the audit days, the management of establishment was very cooperative and very transparent to share the issues & information, Attitude of the management was found positive towards the audit and the audit process. The establishment was found aware of the requirements of a social audit & its applicable ETI and local law. The



the findings and was very keen to implement all the measures to achieve compliance in their facility.

M: Summary of main findings: (positive and negative)

(This is a summary not a repeat of the section detail)

Audit Process

The audit was one full day audit, involving auditor. The whole audit process as follows:

Opening meeting with management

Documents review

Site tour

Worker's interview

Closing meeting.

Positive observations:

No person below 18 years was employed by the establishment.

The whole establishment building construction is under one roof (Ground floor & basement) and workers are getting natural lights/illumination all time during the working period.

The establishment management was co-operative during the audit and produced the entire required document.

The workplace was spacious with proper ventilation. There was no evidence of child/forced/bonded labour in the establishment.

As confirmed by the employees during the interviews and as per the existing records verification there is no evidence of discrimination, harassment and abuse or unfair disciplinary practices in the facility.

All workers are getting wages as per state minimum wages requirement.

Negative findings:

- 1. Factory has applied for approval Pollution NOC(both for Air and Water) to the state pollution control Board.
- 2. Factory has applied for Fire NOC(Fire authorities-Rajasthan).



Key Information

Key Information				
A: Do all workers (including migrant workers) have contracts of employment?	⊠ Yes □ No			
B: Were appropriate records available to verify hours of work and wages?	⊠ Yes □ No			
C: Were any inconsistencies found? (if yes describe nature)	⊠ No □	Poor record keeping Isolated incident Repeated occurrence		
D: For the lowest paid production worker, are wages paid for standard hours (excluding overtime) below or above the legal	Wages found:	Please indicate the breakdown of workforce according to earnings:		
minimum?	☐ Below legal min ☐ Meet ☐ Above	% of workforce earning under min wage100_% of workforce earning min wage30%_ of workforce earning above min wage		
E: % of piece rate workers: (if applicable)	No piece rate workers	s in the factory		
F: Combined hours (standard and overtime) over 60 per week found?	☐ Yes ☐ No			
G: Are the correct overtime premiums paid?	☐ Yes ☐ No (No overtime	e noted)		
H: Is there any night production work at the site?	☐ Yes ☑ No			
I: % of workers living in site provided accommodation (if applicable):	Nil			
J: Age of youngest worker found:	21 years			
K: Workers under 18 subject to hazardous work assignments?	☐ Yes _0% ☑ No	of under 18's at this site (out of total workers)		
L: What form of worker representation / union is there on site?	☐ Union (name) ☑ Worker Committed ☐ Other (specify) ☐ None	е		
M: Is it a legal requirement to have a union?	☐ Yes ☑ No			
N: Is It a legal requirement to have a workers committee?	☐ Yes ☑ No			

O: Is there any other form of effective worker/management communication channel? (Other than union/worker committee)	 Yes No Describe: Workers can directly approach to the management without any fear.
P: Are there any External Processes?	☐ Sub-Contracting ☐ Home working ☐ Other External Process (detail) ☐ No external processes
Management Systems:	
Q: Nationality of Management	Indian
R: Majority nationality of workers	Indian
S: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	10%
T: Were accurate records shown at the first request?	⊠ Yes □ No
If not, why not?	
In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	☐ Yes ☐ No Please describe:



Worker Analysis

Worker Analysis									
	Local			Migrant				Total	
	Permanent	Temporary	Agency	Permanent	Temporary	Home workers			
Worker numbers – male	72	0	0	0	0	0	0	72	
Worker numbers – female	12	0	0	0	0	0	0	12	
Total	84	0	00	0	0	0	0	84	
Number of Workers interviewed	10	0	0	0	0	0	0	10	

Contractors:

(Individuals supplying workers to site with the workers	paid by contractors, not by site)
A: Any contractors on site?	☐ Yes ☐ No
B: If yes, how many workers supplied by contractors	N/A
C: Are all contractor workers paid according to law: (please record evidence)	YES
84'	

Migrant Workers:

Please see SMETA Best Practice Guidance - Page 37

D: Originating Locations/Countries:	No migrant workers
E: Work undertaken by migrant workers:	N/A
F: Were migrant workers recruited through an agency?	N/A
If yes, is there a contract with the agency? Provide details of agencies and contractual arrangements	N/A
G: Percentage of migrant workers in company provided accommodation:	N/A



Audit Results by Clause

- 0: Management systems and code implementation:
- 0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
- 0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
- 0.3 Suppliers are expected to communicate this Code to all employees.
- 0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

The management has displayed ETI code of conducts at main entrance, production area, visitor sitting area & notice board and all the workers are aware about the ETI requirements, It has been noted that management has taken facility running permission from state labour department under factories Act 1948.

Description of Current Status:

The establishment has implemented and maintained a strong system and taken care of ETI code of conduct's requirements in an effective manner.

MR.K.P.Singh (Factory manager) has been appointed as a social compliance representative to implement ETI base code at work place.

It has been noted that all employees has been communicated code of conduct's requirement and also communicated to all their suppliers.

Non-compliance:	
Description of non-compliance:	Objective evidence observed:
Factory has applied for approval Pollution NOC(both for Air and Water) to the state pollution control Board.	Document review
Local law or ETI requirement: Section 41A of Factories Act 1948	
Recommended corrective action: Factory should make sure that the pollution NOC(Air & Water) is obtained from State Pollution Control Board at the earliest	



2. Description of non-compliance: ☑ NC against ETI/Additional Elements ☑ NC against Local Law				
Factory has applied for Fire NOC(Fire authorities-Rajasthan).				
Local law or ETI requirement: Section 38 of Factories Act 1948				
Recommended corrective action: Factory should make sure that the Fire NOC is made available at the earliest.				
Observation				
Description of observation: None	Objective evidence observed:			
Local law or ETI requirement: N/A	N1/A			
Comments: None	N/A			

Good Examples observed:	
Description of Good Example (GE):	Objective evidence observed:
None.	N/A.



1: Employment is Freely Chosen

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.

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

Worker's appointment letter, Xerox copies of worker's identity/voter id and other documents.

Description of current status:

On the day of audit, there was no evidence of the forced or involuntary prison labor.

- 1. All verified workers personnel files were found with application forms with worker seeking appointment on voluntary basis.
- 2. Workers interview confirmed that they are free to leave the establishment premises as per their choice and they are not required any kinds of deposits with the employer.
- 3. The establishment is paying wages to workers on time and all the workers leaves the facility on fixed time.
- Workers do not need to deposit any kind of money, certificate/original documents at the time of employment.
- 5. Workers can give resignation anytime after giving reasonable time period prior notice.
- 6. No nonconformity observed pertaining to forced labour during the audit.

Non-compliance:		
Description of non-compliance:	Objective evidence observed:	
Local law or ETI requirement: N/A	N/A	
Recommended corrective action: N/A		
Observation		
Description of observation: None	Objective evidence	



Local law or ETI requirement: N/A	observed:	
Comments: N/A	N/A	
Good Examples observed:		
Description of Good Example (GE):	Objective evidence observed:	
None	observed.	
	N/A	
2: Freedom of Association and Right to Collective Bargaining are Respected		
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. Evidence of Compliance and Current Status: Please Note: include evidence examined & description of current status. Documents checked & comments: Policy related to freedom of association has been reviewed and found suitable.		
Description of current status: No union exits in the facility, however workers can directly approach to the top management or they can explain their grievances to the supervisor/facility manager.		
 Facility does not obstruct the workers from joining any legal trade unions or outside agency on their choice. All workers have been given freedom by facility management to explain their grievances/suggestion to the manager/top management without any fear. 		
Non-compliance:		
	Objective evidence observed:	
No non conformance observed on the day of audit	N/A	
Local law or ETI requirement: N/A	W/ C	
Recommended corrective action: N/A		



			Objective evidence observed:
			observed:
			N/A
No union exits in the establishment			
Workers Committee and Workers are allowed to directly approach to the management.			
Yes – verified minutes and agenda of meetings.			
☐ Yes ☒ No			
% workers covered by Union% workers covered by worker rep CBA			
☐ Yes ☐ No ☑ No CBA			
Objective evidence observed:			
	N/A		
	Workers Committed management. Yes – verified min Yes No Workers Committed min Yes – verified min Yes No	Workers Committee and Workers are management. Yes – verified minutes and agenda of Yes No No No CBA Objective evidence	Workers Committee and Workers are allowed management. Yes – verified minutes and agenda of meeting. ☐ Yes ☐ No ☐ Yes ☐ No ☐ Yes ☐ No ☐ No ☐ No CBA Objective evidence observed.



3: Working Conditions are Safe and Hygienic

ET

- 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.

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

Appointment letter of health & safety representative, medical check up records of workers, facility layout, fire alarm, fire extinguishers, emergency lights and emergency route posted at each door.

Description of current status:

- 1. MR.K.P.Singh (Factory MANAGER) has been appointed by the management and responsible for health, safety and environments activities implementation at the facility.
- 2. Health & safety policy displayed at each floor and risk analysis done by the facility for worker's safety and avoid health hazards.
- 3. The building height is found more than 11 feet which allows fresh air ventilation.
- 4. The establishment was found very open and proper ventilated.
- 5. Adequate sanitary facilities such as latrine, urinals and fresh drinking water are providing in each area.
- 6. Potable drinking water provided to all workers in all time to the workers and water analysis done by the authorised agency.

Non-compliance:		
Description of non-compliance:	Objective evidence observed:	
No non-compliance.	It was observed during the site tour.	
Local or ETI requirement:	Site tour.	
Recommended corrective action:		

Observation	
Description of observation: None Local law or ETI requirement: N/A Recommended corrective action: N/A	Objective evidence observed: N/A
Good Examples observed:	
Description of Good Example (GE): None	Objective Evidence Observed: N/A

4: Child Labour Shall Not Be Used

ETI

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

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

There is child labour policy displayed at main gate and child labour rehabilitation policy also maintained. Age proof of each worker.

Description of current status:

The establishment has posted "No child labour" board at the main gate.

All workers have been interviewed and each individual worker said that they are above 19 years of age.

Top management has been interviewed and said that they verify the age of worker before hiring them and keep a valid age proof of each employee.

There is no evidence of child labour employment was found at the time of audit.

Non-compliance:	
1. Description of non-compliance: NC against ETI NC against Local Law NC against ETI	Objective evidence observed:
No non conformance observed on the day of audit.	N/A.
Local law or ETI requirement: N/A	
Observation	
Description of observation: None	Objective evidence observed:
Local law or ETI requirement: N/A Comments: N/A	N/A
Good Examples observed:	
Description of Good Example (GE): None	Objective Evidence Observed: N/A



5: Living Wages are Paid

ETI

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

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

Wages records, Attendance records, Leave records, salary slip, overtime records

Description of current status:

or months - please see BPG)

The facility is found that minimum wages is being given to all workers; All the workers are getting wages of unskilled, semi skilled & skilled category. Workers are getting wages in their bank a/c on time.

Non-compliance:		
Description of non-compliance:		Objective evidence observed:
No non conformance observed on the day of audit.		N/A
Local law or ETI requirement: N/A		
ETI requirements: N/A		
Observation		_
Description of observation: None Local law or ETI requirement: N/A Comments: N/A		Objective evidence observed: N/A
Good Examples observed:		
Description of Good Example (GE): None		Objective Evidence Observed: N/A
Wages analysis:		
A: Sample size: (number of wages checked and which weeks	30 (Dec 2012-10 + Jan 2013-10 + March 2013-10)	

B: Legal minimum wage for standard time: (excluding OT - please include time period e.g. hour/week/month)	Unskilled, semiskilled and skilled wages are as below per month. Un-Skilled —INR 4316/4500 per month Semi —Skilled —INR 4576/4800per month Skilled —INR 4836/5000per month		
C: Are there different legal minimum wage grades? If yes, please specify all.	□Yes ☑ No	If yes, please give details:	
D: Where there are different legal minimum wages grades are all workers graded correctly?	⊠ Yes □ No		If no, please give details:
E: What deductions are required by law:	PF, ESIC and	d Labour Welfare Fund.	
F: Have all of these deductions been made?	Yes- PF, ESIC and Labour Welfare Fund. As per law.		
G: Industry norm for this region: (please include time period e.g. hour/week/month)	Same as per Law.		
H: Legal overtime premium for weekdays: (please include time period e.g. hour/week/month)	200% of ordinary wages		
I: Legal overtime premium for rest days: (please include time period e.g. hour/week/month)	200% of ordinary wages + 1 day rest		
J: Legal overtime premium for holidays: (please include time period e.g. hour/week/month)	300% of ordinary wages		



Worker Type	Process Operator (Highest paid)	Process Operator (Average paid)	Process Operator (Lowest paid)
Select one worker's records from each "Worker Type" and populate the boxes. Ensure comparison is made for same pay period (peak) and only uses full-time workers. See SMETA Best Practice Guidance for completing this:			
A: Pay period (please include time period e.g. hour/week/month):	December 2012 (1st to 31st)/Skilled	January 2013 (1 st to 31 st)/Semi Skilled	March 2013 (1 st to 31 st)/Unskilled
B: Anonymous Employee Reference/Dept.	AYAJ	PRASANNA	LAXMI DEVI
C: Employee Gender	Male	Male	Male
D: Contracted wage (please include time period e.g. hour/week/month):	15600/Monthly	6800/Monthly	4500/Monthly
E: Standard working hours (excluding OT - please include time period e.g. hour/week/month):	31 days(48 hours per week)-Worked-21days	31 days(48 hours per week)-Worked-31days	31 days(48 hours per week) -Worked-27days
F: Standard work pay rate (excluding OT - please include time period e.g. hour/week/month):	4030 INR per Month	4836 INR per Month	4320 INR per Month
G: Standard day overtime - hours (please include time period e.g. hour/week/month):	00	00	00
H: Standard day overtime - wage (please include time period e.g. hour/week/month):	Nil	Nil	Nil
I: Rest day overtime – hours (please include time period e.g. hour/week/month):	0	0	0
J: Rest day overtime – wage (please include time period e.g. hour/week/month):	0	0	0
K: Statutory Holiday overtime – hours (please include time period e.g. hour/week/month):	0	0	0
L: Statutory holiday OT - wages (please include time period e.g. hour/week/month):	0	0	0

M: Total overtime hours (please include time period e.g. hour/week/month):	00		00	00
N: Incentives/Bonus/ Allowances etc. (please include time period e.g. hour/week/month):	0		0	0
O: Gross wages (please include time period e.g. hour/week/month):	Rs-15600/Month		6800/Month	4500/Month
P: Social insurance and other deductions	00		671	521
Q: Actual wage paid after deduction (please include time period e.g. hour/week/month):	10568/M	onth	6129/Month	3399/Month
Comments: (Please state here any speci	fic reasons	s/circumstances tha	t explain the lowest and highes	st gross wages)
R: Is there a defined living w This is not normally legal wage. If a please state amount and source of Please see BPG)	nswered Y	Yes ⊠ No Please specify amount/time period:		
S: Are workers paid in a time manner in line with local law?		✓ Yes 7th of every month, for monthly salary.☐ No		
T: Is there evidence that equal are being paid for equal work		 ∑ Yes ☐ No Details: As per wages records, equal rate are being paid by the establishment for man & women employee for the same category. 		
U: How are workers paid:				
Actual overtime premium pa sample for	id in			
V: Weekdays:		No overtime noted		
W: Rest days:		No overtime noted		
X: Holidays:		No overtime noted		



6: Working Hours are not Excessive

ETI

6.1 Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.

6.2 In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

Attendance records, overtime records, wages analysis records and deduction records.

Description of current status:

- Work timings, rest day information are displayed at main notice board of the facility.
- The working hours are as follows: 9.30am to 06.30pm
 - Break: Lunch -1pm to 01.30 pm ,(02tea breaks)
 - Sunday is the declared weekly rest.
- > The facility is providing all national holidays & festival holidays with wages in one calendar year

The facility is providing all flational holidays & restival holidays with wages in one calendar year.		
Non-compliance:		
1. Description of non-compliance: NC against ETI NC against Local Law No non conformance observed on the day of audit. ETI requirement: None Recommended corrective action: N/A	Objective evidence observed: N/A	
Observation		
Description of observation: None Local law or ETI requirement: N/A Comments: N/A	Objective evidence observed: N/A	
Good Examples observed:		
Description of Good Example (GE): None	Objective Evidence Observed: N/A	

Working hours analysis Please include time period e.g. hour/week/month			
A: What timekeeping systems are used: time card etc.	Smart card punching for permanent employee and Time register is being maintained for temporary workers.		
B: Sample size checked (number of workers): Please see BPG	All employees		
C: Legal standard work week (hours): (Excluding OT - please include time period e.g. hour/week/month).	48 hours		
D: Contracted standard work week this site (hours) (excluding OT - please include time period e.g. hour/week/month)::	48 Hours		
E: Actual standard work week averaged over sample for full time workers: (excluding OT - please include time period e.g. hour/week/month)	48		
F: Lowest standard hours worked (excluding OT - please include time period e.g. hour/week/month)	48		
G: Highest standard hours worked (excluding OT - please include time period e.g. hour/week/month)	48		
H: Percentage workers on part-time contracts	_0 % age		
I: Legal permitted overtime hours (please include time period e.g. hour/week/month)	12 hours per week		
J: Any local waivers or permission for annualised hours for this site:	No		
K: Actual overtime hours: (averaged over sample) (please include time period e.g. hour/week/month)	Nil		
L: Range of overtime hours over all workers: (quote highest and lowest please include time period e.g. hour/week/month)	Nil		
M: approx % of workers on highest overtime hours:	_0%		
N: Peak season(s): Months	Business is consistent throughout of the year.		
Comments: (Please state here any specific reasons/circumstances that explain the highest working hours)			
The management of establishment is aware of time limit of actual working hour of employees as per legal requirements.			



7: No Discrimination is practiced

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.

Evidence of Compliance and Current Status Please Note: include evidence examined & description of current status.		
Documents checked & comments:		
Promotion records, increment records, termination records, disciplinary action records and	d bonus records.	
Description of current status:		
Facility has developed a policy on anti-discrimination which is posted and communicated to the employees. None of the employees reported that they are discriminated in any manner.		
Non-compliance:		
Description of non-compliance:	Objective evidence observed:	
No non-compliance observed during the audit day.	N/A	
Local law or ETI requirement: N/A		
Recommended corrective action: N/A		
Observation		
Description of observation: None	Objective evidence observed:	
Local law or ETI requirement: N/A	observed.	
Comments: N/A	N/A	
Good Examples observed:		
Description of Good Example (GE): None	Objective Evidence Observed:	
	N/A	



8: Regular Employment Is Provided

ETI

- 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or homeworking 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.

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

Employee contracts records and full and final records

Description of current status:

The facility has made contract with employee providing full support to them to comply all the norms as per ETI code of conducts.

Non-compliance:	
1. Description of non-compliance: NC against ETI NC against Local Law NC against ETI	Objective evidence observed:
No non conformance observed on the day of audit.	N/A
Local law or ETI requirement: N/A	
Recommended corrective action: N/A	
Observation	
Description of observation: None	Objective evidence
Local law or ETI requirement: N/A	observed:
Comments: N/A	N/A
Good Examples observed:	
Description of Good Example (GE): None	Objective Evidence Observed: N/A
8A: Sub-Contracting and Homeworking: No subcontractors used by the facility.	
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. Evidence of Compliance and Current Status Please Note: include evidence examined & description of current status. Documents checked & comments: As per management, they do not subcontract any production processes to outside subcontractors/agencies. Non-compliance: 1. Description of non-compliance: Objective evidence □ NC against Local Law observed: □ NC against ETI/Additional Elements N/A N/A Local law or ETI /Additional Elements requirement: None Recommended corrective action: N/A Observation Description of observation: N/A Objective evidence observed: Local law or ETI/Additional elements requirement: None N/A Comments: Good Examples observed: Description of Good Example (GE): Objective Evidence Observed: N/A N/A Summary of sub-contracting – if applicable 00 A: Number of sub-contractors/agents used B: Is there a site policy on sub-contracting? If yes, summarise details: They do not subcontract any major production processes, however, they do have a subcontractor monitoring system, in case there is any subcontracting in the future. C: What checks are in place to They do not subcontract any major production processes, however, they do ensure no child labour is being used have a subcontractor monitoring system, in case there is any and work is safe? subcontracting in the future.



D: What processes are sub- contracted?	Nil		
Summary of home working – if applicableN/A			
E: Number of home workers	Male:	Female:	Total:
F: Are home workers employed direct or through agents?	☐ Directly☐ Through Agents		
G: If through agents, number of agents	N/A		
H: Is there a site policy on home working?	☐ Yes ☐ No		
I: How does site ensure worker hours and pay meet local laws for home workers?			
J: What processes are carried out by home workers?			
K: Are written agreements in place for home workers that include regular employment?	☐ Yes ☐ No		
L: Are full records available at the site?	☐ Yes ☐ No		
9: No Harsh or Inhumane Treatment is Allowed			
ETI 9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation be prohibited.			
Evidence of Compliance and Current Status Please Note: include evidence examined & description of current status.			
Documents checked & comments: Disciplinary policy & their records			
Description of current status:			
The establishment is using state model standing order (Approved) and comply all legal requirement related with this.			



Non-compliance:		
Description of non-compliance:	Objective evidence observed:	
No non conformance observed on the day of audit.	N/A	
Local law or ETI requirement: N/A		
Recommended corrective action:		
Observation		
Description of observation: None	Objective evidence observed:	
Local law or ETI requirement: N/A	observea:	
Comments: N/A	N/A	
Good Examples observed:		
Description of Good Example (GE): None	Objective Evidence Observed:	
	N/A	
10. Other Issue areas: 10 A: Entitlement to Work and Immigration		
Additional Elements 10A1 Only workers with a legal right to work shall be employed or used by the supplier. 10A2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation. 10A3 employment agencies must only supply workers registered with them. 10A4 the supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.		
10A4 the supplier shall implement processes to enable adequate control over agencies w	ith regards the above	
10A4 the supplier shall implement processes to enable adequate control over agencies w points and related legislation.	ith regards the above	
10A4 the supplier shall implement processes to enable adequate control over agencies w	ith regards the above	
10A4 the supplier shall implement processes to enable adequate control over agencies w points and related legislation. Evidence of Compliance and Current Status	ith regards the above	
10A4 the supplier shall implement processes to enable adequate control over agencies w points and related legislation. Evidence of Compliance and Current Status Please Note: include evidence examined & description of current status.	ith regards the above	
10A4 the supplier shall implement processes to enable adequate control over agencies w points and related legislation. Evidence of Compliance and Current Status Please Note: include evidence examined & description of current status. Documents checked & comments:	ith regards the above	



Non-compliance:		
Description of non-compliance:	Objective evidence observed:	
No non-conformance observed on the day of audit.	N/A	
Local law or ETI /Additional Elements requirement:		
Recommended corrective action: None		
Observation		
Description of observation: None	Objective evidence observed:	
Local law or ETI/Additional Elements requirement: N/A	observed.	
Comments: N/A	N/A	
Good examples observed:		
' ` ` ` ·	Objective Evidence Observed: N/A	
10. Other issue areas 10 B 2: Environment 2-pillar 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.		
Evidence of Compliance and Current Status Please Note: include evidence examined & description of current status.		
Documents checked & comments:		
State labour's facility licence, Haryana registration, Vat tax registration for this process, waste generator records.		
Description of current status:		
The facility is complying all the legal norms related with environment.		



environmental regulations.

Non-compliance:	
1. Description of non-compliance: NC against ETI /Additional Elements NC against Local Law	Objective evidence observed:
No non-compliances observed on the day of audit.	N/A
Local law or ETI /Additional Elements requirement: N/A	N/A
Recommended corrective action: N/A	
Observation	
Description of observation: None	Objective evidence observed:
Local law or ETI /additional elements requirement:	observed.
Comments: N/A	N/A
Good examples observed:	
	Objective Evidence Observed: N/A
10. Other issue areas 10B4: Environment 4-Pillar-N/A(as this is a 2-pillar audit) To be completed for a 4-Pillar SMETA Audit and remove the previous page which is	10B2 environment 2 pillar
B.4. Compliance Requirements 10B4.1 Suppliers as a minimum should meet the requirements of local and national laws related to environmental standards. 10B4.2.Where it is a legal requirement, suppliers must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc. 10.B4.3. The supplier shall be aware of their end client's environmental standards/code requirements and have a system in place to monitor their performance against these. B4. Guidance for Observations 10B4.4. Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor. 10B4.5. Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers. 10B4.6. Suppliers shall be aware of the significant environmental impact of their site and its processes. 10B4.7. The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details). 10B4.8. Suppliers shall seek to make continuous improvements in their environmental performance. 10B4.9. Suppliers shall have available for review any environmental certifications or any environmental management systems documentation 10B4.10. Suppliers should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.	

10B.4.11. Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to

Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an appropriate the propriate place of the main requirement of the propriate place.



and/or has any certifications or environmental management systems in place. Following this assessment the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and

guidance for auditor)		
Evidence of Compliance and Current Status Please Note: include evidence examined & description of current status.		
Documents checked & comments: N/A Description of current status: N/A		
Non-compliance:		
Description of non-compliance: NC against ETI/Additional Elements NC against Local	Objective evidence observed:	
N/A	N/A	
Local law or ETI /Additional Elements requirement: None		
Recommended corrective action: N/A		
Observation		
Description of observation: None	Objective evidence observed:	
Local law or ETI/Additional elements requirements: N/A	N/A	
Comments:	147.	
N/A		
Good examples observed:		
Description of Good Example (GE): None	Objective Evidence Observed:	
	N/A	



Environmental Analysis (Site declaration only – this has not been verified by auditor. Please state units in all cases below.)		
Criteria	Current year: Please state period:	Previous Year: Please state period:
Electricity Usage: Kw/hrs	N/A	N/A
Gas Usage: Kw/hrs	N/A	N/A
Renewable Energy Usage: Kw/hrs	N/A	N/A
Has site completed any carbon Footprint Analysis?	☐ Yes ⊠ No	☐ Yes ⊠ No
Water Sources Please list all places.	N/A	N/A
Water Volume Used (m³)	N/A	N/A
Water Discharged : Please list all places.	N/A	N/A
Water Volume Discharged: (m³)	N/A	N/A
Water Volume Recycled: (m³)	N/A	N/A
Total waste Produced (please state units)	N/A	N/A
Waste to Landfill: (please state units)	N/A	N/A
Total Product Produced (please state units)	N/A	N/A



10C: Business Practices – 4-Pillar Audit- N/A

To be completed for a 4-Pillar SMETA Audit

10C. Guidance for "Observations"

- 10C.1. Suppliers should have completed the appropriate section of the SAQ and have made it available to the auditor.
- 10C.2. The supplier should have received and acknowledged- preferably in writing the Business Practices policy of the auditor/audit company.
- 10C.3. Suppliers shall seek to conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
- 10C.4. Suppliers shall be aware of any applicable laws, their end client's Business Practices standards/code requirements and have a system in place to monitor their performance against these.
- 10C.5. Supplier should have a Business Practices policy concerning bribery, corruption, or unethical Business Practice. This should be clearly communicated to all relevant parties.
- 10C.6. Suppliers should have a designated person responsible for implementing standards concerning Business Practices
- 10C.7. Suppliers should have a transparent system in place for confidentially reporting, and dealing with unethical Business Practices without fear of reprisals towards the reporter
- 10C.8. Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

Note for auditors and readers. This business practices section is intended to take not more than 0.25 auditor days. It is an assessment not an audit and the main requirement is to gather information on the relevant business practices issues in a supply chain. All findings will be recorded as observations not Non- Compliances and the data collected will allow the membership to define appropriate standards over time as part of a continuous review process.

Evidence of Compliance and Current Status Please Note: include evidence examined & description of current status.	
Documents checked & comments: N/A	
Description of current status: N/A	
Observation	
Description of observation: None	Objective evidence observed:
Local law or ETI/Additional elements requirement: N/A	observed.
Comments: N/A	N/A
Good examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:
None	Observed:
	N/A



Worker Interview Summary

Worker Interview Summary		
A: Were workers aware of the audit?	Yes No No	
B: Were workers aware of the code?	⊠ Yes □ No	
C: Number of group interviews: Please specify number and size of groups. Please see BPG	04 (1group of 04) & 06 individual employee	
D: Number of individual interviews Please see BPG	Male: 04	Female: 02
E: Number of interviewed workers Please see BPG	Male: 07	Female: 03
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?		
H: What was the most common worker complaint?	None	
I: What did the workers like the most about working at this site?	Management attitude and salary payment on time and availability of payment of advance.	
J: Any additional comment(s) regarding interviews:	Workers said that they can approach to the management directly and they can take advance of salary which is a most favourable thing in the factory.	
Agency Workers (workers sourced from a local agent who are not directly paid by the site)		
A: Number of agencies used (average):	NIL	
B: Were agency workers' age/pay/hours included within scope of this audit	⊠ Yes □ No	



Other findings

Other Findings outside the Scope of the Code

None

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

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."

NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection

Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.

Audit has been conducted as per ETI base code and legal regulations.

protection.	
ETI Code	Customer's Supplier Code equivalent
ETI 1. Employment is freely chosen	ETI 1. Employment is freely chosen
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.	Clients accepts ETI code of conducts, hence do not required to fill this column , please refer to CAPR
ETI 2. Freedom of association and the right to collective bargaining are respected	ETI 2. Freedom of association and the right to collective bargaining are respected
2.1. Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. 2.2. The employer adopts an open attitude towards the activities of trade unions and their organisational activities.	Clients accepts ETI code of conducts, hence do not required to fill this column , please refer to CAPR



against and have access to carry out their representative functions in the workplace. 2.4. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining. ETI 3. Working conditions are safe and hygienic ETI 3. Working conditions are safe and hygienic 3.1. A safe and hygienic working environment shall be Clients accepts ETI code of conducts, hence do not provided, bearing in mind the prevailing knowledge of required to fill this column, please refer to CAPR 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 and 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 and safety to a senior management representative. ETI 4. Child labour shall not be used ETI 4. Child labour shall not be used Clients accepts ETI code of conducts, hence do not 4.1. There shall be no new recruitment of child labour. 4.2. Companies shall develop or participate in and required to fill this column, please refer to CAPR 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; "child" and "child labour" being defined in the appendices. 4.3. Children and young persons under 18 shall not be employed at night or in hazardous conditions. 4.4. These policies and procedures shall conform to the provisions of the relevant ILO standards. ETI 5. Living wages are paid ETI 5. Living wages are paid 5.1. Wages and benefits paid for a standard working Clients accepts ETI code of conducts, hence do not required to fill this column, please refer to CAPR week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income. 5.2. All workers shall be provided with written and understandable Information about their employment

conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. 5.3. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded. ETI 6. Working Hours are not excessive ETI 6. Working Hours are not excessive 6.1. Working hours comply with national laws and Clients accepts ETI code of conducts, hence do not benchmark industry standards, whichever affords required to fill this column, please refer to CAPR greater protection. 6.2. In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate. ETI 7. No discrimination is practised ETI 7. No discrimination is practised There is no discrimination in hiring, compensation, Clients accepts ETI code of conducts, hence do not access to training, promotion, termination or retirement required to fill this column, please refer to CAPR based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. ETI 8. Regular employment is provided ETI 8. Regular employment is provided Clients accepts ETI code of conducts, hence do not 8.1. To every extent possible work performed must be on the basis of recognised employment relationship required to fill this column, please refer to CAPR 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. ETI 9. No harsh or inhumane treatment is allowed ETI 9. No harsh or inhumane treatment is allowed Clients accepts ETI code of conducts, hence do not Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or required to fill this column, please refer to CAPR other forms of intimidation shall be prohibited.



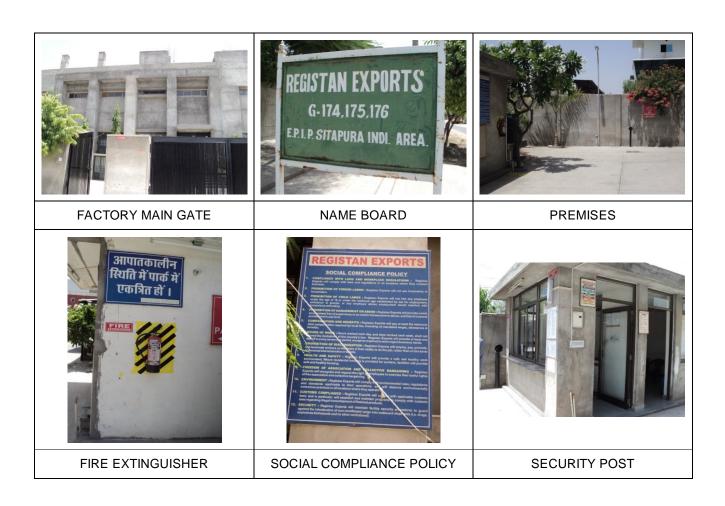
SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
Environment Section	Environment Section
D1. Suppliers as a minimum shall meet the requirements of local and national laws related to environmental standards. D2. Suppliers shall seek to make continuous improvements in their environmental performance. D3. The supplier shall be aware of their end client's environmental standards/code requirements and have a system in place to monitor their performance against these. D4. Suppliers shall have available for review any environmental certifications or any environmental management systems documentation. D5. Suppliers should be aware of the significant environmental impacts of their site and its processes. D6. Suppliers should have an environmental policy, covering its environmental impacts, which are communicated to all appropriate parties, including their own suppliers. D7. Suppliers should have a nominated individual responsible for coordinating the site's efforts to improve environmental performance. D8. Where appropriate suppliers must be able to demonstrate that they have the relevant valid permits for use and disposal of resources e.g. water, waste, etc.	Clients accepts ETI code of conducts, hence do not required to fill this column , please refer to CAPR
Business Practices Section	
E1. As a minimum, suppliers must comply with the requirements of local and national laws and regulations in the area of business integrity. E2. Suppliers shall seek to conduct their business ethically without bribery, corruption or any other type of fraudulent or unfair business practice. E3. Suppliers shall be aware of their end client's business integrity standards/code requirements and have a system in place to monitor their performance against these. E4. Suppliers should have a business integrity policy concerning bribery, corruption or unethical business practice. This should be clearly communicated to all relevant parties. E5. Suppliers should have a transparent system in place for confidentially reporting, and dealing with, unethical business practices, without fear of reprisals towards the reporter.	Clients accepts ETI code of conducts, hence do not required to fill this column , please refer to CAPR



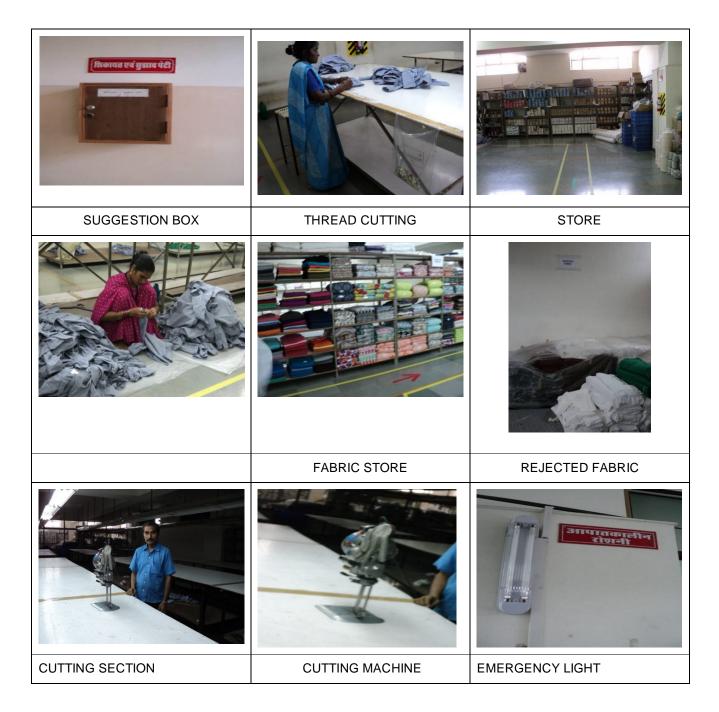
Photo Form

Adding Images To help keep the size of the Report as small as possible for ease of sending and saving the document we recommend that you use Microsoft Paint to resize your photos. To do so please follow these instructions:

- 1) To start Microsoft Paint, click 'Start', 'Programs', 'Accessories', then 'Paint'.
- 2) Open the image file you wish to edit.
- 3) Click the 'Image' Menu at the top and select "Stretch/Skew Image".
- 4) Choose a percentage figure to resize the image: to avoid distortion, choose the same percentage for horizontal and vertical stretch. Click OK.
- 5) Once you have the desired size, click File > Save As... (to prevent overwriting the original image). Save As jpeg (this provides compression to make the file smaller).
- 6) Please delete this text once complete.











Non Compliance Photos:

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:

<u>Click here for A & AB members:</u>
http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw 3d 3d



<u>Click here for B members:</u> http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRqIY 2brg 3d 3d



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