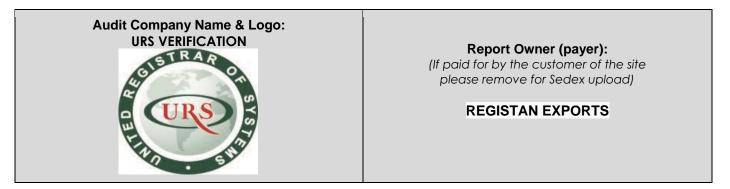


Sedex Members Ethical Trade Audit Report

Version 6.1



	Audit Details									
Sedex Company Reference: (only available on Sedex System)	ZC: 1070514		Sedex Site Reference: (only available on Sedex System)			ZS: 10	73362			
Business name (Company name):	Registan Exports	Registan Exports								
Site name:	Registan Exports									
Site address: (Please include full address)	G-174-176, E.P.I.P. Zone, Sitapura Ind Jaipur-302022				Ind	ia				
Site contact and job title:	Mr. K.P. Singh - Ma	inagi	er							
Site phone:	+91- 9829444473		Site e–n	nail:		<u>shippi</u>	ng@registanexports.com			
SMETA Audit Pillars:	Labour Standards	Saf	fety (plus 4-pilla vironment 2-		Environ 4-pillar	ment	Business Ethics			
Date of Audit:	13 June 2022	-					·			



Audit Conducted By									
Affiliate Audit Company		Purchaser		Retailer					
Brand owner		NGO		Trade Union					
Multi– stakeholder			Combined Audit (select all that appl	у)				



Audit Content:

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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



SMETA Declaration

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

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

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

Auditor Team (s) (please list all including all interviewers):Lead auditor: Nrapendra KumarAPSCA number: 21705216Lead auditor APSCA status: RA in Good StandingTeam auditor: Devdatt ParasharAPSCA number: 21705217Interviewers: Nrapendra Kumar/Devdatt Parashar APSCA number: 21705216/21705217

Report writer: Devdatt Parashar Report reviewer: Mr. Rishiraj Sharma

Date of declaration: 13 June 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 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	(Only conformit	check box y, and only	n–Conformity when there is c in the box/es v ty can be foun	1 non– vhere the		d the nu ues by l		Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
the audit report, hyperlinks are retained.	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	

0A	Universal Rights covering UNGP				04	0	 Observation's - Based on interaction with management and review of records, it was noted that facility does not identify their stakeholders and salient issues. Based on interaction with management and review of records, it was noted that facility does identify direct, indirect, and potential impacts on stakeholder's human rights. Hence no remedial action in place. Based on interaction with management and review of records, it was noted that facility does not have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Based on interaction with management and review of records, it was noted that facility does not have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.
OB	Management systems and code implementation			00	01	00	Observautin-01





							It was noted through the site review SAQ was not filled/completed on date of audit on Sedex portal.
1.	Freely chosen Employment			00	00	00	None Observed
2	Freedom of Association			00	00	00	None Observed
3	Safety and Hygienic Conditions			06	00	00	 NC-01 It was noted during factory tour that fire hydrant was blocked near main gate. NC-02 It was noted during factory tour that, facility have not marked aisles in Stitching Department at ground floor and Ironing at second floor. Aisles was blocked in Finishing department at second floor. NC-03 It was noted during factory tour that, facility have not provided Rubber Mats to 08 ironing tables out of 19, Rubber pads to10 sewing machines out of 256. NC-04 It was noted during factory tour that, facility have not provided needle guards to 06 sewing machines out of 256 sewing machines. NC-05 It was noted during factory tour that, one door of sampling department at ground floor was opening inward.





							NC-06 It was noted during factory tour that, no emergency light was provided on stairs of the factory.
4	<u>Child Labour</u>			00	00	00	None Observed
5	Living Wages and Benefits			00	00	00	None Observed
6	Working Hours			00	00	00	None Observed
7	<u>Discrimination</u>			00	00	00	None Observed
8	Regular Employment			00	00	00	None Observed
8A	<u>Sub–Contracting and</u> Homeworking			00	00	00	None Observed
9	Harsh or Inhumane Treatment			00	00	00	None Observed
10A	Entitlement to Work			00	00	00	None Observed
10B2	Environment 2-Pillar			00	00	00	None Observed
10B4	Environment 4–Pillar			-	-	-	Not Applicable in 2 pillar
10C	<u>Business Ethics</u>			-	-	-	Not Applicable in 2 pillar
Gener	al observations and summary of th	ne site:					

Factory location: The factory 'Registan Exports' was operated at G-174-176, E.P.I.P. Garments Zone, Sitapura Industrial Area, Jaipur-302022, India. The roads were well developed. The site was established from 2007. Manufacturer and Exporter of Home Furnishing Products. The plot area of facility is 69965.42 Sqr. Ft. and built up area is 55000 Sqr. Ft.





Auditor entered the facility at 09:35. In Opening meeting Mr. K.P. Singh – Manager, Mr. Vinod Saini – HR and Mr. Dilip Kumar – Workers Representative were present and they assured full co-operation to this audit.

Site Summary:

- Overall responsibility for meeting the standards is taken by Mr. K.P. Singh Manager.
- There is a total of 248 employees [228 Males / 20 females] and on the day of audit 230 employees (222 males / 18 females) were present on the day of audit.
- There is no evidence of child labour. Age proof record was maintained for all employees.
- The youngest worker on site was 21 Years old.
- There is no evidence of any discrimination, harassment and abuse or unfair disciplinary practices.
- There are no migrant/foreign employees employed at site.
- There is no union at audited facility.
- Worker committee was present in the facility.
- Wages of employees are fixed on monthly basis. Employees are paid on or before 07th day of every next month.
- Facility has not employed any piece rate employees.
- 100% of the employees are paid in Bank Transfer.
- Facility is operational in one shift as per below detail -

Factory timing: 09:30 to 18:30 with 30 minutes lunch break and 2 tea breaks (15 minutes each). Weekly Off : Sunday

- A total of 26 employees were interviewed and the same numbers of records were reviewed for the months of May 2022, January 2022 and June 2021
- All workers said they were satisfied with their employment at the facility.
- As per employee's interaction, they could make suggestions/complaints to their supervisors and team leaders and sometimes they have seen these suggestions are implemented in the factory.
- Legal minimum wage is INR 6552.00 per month for unskilled workers. Facility has paid INR 6555.00 per month to unskilled workers.
- Facility has policy to pay overtime wages at the rate of 200% of regular wage rate.

Positive Observations:

1. Management approach towards this audit was very positive and they assured necessary steps to improve labour standard in their facility. Factories have a designated person responsible, **Mr. K.P. Singh – Manager** for implementing standards concerning Human rights. (Duly documented and displayed on Notice Board).





The closing meeting started at 17:35 pm and corrective action plan was discussed. A copy of the CAP was left to **Mr. K.P. Singh – Manager**, Auditor thanked for good cooperation, organization and friendly working environment.

*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:	Registan Exports					
B: Site name:	Registan Exports					
C: GPS location: (If available)	GPS Address: G-174-176, E.P.I.P. Garments Zone, Sitapura Industrial Area, Jaipur-302022					
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Factory License No. – RJ/28165, for 475 employees, Valid up to 31/03/2027 Fire NOC No.: AF.9(A.F.)/JNN/21/956, Valid till 01.07.2023 Pollution NOC: RPCB/ROJP/A.D./5766, Dated: 27.03.2014 IEC Code: 1390001971 PAN No.: AABFR5942F					
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturer & Exporters of Garments for Ladies / Activities Raw Material, Cutting, Stitching, Finishing, Packing and Dispatch					
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	Factory location: The factory 'M/s. Registan Exports' was operated at G-174-176, E.P.I.P. Garments Zone, Sitapura Industrial Area, Jaipur-302022 (India). The roads were well developed. The facility was established and manufacturing from 2007.					
	The plot area of facility is 6996 55000 sq. ft.	5.42 sq. ft. and built up area is				
		emales) employees are currently day of audit 230 (222 males / 18 ent.				
	The working hours of factory are Working Hours – 09:30 to 18:30 Lunch Break – ½ hrs and 2 tea b Weekly off: Sunday					
	F1: Visible structural integrity issues (large cracks) observed? Yes No					
		crete building. From the stability bearance and during the facility g is sound in construction.				
	F3: Does the site have a structur	al engineer evaluation?				

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	X Yes									
	No									
	F4: Please give de	F4: Please give details:								
	Production Building no	Description	Remark, if any							
	Basement	Fabric store and Embroidery								
	Ground Floor	Admin office, CAD, Production (stitching)	Periphery: Security							
	First Floor	Finishing, Packing, Pressing	Guard room, Diesel generator, Creche							
	Second Floor	Finishing, Pressing, Spotting								
	Is this a shared building?	No								
	From the stability	up of one concrete building of certificate review, physical ap tour it was observed the build	pearance and							
G: Site function:	Agent Agent Factory Processing/Manufacturer Finished Product Supplier Grower Homeworker Labour Provider Pack House Primary Producer Service Provider Sub-Contractor									
H: Month(s) of peak season: (if applicable)	December to Ma	rch								
I: Process overview: (Include products being produced, main operations, number of production lines,	The audited facili Ladies.	ity Manufacturer of readymac	le garments for							
main equipment used)	Processes at site: The processes at site are Raw material, cutting, stitching, packing and dispatch.									
	The production machines installed are stitching m cutting machines, CAD machine, flat lock machin machine, embroidery machines, button & kaj machin detector, kansai machine, interlock machines, stean generator, tumble dryer, washing machine etc.									
J: What form of worker representation / union is there on site?	Union (name)									



	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 If yes approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	☐ Yes ☑ No If Yes approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	 ☐ Yes ☑ No If No, please give details: None of the accommodation buildings.



	Audit Parameters							
A: Time in and time out	A1: Day 1 Time in: 09:35A3: Day 2 Time in:A5: Day 3 Time in:A2: Day 1 Time out: 18:05A4: Day 2 Time out:A6: Day 3 Time out:							
B: Number of auditor days used:	02 Man-days (02 Auditors X	(01 Day)						
C: Audit type:	Full Initial Periodic Full Follow–up Partial Follow–Up Partial Other If other, please define:							
D: Was the audit announced?	Announced Semi – announced: Win Unannounced	dow detail: 02 weeks						
E: Was the Sedex SAQ available for review?	☐ Yes ⊠ No If No, why not: Management was not aware of requirement.							
F: Any conflicting information SAQ/Pre- Audit Info to Audit findings?	 Yes No If Yes, please capture deto 	ail in appropriate audit by a	clause					
G: Who signed and agreed CAPR (Name and job title)	Mr. K.P. Singh - Manager							
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	Management	Worker Representatives	
	Senior management	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)	Worker representativ meeting.	re were present in the	opening and closing
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	No Union was preser	t in the facility.	



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	
Worker numbers – Male	219	0	09	0	0	0	0	228
Worker numbers – female	15	0	05	0	0	0	0	20
Total	234	0	14	0	0	0	0	448
Number of Workers interviewed – male	17	0	03	0	0	0	0	20
Number of Workers interviewed – female	05	0	01	0	0	0	0	06
Total – interviewed sample size	22	0	04	0	0	0	0	26





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:
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)	3 group of 5 workers (ma 1 group of 5 workers (fer			
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 05	D2: Female: 01		
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	Yes No If no, please give details			
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	∑ Yes □ No			
G: In general, what was the attitude of the workers towards their workplace?	∑ Favourable □Non-favourable □ Indifferent			
H: What was the most common worker complaint?	None			
I: What did the workers like the most about working at this site?	Good working environm	nent & timely payment.		
J: Any additional comment(s) regarding interviews:	All workers enjoyed working at the factory, they felt they had sufficient work and good relationship with management.			
K: Attitude of workers to hours worked:	Workers were found satisfied working at the factory, no complaints against management were heard during workers interview. It was also confirmed that overtime is voluntary, no discrimination or inhumane treatment done or supported by the management.			
L. Is there any worker survey information available?				
☐ Yes ⊠ No				

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L1: If yes, please give details:

M: Attitude of workers:

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

Workers were found satisfied working at the factory, no complaints against management were heard during workers interview. They were happy to work there. It was also confirmed that overtime is voluntary, no discrimination or inhumane treatment done or supported by the management.

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

Workers found very positive towards the management and no negative information reported. Their attitude towards factory management seemed to be positive, because they give for the same are: on time payment, good facilities, good behavior of the management and supervisors.

O: Attitude of managers:

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

The management was found aware with the requirements of social audit and management was very cooperative and transparent during the course of audit. They were receptive towards findings. The management approach was found to be positive. The factory management had a system in place to check their current practices against their clients' requirements and the local law.



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:

- Factory has displayed abstract of various national and local laws.
- Factory has displayed ETI Base Code in local language on notice board and training was done on ETI Base code.
- Factory has responsible for their stakeholders and sub-suppliers compliance. He's visiting time to time and checking their compliance.
- All the humanitarian policies pertaining to anti sexual harassment, abuse/harassment, child labour, forced, labour are in place.

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

Details:

- Factory has appointed Mr. K.P. Singh Manager as a senior member of management responsible for compliance with the Code.
- Factory has displayed the various Laws & their abstracts. All workers are well informed of the code requirements.
- Social policies, minimum wages notification, working hours, pay day, other mandatory notifications/ notice.
- Factory has displayed ETI Base Code in local language on notice board and training was done on ETI Base code.
- Facility has displayed and communicated all the humanitarian policies pertaining to anti sexual harassment, abuse/harassment, child labour, forced labour etc. To the employees.



Any other comments: None			
A: Policy statement that expresses commitment to respect human rights?	 Yes No A1: Please give details: Facility has displayed and communicated all the humanitarian policies pertaining to – anti sexual harassment, abuse/harassment, child labour, forced labour etc. To the employees. Facility has installed suggestion/grievance box in the premises, and eating area, which workers can use to put forth their suggestion as well as their grievances to the top management. Although the facility doesn't have a worker union, they do have a worker's committee, where they can discuss their issues and reach out to the management via the committee and workers are free to join unions, committees 		
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	∑ Yes ☐ No Please give details: Name: Mr. K.P. Singh Job title: Manager		
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: Facility has installed suggestion/grievance box in the premises, and eating area, which workers can use to put forth their suggestion as well as their grievances to the top management Although the facility doesn't have a worker union, they do have a worker's committee, where they can discuss their issues and reach out to the management via the committee and workers are free to join unions, committees.		
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights- compatible, a source of continuous learning and based on stakeholder engagement)	∑ Yes □ No D1: If no, please give details		
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	Yes No E1: Please give details: Factory has maintained personal files for each and every employee, which is maintained by HR department in a confidential manner. All documents/records pertaining to the worker are adequately maintained by factory.		

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Findings - 1			
9	Objective evidence observed: Review of records & interaction with management.		
Findings - 2			
Finding: Observation Company NC Description of observation: Based on interaction with management and review of records, it was noted that facility does not identify direct, indirect, and potential impacts on stakeholder's human rights. Hence no remedial action in place. Local law or ETI/Additional elements / customer specific requirement: 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. Comments: It is recommended that facility shall identify direct, indirect, and potential dimpacts on stakeholder's human rights. Remedial action shall be taken and documented in case of impact is notices.	Objective evidence observed: Review of records & interaction with management.		
Findings - 3			
	Objective evidence observed: Review of records & interaction with management.		
Findings - 4			



Finding: Observation Company NC Description of observation: Based on interaction with management and review of records, it was noted that facility does not have effective data privacy procedures for workers' information.	Objective evidence observed: Review of records & interaction with management.
Local law or ETI/Additional elements / customer specific requirement: 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.	
Comments: It is recommended that facility shall have effective data privacy procedures for workers' information.	

Good examples observed:		
	Objective Evidence Observed:	
None	N/A	



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: 12_%	A2: This year 08_ %
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]	05%	
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: 15%	C2: This year 08_ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	05%	
E: Are accidents recorded?	Yes No E1: Please describe: Factory has maintained accident and injuries register and as per records there is no accidents reported.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 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 months 0_% workers	I2: 12 months 0_% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 0_% workers	J2: 12 months 0_% workers



0B: Management system and Code Implementation

<u>(Click here to return to summary of findings)</u>

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- Factory has displayed abstract of various national and local laws.
- Factory has displayed ETI Base Code in local language on notice board and workers were aware about the ETI Base code.
- The facility has appointed a senior Person who is responsible for Code Implementation (Mr. K.P. Singh Manager).
- The facility has obtained all the consent to operate the factory (I.e. Factory License, IEC Code, Building Plan Lay Out, Fire NOC etc.).

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)
- Factory has displayed the various Laws & their abstracts. All workers are well informed of the code requirements.
- Social policies, minimum wages notification, working hours, pay day, other mandatory notifications/ notice etc. were displayed at the entrance of the facility in English and Hindi for employees' reference.
- Factory has displayed ETI Base Code in local language on notice board and workers were aware about the ETI Base code, it was confirmed thru workers & management interview.

Any other comments: None

Management Systems:			
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	 ☐ Yes ➢ No Please give details: No fines were noticed in the review documents of the year 2021. 		



B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	Yes No Please give details: Factory has maintained all policies and procedures to reduce risk of forced labour, child labour, discrimination, harassment and abuse. The same was confirmed during document review and worker's interview.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	All abstracts & social policies like child labour, forced labour, discrimination, anti-sexual harassment were reviewed on the day of audit and same were posted on the notice board near the security office and same was confirm during interview with the workers and documents review.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	 Yes No D1: Please give details: Training was not done on standards to the workers.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	☐ Yes ⊠ No E1: Please give details: Training was not done.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). <i>Please detail (Number and date)</i> .	☐ Yes ⊠ No F1: Please give details:
G: Is there a Human Resources manager/department? If Yes, please detail.	Yes No G1: Please give details: Mr. K.P. Singh – Manager is responsible for all things, which was present during the audit process.
H: Is there a senior person / manager responsible for implementation of the code	Yes No H1: Please give details: Mr. K.P. Singh – Manager is responsible for implementation of the code.
I: Is there a policy to ensure all worker information is confidential?	Yes No I1: Please give details: HR department has maintained separate records of all employees and keep confidential in their personal files and their systems.
J: Is there an effective procedure to ensure confidential information is kept confidential?	⊠ Yes □ No



	J1: Please give details: All systems are password protected and all information with Mr. K.P. Singh – Manager.		
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	Yes No K1: Please give details: Factory has developed and implemented risk assessment analysis for the area and function.		
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	Yes No L1Please give details: Factory has developed risk assessment analysis for all areas and functions and takes effective steps to reduce the associated risks.		
M: Does the facility have a policy/code which require labour standards of its own suppliers?	Yes No M1: Please give details: All abstracts & social policies like child labour, forced labour, discrimination, anti-sexual harassment were reviewed on the day of audit and same were posted on the notice board near the security office and same was confirm during interview with the workers and documents review.		
Land rights			
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	Yes No N1: Please give details: All required land rights licenses were provided. Like the report of inspection for completed		
	building construction projects and the certificate of inspection for completed building construction projects 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?	building construction projects and the certificate of inspection for completed building construction		
legal due diligence to recognize and apply national	 building construction projects and the certificate of inspection for completed building construction projects etc. Yes No O1: Please give details: These were performed by the parent company's legal staff to accepted 		



	Q1: Please give details: Facility was built-up as per stability certificate and approved building layout plan.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	Yes No R1: Please give details: They have all legal permits and comply with social as well as legal compliance.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	Yes Xo S1: Please give details: There is no evidence of illegal appropriation of land for facility building.

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

Observation:	
Description of observation: It was noted through the site review that SAQ was not filled/completed on date of audit on Sedex portal.	Objective evidence observed:
Local law: Not Applicable ETI requirement: 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.	During site review and management interaction
Comments: It is recommended that facility should complete SAQ on Sedex portal.	

	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:

- Factory has a policy like no child labour & no forced labour.
- Personnel records file (to check for ID's, terms & condition, evidence of force labour policy).

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

Details:

- Workers interviews confirmed that they can leave their employer after reasonable notice.
- During workers interviews confirmed that they are not required to submit any original documents or any deposits with the employer.
- During audit process on the day of audit, there was no evidence of forced, bonded or prison labour in the factory. They also confirmed that they are working voluntarily in the factory.

Any other comments: None

A: Is there any evidence of retention of original documents, e.g. passports/ID's	☐ Yes ⊠ No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	☐ Yes ⊠ No B1: If yes, please give details and category of worker affected:
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 is no restrictions on workers' freedom to terminate employment they can leave their employer after reasonable notice.



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 ☐ Not applicable E1: Please describe finding:
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: Workers can freely leave the site at the end of the work day there is restrictions on workers confirmed in the worker interview.
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: Factory has understood the risks and they have maintained a policy on forced / trafficked / bonded labour. During audit process on the day of audit, there was no evidence of forced, bonded or prison labour in the factory. They also confirmed that they are working voluntarily in the factory.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	 Yes No H1: Please describe finding: Factory has maintained all policies and procedures to reduce risk of forced labour, child labour, discrimination, harassment and abuse. The same was confirmed during document review and worker's interview.

Non-compliance:



1. Description of non-compliance: NC against ETI NC against Local Law: 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:

Comments:

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

- Factory has a policy on freedom of association and collective bargaining.
- There was no evidence of suppression of worker rights.
- Factory does not obstruct workers to form or join any legal trade unions of their choice.

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

Details:

- Workers interviews confirmed that workers have access to members at work place and management does not interfere in their rights.
- No union or association is functioning in the factory.
- Verified factory policy on freedom of association and collective bargaining and found that it was in compliance with ETI requirements and local law requirement.
- Suggestion boxes were installed inside of main gate, so that the employees can post their views confidentially. The management provided free access to the proprietor for the same.
- Factory has formed works committee with elected workers representatives. It was observed from the records of the meeting that factory conducts meetings and minutes are documented. Last two meetings were held on 03.12.2021 and 02.03.2022.

Any other comments: None

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 As per Industrial Disputes Act, 1947, Section-3. Works Committee(1) In the case of any industrial establishment in which one hundred or more workmen are employed or have been employed on any day in the preceding twelve months, the appropriate government may by general or special order require the employer to constitute in the prescribed manner a Works Committee consisting of representatives of employers and workmen engaged in the establishment, so however that the number of representatives of workmen on the Committee shall not be less than the number of representatives of the employer. The representatives of the workmen shall be chosen in the prescribed manner from among the workmen engaged in the establishment and in consultation with their trade union, if any, registered under the Indian Trade Unions Act, 1926 (16 of 1926).		
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	 Yes No D1: Please give details: H&S committee and sexual harassment prevention committee/complain committee and suggestion boxes were installed in the premises and employees can share their concerns and they can approach to the management directly for any requirement.Factory has formed H&S and Sexual Harassment preventive committee. Company policy on equal opportunities and inhumane treatment. Committee representatives/members have held meetings from time to time at regular intervals. Last H&S meeting was held on 16.03.2022 and Sexual harassment committee on 24.03.2022. D2: Is there evidence of free elections? Yes No N/A 		
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	Yes No E1: Please give details: Factory does not obstruct workers to form or join any legal trade unions of their choice.		
F: Name of union and union representative, if applicable:	N/A	F1: Is there evidence of free elections?	
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Worker committee	G1: Is there evidence of free elections? ∑Yes □No □N/A	
H: Are all workers aware of who their representatives are?	🛛 Yes 🗌 No	Works committee representative and he was present in the opening and closing meeting.	



I: Were worker representatives freely elected?	Yes No N/A	11: Date (17.11.202	of last election: 21
J: Do workers know what topics can be raised with their representatives?	Yes No Workers can raise their complaints and suggestions and their rights as per statement of workers interview.		
K: Were worker representatives/union representatives interviewed?	Yes No If Yes , please state how many: 1 works committee member		
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Factory has formed works committee with elected workers representatives. It was observed from the records of the meeting that factory conducts meetings and minutes are documented. Topic discussed about health, their problems and suggestions. Minutes of works committee meeting was continued ½ hrs. Last two meetings were held on 03.12.2021 and 02.03.2022.		
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ⊠ No		
If Yes , what percentage by trade Union/worker representation	M1: _0% workers cover Union CBA	ed 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	Objective evidence observed: (where relevant please add photo numbers)	
Local law and/or ETI requirement:		
Recommended corrective action:		

Observation:		
Description of observation: None Observed	Objective evidence observed:	
Local law or ETI requirement:		
Comments:		



Good Examples observed:

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

3: Working Conditions are Safe and Hygienic

(Click here to return to summary of findings)

(Click here to return to Key Information)

ETI

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

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

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers. 3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined

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

Current systems:

- The facility has a Mr. K.P. Singh, those are responsible for H&S at work.
- Factory was neat and clean and with adequate lighting arrangements and well ventilated.
- Accidents / injuries records are maintained.
- The facility has a policy on health and safety, which was found to be suitable.
- Safety signage was posted in various departments.
- Emergency exits are identified, marked.
- Fire evacuation drills were conducted once in 3 months, last two drills held on 10.01.2022 & 09.04.2022.
- Fire evacuation plans are displayed in English language and in the local language at all sections of the factory.
- Adequate number of first aid boxes (7) with prescribed contents are kept at all sections of the factory. Adequate number of persons (7) was trained for first aid from St. John Ambulance Association.
- 10 persons are trained on use of fire fighting equipment.
- The facility has provided 24 X 7 security arrangements.

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

Details:

- Factory has obtained factory license for 475 employees, valid till 31.03.2027.
- Accident and Injury records



- Minutes of meeting records of committees
- H&S policy
- Pressure vessel inspection verified
- Fire mock drill record
- List of first aid box, fire extinguishers and training records of first aid and fire fighting operations

Any other comments: None

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	Yes No A1: Please give details: Minutes of meeting was done on 16.03.2022, same was confirmed in workers interview.	
B: Are the policies included in workers' manuals?	Yes No B1: Please give details: All policies are included in the workers manual.	
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	 Yes No C1: Please give details: There were no structural additions without prior permits/inspections. 	
D: Are visitors to the site informed on H&S and provided with personal protective equipment	Yes No D1: Please give details: Briefing to all visitors about H&S, prior to visit in the production areas and they have provide PPE's, like face mask, ear plug etc.	
E: Is a medical room or medical facility provided for workers?	Yes No	
If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	E1: Please give details: Only first aid treatment provided to the workers, after that refer to the ESI hospital, if there is any serious.	
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	Yes No F1: Please give details: Easy access to the first aider, there is trained first aid persons by saint john ambulance.	
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	 Yes No G1: Please give details: All workers are coming from nearby areas to user their own vehicles or public transports. 	



H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	 Yes No H1: Please give details: There is no living space inside of the premises.
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 I1: Please give details: Factory has developed risk assessment analysis for all areas and functions and takes effective steps to reduce the associated risks.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	 Yes No J1: Please give details: Facility has all legal permits related to the environment requirements.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	Yes No K1: Please give details: Facility has a responsible person for the H&S and Environmental things. That person take care about all standards, including the use of banned chemicals, however they were not using any banned chemicals in their process.

Non-compliance:		
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: It was noted during factory tour that fire hydrant was blocked near main gate.	Objective evidence observed: (where relevant please add photo numbers)	
Local Law Requirement: According to Rule 68 (10 f) of Model Rules of The Factories Act 1948 All first-aid fire fighting equipment shall be placed in a conspicuous position and shall be readily and easily accessible for immediate use. Generally, these equipment shall be placed as near as possible to the exits or stair landing or normal routes of escape.	It was noted during factory tour. See photo-1 : NC-1	
ETI requirement: In accordance with ETI Base Code 3.1 a safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.		
Recommended corrective action: Factory is recommended to keep all fire fighting equipment's obstruction free at all times.		



2. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: It was noted during factory tour that, facility have not marked aisles in Stitching Department at ground floor and Ironing at second floor. Aisles was blocked in Finishing department at second floor.	It was noted during factory tour. See photo-2 : NC-2
Local Law Requirement: According to Rule 68 (9x) of The Model Rules of The Factories act, 1948, Exit corridors and passage ways shall be of a width not less than the aggregate required width of exit doorways leading from there in the direction of travel to the exterior.	366 photo-2 . NC-2
ETI requirement: In accordance with ETI Base Code 3.1 a safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Recommended corrective action: Factory is recommended to provide aisles marking with directional arrows in all departments/floors and keep them always obstruction free.	
3. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: It was noted during factory tour that, facility have not provided Rubber Mats to 08 ironing tables out of 19, Rubber pads to10 sewing machines out of 256.	It was noted during factory tour.
Local Law Requirement: 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-	See photo-3 : NC-3
 (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. 	
ETI requirement: In accordance with ETI Base Code 3.1 a safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents	



and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Recommended corrective action: Factory is recommended to provide to provide rubber mats to all ironing tables, rubber pads to all sewing machines.	
4. Description of non-compliance:	It was noted during factory tour.
Local Law Requirement: According to Section 21 of The Factories Act, 1948, Every moving part of a prime mover and every flywheel connected to a prime mover, whether the prime mover or fly wheel is in the engine house or not shall be securely fenced by safeguards of substantial construction which shall be constantly maintained and kept in position while the part of machinery they are fencing are in motion or in use.	See photo-4 : NC-4
ETI requirement: In accordance with ETI Base Code 3.1 a safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Recommended corrective action: Factory is recommended to provide needle guards and pulley guards to all sewing machines.	
 5. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: It was noted during factory tour that, one door of sampling department at ground floor was opening inward. 	It was noted during factory tour. See photo-5 : NC-5
Local Law Requirement: According to Rule 68 (9u) of The Model Rules of The Factories Act, 1948, Exit doorways shall open outwards, that is, away from the room but shall not obstruct the travel along any exit. No door when opened shall reduce the required width of a stairway or landing too less than 90 cm. Over head or sliding doors shall not be installed for this purpose.	
ETI requirement:	



In accordance with ETI Base Code 3.1 a safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Recommended corrective action: Factory is recommended to provide all door open able to outside or both side.	
6. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: It was noted during factory tour that, no emergency light was provided on stairs of the factory.	It was noted during factory tour. See photo-6 : NC-6
Local Law Requirement: According to Rule 68 9(e) of The Modell Rules of The Factories Act, 1948, 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.	
ETI requirement: In accordance with ETI Base Code 3.1 a safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Recommended corrective action: Factory is recommended to provide industrial emergency lights on stairs basement to second floor.	

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

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







4: Child Labour Shall Not Be Used

<u>(Click here to return to summary of findings)</u> <u>(Click here to return to Key Information)</u>

ETI

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined

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

Current systems:

- Facility has policies made on 'child labour prohibition' in front of gate and followed same.
- Facility has maintained personnel files with the age proofs of all workers, like ID card, voter card or dental certificate.

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

Details:

- Employees' personal files were reviewed and verified.
- Verified Factory policies made on 'child labour prohibition' which is in accordance to ETI requirements.

Any other comments: None

A: Legal age of employment:	14 Years and above (with restrictions)
B: Age of youngest worker found:	All are above 18 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

Non-compliance:



1. Description of non-compliance: NC against ETI NC against Local Law 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	Objective evidence observed:			

Local law or ETI requirement:

Comments:

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



5: Living Wages are Paid

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The employees were paid regular wages on monthly basis.
- Payments are paid in bank accounts to all of employees on or before 7th day of every month.
- Abstracts of minimum wages Act, payment of wages Act, factories Act, payment day etc. are displayed at notice board.
- All employees are issued pay-slips.
- All sample employees were given the regulatory benefits like leave, holiday benefits and welfare fund etc. under the law framework.

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

Details:

- Verified employee's leave records for the sample months.
- Verified Factory policies made on 'remuneration' which is in accordance to ETI requirements.
- Verified employee's time, wage, overtime, paystub, statutory benefits, records of May 2022, January 2022 and June 2021.

Non-compliance:			
1. Description of non-compliance: NC against ETI 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)		
Recommended corrective Action:			



Observation:			
Description of observation: None observed	Objective evidence observed:		
Local law or ETI requirement:			
Comments:			

Good Examples observed:

Description of Good Example (GE): None observed Observed:

Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 8 hours per day, 48 hours per week, 208 hours per month.	A1: 8 hours per day, 48 hours per week, 208 hours per month.	A2: □ Yes ⊠ No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 2 hours per day, 12 hours per week, 50 hours per quarter	B1: No overtime conducted verified during document review.	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: Unskilled: INR 6552.00 per month Semi-Skilled: INR 6864.00 per month Skilled: INR 7176.00 per month Highly Skilled: INR 8476.00 per month And these wages are applicable with effect from 01.07.2020	C1: Unskilled: INR 6555.00 per month Semi-Skilled: INR 6865.00 per month Skilled: INR 7180.00 per month Highly Skilled: INR 8480.00 per month	C2: ☐ Yes ⊠ No
D: Overtime wage:	Legal minimum:	D1:	D2:



(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	 @200% of rate ordinary wages normal workdays. @300% of rate of ordinary wages on holidays. 	of on		No No
--------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------	----------	--	-------

Wages analysis: (Click here to return to Key Information)			
A: Were accurate records shown at the first request?	Xes No		
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)	26 from May 2022 26 from January 2022 26 from June 2021		
C: Are there different legal minimum wage grades? If Yes , please specify all.	☐ Yes ⊠ No	C1: If Yes , please give details: Unskilled: INR 6552.00 per month Semi-Skilled: INR 6864.00 per month Skilled: INR 7176.00 per month Highly Skilled: INR 8476.00 per month And these wages are applicable with effect from 01.07.2020	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	□ Yes □ No ⊠ N/A	D1: If No , please give details:	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	 □ Below legal min ☑ Meet □ Above 	E1: Lowest actual wages found: Note: full time employees and please state hour / week / month etc. Unskilled: INR 6555.00 per month Semi-Skilled: INR 6865.00 per month Skilled: INR 7180.00 per month Highly Skilled: INR 8480.00 per month	



F: Please indicate the breakdown of workforce per earnings:	F1:% of workforce earning under minimum wage F2:% of workforce earning minimum wage F3: _100_% of workforce earning above minimum wage			
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: Note: full time employees and please state hour / week/month etc. According to Section 10 of The Payment of Bonus Act, 1965, every employer shall be bound to pay to every employee a minimum bonus which shall be 8.33% of the salary or wage earned by the employee during the accounting year or one hundred rupee whichever is higher.			
H: What deductions are required by law e.g. social insurance? Please state all types:	EPF: 12% from the basic wage ESI: 0.75% from the total earned wage			
I: Have these deductions been made?	X Yes	Please list of deduction have beer	s that	 EPF: 12% from the basic wage ESI: 0.75% from the total earned wage
				Please describe: Only legal deductions as per Govt. Norms
		Please list of deduction have not b	s that	1. No fine 2. No dress charges
		made.		Please describe: No deductions apart from legal deductions
J: Were appropriate records available to verify hours of work and wages?	Yes No			
K: Were any inconsistencies found? (if yes describe nature)	Yes		K1:Type	
			🗌 Isolate	ecord keeping ed incident ated occurrence:
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	 Yes No L1: Please give details: All trainings and meetings of the workers were attended during working hours. 			
M: Is there a defined living wage: This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	 Yes No M1: Please specify amount/time: Factory did not define any living wages. At present factory is following the applicable minimum wages notified by the State Government. 			



M2: If yes, what was the calculation method used.	ISEAL/Anker Benchmarks Asia Floor Wage Figures provided by Unions Living Wage Foundation UK Fair Wear Wage Ladder Fairtrade Foundation Other – please give details: N/A
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: Wages is reviewed according to revision of minimum wages notification of Govt.
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: During review of documents and workers interview, it was noted that equal rates are paid for equal work.
Q: How are workers paid:	 □ Cash □ Cheque ⊠ Bank Transfer □ Other Q1: If other, please explain:



6: Working Hours are not Excessive

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

ETI

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

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

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

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

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

- this is allowed by national law;

- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;

- appropriate safeguards are taken to protect the workers' health and safety; and

- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

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

Current Systems and Evidence Examined

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

Current systems:

- During discussion with management it was noted that presently, the factory records were maintain in bio matric machine of all employees.
- During discussion with facility management and interview with workers it was noted that factory works in 1 shift.
- Factory provides lunch break of ½ hour to all of the workers.
- Factory operates from Monday to Saturday weekly day off is Sunday.

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

Details:

• Security guards' duty records i.e. duty chart of the security guards.



- Records of actual in and out time for the sample months May 2022, January 2022 and June 2021.
- Accident / Injury register.
- Materials movement records: Inward / Outward register.

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

Observation:		
Description of observation: None observed	Objective evidence observed:	
Local law or ETI requirement:		
Comments:		

Good Examples 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: Bio matric machine	
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	D1: If YES, please complete as appropriate:	
contracts/employment agreements used?	🛛 No	0 hrs Part time Variable hrs Other	
		If "Other", Please define:	
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 number 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 hours per week	☐ Yes ⊠ No	G1: If yes, % of workers & frequency:	
found?			
H: Any local waivers/local law or permissions which allow	□ Yes ⊠ No	H1: If yes, please give details:	
averaging/annualised hours for this site?			
Overtime Hours worked			
l: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 0 hrs		
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: No overtime conducted in the factory, However as per the overtime policy, overtime is voluntary.
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 standard wages: No overtime conducted in the factory.
N: ls overtime paid at a premium?	□ Yes □ No ⊠ N/A	N1: If yes, please describe % of workers & frequency: No overtime conducted in the factory.
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 N/A 	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	
	N/A	
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	 Overtime is voluntary Onsite Collective bargaining allows 60+ hours/week Safeguards are in place to protect worker's health and safety Site can demonstrate exceptional circumstances Other reasons (please specify) 	
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:	
	No overtime conducted in the factory.	
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ⊠ No Q1: If yes, please give details:	



R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	☐ Yes ⊠ No
-----------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------



7: No Discrimination is Practiced

<u>(Click here to return to summary of findings)</u>

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:

- Factory hires workers based exclusively on their ability to perform the job.
- There was no evidence of discrimination in hiring, workers of different caste; religion, age etc. were seen to be working in the factory.
- Workers also confirmed during interviews that they do not feel discriminated against in the factory in any
 respect.

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

Details:

- Discrimination Policy.
- Verification of sampled employee's personal files.
- Recruitment Policy.

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male:80 % A2: Female20 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	02
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	 Hiring Compensation Access to training Promotion Termination or retirement No evidence of discrimination found C1: Please give details: No evidence of discrimination found during the audit as per document review and management worker interview.



Professional Development		
A: What type of training and development are available for workers?	Induction training, Fire fighting training, H&S training, First aid training, Skill development training about their works, ETI code training, Machinery safety / operating training, PPE's training, Chemical handling training etc.	
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 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:	ada prioro nombersj
Recommended corrective action:	

Observation:	
Description of observation: None observed	Objective evidence observed:
Local law or ETI requirement:	observed.
Comments:	

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



8: Regular Employment Is Provided

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

ETI

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

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour–only contracting, sub–

contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

Factory issues appointment letters to all their workers.

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

Details:

Employment orders and personal file of the employees.

Non-compliance:	
1. Description of non-compliance: NC against ETI 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	Objective evidence observed:
Local law or ETI requirement:	
Comments:	

Good Exa	nples observed:
Description of Good Example (GE):	Objective Evidence
None observed	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?	 Terms & Conditions presented Understood by workers Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	☐ Yes ⊠ No B1: If yes, please describe details and specific category(ies) of workers affected:



C: 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 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 – C1: If other, please give details:
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:	N/A No migrant workers ev	rident from any foreign countries.
B: Please give details about recruitment agencies for migrant workers:		country recruitment agencies) used: (outside of local country) recruitment grant workers.
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: None
D: Are Any migrant workers in skilled, technical, or management roles Migrant Workers (this should include all migrant workers including permanent	☐ Yes ⊠ No D1: If yes, number and	l example of roles:



workers, temporary and/or seasonal workers)	
---------------------------------------------	--

NON-EMPLOYEE WORKERS

Yes
No
Recruitment / hiring fees
Application costs
Recommendation fees
Placement fees
Administrative, overhead or processing fees
Skills tests
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

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: Pinky Fashion - 14 (09 males / 05 females)		
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: Factory has legal contract with agency.
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	Yes No E1: Please give details: Site have system for checking their labour standards of agencies. Facility management frequently visited their areas, where most of the agencies workers are living and check their living standards.

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: 		
B: If Yes , how many workers supplied by contractors?	0		
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:	N/A		



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:

It was verified through document review, factory tour, management interview, production records, goods movement records and workers interview that factory has printing & dyeing is being outsourced (subcontracting), details as below:

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

- Document Review.
- Factory Tour.
- Management interview.
- Worker interview.
- Internal audit reports
- Purchase order files.
- Material inward/outward records.

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

Process Subcontracted	Printing	Dyeing
Name of factory	V. CAN	Pooja Dyeing
Address	A-301, Shiromani, Nehru Bazar, Shivrainjani Road, Ahmedabad, Gujarat	G-657, Sitapura Industrial Area, Jaipur (Rajasthan)

Details: None

Non-compliance:



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

Description of observation:

None Observed

Local law or ETI/Additional elements requirement:

Comments:

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

Summary of sub-contracting - if applicable		
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: There were not noted unrecorded work hours.	
B: If sub–contractors are used, is there evidence this has been agreed with the main client?	Yes No B1: If Yes , summarise details: They have mail communication with the main clients.	
C: Number of sub– contractors/agents used:	1	
D: Is there a site policy on sub- contracting?	Yes No D1: If Yes , summarise details: Subcontracting policy focuses on no child labour, no forced labour, wages and benefits and working hours as per law, adequate health and safety arrangements etc.	

observed:



Factory has a monitoring system and focuses on no child labour, no
forced labour, wages and benefits and working hours as per law,
adequate health and safety arrangements, etc.

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 details:			
B: Number of homeworkers	B1: Male: B2: Female: Total:			
C: Are homeworkers employed direct or through agents?	Directly Through Agents		C1: If through agents, number of agents:	
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: Through workers committee, suggestions boxes and health and safety committee, workers can directly approach to the management to get the same resolved. This was confirmed thru worker's interview and document review.
B: If Yes , are workers aware of these channels and have access? Please give details.	Yes, all workers are well aware about the channels (workers committee, suggestions boxes and health & safety committee) and same was verified thru factory tour, documents review and workers interview. Contact details of public authorities (police, fire station and labour department etc.), have been displayed on notice board.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Yes, all workers are well aware about the channels (workers committee, suggestions boxes and health & safety committee) and same was verified thru factory tour, documents review and workers interview. Contact details of public authorities (police, fire station and labour department etc.), have been displayed on notice board.
D: Which of the following groups is there a grievance mechanism in place for?	 Workers Communities Suppliers Other D1: Please give details: Workers committee is formed in place.
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	X Yes
disciplinary procedure?	No
	H1: If no, please give details
I: Does the disciplinary procedure allow	
for deductions from wages (fines) for	No
disciplinary purposes (see wages	
section)?	11: If yes, please give details

Current Systems and Evidence Examined

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

Current systems:

- Company policy on equal opportunities and inhumane treatment.
- There was no evidence of harassment in any form observed in the factory.
- During workers interviews, there were no complaints or issues raised on harassment in any manner in the factory.
- Factory has formed a Sexual Harassment Prevention Committee/Complaint committee.

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

Details: Discussion with worker in meeting.

Any other comments: none

Non-compliance:		
1. Description of non-compliance: NC against ETI NC against Local Law NC against event 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	Objective evidence observed:	
Local law or ETI requirement:		
Comments:		

Good Examples observed:



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



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

(Click here to return to NC-table)

Additional Elements

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

Current Systems and Evidence Examined

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

Current systems:

- All workers working in the factory were found to be Indian nationals and they have rights to work anywhere in India, same was confirmed in management and workers interviews.
- The factory has taken copies of all relevant identification documents from all workers and maintains the same in their personal files.

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

Details:

- Employee's personal files.
- Recruitment process.

Non-compliance:	
Description of non-compliance: NC against ETI/Additional Elements NC against Local Law NC against customer code: None observed	Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI /Additional Elements requirement:	
Recommended corrective action:	

Observation:	
Description of observation: None observed	Objective evidence observed:
Local law or ETI/Additional Elements requirement:	
Comments:	



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

Factory have Pollution NOC from Rajasthan pollution control board and factory has Environment policies and it's communicated to all the employees.

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

Details:

- Environment policies.
- Relevant environmental test reports.
- Legally required permissions/certificates.

Any other comments: None

Non-compliance:				
 Description of non-compliance: NC against ETI/Additional Elements None observed 	🗌 NC against Local Law	Objective evidence observed: (where relevant please		
Local law and/or ETI/Additional Elements requirement:		add photo numbers)		
Recommended corrective action:				
Observation:				
Description of observation: None observed		Objective evidence observed:		

Local law or ETI/additional elements requirement:

Comments:



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



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."

 \boxtimes Not Applicable please x



Photo Form



Factory overview

Security











Fire Siren

Emergency Light

Emergency Call Point







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Stitching Computer Embroidery Finishing
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Image: state s







NC Photo's



03 NC 01 Fire hydrant was blocked





03 NC 02 Aisles in Stitching Department at ground floor and Aisles was blocked in Finishing department at second floor.



03 NC 03 No Rubber Mats was provided to 08 ironing tables out of 19 and Rubber pads to10 sewing machines

03 NC 04 No needle guards provided to 06 sewing machines and pulley guards to 05 sewing machines.







For more information visit: <u>Sedexglobal.com</u>

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



