




# Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: (only available on Sedex System)	ZC: 1073686	Sedex Site Reference: (only available on Sedex System)	ZS: 1018927
Business name (Company name):	ORANGE INTERNATIONAL		
Site name:	ORANGE INTERNATIONAL		
Site address: (Please include full address)	A-85 Sector 57 Noida UP - 20301	Country:	India
Site contact and job title:	Mr. Manoj Kumar (Manager HR)		
Site phone:	+91 9811020159	Site e-mail:	Manoj@orangeinternational.net
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:	31/07/2021		

<b>Audit Company Name &amp; Logo:</b>  <b>CSR Solutions Limited</b> 	<b>Report Owner (payer):</b>  <b>ORANGE INTERNATIONAL</b>
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

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

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

## Audit Content:

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

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

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

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

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

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

Lead auditor: Mr. Ugrasen Kumar APSCA number: RA21704628

Lead auditor APSCA status: R/A

Team auditor: Mr. Kamal Shah APSCA number: ASCA21703194

Interviewers: Mr. Kamal Shah APSCA number: ASCA21703194

Report writer: Mr. Ugrasen Kumar

Report reviewer: Ms. Cara Li/Senior Report Reviewer

Date of declaration: 31/07/2021

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

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

## Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.		Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
		ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	<a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>				Nil
0B	<a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	01			NC: During document review it was found that factory has not communicated ETI base code to its supply chain
1.	<a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				Nil
2	<a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				Nil
3	<a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	04			NCs: 1.During factory tour it was found that aisle marking was faded in alteration department. 2.During Factory tour it was found that there wasn't rubber mat below DG set. 3.During Factory tour it was found that there wasn't rubber mat on foot step of one of the stitching machines in alteration department. 4.During factory tour it was found that liquid soap was not provided in one of the worker's toilets.
4	<a href="#">Child Labour</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				Nil

5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				Nil
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				Nil
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				Nil
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Nil
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Nil
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Nil
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Nil
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Nil
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				N/A
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				N/A

#### General observations and summary of the site:

This is Full Initial Semi-announced 2 Pillar SEDEX audit conducted by CSR Solutions Limited. There were 02 auditors for 1 day, who assessed the facility. The scope of this audit was based on 2 Pillar SMETA systems. The factory is established in January 2012 itself and they manufacturer of ladies High fashion readymade garment. Upon discussion with factory management, it was understood that they Majorly Export to USA, Kuwait and Dubai. On Viewing of payroll, the total strength of the factory is 155 workers (129 male & 26 female) on date of audit 140 workers (116 Male & 24 Female) Were present. The factory operates in Single shifts i.e. 9:00 to 18:00 with half an hour lunch break 13:00 to 13:30, two tea break for fifteen minutes pre & post lunch. On the date of audit and interaction with Management noted that the main process includes Fabric & Accessories Storage, Cutting, Stitching, Washing, Finishing, Packing and dispatch.

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

## Site Details

Site Details		
A: Company Name:	ORANGE INTERNATIONAL	
B: Site name:	ORANGE INTERNATIONAL	
C: GPS location: (If available)	GPS Address: A-85 Sector 57 Noida UP - 20301	Latitude: 28.6029199 Longitude: 77.3525704
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>A) Factory Licence: - UPFA10000335, Issued for 250 persons, with a HP of 500, as on 01/01/2020, valid till 31/12/2022.</p> <p>B) Fire NOC: - UPFS/2019/5320/GBN/GAUTAM BUDDH NAGAR/2140/DD, Issued from Assistant Director of Fire and life safety, Noida. As on 04/04/2019, valid till 11/07/2022.</p> <p>C) Building Plan Lay out: - plan no – 1905/D.D/F/PLAN/LIC. Approved by Asst. Director of factories UP as on 30/06/2017</p> <p>D) Building Stability Certificate: - Obtained from Mr. Prakash Verma(B.E Civil) as on 28/02/2017</p> <p>E) Air &amp; Water Consent: - Air Consent: - No.85541/UPPCB/NOIDA(UPPCBRO)/CTO/AIR/NOIDA/2020 as on 01/01/2020 valid till 31/03/2023. Water consent :- No.85542/UPPCB/NOIDA(UPPCBRO)/CTO/WATER/NOIDA/2020 as on 01/01/2020 valid till 31/03/2023</p> <p>F) DG Approval – no.2312 Ni/Ghaziabad/rule-46/2019-20 as on 20/09/2019 valid till 19/09/2022, Obtained from electrical safety department Ghaziabad up.</p> <p>G) Hazardous waste disposal Certificate – BOWML/K/2194/16, Obtained from Bharat oil &amp; waste management LTD. As on 26/09/2020 valid till 25/09/2021</p> <p>H) ESIC Code: - 67000510120000199, Obtained from ESIC Department.</p> <p>I) EPF Code: - MRNO10055637000 Obtained from EPF Department.</p>	
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturer of Ladies High fashion readymade garment, Main Process Includes Fabric & Accessories Storage, Cutting, Stitching, Washing, Finishing, Packing and dispatch.	

<p>F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)</p>	<p>ORANGE INTERNATIONAL is situated at A-85 Sector 57 Noida UP - 20301. The main manufacturing facility includes Raw Material Storage, Cutting, Stitching, Washing, Finishing, Packing and dispatch. The Company has a suitable storage to preserve the incoming &amp; finished goods. The factory has total area of 1216 sq mt and covered area 3110 sq mt. The building has 04 floors for production Area which are as described.</p> <table border="1" data-bbox="566 474 1442 972"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground</td> <td>Fabric and accessories store and finishing.</td> <td>Nil</td> </tr> <tr> <td>1<sup>st</sup> Floor</td> <td>Embroidery, showroom and office area</td> <td>Nil</td> </tr> <tr> <td>2<sup>nd</sup> Floor</td> <td>Cutting and stitching</td> <td>Nil</td> </tr> <tr> <td>3<sup>rd</sup> floor</td> <td>Sampling, washing and canteen area.</td> <td>Nil</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>N/A</td> </tr> </tbody> </table> <p>F1: Visible structural integrity issues (large cracks) observed?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: No Large crack found in the factory.</p> <p>F3: Does the site have a structural engineer evaluation?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F4: Please give details: Company has obtained Building Stability certificate from Mr. Prakash Verma (B.E Civil) as on 28/02/2017</p>	Production Building no	Description	Remark, if any	Ground	Fabric and accessories store and finishing.	Nil	1 <sup>st</sup> Floor	Embroidery, showroom and office area	Nil	2 <sup>nd</sup> Floor	Cutting and stitching	Nil	3 <sup>rd</sup> floor	Sampling, washing and canteen area.	Nil	Is this a shared building?	No	N/A
Production Building no	Description	Remark, if any																	
Ground	Fabric and accessories store and finishing.	Nil																	
1 <sup>st</sup> Floor	Embroidery, showroom and office area	Nil																	
2 <sup>nd</sup> Floor	Cutting and stitching	Nil																	
3 <sup>rd</sup> floor	Sampling, washing and canteen area.	Nil																	
Is this a shared building?	No	N/A																	
<p>G: Site function:</p>	<p> <input type="checkbox"/> Agent  <input checked="" type="checkbox"/> Factory Processing/Manufacturer  <input type="checkbox"/> Finished Product Supplier  <input type="checkbox"/> Grower  <input type="checkbox"/> Homeworker  <input type="checkbox"/> Labour Provider  <input type="checkbox"/> Pack House  <input type="checkbox"/> Primary Producer  <input type="checkbox"/> Service Provider  <input type="checkbox"/> Sub-Contractor         </p>																		
<p>H: Month(s) of peak season: (if applicable)</p>	<p>Consistent throughout the year.</p>																		
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment)</p>	<p>Manufacturer Ladies High fashion readymade garment, Processes Finished goods Storage, Checking, packing dispatch. Main Equipment used like Stitching machine, Cutting machine, Cad machine, generator, Dry clean machine and Tumbler.</p>																		

used)	
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details

### Audit Parameters

A: Time in and time out	A1: Day 1 Time in: 09:00 A2: Day 1 Time out: 18:00	A3: Day 2 Time in: N/A A4: Day 2 Time out: N/A	A5: Day 3 Time in: N/A A6: Day 3 Time out: N/A
B: Number of auditor days used:	2 Man Days (02 Auditors * 01 Day)		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other  If other, please define		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 04 weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Manoj Kumar (Manager HR)		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	N/A		
J: Previous audit type:	N/A		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

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

A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	N/A		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	Union not exists in the factory.		

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	129							129
Worker numbers – female	26							26
Total	155							155
Number of Workers interviewed – male	16							16
Number of Workers interviewed – female	10							10
Total – interviewed sample size	26							26



A: Nationality of Management	Indian	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i>	Nationalities: B1: Nationality 1: ____Indian____ B2: Nationality 2: ____ B3: Nationality 3: ____	Was the list completed during peak season? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If no, please describe how this may vary during peak periods: Consistent throughout the year.
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 ____100%____ 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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)	04 groups, 05 workers per group, total 20 workers	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 04	D2: Female: 02
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	Not Anything	
I: What did the workers like the most about working at this site?	On Time Salary.	
J: Any additional comment(s) regarding interviews:	N/A	
K: Attitude of workers to hours worked:	Good	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 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		

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

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

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

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

O: Attitude of managers:

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

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

## Audit Results by Clause

### 0A: Universal Rights covering UNGP

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

#### 0.A. Guidance for Observations

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

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

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

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

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

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

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

##### Details:

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

#### Any other comments:

Nil

A: Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Company have policy of all UNGP rights.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Mr. Manoj Kumar Job title: Manager HR
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The factory has system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter; thus, committing transparent system. This can be circulated through suggestion boxes/ circular/ emails etc.
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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details: Yes, the business demonstrate effective data privacy procedures for workers' information as all such documents are kept in lock and key with Management only.
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: All the worker Information keep in lock & key.

Findings		
<b>Finding:</b> Observation <input type="checkbox"/> Company NC <input type="checkbox"/> <b>Description of observation:</b> None Observed  <b>Local law or ETI/Additional elements / customer specific requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>	

Good examples observed:	
<b>Description of Good Example (GE):</b> None Observed	<b>Objective Evidence Observed:</b>

## 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: __4.3__ %	A2: This year __3.5__ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	5%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: __6__ %	C2: This year __4__ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	10%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: All major/ minor accidents are recorded in "Accident Register" Form-15 & Form-26.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: Number: 0	F1: Last 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	H1: Last 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	I1: 6 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	J1: 6 months __0__% workers

## 0B: Management system and Code Implementation

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

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

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

##### Details:

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

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

Interview (Management & workers)

#### Any other comments:

Nil

### Management Systems:

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

D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: The factory has imparted training on ETI based code to their workers and employees.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: ETI Base Code posted on the notice board in the factory.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: Company has not obtained this type of certificate.
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Company has 01 Employees in HR Department.
H: Is there a senior person / manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Mr. Manoj Kumar (Manager HR) is responsible for implementing code of conduct.
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: They have confidentiality policy in place.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: They have an effective procedure to ensure confidential information.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Company have done Internal Audit in the factory.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1Please give details: Company would take corrective actions by themselves.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please give details: The facility has a policy which requires labour standards of its own suppliers but it is not communicated with their own suppliers.
<b>Land rights</b>	

N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The factory has obtained legal licence like ESIC & Factory Licence etc.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: Yes, site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC: It is not applicable in India.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: Please give details: The facility has its rented building.
R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: The Facility has one unit.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: The entire building is rented by the facility and proper taxes Paid till date.

#### Non-compliance:

##### 1. Description of non-compliance:

☒ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

During document review it was found that factory has not communicated ETI base code to its supply chain

##### Local law and/or ETI requirement:

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

##### Recommended corrective action:

It is recommended to the factory to communicate ETI base code to its supply chain

##### Objective evidence observed:

(where relevant please add photo numbers)  
During Document review.

#### Observation:

<b>Description of observation:</b> None Observed  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>
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Good Examples observed:	
<b>Description of Good Example (GE):</b> None Observed	<b>Objective evidence observed:</b>

## 1: Freely Chosen Employment

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

### ETI

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

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

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

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

Any other comments:

Nil

A: Is there any evidence of retention of original documents, e.g. passports/ID's	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:
C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: There are no any restrictions on it
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding: N/A
F: Is there evidence of any restrictions on workers' freedoms to	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

leave the site at the end of the work day?	F1: Please describe finding: There is no evidence of any restrictions.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: Yes, the site understands the risk of forced/trafficked/Bonded labour in its supply chain, No workers (within company and its sub-chain) are affected.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: The factory had established anti-forced/trafficked labour policy, communicated the policy with its employees, and conducted regular internal audit to assure that there was no forced/trafficked labour happened.

#### Non-compliance:

<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code: None Observed  <b>Local law and/or ETI requirement</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>
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#### Observation:

<b>Description of observation:</b> None Observed  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>
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#### Good Examples observed:

<b>Description of Good Example (GE):</b> None Observed	<b>Objective evidence observed:</b>
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## 2: Freedom of Association and Right to Collective Bargaining are Respected

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

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

### ETI

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

### Current Systems and Evidence Examined

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

#### Current systems:

Workers Committee is available in the factory which meets quarterly, last meeting done 17/06/2021 and 01 complaint / suggestion boxes have been placed inside the factory. The workers could complain to their supervisors directly or through their worker representative, although the suggestion box was available in the factory for collecting workers' appeals. Workers had formed a committee & last meeting record dated 17/06/2021 verified. At present Mr. Brijesh Kumar is elected as Worker Representative. Workers can raise their voice through complaint box also.

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

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

#### Any other comments:

Nil

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Is there any other form of effective worker/management communication channel? (Other	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details:

than union/worker committee e.g. H&S, sexual harassment)	D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details:	
F: Name of union and union representative, if applicable:	N/A	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Yes, worker committees	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Mr. Brijesh Kumar
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 17/05/2021
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Company Post works committee meeting record on notice board.	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: 1 worker representative was interviewed.	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	In packing department fan was not working, point raised to management through WR and the same was resolved after company replaced old fan with a new one.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If <b>Yes</b> , what percentage by trade Union/worker representation	M1: __0__% workers covered by Union CBA	M1: __0__% workers covered by Union CBA
M3: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A	

### Non-compliance:

#### 1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer

#### Objective evidence observed:

*(where relevant please add*

code: None Observed  Local law and/or ETI requirement:  Recommended corrective action:	photo numbers)
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Observation:	
Description of observation: None Observed  Local law or ETI requirement:  Comments:	Objective evidence observed:
Good Examples observed:	
Description of Good Example (GE): None Observed	Objective evidence observed:

### 3: Working Conditions are Safe and Hygienic

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

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

#### 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 factory has installed fire extinguisher, first aid facility, and working environment (lighting, ventilation, temperature etc.) were good. Based on workers and management interview, the factory had provided appropriate safety training to workers. And the factory provided relevant records for review. Mr Manoj Kumar (Manager HR) is responsible for H&S issues in the factory. There were four trained first aider at the factory. The factory had established health and safety policy. Kept accident records in files. Last meeting of Health & Safety is done on 08/06/2021. First Aid Training by St. John Ambulance.

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

##### Details:

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

##### Any other comments:

Nil

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

without required permits/inspections (e.g. floors added)?	<input checked="" type="checkbox"/> No C1: Please give details: Not have
D: Are visitors to the site informed on H&S and provided with personal protective equipment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Informed about health & Safety to the auditor.
E: Is a medical room or medical facility provided for workers?  If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Company has Provided medical room facility in the factory.
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: Company has Provided medical aid facility by well First aid Trained person.
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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: No, Company has not provided Transportation to workers.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Yes, company has personnel storage space provided to workers for keep bags, Helmet, Lunch box etc.
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Company has done the Risk Assessment and cover all the area.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Company has obtained Air & Water Consent from Uttar Pradesh pollution control board.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Yes, the company meets all environmental standards and they have also listed out details of "Banned Chemicals" should are forbidden by law.

**Non-compliance:**

### 1. Description of non-compliance:

☒ NC against ETI ☒ NC against Local Law ☐ NC against customer code:

During factory tour it was found that aisle marking was faded in alteration department.

### Local law and/or ETI requirement:

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

### Local Law

In accordance with Factories Act 1948, Chapter IV section 38 (1), in every factory all practicable measures shall be taken to prevent out break of fire and its spread both internally and externally and to provide and maintain – (a) safe means of escape in all persons in the event of a fire.

### Recommended corrective action:

It is recommended to the factory to have proper outlining of aisle marking in alteration department.

(See NC Photo # 1)  
1. During Factory tour.

### 2. Description of non-compliance:

☒ NC against ETI ☒ NC against Local Law ☐ NC against customer code:

During Factory tour it was found that there wasn't rubber mat below DG set.

### Local law and/or ETI requirement:

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

### Local Law

AS per factory rules 1950...52B. Machinery and plant.—No machinery or plant equipment shall be constructed, situated, operated or maintained in any factory in such a manner as to cause risk of bodily injury.

### Recommended corrective action:

It is recommended to the factory to put rubber mat below DG set.

(See NC Photo # 2)  
2. During Factory tour.

### 3. Description of non-compliance:

☒ NC against ETI ☒ NC against Local Law ☐ NC against customer code:

During Factory tour it was found that there wasn't rubber mat on foot step of one of the stitching machines in alteration department.

### Local law and/or ETI requirement

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of,

(See NC Photo # 3)  
3. During Factory tour.

associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

#### Local Law

AS per factory rules 1950...52B. Machinery and plant.—No machinery or plant equipment shall be constructed, situated, operated or maintained in any factory in such a manner as to cause risk of bodily injury.

#### Recommended corrective action:

It is recommended to the factory to put rubber mat on foot step of stitching machine.

#### 4. Description of non-compliance:

☒ NC against ETI ☒ NC against Local Law ☐ NC against customer code:

During factory tour it was found that liquid soap was not provided in one of the worker's toilet.

#### Local law and/or ETI requirement:

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

#### Local Law

(Section-42) 64. (1) Before April 1, 1951, there shall be provided and maintained in every factory for the use of the workers employed adequate and suitable facilities for washing, which shall include soap, after use of Toilet. The facilities shall be conveniently accessible and shall be kept in a clean and orderly condition.

#### Recommended corrective action:

It is recommended to the factory to have liquid soap in worker's toilet.

(See NC Photo # 4)  
4. During Factory tour.

#### Observation:

##### Description of observation:

None Observed

##### Local law or ETI requirement:

##### Recommended corrective action:

Objective evidence observed:

#### Good Examples observed:

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

None Observed

Objective Evidence Observed:

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

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

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

##### 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:

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

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

Details:

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

Any other comments:

Nil

A: Legal age of employment:	18 Years old
B: Age of youngest worker found:	21 Years old
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0%
E: Are workers under 18 subject to hazardous work assignments? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details

Non-compliance:

<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>
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Observation:	
<b>Description of observation:</b> None Observed  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

Good Examples observed:	
<b>Description of Good Example (GE):</b> None Observed	<b>Objective Evidence Observed:</b>

## 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:

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

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

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

Any other comments:

Nil

### Non-compliance:

#### 1. Description of non-compliance:

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

None Observed

Local law and/or ETI requirement:

Recommended corrective action:

#### Objective evidence observed:

(where relevant please add photo numbers)

#### Observation:

#### Description of observation:

None Observed

#### Objective evidence observed:

Local law or ETI requirement:	
Comments:	

Good Examples observed:	
Description of Good Example (GE): None Observed	Objective Evidence 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 minimum: 8 hours per day 48 hours per week	A1: 8 hours per day 48 hours per week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal minimum: 2 hours per day 12 hours per week	B1: 0 hour per day 0 hour per week	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: Rs. 9078.00 for unskilled worker. Rs. 9985.00 for semi-skilled worker. Rs. 11185.00 for skilled worker.	C1: Rs. 9078.00 for unskilled worker. Rs. 9985.00 for semi-skilled worker. Rs. 11185.00 for skilled worker.	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 200% of Legal Wages	D1: 200% of Legal Wages	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Wages analysis: <a href="#">(Click here to return to Key Information)</a>	
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A1: If <b>No</b> , why not?	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	26 Samples from July 2020(random month). 26 Samples from October 2020(random month). 26 Samples from current month June 2021.

see SMETA Best Practice Guidance and Measurement Criteria)			
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	C1: If <b>Yes</b> , please give details: Legal minimum:	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	D1: If <b>No</b> , please give details:	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> Rs. 43.64 for unskilled worker. Rs. 349.15.00 for semi-skilled worker. Rs. 9078.00 for skilled worker.	
F: Please indicate the breakdown of workforce per earnings:	F1: ____% of workforce earning under minimum wage F2: __100__% of workforce earning minimum wage F3: ____% of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i> It will be paid on yearly basis and It will be paid in October 2020.		
H: What deductions are required by law e.g. social insurance? Please state all types:	As per Factory Act & Minimum Wages Act 1948 of the India, factory may deduct wages for un-authorized absence, for fines, housing facility advance payments, loans, income tax, profession tax etc. However, factory is deducting un-authorized absence, Provident fund and ESI etc.		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that <b>have</b> been made.	1. ESIC 2. EPF Please describe: N/A
		I2: Please list all deductions that <b>have not</b> been made.	1. N/A 2. N/A Please describe: N/A
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked?	<input checked="" type="checkbox"/> Yes		

(For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input type="checkbox"/> No L1: Please give details: Yes, Wages reflect all the time.
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: N/A
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation N/A Other – please give details:
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Periodic review of wages are done/ calculated once per year during April month. All such increments etc. are done based on performances etc.
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Verified 12 months' Salary Sheet, Salary Pay Slip & Worker Interview.
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> 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 **all** of the following are met:

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

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

## Current Systems and Evidence Examined

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

### Current systems:

The Factory is running in Single shift, start from 9:00 to 18:00 with half an hour lunch break, two tea break for fifteen minutes pre & post lunch. Factory only engages workers for overtime work when there is an urgency of shipment. Workers also conformed during interaction that overtime is voluntary. Workers are getting day off on Sunday as weekly holiday. Factory maintains time records using Biometric Attendance Recording System. Working hours comply with national law.

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

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

### Any other comments:

Nil

### Non-compliance:

#### 1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:  
None Observed

Local law and/or ETI requirement:

Recommended corrective action:

#### Objective evidence observed:

(where relevant please add photo numbers)

### Observation:

#### Description of observation:

None Observed

Local law or ETI requirement:

Comments:

#### Objective evidence observed:

### Good Examples observed:

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

None Observed

#### Objective Evidence Observed:

### Working hours' analysis

Please include time e.g. hour/week/month  
(Go back to Key information)

#### Systems & Processes

A. What timekeeping systems are used: time card etc.

Describe: Biometric Attendance Recording System.

B: Is sample size same as in wages section?

☒ Yes  
☐ No  
B1: If no, please give details

C: Are standard/contracted working hours defined in all contracts/employment agreements?

☒ Yes  
☐ No

C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:

D: Are there any other

☐ Yes

D1: If YES, please complete as appropriate:

types of contracts/employment agreements used?	<input checked="" type="checkbox"/> No	<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:			
		N/A			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If <b>yes</b> , 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: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
		Maximum number of days worked without a day off (in sample):			
		6 Days in a week			
<b>Standard/Contracted Hours worked</b>					
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:			
		N/A			
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:			
		N/A			
<b>Overtime Hours worked</b>					
I: Actual overtime hours worked in sample (State per day/week/month)	<p>Highest OT hours:</p> <p>26 out of 26 Samples from random month (July 2020): Daily OT: Maximum 0 Hour Weekly OT: Maximum 0 Hour Monthly OT: Maximum 0 Hour</p> <p>26 out of 26 Samples from random month (October 2020): Daily OT: Maximum 0 Hour Weekly OT: Maximum 0 Hour Monthly OT: Maximum 0 Hour</p>				

	26 out of 26 Samples from current month (June 2021): Daily OT: Maximum 0 Hour Weekly OT: Maximum 0 Hour Monthly OT: Maximum 0 Hour	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	___0___%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:
<b>Overtime Premiums</b>		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of <u>standard</u> wages:200%
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency:
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other NA Site is paying 200% OT Premium which is verified from the salary sheet and OT record.	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	
	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A – there is no legal requirement to OT premium	
P: If more than 60 total hours per week and this is	<input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week	

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

## 7: No Discrimination is Practiced

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

### ETI

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

### Current Systems and Evidence Examined

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

#### Current systems:

There was no evidence of discrimination in employment, promotion, compensation, welfare, dismissal, and retirement found. No discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation found to be practised in the company.

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

Details: Personal files, Wage Records and Worker Interview.

Any other comments:

Nil

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: ___83___ % A2: Female___17___ %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	12 Females are working in skilled or technical roles.
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found C1: Please give details: Discrimination not found in the factory

### Professional Development

A: What type of training and development are available for workers?	Skill Development Training.
---	-----------------------------

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

### Non-compliance:

<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>
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### Observation:

<b>Description of observation:</b> None Observed  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>
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### Good Examples observed:

<b>Description of Good Example (GE):</b> None Observed	<b>Objective Evidence Observed:</b>
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## 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:

Company do not any use any sub-contractor & home workers for production. Factory does not engage workers through Subcontractor and no immigrant worker have been engaged by the factory. Suppliers have understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.

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

Details: Policy, handbook, management review, worker interview and training record.

Any other comments:

Nil

Non-compliance:

<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>
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Observation:	
<b>Description of observation:</b> None Observed  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

Good Examples observed:	
<b>Description of Good Example (GE):</b> None Observed	<b>Objective Evidence Observed:</b>

## 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?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category(ies) of workers affected:

C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details: N/A
D: If any checked, give details:	N/A

### Migrant Workers:

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

A: Type of work undertaken by migrant workers:	No Migrant worker working in the factory.	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: 0  B2: Total number of (outside of local country) recruitment agencies used: 0	
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please describe finding:	C2: Observations: N/A
D: Are Any migrant workers in skilled, technical, or management roles  Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: If yes, number and example of roles: N/A	

## NON-EMPLOYEE WORKERS

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

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

checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> No N/A E1: Please give details: N/A
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#### 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details: No any contractor working in the factory.
B: If <b>Yes</b> , how many workers supplied by contractors?	N/A
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: N/A
D: If <b>Yes</b> , 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:

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

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

Details:

Site tour, worker interview, management interview and material in and out record.

Any other comments:

Nil

### Non-compliance:

#### 1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

None Observed

**Local law and/or ETI /Additional Elements requirement:**

**Recommended corrective action:**

**Objective evidence observed:**

*(where relevant please add photo numbers)*

### Observation:

**Description of observation:**

None Observed

**Local law or ETI/Additional elements requirement:**

**Comments:**

**Objective evidence observed:**

### Good Examples observed:

Description of Good Example (GE):  
None Observed

Objective Evidence  
Observed:

### Summary of sub-contracting – if applicable

☒ Not Applicable please x

A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting

☐ Yes  
☐ No  
A1: Please describe:

B: If sub-contractors are used, is there evidence this has been agreed with the main client?

☐ Yes  
☐ No  
B1: If **Yes**, summarise details:

C: Number of sub-contractors/agents used:

D: Is there a site policy on sub-contracting?

☐ Yes  
☐ No  
D1: If **Yes**, summarise details:

E: What checks are in place to ensure no child labour is being used and work is safe?

### Summary of homeworking – if applicable

☒ Not Applicable please x

A: If homeworking is being used, is there evidence this has been agreed with the main client?

☐ Yes  
☐ No  
A1: If **Yes**, summarise 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No  G1: Please give details:
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> 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 <sup>rd</sup> party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Company maintains a grievance committee; last committee meeting was as on 18/06/2021.
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	Workers are aware because they are periodically trained on such topics.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Direct access to management/ Complaints can also be registered through suggestion boxes.
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: Suggestion Box.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details

I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  I1: If yes, please give details
---	---

<p align="center"><b>Current Systems and Evidence Examined</b></p> <p><i>To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.</i></p> <p><b>Current systems:</b>  Company maintains a grievance committee. Physical abuse or the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation not found practised within the company. Last committee meeting was held as on 18/06/2021.</p> <p><b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b>  Details: Records and worker interview.</p> <p><b>Any other comments:</b>  Nil</p>
--

<b>Non-compliance:</b>	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:  None Observed</p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p>

<b>Observation:</b>	
<p><b>Description of observation:</b>  None Observed</p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

<b>Good Examples observed:</b>	
<p><b>Description of Good Example (GE):</b>  None Observed</p>	<p><b>Objective Evidence Observed:</b></p>

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

[\(Click here to return to NC-table\)](#)

### Additional Elements

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.

10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

### Current Systems and Evidence Examined

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

#### Current systems:

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

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

Details:

Records and workers' interview.

Any other comments:

Nil

### Non-compliance:

#### 1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

None Observed

Local law and/or ETI /Additional Elements requirement:

Recommended corrective action:

**Objective evidence observed:**

(where relevant please add photo numbers)

### Observation:

#### Description of observation:

None Observed

Local law or ETI/Additional Elements requirement:

Comments:

**Objective evidence observed:**

Good examples observed:

Description of Good Example (GE):  
None Observed

Objective Evidence  
Observed:

### 10. Other issue areas 10B2: Environment 2–Pillar

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

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

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

10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.

Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

### Current Systems and Evidence Examined

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

#### Current systems:

Company has obtained Air & Water Consent from Uttar Pradesh Pollution Control Board. They have conducted all test report like ambient air, Ambient noise, DG Stack Emission, Lux etc.

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

Details: Company has obtained Air & Water Consent from Uttar Pradesh Pollution Control Board.

Any other comments:

Nil

### Non-compliance:

#### 1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local

☐ NC against customer code:

None Observed

Local law and/or ETI/Additional Elements requirement:

Recommended corrective action:

#### Objective evidence observed:

(where relevant please add photo numbers)

### Observation:

#### Description of observation:

None Observed

Local law or ETI/Additional elements requirements:

Comments:

Objective evidence observed:

### Good examples observed:

Description of Good Example (GE):

Objective Evidence

None Observed	Observed:
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Other findings

Other Findings Outside the Scope of the Code
None Observed

**Community Benefits**

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

None Observed
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## Appendix 1

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

☒ Not Applicable please x

## Photo Form

Auditor and Auditee	Factory Name Board	Factory Building
Evacuation Map	Fire Extinguisher	First aid Box
Fire Alarm	Emergency Light	Fire Hydrant

		
ETP Plant	Hose Reel	Worker's toilet
		
Drinking water area	Suggestion Box	Chemical Room
		
Embroidery Department	Sampling Department	Cutting Department



Stitching Department



Accessories Store



Fabric Checking Department



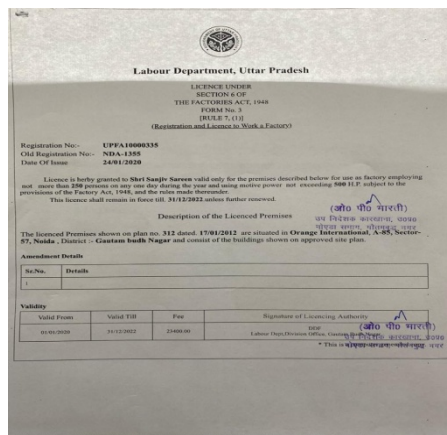
Cad Machine



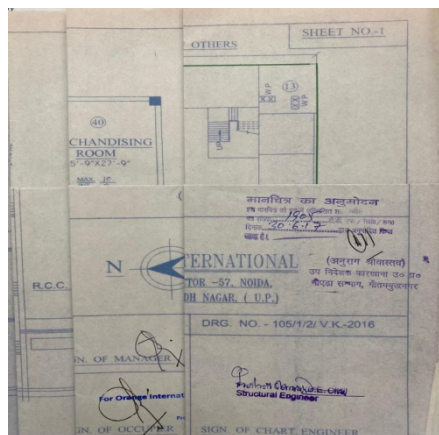
Tumbler



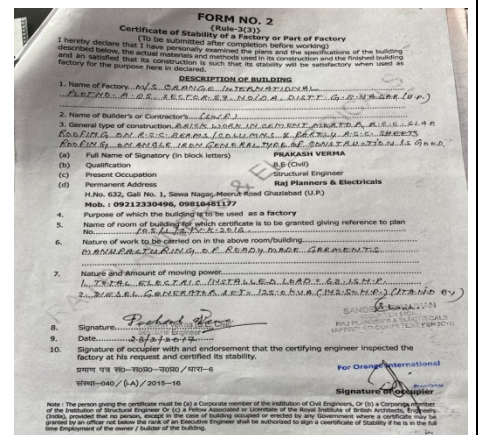
Dry clean machine



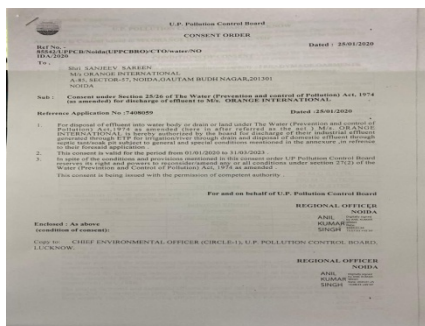
Business Licence



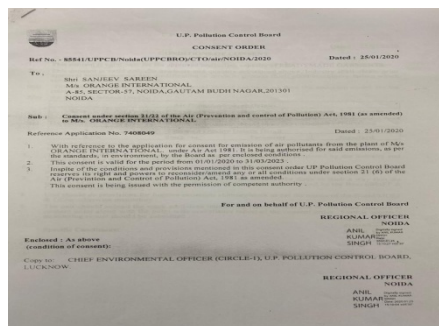
Layout Plan



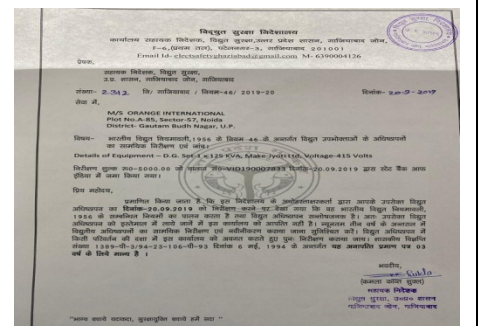
Building Stability



Water Consent



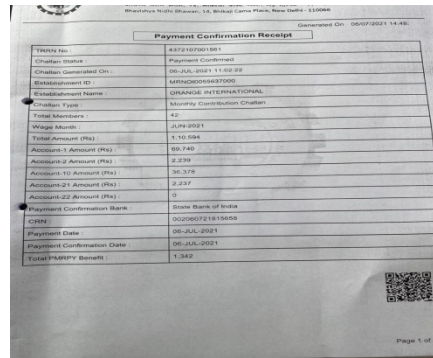
Air Consent



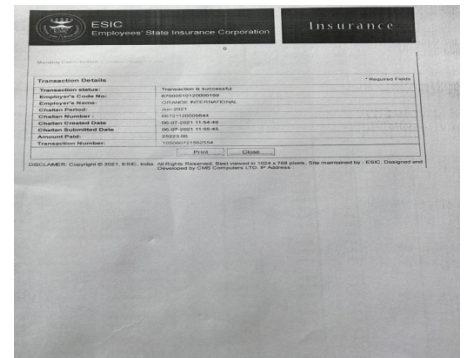
DG Approval



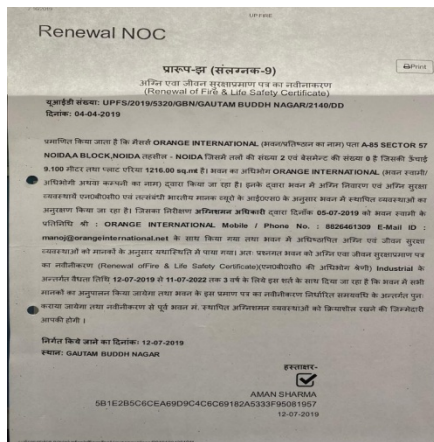
Hazardous waste disposal Certificate



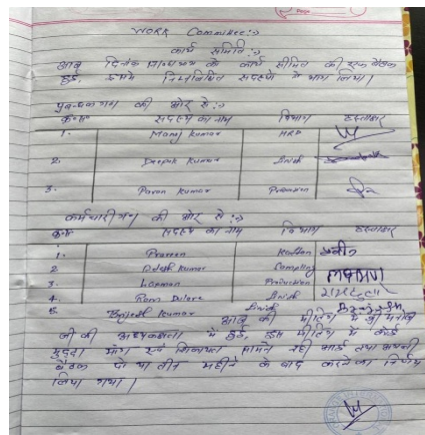
EPF Challan



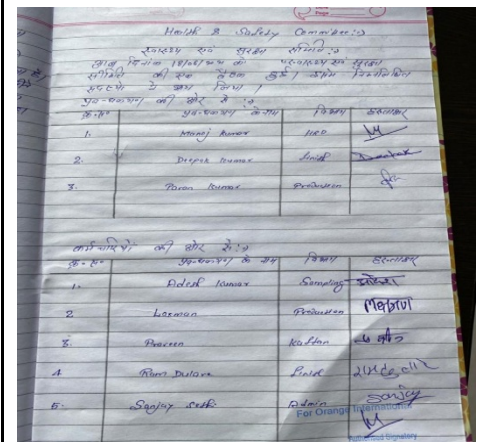
ESIC Challan



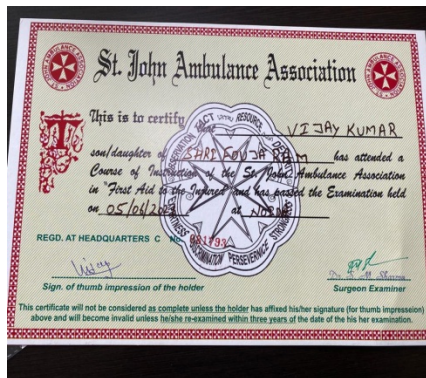
Fire NOC



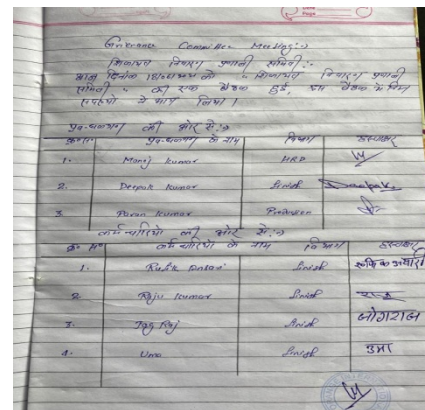
Worker's committee



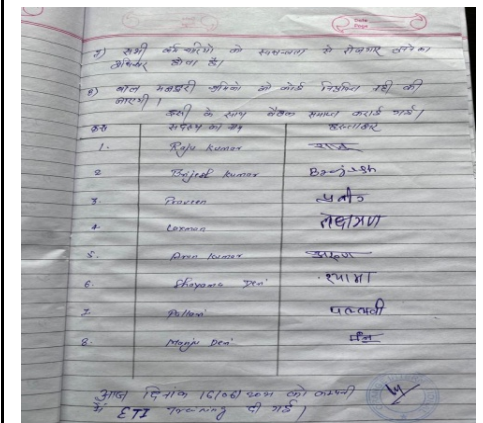
Health and safety training



First aid certificate

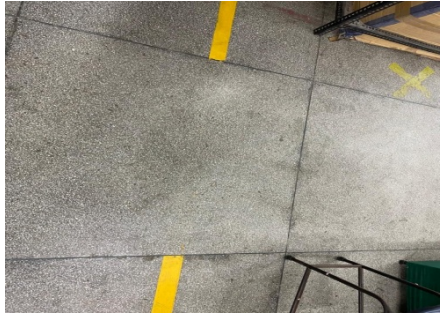





Grievance Committee



ETI Training

NC PHOTOS

		
<p>NC PHOTO # 1 – Aisle marking faded in alteration department.</p>	<p>NC PHOTO # 2 – Rubber mat not found under DG set.</p>	<p>NC PHOTO # 3- rubber mat not found on footstep of stitching machine</p>
	<p>Nil</p>	<p>Nil</p>
<p>NC PHOTO #4 – Liquid soap not found in worker's toilet.</p>	<p>Nil</p>	<p>Nil</p>



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

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

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

**[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw_3d_3d)**

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw\\_3d\\_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw_3d_3d)

**[Click here for Supplier \(B\) members:](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)**

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

**[Click here for Auditors:](https://www.surveymonkey.co.uk/r/BRTVCKP)**

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