




# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 403891708	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 404067901
Business name (Company name):	Apex Fashion Wear Limited		
Site name:	Apex Fashion Wear Limited		
Site address: <i>(Please include full address)</i>	Word no. 06, Holding no. B-50/3, area-Kalampur, Kaliakoir Pouroshova, Kaliakoir, Gazipur.	Country:	Bangladesh
Site contact and job title:	Mr. Md. Harun Or Rashid – DGM (Compliance)		
Site phone:	+8801787-668185	Site e-mail:	<a href="mailto:compliance@apexholdings.com">compliance@apexholdings.com</a>
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:	23 November 2022		

<b>Audit Company Name &amp; Logo:</b>  <b>ITS Labtest Bangladesh Ltd.</b>   Total Quality. Assured.	<b>Report Owner (payer):</b>  <b>Apex Fashion Wear Limited</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): The audit duration took less time than expected as the audit support of facility management was very prompt, very transparent and no discrepancies found during the audit process.

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

Mohammad Abul Kashem  
Mynul Hasan  
Mahmudul Islam Tapu  
Rokibul Hasan Mollah  
Md. Imran khan

Asst. Manager (RA 21702386)  
Asst. Supervisor (ASCA 21704283)  
Senior Auditor (ASCA 32200107)  
Auditor (ASCA 32200261)  
Auditor (ASCA 32200256)

Lead auditor: Mohammad Abul Kashem  
Lead auditor APSCA status:

APSCA number: RA 21702386  
In Good Standing

Team auditor:

Mynul Hasan  
Mahmudul Islam Tapu  
Rokibul Hasan Mollah  
Md. Imran khan

APSCA number: ASCA 21704283  
APSCA number: ASCA 32200107  
APSCA number: ASCA 32200261  
APSCA number: ASCA 32200256

Interviewers:

Mohammad Abul Kashem  
Mynul Hasan  
Mahmudul Islam Tapu  
Rokibul Hasan Mollah  
Md. Imran khan

APSCA number: RA 21702386  
APSCA number: ASCA 21704283  
APSCA number: ASCA 32200107  
APSCA number: ASCA 32200261  
APSCA number: ASCA 32200256

Report writer: Md. Imran khan

APSCA number: ASCA 32200256

Report reviewer: Mazharul Anwar

Date of declaration: 23 November 2022

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

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

## Summary of Findings

Issue <i>(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.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	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"/>		0	0	None observed
0B <a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
1 <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
2 <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
3 <a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	03	0	0	<p><b>Non-Compliance:</b></p> <ul style="list-style-type: none"> <li>• Eye guards of overlock machines were found displaced from its position.</li> <li>• Aisles were partially blocked with finished goods &amp; trolley.</li> <li>• Approved layout plan found mismatched with current floor usage.</li> </ul>
4 <a href="#">Child Labour</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
5 <a href="#">Living Wages and Benefits</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	02	<p><b>Good Example:</b></p> <ul style="list-style-type: none"> <li>• Facility provides attendance bonus to all employees as per company policy.</li> </ul>



									<ul style="list-style-type: none"> <li>Facility has a free medical consultancy to family members of their worker.</li> </ul>
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	NA
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	NA

General observations and summary of the site:

- The product manufactured at this site is all kind of Knit garments item.
- The facility has started its operation in May 2017.
- Overall responsibility for meeting the standards is taken by Mr. Md. Harun Or Rashid – DGM (Compliance)
- A total of 4880 employees are working in the facility including 983 non-production employees where 493 are from management employees. Out of 4880 employees, 2813 are female employees and 2067 are male employees.
- Total land area of the facility premises 22,95,000 square feet, production and warehouse area are 3,60,000 square feet and 40,000 square feet respectively.
- There is another sister concern in the facility namely Apex Lingerie Ltd. Sister Concern Facility is with same management located at the facility premises.
- All the employees are local (Bangladeshi).

- Facility has a Trade Union, Name: Apex Holdings (Garments) Ltd. Sromik and kormochari Union, Reg. no: Dhaka- 3275. Trade Union member were present during the audit. Moreover, management informed that they would communicate the outcome of the audit to the workers through notice board and would discuss at next committee meeting.
- There is evidence of both male and female in management and among supervisors.
- Site has no peak seasons; their production capacity is round the year same.
- Site uses no sub-contractors.
- Facility has all 100% fixed employees.
- Facility has weekly holiday on Friday, only Knitting section workers get one day off in a week according with roaster basis.
- All the department of the facility operates in one general shift from 8:00 am to 5:00 pm with 1-hour lunch break in 3 shifts from 12:45 pm to 1:45 pm, 1:00 pm to 2:00 pm and 1:30 pm to 2:30 pm.
- Only Knitting section operates in three shifts from 6:00 am to 2:00 pm, 2:00 pm to 10:00 pm and 10:00 pm to 06:00 am including 1-hour meal break.
- Standard working hours on site was in average 208 hours/month with 1 day off in every 7-day-period.
- Legal minimum pays (BDT 8000.00) were paid to all employees and facility provides minimum wage as per Bangladesh Government Gazette dated 24<sup>th</sup> January 2019.
- Correct Overtime hours were paid; Employees were paid 200% of minimum hourly wage for Overtime.
- Employee's wages are calculated monthly. The payment method of the salary is Mobile financing system within 7 working days of following month and the payment cycle is 01 to 30/31 for workers and 26 to 25 for management stuff. Workers Last payment day was on 06 November 2022.
- Time keeping system is electronic face detection and card punch.
- Audit scope is 01 year (from November 2021 to October 2022).
- The youngest worker on site was 19-year-old.
- Audit sample is 75 according to the manpower of the facility.
- 75 Records to show wages and hours were taken from October 2022 (Current paid month), May 2022 (Random month) & December 2021 (Random Month).
- 75 employees were selected for interview; they were interviewed as 09 groups of 05 and 30 employees were interviewed individually.

*\*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:	Apex Fashion Wear Limited							
B: Site name:	Apex Fashion Wear Limited							
C: GPS location: (If available)	GPS Address: Word no. 06, Holding no. B-50/3, area-Kalampur, Kaliakoir Pouroshova, Kaliakoir, Gazipur.	Latitude: 24.0618252 Longitude: 90.2458259						
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p><b>Factory license:</b> License No: 18023/Gazipur 'L' category, issued by Deputy Chief Inspector General of Industries (Govt. Of the People's Republic of Bangladesh), which is valid till 30th June 2023.</p> <p><b>Fire License:</b> Fire License No: DD/Dhaka/25645/2015 issued by Bangladesh Fire Service &amp; Civil Defense Authority which is valid till 30th June 2023.</p> <p><b>Trade License:</b> Trade License No: 62207, issued by Kaliakoir Pouroshova, which is valid till 30th June 2023.</p>							
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	All kind of Knit garments item.							
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Apex Fashion Wear Limited is located at Word no. 06, Holding no. B-50/3, area-Kalampur, Kaliakoir Pouroshova, Kaliakoir, Gazipur. The facility has started its operation in May 2017.</p> <p>Total land area of the facility premises 22,95,000 square feet, production and warehouse area are 3,60,000 square feet and 40,000 square feet respectively</p> <p>A total of 4880 employees are working in the facility including 983 non-production employees where 493 are from management employees. Out of 4880 employees, 2813 are female employees and 2067 are male employees</p> <p>There is another sister concern in the facility namely Apex Lingerie Ltd. with same management located at the facility premises.</p> <p>The facility premises (audited facility) consist of total 08 buildings and 12 Shed areas. Details description provided as below:</p> <table border="1" data-bbox="555 1955 1485 2000"> <thead> <tr> <th>Production</th> <th>Description</th> <th>Remark,</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>		Production	Description	Remark,			
Production	Description	Remark,						

Building /shed		if any
<b>Building 01 (9 storied)</b>		
Ground Floor	Knitting and Store under Apex Fashion Wear Limited, Narrow Fabric Department (NFD) under Apex Lingerie Ltd (sister Concern Facility)	Common Use
1st Floor	Workers dinning and canteen commonly used, incubator (training center of unskilled worker), admin, office, conference room, learning center (incubator). Narrow Fabric Department (NFD) under Apex Lingerie Ltd (sister Concern Facility)	Common Use
2nd Floor	Sewing section, stationary store, finishing section, packing section, maintenance room, spot removing room, accessories store, finished goods store & office	NA
3rd Floor	Sewing section, cutting section, fusing machine area, spot removing room, piping area, CAD, fabric store	NA
4th Floor	Sample section, temporary leftover store	Proposed for Sewing, Finishing & Finished Goods Store
5th Floor	Temporary leftover store, idle machine area	Proposed for Sewing, Finishing & Fabric Store
6th Floor	Temporary leftover store, idle machine area	Proposed for Sewing, Finishing & Fabric Store
7th Floor	Printing section, heat press area, chemical sub store, office, Temporary leftover store area, vacant approximate 50% area	NA
8th Floor	Vacant – Proposed for Office	NA
Top Floor	100% vacant	NA
<b>Building 02 (02 storied)</b>		
Ground floor	Power generator room, electrical substation.	Common Use
First floor	Chiller room	Common Use
Roof top	Cooling tower, 50% vacant	Common Use
<b>Building 03 (03 storied)</b>		

Ground floor	Fire pump room, fire alarm control panel, firefighting equipment store, central workshop, utility office, compressor room, fabrication workshop	Common Use
First floor	Industrial engineering solution department and utility store	Common Use
Second floor	Staff dining and kitchen	Common Use
Roof top	100% vacant	NA
<b>Building 04 (01 storied)</b>		
Ground floor	RMS room, cathode transformer room	Common Use
Roof top	100% vacant	NA
<b>Building 05 (01 storied)</b>		
Ground floor	Transformer room	Common Use
Roof top	100% vacant	NA
<b>Building 06 (01 storied)</b>		
Ground floor	Security room	Common Use
Roof top	100% vacant	NA
<b>Building 07 (01 storied)</b>		
Ground floor	Boiler room	NA
Roof top	100% vacant	NA
<b>Building 08 (01 storied)</b>		
Ground floor	Security room, waiting room	Common Use
Roof top	100% vacant	NA
<b>Shed 1</b>		
Ground floor	Processing hall (Under construction and this area under Apex Lingerie Ltd. which is sister concern facility), medical room, childcare room which is commonly used.	Common Use
Mezzanine floor	Under construction	NA
<b>Shed 2</b>	Yarn store and Office – Under Apex Lingerie Limited	NA
<b>Shed 3</b>	Fabrication workshop	Commonly used
<b>Shed 4</b>	Civil construction material store	Commonly used

	<b>Shed 5</b>	Blank	NA
	<b>Shed 6</b>	Wastage store	Commonly used
	<b>Shed 7</b>	Temporary fire installation workshop	Commonly used
	<b>Shed 8</b>	Carpenter store	Commonly used
	<b>Shed 9</b>	Workshop	Commonly used
	<b>Shed 10</b>	Security post	Commonly used
	<b>ETP area</b>	Effluent treatment plant	Commonly used
	<b>WTP area</b>	Water treatment plant	Commonly used
	<p>Visible structural integrity issues (large cracks) observed?</p> <p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  Please give details: No such cracks were found during audit.</p> <p>Does the site have a structural engineer evaluation?</p> <p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please give details: Site have a structural engineer evaluation, by Kaliakoir Pouroshova on 02 September 2021.</p> <p>Machine lay out evaluation by Department of Inspection for Factories and Establishments (DIFE) on 27 June 2021.</p>		
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input checked="" 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		
H: Month(s) of peak season: (if applicable)	Round the year same.		
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<p><b>Product Manufactured:</b> All kind of Knit garments item.</p> <p><b>Main production process:</b> Knitting, Cutting, printing, sewing, finishing and packing.</p> <p><b>Production Capacity:</b> 25,00,000 pieces per month.</p>		

**Production Lines:** 80

**Machines used:**

Oval Printing M/C, Glass Table , Auto Run Dryer, Curing Machine, Heat Press Machine, Fusing Machine, Mesh Stretching Machine, Flock Print Machine, Expose Machine, Expose Machine, Color Mixer Machine, Hand Color Mixer M/C, Hot Air Gun, Oven Dryer Machine, Balance Machine, Shade Light Box, Xante En/Press, Single Needle Lock Stitch Plain Machine, Single Needle Chain Stitch Plain Machine, Single Needle V Cutting, Two Needle Lock Stitch Machine, 4 Needle Over Lock Machine, Flat Lock Small Cylinder Bed, Flat Lock Cylinder Bed W.B, Flat Lock Small Cylinder Bed, Flat Lock Cylinder Bed, Flat Lock Cylinder Bed Rear Roller , F/L Fb Lace Attaching, , Flat Lock Cylinder Bed, Flat Lock Cylinder Bed Hem, Bar Tack Machine, Zig Zag Machine, Design-Zig Zag Machine, Velcro Attach Machine, Cylinder Bed Interlock Sewing Machine-Vt, Flat Lock Fb-F-Set Binding Machine, Flat Lock Fb-F-Set Binding Machine, Flat Lock Cb-Lc Hemming With Walking Feed, Flat Lock Cb-Lc Hemming Standard Feed, Flat Lock Scb-Lc Hemming With Top Feed, Fd 4 Needle 6 Thread Flat Scammer, Multi Needle Flatbed Top Seamer, Multi Needle Cylinder Bed Top Seamer, Multi Needle Cylinder Bed Top Seamer, Scallop Binding Machine, Picot Machine, Feed Of Arm 2 Needle, Pattern Sewer Machine, Buttonhole Machine, Lockstitch Button Sewer, Bar Tacker Machine, Thread Winder, Button Pull Test Machine, Automatic Snap Attaching Machine, Automatic Snap Attaching Machine, Cloth Cutting Mc, Compact Fusing, Band Knife, Fabric End Cutter, Auto Spreading, Fabric Relax, Fabric Rolling, Fabric Inspection, Manual Spreading, Regulating Cm, Band Cutting Machine, Metal Detector, Thread Suction, Iron Table, Digitizer, Inkjet Plotter, Electric Grinder, Metering Device, Knitting Machine

**Chemical used:**

PLACEMENT PRINT-AFWL, PLACEMENT PRINT-AFWL, Decoloring Agent, Poly Aluminum Chloride (PAC), Super Floc C-492 HMW, Super Floc C-496 HMW, Polyacrylamide, Urea,Caustic Soda LIQ, AFP-100, Aica (Frame) Glue, Aquasol TS, Bezafluor Blue BS-NF, Bezafluor Green BS-NF, Bezafluor Orange RS-NF, Bezafluor Pink BS-NF, Bezafluor Red RS-NF, Bezafluor Violet BR, Bezafluor Yellow BS-NF, Bezaprint Black DW, Bezaprint Blue RR, Bezaprint Blue TB, Bezaprint Green BT, Bezaprint Red SGR, Bezaprint Violet KB, Bezaprint Yellow RR, CTA-0100 Oxal, CTS-F680 Foaming Paste, Colormatch 102 Citron, DTR-101, Emulsion Hardener (A), Emulsion Hardener DI, Flock Green, Flock Powder Black, Flock Powder-Red, Flock White, Flock Yellow, Glitter Blue, Glitter Pink, Glitter Powder (Golden), Glitter Violet, Glitter-Black Color, Matclean PIR Liquid, Minerprint Binder NFO , Minerprint Clear Rubber EC, NX Evolution PC Pro Blue PF, NX Evolution PC Pro Magenta PF, NX Evolution PC Pro Orange PF, NX Evolution PC Pro Red 254 PF ,NX Evolution PC Pro Red X PF, NX Evolution PC Pro Red YS PF,NX Evolution PC Pro Violet PF, NX-6581 Optical White,NX-6835 Bash- H.D, Nk Binder R-5HN, PC-50, Polytex W-690, Premium Rubber White SXF-102 (Matt), Print Perfekt AM-1, Printperfekt

	<p>226 EC , Printperfekt 226 EC, Printperfekt Gloss, Rainbow Glitter, Reflective Powder, Rose Golden Glitter, SC-20C, SC-20W, STI 7160 Catalyststi SILICONE 7835 HIGH DENSITY BASE, STI Silicone 7581 White, STI Silicone 7701 Overprint Clear, STI Silicone 7711 Defender Black, STI Silicone 7838 HD Clear ,STI Silicone Reducer , Silkflex Aquasol Emboss EMB-501, Silk Flex Eco Oxal Fixer SU-400E, Silk Flex High Density Rubbeclear CHD-301, Silk Flex High Density Rubbewhite WHD-302, Silver Color Glitter, Texsol 499 TEX, Translac Bond 55, Tubiscreen GD 200.</p>
<p>J: What form of worker representation / union is there on site?</p>	<p><input checked="" type="checkbox"/> Union (name) Apex Holdings (Garments) Ltd. Sromik and kormochari Union Reg. no: Dhaka- 3275  <input type="checkbox"/> Worker Committee:  <input type="checkbox"/> Other (specify)  <input type="checkbox"/> None</p>
<p>K: Is there any night production work at the site?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No          Only Knitting section operates work in three shifts from 6:00 am to 2:00 pm, 2:00 pm to 10:00 pm and 10:00 pm to 06:00 am including 1-hour meal break.</p>
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No          If yes approx. % of workers in on site accommodation</p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No          If Yes approx. % of workers</p>
<p>N: Were all site provided accommodation buildings included in this audit</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No          If No, please give details: There is no accommodation buildings in this facility.</p>



Audit Parameters			
A: Time in and time out	Day 1 Time in: 9:30 hours Day 1 Time out: 16:30 hours	Day 2 Time in: NA Day 2 Time out: NA	Day 3 Time in: NA Day 3 Time out: NA
B: Number of auditor days used:	5 Man Days (Five auditors in one day)		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input 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: 4 weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 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. Md. Harun Or Rashid – DGM (Compliance)		
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:	Not Applicable		
J: Previous audit type:	Not Applicable		
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	The audited facility has trade union. Member of trade union was present during the meeting.		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	Not Applicable as Union representative was present during the opening meeting.		

## 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*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	1183	0	0	0	0	0	0	1183
Worker numbers – female	2714	0	0	0	0	0	0	2714
Total	3897	0	0	0	0	0	0	3897
Number of Workers interviewed – male	35	0	0	0	0	0	0	35
Number of Workers interviewed – female	40	0	0	0	0	0	0	40
Total – interviewed sample size	75	0	0	0	0	0	0	75



A: Nationality of Management	Bangladeshi	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: <u> Bangladeshi </u></p> <p>B2: Nationality 2: <u> NA </u></p> <p>B3: Nationality 3: <u> NA </u></p>	<p>Was the list completed during peak season?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Not applicable.</p> <p>Facility has no peak season. Their production capacity is round the year same.</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx. % total workforce: Nationality <u> 100% </u></p> <p>C1: approx. % total workforce: Nationality 2 <u> NA </u></p> <p>C2: approx. % total workforce: Nationality 3 <u> NA </u></p>	
D: Worker remuneration <i>(management information)</i>	<p>D: <u> NA </u> % workers on piece rate</p> <p>D1: <u> NA </u> % hourly paid workers</p> <p>D2: <u> 100 </u> % salaried workers</p> <p>Payment cycle:</p> <p>D3: <u> NA </u> % daily paid</p> <p>D4: <u> NA </u> % weekly paid</p> <p>D5: <u> 100 </u> % monthly paid</p> <p>D6: <u> NA </u> % other</p> <p>D7: If other, please give details</p>	



Worker Interview Summary

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: <i>(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)</i>	09 groups of 05
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 35      D2: Female: 40
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?	None.
I: What did the workers like the most about working at this site?	Overtime is fully voluntary, Wages are paid on time, working condition is hygienic, Benefits are provided more than law requirement and management are very supportive and well behaved.
J: Any additional comment(s) regarding interviews:	Most employees enjoyed working at this facility, they felt they had sufficient wage and had a good relationship with management in general.
K: Attitude of workers to hours worked:	Very favourable as total working hour is within their limit and overtime is fully voluntary.

L. Is there any worker survey information available?

Yes

No

L1: If yes, please give details:

M: Attitude of workers:

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

The employees were generally positive about their workplace; they got on well with workers and managers. They found management team positive and approachable.

The employees were assured of confidentiality, and they spoke freely of their views of the factory. All employees said they were satisfied with their employment at the factory, and they are provided wages as per their agreement. They felt free to leave this employer and understood the notice period required. The facility management treated them with respect.

Employees are able to complain directly to their welfare officer, compliance responsible person or line manager and also felt free to give their general concerns to their management representative.

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 Trade union members were positive about the facility and looking forward to developing relationships with the management team.

Trade union members' interviews were conducted privately in a separate place. The Trade union members replied naturally regarding their responsibilities as Trade union member, and they also informed that they can easily carryout their daily job without any difficulties.

O: Attitude of managers:

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

The facility management showed a positive attitude to this audit and during the whole audit Mr. Md. Harun Or Rashid – DGM (Compliance) along with his team was present through the audit process and co-operated the whole audit. Facility management respected clients' requirement and allowed auditors to take photographs of all production process, best practices and also non-conformities. They also provided photocopy of required documents and allowed auditors to interact with the employees confidentially. At the closing meeting, the facility management agreed with all the findings and suggested corrective actions. The factory management had a system in place to check their current practices against their clients' requirements and the local law, and they took notice of the findings of the internal audit team and also have a Health & Safety committee to take care of health and safety concerns.



## Audit Results by Clause

0A: Universal Rights covering UNGP

### 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:

- The responsible person for implementation and monitoring Mr. Md. Harun Or Rashid – DGM (Compliance)
- The facility has policy and procedures for human rights.
- The facility communicates this code of conduct to the employees through notice board and orientation training.
- It is communicated to all appropriate parties, including suppliers through the responsible person.

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

#### Details:

- Facility code of conduct.
- Written policies and procedure that being provided individually to employees.
- Management, employee training / meeting records.
- Last orientation training was held on 06 November 2022 with 28 members.

Any other comments: None.

A: Policy statement that expresses commitment to respect human rights?

Yes

No

A1: Please give details: (mainly applicable for the parent company):

	The facility has a social compliance policy which is a commitment to respect human 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: The facility has a designated person who responsible for implementing standards concerning Human Rights. Name: Mr. Md. Harun Or Rashid – DGM (Compliance)
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 facility has an independent compliance team for reporting and dealing with human rights impact without fear and it is a completely transparent system.
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:
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: The facility uses software for keeping privacy of workers information. Moreover, facility has an IT policy for data safety.

Findings	
Finding: 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> Not Applicable.  <b>Comments:</b> None	<b>Objective evidence observed:</b> None observed.

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

## Measuring Workplace Impact

Measuring Workplace Impact Table

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: November 2020 to October 2021: 02 %	A2: This year: November 2021 to October 2022: 03 %
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]	August to October 2022: 04 %	
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: November 2020 to October 2021: 02 %	C2: Last year: November 2021 to October 2022: 02 %
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	December 2021 to February 2022: 01 %	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: All the minor and major injuries are recorded in an injury register. Last injury was on 31 October 2022. Which was minor cutter injury in right hand finger by Needle.	
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: November 2020 to October 2021: 0.9 %	F2: This year: November 2021 to October 2022: 1.2 %
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]	December 2021 to February 2022: 0.3 %	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents & work related injuries * 100) / Number of total workers]	H1: Last year: November 2020 to October 2021: 0.6 %	H2: This year: November 2021 to October 2022: 0 %
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0 % workers	I2: 12 months 0 % workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 0 % workers	J2: 12 months 0 % workers

0B: Management systems and Code Implementation

**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:**

- Responsibility for meeting the legal and client code requirements is taken Mr. Md. Harun Or Rashid – DGM (Compliance)
- The facility communicates this Code to all employees by training as confirmed by training records and employee interviews.
- The ETI based code was posted on-site for employee's review.
- The facility had set up policy and pointed one staff to update labour law requirements.
- Implementation of any necessary changes is then given to the individual department heads after agreement with the facility manager.
- Social compliance policy statement appropriate for the nature of the facility's operation and aligned with the company's vision and an integral part of the company's strategy.
- Facility conducts periodic assessments of its social compliance system to identify improvement opportunities.
- The facility conducts orientation training for all new employees.

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

Details:

- Employee handbook.
- Facility Code of Conduct (COC).
- All policies of facility.
- Legal license (Factory, Fire, Trade)
- Internal audit records.
- Meeting records.
- Internal audit records
- Management, employee training / meeting records

Any other comments: None.

<b>Management Systems:</b>	
<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>A1: Please give details: The site has not been subject to any fines/prosecutions for non-compliance to any regulations in the last 12 months.</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>B1: Please give details: It was noted through documentation review that facility has policies and procedures for forced labour, child labour, discrimination, harassment &amp; abuse.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Facility provides training on forced labour, child labour, discrimination, harassment &amp; abuse on monthly basis to the management level employees. Moreover, no forced labour, child labour, discrimination, harassment &amp; abuse was found during facility tour and employee interview.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: Please give details: Managers were provided training for forced labour, child labour, discrimination, harassment &amp; abuse on Mid-level Management training. Last Mid-level Management training was held on 06 November 2022 with 40 participants and conducted by Deputy Manager.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details: Training records were found including picture and attendance sheet.</p>
<p>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).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F1: Please give details: Facility has BSCI (Validity till 26 January 2023), WRAP (Validity till 13 March 2023), GRS (Validity till 07 August 2023), RCS (Validity till 07 August 2023), OCS (Validity till 07 August 2023), GOTS (Validity till 07 August 2023), HIGG (Validity till 26 June 2023).</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>G1: Please give details: There is 20 members in Human Resources department which is headed</p>

	by Mr. S.M. Shaokat Manager, HR & Compliance.
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. Md. Harun Or Rashid – DGM (Compliance)
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: The facility has an IT security policy which ensures worker information is confidential.
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: The facility has an effective key control procedure to keep the information confidential.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility's risk assessment was according to law. Last risk assessment was conducted on 25 August 2022.
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 L1: Please give details: The facility has an internal system to raise the issue found in risk assessment and to implement the way of reducing it.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Facility has a supplier selection policy which ensures labour standard of its own supplier.
<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 facility has all the required licenses and permissions as per legal requirements.
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: the facility has anti-corruption committee, anti-bribery policy to support due diligence in applying national laws and practices relating to land title.
P: Does the site have a written policy and procedures specific to land rights.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No



<p>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</p>	<p>P1: If yes, how does the company obtain FPIC:</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Q1: Please give details: The facility has ownership of the building maintaining all legal procedure and no expansion was conducted.</p>
<p>R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  R1: Please give details: The facility maintaining all legal procedure and specific land acquisition were considered to avoid or minimize adverse impacts.</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  S1: Please give details: No illegal appropriation of land for facility building or expansion of footprint.</p>

Non-compliance:	
<p><b>Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI/Additional Elements      <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>                  None required</p> <p><b>Recommended corrective action:</b>                  Not applicable</p>	<p><b>Objective evidence observed:</b>                  (Where relevant please add photo numbers)</p> <p>None</p>

Observation:	
<p><b>Description of observation:</b> None observed.</p> <p><b>Local law or ETI requirement:</b> Not applicable</p> <p><b>Comments:</b> None.</p>	<p><b>Objective evidence observed:</b> None observed.</p>

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

1: Employment is Freely Chosen

<p><b>1: Freely Chosen Employment</b>  <a href="#">(Click here to return to summary of findings)</a></p>
<p><b>ETI</b></p> <p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>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.</p>

<p><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></p> <ul style="list-style-type: none"> <li>• The facility has a policy which prohibits forced labour, and this was also available for review.</li> <li>• Age verification documents (National ID card copy, educational certificate, nationality certificates) were available in employee personal files.</li> <li>• Service book is provided to every employee.</li> <li>• Overtime is voluntary.</li> <li>• The terms and conditions of employment state that the employees are free to leave the workplace outside of their working hours. Facility also has a written policy regarding this.</li> <li>• Work tools, PPE, IC/staff card, training, etc. are provided without payment.</li> <li>• The facility does not implement prison labour.</li> <li>• The above was confirmed in management and employee interview.</li> </ul> <p><b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b></p> <p>Details:</p> <ul style="list-style-type: none"> <li>• Facility policy and procedure</li> <li>• Sample employee personal files.</li> <li>• Service book</li> <li>• Employee hand book</li> </ul> <p>Any other comments: None</p>

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  If yes, please give details and category of workers affected:</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  If yes, please give details and category of workers affected:</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  If yes, please give details and category of workers affected:</p>

<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  Please describe finding:                   Facility has a policy mentioning Workers are free to terminate employment from the facility.</p>
<p>E: If any part of the business is UK based or registered there &amp; has a turnover over £36m, is there is a published 'modern day slavery statement.</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                  Please describe finding:   <input checked="" type="checkbox"/> Not applicable                  Yearly production turnover is 25 million USD.</p>
<p>F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the workday?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  Please describe finding: The employees can leave their workplace after their respective duties.</p>
<p>G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  If yes, please give details and category of workers affected:                   Facility has established forced labour and bonded labour policy; even though they have no such type of labour.</p>
<p>H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please describe finding:                   The facility has policy on forced/trafficked labour to raises awareness among employees. The facility communicates it through notice board on production floor. Overtime is totally voluntary. Employees can leave their workplace freely after their respective jobs.</p>

<b>Non-compliance:</b>	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI/Additional Elements <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> Not applicable</p> <p><b>Recommended corrective action:</b> None</p>	<p><b>Objective evidence observed:</b>  None observed</p>

**Observation:**

<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI requirement:</b> Not applicable</p> <p><b>Comments:</b> None</p>	<p><b>Objective evidence observed:</b> None observed</p>
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<p><b>Good Examples observed:</b></p>	
<p>Description of Good Example (GE): None observed</p>	<p><b>Objective evidence observed:</b> None observed</p>

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

**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:**

- All the employees are allowed to form or join the trade union of their own choice.
- There is one trade union in the facility (Name: Apex Holdings (Garments) Ltd. Sromik and kormochari Union), Reg. no: Dhaka- 3275
- Trade Unions were elected on 23 October 2020
- There are 10 members in the trade union.
- Trade Union members are not treated less favourably than other workers and are allowed to carry out their duties within working hours without affecting their remuneration.

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

Details:

- Freedom of association policy review.
- Trade Union registration document.
- Trade Union formation records
- Trade Union member interview.
- Trade Union meeting attendance register.

Any other comments: None

A: What form of worker representation/union is there on site?

- Union (name) Apex Holdings (Garments) Ltd. Sromik and kormochari Union. Reg. no: Dhaka- 3275
- Worker Committee:
- Other (specify)
- 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details:  Facility has an effective grievance handling procedure. Workers can submit their grievance verbally or in written through welfare officer or complaint box.  D2: Is there evidence of free elections? <input type="checkbox"/> Yes <input checked="" 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: Facility has a policy regarding Freedom of Association. The union members are involved in the development part of the facility. Besides, facility conducts regular meetings with the members of trade unions and the meeting minutes were communicated with the workers through notice board	
F: Name of union and union representative, if applicable:	Apex Holdings (Garments) Ltd. Sromik and kormochari Union. Reg. no: Dhaka- 3275	F1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Not applicable.	G1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	H1: Trade Union members name with picture are posted in the notice board.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 23 October 2020.
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	J1: Meeting minutes are posted 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: 02	
L: Please describe any evidence that union/worker's committee is effective?	The formation of the trade union held on 23 October 2020 Each meeting of trade union is conducted with two-month interval as per Bangladesh local law, Last meeting was on 09 September 2022 and the agenda were-	



Specify date of last meeting; topics covered; how minutes were communicated etc.	<ol style="list-style-type: none"> <li>1. Discuss about previous meeting minuetts.</li> <li>2. Discuss about new labor law Amendment</li> <li>3. Others</li> </ol>	
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: ___% workers covered by Union CBA Not applicable	M2: ___% workers covered by worker rep CBA Not applicable
M3: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable	

Non-compliance:	
<b>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> Not applicable  <b>Recommended corrective action:</b> None observed	<b>Objective evidence observed:</b> <i>(Where relevant please add photo numbers)</i>  None observed

Observation:	
<b>Description of observation:</b> None observed  <b>Local law or ETI requirement:</b> Not applicable  <b>Comments:</b> None	<b>Objective evidence observed:</b> None observed

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

3: Working Conditions are Safe and Hygienic

**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:**

**1. General Health and Safety management**

- Mr. Maien Uddin Ass. Manager looks after Health & Safety issues for the site.
- Ventilation, temperature, and lighting were adequate for the production processes.
- Potable water was freely available in all areas and last drinking water test has been done on 30 May 2022 by Bangladesh University of Engineering and Technology (BUET).
- Sufficient clean toilets segregated by gender were available at all times for workers. There are 122 male toilets & 244 female toilets.
- Minutes of meetings show that there is monthly H&S committee meeting. Last meeting on 22 September 2022 with 12 participants.

**2. Fire Safety**

- There are 02 or more exit in each room.
- Firefighting equipment was adequate, and checks were up to date. Facility checked all fire equipment monthly schedules wise. Last fire equipment test was on 01 November 2022.
- The facility management posted the evacuation plans on every production floors/ shed with local language.
- Public Address system, fire hose found active throughout the facility.
- Facility has a firefighting team of 350 members and 350 rescuers, most of them are trained by Fire Service & Civil Defence authority. Some of the members had training internally.
- Facility has several fire safety equipment including but not limited to DCP extinguisher, CO2 extinguisher, foam extinguisher, helmet, bucket, blanket, stretcher, fire bitter, fire hook, lock cutter, gas mask, eye goggles, fire alarm control panel, smoke- heat -multi detectors, manual call point, sounders, hose pipe etc.

**Fire drill Information:**

Last fire drill	Date	Time took	Employee was present	Fire drill monitored by
Day	18 August 2022	05 min 40 sec	4520	Fire safety officer
Night	31 October 2022	4 min 15 Sec	441	Fire safety officer
FSCD	22 September 2022	05 min 25 sec	4728	Warehouse Inspector Fire service and Civil Defense

### 3. Electrical, Machine & fire safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- Facility has 16 electrician and 04 boiler operators who checks and does inspection, roster wise for whole facility.
- Facility has 04 gas generators and 03 gas boilers.
- Facility checks all electric channels, electrical distribution board and electric connection daily and monthly schedule wise.

#### Electrical equipment checking information:

(Name) Inspection record	Last inspection date (Internal)	Internal check done by (designation)	Frequency of inspection (Internal)
Boiler	30-10-2022	Boiler Operator	Daily
Compressor	20-11-2022	Electrical Supervisor	Daily
Generator	05-11-2022	Generator operator	Daily
Distribution Board	24-22-2022	Electrician	Weekly
Machine	11-11-2022	Operator	Weekly

### 4. Chemical safety

- Facility uses hazardous chemicals for their production process maintaining safety measures.
- Material Safety Data Sheets were found for all other chemicals.

### 5. Medical services

- There were 54 first aid boxes with sufficient kits in the full facility.
- There were 126 internal first aid certified responders.
- Facility has 02 appointed Doctor 01 Nurse and 04 Medical assistant who are available in working time of the facility. They also arranged monthly first aid training with first aider. Last training was on 02 November 2022 with 61 participants.
- In the medical room they have more than 06 beds segregated for male and female.

### 6. Dormitory

- Facility didn't provide dormitory facilities to any employees.

### 7. Facility provide bellow training to employees:

Training Type	Last Date of training	Participant	Trainer Designation	Frequency of training
---------------	-----------------------	-------------	---------------------	-----------------------

Orientation Training to factory rules	06-11-2022	28	Welfare Officer	As required
Fire Fighting Training (Internal)	19-11-2022	66	Fire Safety Officer	As required
Fire Fighting Training (External)	15&16-06-2022	40	Warehouse Inspector	As required
First Aid Training	02-11-2022	61	Doctor	As required
PPE Training	16-11-2022	66	Deputy Manager	As required
Mid-level management Training	06-11-2022	40	Deputy Manager	As required
Health & Safety Training	16-11-2022	66	Deputy Manager	As required
Chemical Handling Training	05-11-2022	72	Deputy Manager	As required
Wastage handling Training	03-11-2022	60	Welfare officer	As required
Grievance	01-11-2022	65	Executive	As required
Environmental Health & safety	07-11-2022	57	Sr. Executive	As required

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

Details:

- License review: Fire license
- Building approval plan
- Group insurance
- Water test report
- Injury record and analysis report
- Machine and electric maintenance record
- Risk assessment report
- Training record: Fire training, First aid training, PPE training, Health and safety training
- Fire drill record
- Health and safety committee record
- Electric installation checking record
- Training records and certificates
- Fire equipment maintenance records
- Accident reports
- Chemical list and MSDS for each chemical
- Health and safety policy
- Potable water testing certificates

Any other comments: None.

<p>A: Does the facility have general and occupational Health &amp; Safety policies and procedures that are fit for purpose</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
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<p>and are these communicated to workers?</p>	<p>Details: The facility has general health &amp; safety and Occupational Health &amp; Safety policy and procedures which are fit for purposes and these policies are communicated through orientation training.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: The facility provides workers manual to the workers where all the policies and applicable govt. law are included.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Details: No additional structures were found without building construction approval.</p>
<p>D: Are visitors to the site informed on H&amp;S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: All the visitors to the site are informed on H&amp;S and provided with personal protective equipment where necessary.</p>
<p>E: Is a medical room or medical facility provided for workers?</p> <p>If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The facility has medical facility for the employees. Equipment's are provided as per legal requirements.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Facility has 02 appointed Doctor 01 Nurse and 04 Medical assistant who are available in working time of the facility. They also arranged monthly first aid training with first aider. Last training was on 02 November 2022 with 61 participants.</p>
<p>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?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Facility provides transport facility to the employees.</p>
<p>H: Is secure personal storage space provided for workers in their living space and is it fit for purpose?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: The facility provides personal storage space for all the employees, and they are fit for purposes.</p>

<p>I: Are H&amp;S Risk assessments conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Details: Risk assessment was conducted according to law. Last risk assessment was conducted on 25 August 2022.</p>
<p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please describe:                  The facility management has conducted noise and air quality assessment as required by law. The assessments were done by Greentech on 22 August 2022.</p>
<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please describe: The facility meets all legal obligations on environmental requirements including required permits for use and disposal of natural resources like gas, water etc.                  The facility management has conducted wastewater test. The test was done by Burau Veritas on 20 June 2022.</p>

**Non-compliance:**

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

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

It was noted through facility tour that, 10% eye guards of overlock machines were found displaced from its position at sewing sections located at 2<sup>nd</sup> & 3<sup>rd</sup> floor of production building no-1.

**Local law and/or ETI requirement**

**Working condition are safe and hygienic, ETI Base Code 3.1:**

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

**In accordance with Bangladesh Labour Rules 2015, Section 64 (2):**

Effective machine guard or eye safety goggles must be installed/used in all cases where the possibility of having injuries in the eye is high.

**Recommended corrective action:**

It is recommended that the facility should ensure the proper use of the mentioned machine safety guards.

**2. Description of non-compliance:**

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

It was noted through facility tour that:

-03 Out of 10 aisles were partially blocked with finished goods & trolley located at sample section of the 4<sup>th</sup> floor of the building 01.

-02 out of 05 aisles were partially blocked with fabric rolls & trolley located at fabric store at the 3<sup>rd</sup> floor of the building 01

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

**Working condition are safe and hygienic, ETI Base Code 3.1:**

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

**In accordance with Bangladesh Labour Law 2006, Section 72 (c):**

All floors, ways and stairways shall be clean, wide and clear of all obstructions.

**Recommended corrective action:**

It is recommended that facility should keep all escape routes free of obstacles.

**Objective evidence observed:**

*(where relevant please add photo numbers)*

1. Through facility visit  
NC photo: 01

2. Through facility visit  
NC photo: 02



<p><b>3. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input checked="" type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p>It was noted through facility visit, review of approved plant layout and management interview that the approved layout plan found mismatched with current floor use. The approved layout plan shows the staff dining areas at shed 06 which is missing and there storing few civil constructional materials and currently staff dining area found at 2<sup>nd</sup> floor of building-03 which is not mentioned in approved layout plan.</p> <p><b>Local law and/or ETI requirement</b>  <u>Working condition are safe and hygienic, ETI Base Code 3.1:</u>  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.</p> <p><u>In accordance with Bangladesh Labour Rules 2015, Rule 353 (1)</u>  Before use, change or expansion of any houses, building or premises as factory, approval in writing of the inspector general or any officer empowered by him shall be taken. Provided, however, that the inspector general or any officer empowered by him shall not sanction any approval without any inspection on the spot.</p> <p><b>Recommended corrective action:</b>  It is recommended that facility should ensure proper layout plan accordingly.</p>	<p>3. Through document review and management interview.</p>
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Observation:	
<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI requirement:</b> Not applicable</p> <p><b>Comments:</b> None</p>	<p><b>Objective evidence observed:</b></p> <p>None observed</p>

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

4: Child Labour Shall Not Be Used

**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:**

- The facility has established a practice that they will never employ and use any child labour.
- The facility verifies all workers' original national ID card, birth certificate, school certificate etc. at the time of recruitment and keeps the photocopies of workers' ID cards, birth certificate in their personal files.
- Facility verifies the workers age through registered doctors.
- Sampling basis employees' personal files was taken for review. Each employee file included a bio-data sheet,
- Recent photo, birth registration certificate / photo-copied national identification card and other documents.
- There was no child or young employee observed in the facility.
- Age of youngest worker found 19 years.

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

Details:

- Recruitment policy
- Policy on No-Child labour
- Personal file including Birth certificate, primary/secondary education certificate, national ID card, etc. of sample employees
- Age verification documents

Any other comments: None

A: Legal age of employment:	18
B: Age of youngest worker found:	19 years
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 %

<p>E: Are workers under 18 subject to hazardous work assignments?  <a href="#">(Go to clause 3 – Health and Safety)</a></p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  E1: If yes, give details: Not applicable as the facility did not recruit workers under 18 ages.</p>
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Non-compliance:	
<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>  Not applicable</p> <p><b>Recommended corrective action:</b>  Not applicable</p>	<p><b>Objective evidence observed:</b>  <i>(Where relevant please add photo numbers)</i></p> <p>None observed</p>

Observation:	
<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI requirement:</b> Not applicable</p> <p><b>Comments:</b> None</p>	<p><b>Objective evidence observed:</b></p> <p>None observed</p>

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

5: Living Wages are paid

**5: Living Wages are Paid**

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

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

**ETI**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- The facility is providing more than local legal minimum wage BDT 8000/month for all the employees.
- Time keeping system is electronic face detection and card punch.
- All workers are 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.
- Benefits of paid, annual leave; maternity benefit to appropriate workers.
- All social insurance payments were passed on to the relevant authorities in a timely manner.
- Employees are aware of their minimum wage.
- The payment done by Mobile financing system.
- Wages have been recorded according to documents checked.
- There are some good practices by the facility; see below Good Example section.
- Salary sheet and timecard review: November 2021– October 2022.

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

Details:

- Salary sheet review
- Overtime payment record review
- Payslip review
- Attendance register review
- Production record review
- Maintenance register review
- Maternity benefit register review
- Leave record review
- Final settlement record review

Any other comments: None

Non-compliance:	
<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>                      Not applicable</p> <p><b>Recommended corrective action:</b>                      Not applicable</p>	<p><b>Objective evidence observed:</b>                      (Where relevant please add photo numbers)</p> <p>None observed</p>

Observation:	
<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI requirement:</b> Not applicable</p> <p><b>Comments:</b> None</p>	<p><b>Objective evidence observed:</b></p> <p>None observed</p>

Good Examples observed:	
<p><b>Description of Good Example (GE):</b></p> <ul style="list-style-type: none"> <li>Facility provides attendance bonus to all employees as per company policy.</li> <li>Facility has a free medical consultancy to family members of their worker.</li> </ul>	<p><b>Objective Evidence Observed:</b>                      Document review (salary sheet), management and worker interview.</p>

**Summary Information**

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 08 hours per day 48 hours per week 208 hours per month	A1: 08 hours per day 48 hours per week 208 hours per month (For all sample months)	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Not mandatory by Local Law)
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	As per Circular on 06 November 2022 from Bangladesh	02 hours/day, 12 hours/week in October 2022	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	Labour and Employment Ministry; Facility can do 4 hours overtime in a day and 24 hours overtime in a week with the consent of employees which is valid from 17 October 2022 to 16 April 2023.	(Current Paid Month) 02 hours/day, 12 hours/week in May 2022 (Random Month) 02 hours/day, 12 hours/week in December 2021 (Random month).	(Not mandatory by Local Law)
C: wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: BDT 8000.00 per month	C1: BDT 8000 in the month of October 2022	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Not mandatory by Local Law)
D: overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: Per hour 200% of basic hourly rate	D1: Per hour 200% of basic hourly rate	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Not mandatory by Local Law)

Wages analysis:

<p><b>Wages analysis:</b> <i>(Click here to return to Key Information)</i></p>	
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If <b>No</b> , why not?	Not applicable
B: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	75 samples from October 2022 (Currently Paid Month) 75 samples from May 2022 (Random Month) 75 samples from December 2021 (Random Month)

<p>C: Are there different legal minimum wage grades? If <b>Yes</b>, please specify all.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>C1: If <b>Yes</b>, please give details:          The Government announced pay structure on 24th January 2019 for the workers of the Garments Industries with effect from December 2018.</p> <table border="1" data-bbox="547 353 1469 842"> <thead> <tr> <th>Grades</th> <th>Basic wage (BDT)</th> <th>House rent (50% × basic) (BDT)</th> <th>Meal (BDT)</th> <th>Medical (BDT)</th> <th>Travel (BDT)</th> <th>Gross monthly wage (BDT)</th> </tr> </thead> <tbody> <tr> <td>Grade 1</td> <td>10938</td> <td>5469</td> <td>900</td> <td>600</td> <td>350</td> <td>18257</td> </tr> <tr> <td>Grade 2</td> <td>9044</td> <td>4522</td> <td>900</td> <td>600</td> <td>350</td> <td>15416</td> </tr> <tr> <td>Grade 3</td> <td>5330</td> <td>2665</td> <td>900</td> <td>600</td> <td>350</td> <td>9845</td> </tr> <tr> <td>Grade 4</td> <td>4998</td> <td>2499</td> <td>900</td> <td>600</td> <td>350</td> <td>9347</td> </tr> <tr> <td>Grade 5</td> <td>4683</td> <td>2342</td> <td>900</td> <td>600</td> <td>350</td> <td>8875</td> </tr> <tr> <td>Grade 6</td> <td>4380</td> <td>2190</td> <td>900</td> <td>600</td> <td>350</td> <td>8420</td> </tr> <tr> <td>Grade 7</td> <td>4100</td> <td>2050</td> <td>900</td> <td>600</td> <td>350</td> <td>8000</td> </tr> <tr> <td>Apprentice</td> <td>2750</td> <td>1375</td> <td>900</td> <td>600</td> <td>350</td> <td>5975</td> </tr> </tbody> </table>	Grades	Basic wage (BDT)	House rent (50% × basic) (BDT)	Meal (BDT)	Medical (BDT)	Travel (BDT)	Gross monthly wage (BDT)	Grade 1	10938	5469	900	600	350	18257	Grade 2	9044	4522	900	600	350	15416	Grade 3	5330	2665	900	600	350	9845	Grade 4	4998	2499	900	600	350	9347	Grade 5	4683	2342	900	600	350	8875	Grade 6	4380	2190	900	600	350	8420	Grade 7	4100	2050	900	600	350	8000	Apprentice	2750	1375	900	600	350	5975
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Grade 7	4100	2050	900	600	350	8000																																																											
Apprentice	2750	1375	900	600	350	5975																																																											
<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>D1: If <b>No</b>, please give details: Not applicable</p>																																																															
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i></p> <p>Lowest gross salary is 8000.00 BDT In the Month of October 2022 from sample employees</p>																																																															
<p>F: Please indicate the breakdown of workforce per earnings:</p>		<p>F1: 0 % of workforce earning under minimum wage          F2: 10 % of workforce earning minimum wage          F3: 90 % of workforce earning above minimum wage</p> <p>75 samples from October 2022 (Currently Paid Month)          75 samples from May 2022 (Random Month)          75 samples from December 2021 (Random Month)</p>																																																															
<p>F: Bonus scheme found: Please specify details:</p>		<p>Bonus Scheme found:  <i>Note: full time employees and please state hour / week / month etc.</i>          Festival bonus: Facility provides festival bonus to all employees as per company policy.</p>																																																															
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>		<p>As per section 125 of the Bangladesh Labour Law, 2006, facility may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc.          As per Bangladesh Stamp Act 1899 (Amendment 2022) factory may deduct BDT 20 for Government Revenue Stamp.</p>																																																															



<p>I: Have these deductions been made? Please list all deductions that have/have not been made.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Please list all deductions that <b>have</b> been made.</p>	<p>1. Deduction is only made for un-authorized absent</p>
		<p>Please list all deductions that <b>have not</b> been made.</p>	<p>1. Housing facility,          2. Loans,          3. Income tax,          2. Fines,          3. Provident fund which is done as per law. etc.</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type  <input type="checkbox"/> Poor record keeping  <input type="checkbox"/> Isolated incident  <input type="checkbox"/> Repeated occurrence:</p>	
<p>L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>L1: Please give details: The facility shows all real records which reflect all scenarios.</p>		
<p>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></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>M1: Please specify amount/time:           Facility did not define living wages as it is not required by law. However, facility is providing the minimum wage as per published Government Minimum Wages on 24 January 2019.</p>		
<p>If yes, what was the calculation method used.</p>	<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 Other – please give details: Not applicable
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: Please give details: There are no periodic reviews of wages.
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No All employees are paid within 07 working day of the following month. Last payment was done on 06 November 2022 by mobile financing system.
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: Through payroll records review and employee's interviews' interview, it was confirmed that equal rates are being paid for equal work.
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input checked="" type="checkbox"/> Other Q1: If other, please explain: All workers are paid by mobile financing system.

6: Working Hours are not Excessive

**6: Working Hours are not Excessive**

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

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**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:**

- Through employees' interview, overtime is voluntary.
- Time keeping system is electronic face detection and card punch.
- All overtime is compensated at a premium rate for all employees.
- Facility has weekly holiday on Friday, only Knitting section workers get one day off in a week according with roaster basis.
- Salary sheet and timecard review: November 2021 to October 2022.
- 

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

Details:

- Employees' interviews
- Management interview
- Local laws
- Facility policy on working hours

<ul style="list-style-type: none"> <li>• Salary sheet</li> <li>• Payslip</li> <li>• Job card</li> <li>• Attendance register</li> <li>• Production record</li> <li>• Quality and production records to cross check hours</li> </ul> <p>Any other comments: None</p>
--

Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI/Additional Elements <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> Not applicable</p> <p><b>Recommended corrective action:</b> None</p>	<p><b>Objective evidence observed:</b> None observed</p>

Observation:	
<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI requirement:</b> Not applicable</p> <p><b>Comments:</b> None</p>	<p><b>Objective evidence observed:</b> None observed</p>

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

Working hours' analysis

Working hours' analysis	
<p>Please include time e.g. hour/week/month  <a href="#">(Go back to Key information)</a></p>	
Systems & Processes	
<p>A. What timekeeping systems are used: time card etc.</p>	<p>Describe: Card punch &amp; face detection system</p>
<p>B: Is sample size same as in wages section?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <i>B1: If no, please give details</i></p>

<p>C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>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:</p>				
<p>D: Are there any other types of contracts/employment agreements used?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>D1: If YES, please complete as appropriate:</p>				
		<table border="1"> <tr> <td><input type="checkbox"/> 0 hrs</td> <td><input type="checkbox"/> Part time</td> <td><input type="checkbox"/> Variable hrs</td> <td><input type="checkbox"/> Other</td> </tr> </table>	<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other	
		<p>If "Other", Please define:</p>				
<p>Not applicable</p>						
<p>E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>E1: If yes, please detail hours, %, types of workers affected and frequency</p> <p>Please give details: Not applicable</p>				
<p>F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?</p>	<p>F2: Please select all applicable:</p> <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	<p>F3: Is this allowed by local law?</p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
	<p>Maximum number of days worked without a day off (in sample):</p>					
	<p>06 Days</p>					
<p><b>Standard/Contracted Hours worked</b></p>						
<p>G: Were standard working hours over 48 hours per week found?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>G1: If yes, % of workers &amp; frequency:</p> <p>Not applicable</p>				
<p>H: Any local waivers/local law or permissions which allow averaging/ annualised hours for this site?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>H1: If yes, please give details:</p> <p>As per Circular on 06 November 2022 from Bangladesh Labour and Employment Ministry; Facility can do 4 hours overtime in a day and 24 hours overtime in a week with the consent of employees which is valid from 17 October 2022 to 16 April 2023.</p> <ul style="list-style-type: none"> <li>•OT should be paid at the rate of 200% of regular WH.</li> <li>•Overtime should be voluntary.</li> </ul>				

		<ul style="list-style-type: none"> <li>• Weekly day off to be ensured.</li> <li>• BLL 2006, Amendment 2018 and BLR 2015 should be followed.</li> </ul>
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 02 hours/day, 12 hours/week in October 2022 (Current Paid Month) 02 hours/day, 12 hours/week in May 2022 (Random Month) 02 hours/day, 12 hours/week in December 2021 (Random month).	
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:	___80__%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	<i>L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:</i>  Based on employees' interviews, employee can do overtime as per their willingness and it's not mandatory. Facility management never forces employees to do overtime.
<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	<i>M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages:</i>  200% of Standard wages.
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<i>N1: If yes, please describe % of workers &amp; frequency:</i>  Overtime payments for employees are as per legal requirement.  100% employees were getting overtime premium (200% of basic wage) as per legal requirement.
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please	<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	

<p>complete the boxes where relevant.</p>	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<p>Not applicable</p> <p><input checked="" type="checkbox"/> <b>Overtime is voluntary</b></p> <p><input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week</p> <p><input type="checkbox"/> Safeguards are in place to protect worker's health and safety</p> <p><input type="checkbox"/> Site can demonstrate exceptional circumstances</p> <p><input type="checkbox"/> Other reasons (please specify)</p> <p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> <p>As per Circular on 06 November 2022 from Bangladesh Labour and Employment Ministry; Facility can do 4 hours overtime in a day and 24 hours overtime in a week with the consent of employees which is valid from 17 October 2022 to 16 April 2023.</p>
<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>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Q1: If yes, please give details: Not Applicable</p>
<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>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>

7: No Discrimination is practiced

**7: No Discrimination is Practiced**

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**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 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.
- There was no evidence of sexual harassment.
- There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
- The factory provides the same wage amount to all employees of the same rank.
- There is no restriction for formation of trade union in the factory.

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

Details:

- Policy of Anti-Discrimination.
- Recruitment policy.
- Training record.
- Termination records.
- Female employee rights

Any other comments: None.

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: <u>93</u> % A2: Female <u>07</u> %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	0 No such women is present in this facility.
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: No such evidence found.
--	---

**Professional Development**

A: What type of training and development are available for workers?	Orientation Training First Aid Training PPE Training Chemical Handling Training Fire Fighting Training Health & Safety training Mid-level management Training Aids/HIV Training Chemical Handling Training Wastage handling Training Grievance Training Environmental Health & safety 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/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed  <b>Local law and/or ETI requirement:</b> Not applicable  <b>Recommended corrective action:</b> None	<b>Objective evidence observed:</b>  None observed

Observation:	
<b>Description of observation:</b> None observed  <b>Local law or ETI requirement:</b> Not applicable  <b>Comments:</b> None	<b>Objective evidence observed:</b> None observed

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

8: Regular Employment Is Provided

**8: Regular Employment Is Provided**

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**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:**

- All employees were recruited by the factory directly.
- No labour agency was used to hire workers. No temporary worker, apprenticeship schemes or home worker was identified by the auditors.
- No subcontractors were used.
- All employees are getting signed labour contract and ID card during their recruitment.
- Facility maintains service books for all employees.

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

Details:

- Recruitment policy.
- Employees personal file.
- Appointment letter.
- Employee service book.
- New employee joining register.

Any other comments: None.

Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI/Additional Elements <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> Not applicable</p> <p><b>Recommended corrective action:</b> None</p>	<p><b>Objective evidence observed:</b> None observed</p>

Observation:	
<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI requirement:</b> Not applicable</p> <p><b>Comments:</b> None</p>	<p><b>Objective evidence observed:</b> None observed</p>

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

### Responsible Recruitment

All Workers	
<p>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?</p>	<p><input checked="" type="checkbox"/> Terms &amp; Conditions presented  <input checked="" type="checkbox"/> Understood by workers  <input checked="" type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:</p>
<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>B1: If yes, please describe details and specific category(ies) of workers affected:</p>

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: Not applicable.
D: If any checked, give details:	Not applicable.

<b>Migrant Workers:</b>			
<i>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</i>			
A: Type of work undertaken by migrant workers:	There are no migrant workers in the facility.		
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: Not Applicable. B2: Total number of (outside of local country) recruitment agencies used: Not Applicable.		
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?	<table border="1" style="width: 100%;"> <tr> <td style="width: 50%;"> <input type="checkbox"/> Yes  <input type="checkbox"/> No                              C1: Please describe finding:                              Not Applicable.                         </td> <td style="width: 50%;"> <input type="checkbox"/> Yes  <input type="checkbox"/> No                              C1: Please describe finding:                              Not Applicable.                         </td> </tr> </table>	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not Applicable.	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not Applicable.
<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not Applicable.	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not Applicable.		
D: Are Any migrant workers in skilled, technical, or management roles  <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: If yes number and example of roles: Not Applicable.		

### 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 – please give details B1 - Not applicable, no fees required
C: If any checked, give details:	Not applicable, no fees required

Agency Workers (if applicable) <i>(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.)</i>	
A: Number of agencies used (average):	A1: There is no agency worker in the facility. And names if available: Not Applicable
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: Please give details: Not applicable, site does not use agencies.

<p>E: Does the site have a system for checking labour standards of agencies? If yes, please give details.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details: Not applicable, site does not use agencies.</p>
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<b>Contractors:</b> <i>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,</i>	
<p>A: Any contractors on site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>A1: If yes, how many contractors are present, please give details:</p>
<p>B: If <b>Yes</b>, how many workers supplied by contractors?</p>	<p>Not applicable</p>
<p>C: Do all contractor workers understand their terms of employment?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please describe finding: Not applicable, No contractor on site</p>
<p>D: If <b>Yes</b>, please give evidence for contractor workers being paid per law:</p>	<p>Not applicable</p>

8A: Sub-Contracting and Homeworking:

**8A: Sub-Contracting and Homeworking**

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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:**

- No Sub-contracting and Homeworking were used by this facility.

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

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

Not applicable

**Details:**

- Shipment record
- Goods in and out register
- Production record
- Goods in and out gate pass / records

**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 requirement:** Not applicable

**Recommended corrective action:** None

**Objective evidence observed:**

None observed

Observation:	
<b>Description of observation:</b> None observed  <b>Local law or ETI requirement:</b> Not applicable  <b>Comments:</b> None	<b>Objective evidence observed:</b> None observed

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

Summary of sub-contracting – if applicable <input checked="" type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe:
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: If <b>Yes</b> , summarise details:
C: Number of sub-contractors/agents used:	
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If <b>Yes</b> , 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 <input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If <b>Yes</b> , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:



D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> 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

<p><b>9: No Harsh or Inhumane Treatment is Allowed</b>  <a href="#">(Click here to return to summary of findings)</a></p>
<p><b>ETI</b></p> <p>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</p>

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&amp;S or any other grievances to a 3<sup>rd</sup> party?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  A1: Please describe: Facility has an open channel for reporting any violations of labour standard which is posted in the notice board. The facility has a designated channel to conduct grievance handling procedure.</p>
<p>B: If <b>Yes</b>, are workers aware of these channels and have access? Please give details.</p>	<p>All the workers are aware of these channels and have full access to these channels. Facility also has a grievance handling procedure posted with every complaint box.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Facility has posted hotline &amp; provided grievance box in toilet area.</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers  <input type="checkbox"/> Communities  <input type="checkbox"/> Suppliers  <input type="checkbox"/> Other                  D1: Please give details:                  Employee can place their grievance verbally or in written. Employee can also keep their identity confidential if required.</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  E1: If yes, please give details</p>
<p>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)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  F1: If no, please give details</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  G1: If no, please explain</p>
<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  H1: If no, please give details</p>

<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No II: If yes, please give details
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**Current Systems and Evidence Examined**

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

**Current systems:**

- The facility has established anti-harassment or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- Through the factory management and employees' interviews, it was noted that no physical abuse happened in the factory.
- There is an internal process for grievance, which is through grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, any received complaint will be handled by management, without any reprisal for the worker in question.

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

Details:

- Anti-Harassment policy
- Grievance box open register
- Orientation training record

Any other comments: None

**Non-compliance:**

<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI/Additional Elements <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> Not applicable</p> <p><b>Recommended corrective action:</b> None</p>	<p><b>Objective evidence observed:</b> None observed</p>
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**Observation:**

<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI requirement:</b> Not applicable</p> <p><b>Comments:</b> None</p>	<p><b>Objective evidence observed:</b> None observed</p>
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**Good Examples observed:**

Description of Good Example (GE): None observed

**Objective evidence observed:**  
None observed

10 A: Entitlement to Work and Immigration

**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:**

- Only employees with a legal right to work shall be employed or used by the factory.
- The youngest age was 19 years old from sample employees.

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

Details:

- Factory recruitment policy.
- Employees personal file.

Any other comments: None

**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 requirement:** Not applicable

**Recommended corrective action:** None

**Objective evidence observed:**

None observed

**Observation:**

**Description of observation:** None observed

**Local law or ETI requirement:** Not applicable

**Comments:** None

**Objective evidence observed:**

None observed

**Good examples observed:**

Description of Good Example (GE): None observed

**Objective evidence observed:**  
None observed

10 B 2: Environment 2-pillar

**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:**

- The facility prepared an environmental policy and procedure.
- The facility disposes all solid waste in a segregated area with proper level and identification.
- The facility also provides awareness training to all related personnel.
- Solid waste has been handed over to licensee vendor S.M. Enterprise which contract start on 01 July 2020 and end until the close of contact.
- Facility conducted Wastewater test on 20 June 2022 from Bureau Veritas.
- Facility conducted air emission and noise level test on 22 August 2022 from Greentech.

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

Details:

- Environment policy
- Wastage management policy.
- Air emission and noise level test reports

Any other comments: None

**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 requirement:** Not applicable

**Recommended corrective action:** None

**Objective evidence observed:**

None observed

**Observation:**

<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI requirement:</b> Not applicable</p> <p><b>Comments:</b> None</p>	<p><b>Objective evidence observed:</b> None observed</p>
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<b>Good examples observed:</b>	
<p>Description of Good Example (GE): None observed</p>	<p><b>Objective evidence observed:</b> None observed</p>

Other findings

<b>Other Findings Outside the Scope of the Code</b>
None observed

<b>Community Benefits</b>
<i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
None



## Appendix 1

<p><b>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."</b></p> <p><input checked="" type="checkbox"/> Not Applicable please x</p>	
<p><b>NOTE:</b> The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p><b>Instruction to Audit Company:</b> fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
<b>ETI Code / Additional Elements</b>	<b>Customer's Supplier Code equivalent</b>
<b>0.A. Universal Rights covering UNGP</b>	<b>0.A. Universal Rights covering UNGP</b>
<p><b>0.A. Guidance for Observations</b></p> <p>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.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>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.</p> <p>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.</p>	
<b>0.B. Management Systems &amp; Code Implementation</b>	<b>0.B. Management Systems &amp; Code Implementation</b>
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p>	

<p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	
<p><b>ETI 1. Forced Labour</b></p>	<p><b>ETI 1. Forced Labour</b></p>
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>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.</p>	
<p><b>ETI 2. Freedom of association and the right to collective bargaining are respected</b></p>	<p><b>ETI 2. Freedom of association and the right to collective bargaining are respected</b></p>
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>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.</p>	
<p><b>ETI 3. Working conditions are safe and hygienic</b></p>	<p><b>ETI 3. Working conditions are safe and hygienic</b></p>
<p>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.</p> <p>3.2 Workers shall receive regular and recorded Health &amp; Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p>	

<p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health &amp; Safety to a senior management representative.</p>	
<p><b>ETI 4. Child labour shall not be used</b></p>	<p><b>ETI 4. Child labour shall not be used</b></p>
<p>4.1 There shall be no new recruitment of child labour.</p> <p>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.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	
<p><b>ETI 5. Living wages are paid</b></p>	<p><b>ETI 5. Living wages are paid</b></p>
<p>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.</p> <p>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.</p> <p>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.</p>	
<p><b>ETI 6. Working Hours are not excessive</b></p>	<p><b>ETI 6. Working Hours are not excessive</b></p>
<p>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.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p>	

<p>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.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where <b>all</b> of the following are met:</p> <ul style="list-style-type: none"> <li>- this is allowed by national law;</li> <li>- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;</li> <li>- appropriate safeguards are taken to protect the workers' health and safety; and</li> <li>- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.</li> </ul> <p>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.</p>	
<p><b>ETI 7. No discrimination is practised</b></p>	<p><b>ETI 7. No discrimination is practised</b></p>
<p>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.</p>	
<p><b>ETI 8. Regular employment is provided</b></p>	<p><b>ETI 8. Regular employment is provided</b></p>
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>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</p>	

<p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p><b>Additional Elements: Responsible Recruitment</b>              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.</p>	
<p><b>8A: Sub-Contracting and Homeworking</b></p>	<p><b>8A: Sub-Contracting and Homeworking</b></p>
<p>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.</p>	
<p><b>ETI 9. No harsh or inhumane treatment is allowed</b></p>	<p><b>ETI 9. No harsh or inhumane treatment is allowed</b></p>
<p>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</p>	
<p><b>10. Other Issue areas: 10A: Entitlement to Work and Immigration</b></p>	
<p><b>Additional Elements</b>              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.</p>	
<p><b>10. Other issue areas 10B2: Environment 2-Pillar</b></p>	

<p>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.  <i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	
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SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
Environment Section	Environment Section
<p><b>B.4. Compliance Requirements</b>            10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.            10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.            10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements            10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.            10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.            10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).            10B4.7 Businesses shall make continuous improvements in their environmental performance.            10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation            10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.  <b>B4. Guidance for Observations</b>            10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.            10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p>	
Business Practices Section	

**10C. Compliance Requirements**

10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.

10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.

10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.

10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.

10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,

10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics

10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

**10C. Guidance for Observations**

10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.

10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented.



## Photo Form

### Non-Compliance photos:

		<p>Nil</p>
<p>NC Photo 01: Eye guard found displaced</p>	<p>NC Photo 02: Aisle found partially blocked</p>	<p>N/A</p>













### General facility tour photos:













		
<p>Facility Name</p>	<p>Facility Main Gate</p>	<p>Facility Building</p>
		
<p>Security Check Post</p>	<p>Fabric Store</p>	<p>Accessories Store</p>



<p>Finished Goods Store</p>	<p>Knitting section</p>	<p>Screen printing Section</p>
<p>Cutting Section</p>	<p>Pressing Area</p>	<p>Sewing section</p>
<p>Finishing Section</p>	<p>Packing section</p>	<p>Hand Tag section</p>
<p>Spot removing room</p>	<p>Eye Wash and Shower Station</p>	<p>People wearing PPE</p>



		
<p>In &amp; Out Time Recording System</p>	<p>Industrial Exhaust Fan</p>	<p>Drinking Water Station</p>
		
<p>Canteen</p>	<p>Complain Box</p>	<p>Dining Area</p>
		
<p>Medical Room</p>	<p>First Aid Box</p>	<p>Toilet Area</p>
		
<p>Childcare Room</p>	<p>Public Address System</p>	<p>First Aider Identification</p>

		
<p>Fire Alarm Sounder</p>	<p>Fire Alarm Switch</p>	<p>Evacuation plan</p>
		
<p>Emergency Light</p>	<p>Sub-Aisles mark</p>	<p>Main Aisles mark</p>
		
<p>Exit sign</p>	<p>Staircase</p>	<p>Fire Extinguisher</p>
		
<p>No smoking sign</p>	<p>Smoke Detector</p>	<p>Fire Exit Door</p>



		
<p>Fire Hose Cabinet</p>	<p>Fire hose demonstration</p>	<p>Firefighting Equipment</p>
		
<p>Firefighting Team Member Identification</p>	<p>Rescue Team Member Identification</p>	<p>Fire Detection Control Panel</p>
		
<p>Fire Hydrant Pump</p>	<p>ETP</p>	<p>Compressor</p>
		
<p>Electrical Distribution Board</p>	<p>Generator</p>	<p>Boiler</p>

		
<p>Substation</p>	<p>Chiller</p>	<p>Chemical store area</p>
		
<p>Wastage Store</p>	<p>Preventive measure for Covid -19: Hand sanitizing facility</p>	<p>Preventive measure for Covid -19: Body temperature measuring.</p>
		<p>Nil</p>
<p>Preventive measure for Covid -19: Hand washing facility</p>	<p>Preventive measure for Covid -19: COVID-19 Awareness Poster.</p>	<p>N/A</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:](#)**

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**[Click here for Supplier \(B\) members:](#)**

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

**[Click here for Auditors:](#)**

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