




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 3572090	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 419392534
Business name (Company name):	Swisspro Manufacturing Company		
Site name:	Swisspro MFG Company		
Site address: <i>(Please include full address)</i>	17 Km GT Road, Bagh Wali Pulli Near Bata Pur, Lahore.	Country:	Pakistan
Site contact and job title:	Mr. Muhammad Abubakar (HR Manager)		
Site phone:	+92 331 9999732	Site e-mail:	a-jabbar@swisspro.com.pk
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:	17 th May 2022		

Audit Company Name & Logo:  Assessment Services ALGI Pakistan	Report Owner (payer): Swisspro Manufacturing Co <i>(If paid for by the customer of the site please remove for Sedex upload)</i>
--	--

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.

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): No Group Interviews conducted due COVID-19.

Auditor Team (s) (please list all including all interviewers): Muhammad Ejaz
Lead auditor: Muhammad Ejaz APSCA number: RA21700894
Lead auditor APSCA status: Registered Auditor (RA)
Trainee auditor: Zubair Elahi APSCA number: ASCA32200131
Interviewers: Muhammad Ejaz APSCA number: RA21700894

Report writer: Muhammad Ejaz
Report reviewer: Muhammad Atiyab

Date of declaration: 17th May 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)</i> <i>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 Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None
0B Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None
2. Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None
3. Safety and Hygienic Conditions	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	4	0	0	<ul style="list-style-type: none"> It was noted during factory visit that diesel drums were found stored without secondary containment for spillage control at generator room. It was noted during factory visit that rubber mat not kept beneath under 01 out of 01 electrical panel in garment stitching hall # 1 at first floor and also rubber mat was not kept beneath under electrical panel at generator area. It was noted during factory visit that belt covers and eye guards were not installed on 10 out of 30 stitching machines in stitching hall on first floor. It was noted during factory visit that signs in local language were not posted on toilets near garments stitching hall on first floor.
4. Child Labour	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None

5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None
9	<u>Harsh or Inhumane Treatment</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1	0	0	<ul style="list-style-type: none"> It was noted during factory visit that complaint registering instructions for lodging complaints and suggestions were not posted near complaint / suggestion box at gloves checking & packing hall on ground floor.
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Not applicable as it is 2-pillar audit
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Not applicable as it is 2-pillar audit

Due to current pandemic situation, factory has provided hand sanitizer & soap in all departments. Factory has assigned security personals for checking workers temperature and instructed to every worker should sanitize the hands prior to enter in the factory. Factory management has provided Personal Protective Equipment such as face mask and gloves and also posted COVID-19 safety instruction on main gate and all the production departments. All the departments' head are responsible for workers to used PPEs and respect social distancing during working hours. Factory has provided awareness training to all workers related to COVID-19 and instructed them to follow the COVID-19 safety precautions.

The ALGI Pakistan auditor & trainee auditor arrived at around 09:02 am to conduct an initial assessment at the facility Swisspro MFG Company Upon arrival, the auditor was greeted by Mr. Muhammad Abubakar (HR Manager) and escorted the auditor to conference room where the auditor conducted an opening meeting. After the exchange of business cards and opening meeting was conducted in the presence of Mr. Muhammad Abubakar (HR Manager), Mr. Zulfiqar Ali (Worker's Representative) and Mr. Mansoor Ahmed Aziz (H&S Manager), determining the audit agenda.

The auditor took permission for taking photographs and conducting confidential employee interviews. The facility management granted permission to conduct a full audit, including employee interviews, facility walk through and document review. The facility was very cooperative towards the audit and the audit findings. The auditor performed all processes including health and safety tour, documentation, employee and management interviews. After completion of all the processes the auditor conducted the closing meeting at around 05:45 pm in the presence of Mr. Muhammad Abubakar (HR Manager), Mr. Zulfiqar Ali (Worker's Representative) and Mr. Mansoor Ahmed Aziz (H&S Manager) where the auditor discussed. The facility management was receptive and agreed to make corrective actions at the earliest possible and the CAPR was signed by Mr. Muhammad Abubakar (HR Manager).

**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 q.*

Site Details

Site Details																							
A: Company Name:	Swiss Pro Manufacturing Co																						
B: Site name:	Swiss Pro Manufacturing Co																						
C: GPS location: (If available)	GPS Address: 17 Km GT Road, Bagh Wali Pulli Near Bata Pur, Lahore.	Latitude: 31.594403 Longitude: 74.468919																					
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	National Tax Number: 2692031-0 Directorate of Labour Welfare, Certificate No.: DLW/F/LHR/359 Pakistan Hosiery Membership No: C-2053 PGMEA: A-374 PSGMEA: C-765																						
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Product: Working gloves, knitwear and denim garments Process: Cutting, stitching, finishing, checking and packing.																						
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Swiss Pro Manufacturing Co was established in 2010 and is located at 17 Km GT Road, Bagh Wali Pulli Near Bata Pur, Lahore - Pakistan. The total land area is 65050 square feet and built area is 72506 square feet and section wise facility layout was as follows:</p> <table border="1"> <thead> <tr> <th>Production Building no 1</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground floor</td> <td>Security room, time office and HR office.</td> <td></td> </tr> <tr> <th>Production Building no 2</th> <th>Description</th> <th>Remark, if any</th> </tr> <tr> <td>Ground floor</td> <td>Reception, gloves stitching hall #1, gloves stitching hall #2, cut part store, prayer area, sampling room, gloves final checking & packing hall, leather store, gloves press cutting hall, gloves stitching hall #3, denim garments stitching hall, waste store, workers washrooms and generator area.</td> <td>None</td> </tr> <tr> <td>First floor</td> <td>Conference hall, management and IT server offices, sampling hall, garment stitching hall #1, garment stitching hall #2, GGT plotter room, garments finishing section, garment checking & packing hall and workers washrooms.</td> <td>None</td> </tr> <tr> <td>Second floor</td> <td>Accessories store, fabric store and fabric cutting hall.</td> <td>None</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>None</td> </tr> </tbody> </table>		Production Building no 1	Description	Remark, if any	Ground floor	Security room, time office and HR office.		Production Building no 2	Description	Remark, if any	Ground floor	Reception, gloves stitching hall #1, gloves stitching hall #2, cut part store, prayer area, sampling room, gloves final checking & packing hall, leather store, gloves press cutting hall, gloves stitching hall #3, denim garments stitching hall, waste store, workers washrooms and generator area.	None	First floor	Conference hall, management and IT server offices, sampling hall, garment stitching hall #1, garment stitching hall #2, GGT plotter room, garments finishing section, garment checking & packing hall and workers washrooms.	None	Second floor	Accessories store, fabric store and fabric cutting hall.	None	Is this a shared building?	No	None
Production Building no 1	Description	Remark, if any																					
Ground floor	Security room, time office and HR office.																						
Production Building no 2	Description	Remark, if any																					
Ground floor	Reception, gloves stitching hall #1, gloves stitching hall #2, cut part store, prayer area, sampling room, gloves final checking & packing hall, leather store, gloves press cutting hall, gloves stitching hall #3, denim garments stitching hall, waste store, workers washrooms and generator area.	None																					
First floor	Conference hall, management and IT server offices, sampling hall, garment stitching hall #1, garment stitching hall #2, GGT plotter room, garments finishing section, garment checking & packing hall and workers washrooms.	None																					
Second floor	Accessories store, fabric store and fabric cutting hall.	None																					
Is this a shared building?	No	None																					

	<p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F2: Please give details: No cracks were observed.</p> <p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F4: Please give details: Facility has obtained "Form K" building stability from approved government engineer.</p>
<p>G: Site function:</p>	<p><input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor</p>
<p>H: Month(s) of peak season: (if applicable)</p>	<p>None</p>
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>Product: Working gloves, knitwear and denim garments Process: Cutting, stitching, finishing, checking and packing. Production Capacity: 650,000 Pieces of garment & 610,000 pairs of gloves</p>
<p>J: What form of worker representation / union is there on site?</p>	<p><input type="checkbox"/> Union (name) <input checked="" 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No</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 L1: If yes, approx. % of workers in on site accommodation: No on site accommodation is provided</p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers: No offsite accommodation is provided</p>
<p>N: Were all site-provided accommodation buildings included in this audit</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details: N/A facility has not provided any onsite or offsite accommodation.</p>

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:02 am Day 1 Time out: 06:10 pm	Day 2 Time in: Day 2 Time out:	Day 3 Time in: Day 3 Time out:
B: Number of auditor days used:	One auditor in one day (One man 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If No, why not? SAQ was not filled by company		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Muhammad Abubakar (HR Manager)		
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:	None		
J: Previous audit type:	None		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<p>D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i></p>	<p>Worker representative attended opening and closing meetings.</p>
<p>E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i></p>	<p>There is no registered union in the company. There is a local worker council committee in the company whose representative was present in the meeting.</p>

Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	89	00	00	00	00	00	00	89
Worker numbers – female	11	00	00	00	00	00	00	11
Total	100	00	00	00	00	00	00	100
Number of Workers interviewed – male	06	00	00	00	00	00	00	06
Number of Workers interviewed – female	04	00	00	00	00	00	00	04
Total – interviewed sample size	10	00	00	00	00	00	00	10



A: Nationality of Management	Pakistan	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities: B1: Nationality 1: Pakistan B2: Nationality 2: _____ B3: Nationality 3: _____</p>	<p>Was the list completed during peak season? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: No peak seasons declared by the factory.</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 100% C1: approx % total workforce: Nationality 2 00% C2: approx % total workforce: Nationality 3 00%</p>	
D: Worker remuneration (management information)	<p>D: 20 % workers on piece rate D1: 00 % hourly paid workers D2: 80 % salaried workers</p> <p>Payment cycle: D3: 00 % daily paid D4: 00 % weekly paid D5: 100% monthly paid D6: 0 % other D7: If other, please give details: All workers are paid in monthly time scale</p>	



Worker Interview Summary	
A: Were workers aware of the audit?	<input type="checkbox"/> Yes <input checked="" 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>	No Group Interviews were performed during audit
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 06 D2: Female: 04
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: facility has only permanent employed workers on site which were chosen as sampled size for individual interviews and documentation review.
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?	Workers were satisfied with the facility management. No complaints were reported.
I: What did the workers like the most about working at this site?	Workers enjoyed working here as they are granted social benefits, which includes social security, EOBI (Employee Old Age Benefits Institutions) and group life insurance, moreover on time salary and wages distribution and mandated leaves are provided.
J: Any additional comment(s) regarding interviews:	All interviewed workers have very positive attitude towards management
K: Attitude of workers to hours worked:	Workers are satisfied with working hours they are working 8 hours in a day and 48 hours in a week they work from 09:00 AM to 06:00 PM and all the workers are satisfied with working hours. Overtime hours are within legal limits of 2 hours a day and 12 hours a week according to company policy. Overtime is voluntary, and workers are not forced to work overtime hours.
L: Is there any worker survey information available?	

- Yes
 No

L1: If yes, please give details: Feedback form

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 Management of Swisspro MFG Company agreed that the auditor can conduct confidential interviews with workers who were chosen freely without any influence by the Company management; workers were selected randomly from different processes for group and individual interviews, conducted at an independent room that was located at the Management Office. The workers showed a cooperative attitude during the interview process. The overall attitude of workers toward management was positive, workers were happy with the on-time payments and encouraging working environment. They agreed with management policies of the Company and praises for motivational and supportive behaviour of management.

The information of interview was as below:

- For child labour issue, all interviewees confirmed that the Company requested national identity cards to verify their ages in recruiting. All interviewed workers declared their ages were over 18 years old and also showed their national identity cards for verification, youngest worker found in facility was 19 years old.
- For forced labour issue, the workers confirmed no “security money or deposit” was required and their original documents such as original identity cards were not retained by company.
- For discrimination issue, the workers’ wages were paid based on their skills, production outputs and abilities. Workers are treated with respect & dignity, all interviewees confirmed that no discrimination was in practice by the Company.
- For disciplinary practices issues, the interviewees said they were asked to observe the Company rules and policies, no employees were fined or fired if they violate the Company rules.
- For safety and health issue, the workers were satisfied with the working condition and the Company provided orientation training for new workers and regular safety training to all workers. Fire drills were conducted twice per year for production area and admin, which included the evacuation.
- For working hour’s issues, workers reported they worked for 6 days per week, 8 hours per day as per local law.
- For wages issue, the interviewed worker said they could obtain the wages in cash. Their wages were paid before 7th of every month. Workers’ wages were calculated by monthly rate. For OT wages, the interviewees said the Company having a policy; 200% of normal rate for overtime on working days and 300% of gazetted holidays. Legal leaves were provided to all employees as per local law.
- For treatment issue, the workers confirmed in interviews, no harsh or inhumane treatment was in practice and the management was encouraging and supportive to all employees.

For freedom of association issue, there was a Worker Council Committee and workers confirmed the election process and nomination of worker representative. They could also complaint to their supervisors directly or wrote anonymous letter to the suggestion box, company also had open door policy for all workers to report any issue and suggestions.

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

As per the interviewed committee members, they are happy with the current environment. Regular meetings are held and the grievances are taken care of by the management elections are performed every year to choose worker representative of the workers choice who can represents and submit grievances and suggestion of the workers to the top management of the factory regular meetings are also held after different time periods and/or when its needed.

O: Attitude of managers:

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

The facility management was very receptive and showed a positive attitude towards the audit. All documents were provided on timely manner. At the end of the audit, all the non-compliances were accepted by the facility.

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Company has established and maintained appropriate procedures to evaluate and select suppliers based on their ability to meet the requirements of this standard.
2. Suppliers are evaluated and selected based on Supplier evaluation system. Following points are considered in the selection Arrange a meeting with suppliers for motivation and get consensus to comply with the requirements of this standard.
3. Decide for the motivation of suppliers to accept and participate the monitoring activities implement all remedial action identified during monitoring activity.

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

Details:

- Supplier Social Audit Report
- Ability of supplier (Social and Quality Management System)
- Control of Supplier (Supplier Assessment Report)
- Relationship based on Past Experience
- Supplier Social & ETI code Commitment
- Social & ETI Code Policy Communication records

Any other comments: None

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility has developed their policy for Human Rights and also communicated with their partners</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory has hired Human Resources Manager for their factory. Name: Mr. Muhammad Abubakar Job title: HR Manager</p>
<p>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?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Yes, Company has a transparent system for documents and information. Open door policy and complaint / suggestion box.</p>
<p>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)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details: Facility has established grievance mechanism system in form of different channels worker council committee and suggestion complaints box system are used to deliver grievances to the upper management.</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility has developed an effective database privacy system for workers and company information.</p>

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

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

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 0 %	A2: This year 2 %
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 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	0.5%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 0 %	C2: This year 1 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	0.25%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Injuries / accidents are recorded in register	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: Number: 01	F2: This year: Number: 00
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]	Not calculated by factory	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 0% No lost days reported as minor injuries were happened and recorded	H2: This year: 0% No lost days reported as minor injuries were happened and recorded
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months _00_% workers	I2: 12 months _00_% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months _00_% workers	J2: 12 months _00_% workers

0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The facility has system in place to implement the social code
2. Company has taken written commitment from all its suppliers to comply with social compliance code of conduct. Company adopted and maintains procedure to evaluate and renew the suppliers annually.
3. The facility has appointed Mr. Muhammad Abubakar (HR Manager), responsible for implementation of ETI Base code in the facility.
4. Personnel files are found to be well maintained and kept in HR department and kept confidential.
5. The facility has drafted its policies on forced labour, child labour, discrimination, harassment and freedom of association

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

Details:

- Employees Handbook
- Management Representative labour contract.
- Policy on forced labour, child labour, discrimination, Harassment, general human rights, freedom of association
- Training records
- Business Licenses
- Personnel files
- Notice boards

Any other comments:

The overall observation shows that the Company has set partial system to implement & monitor the social management system, appointed a Senior Compliance Manager to implement and maintain company's Social Management system. Company has a system to select business partners as per their company policy, company has communicated the ETI base code with their partners. Further, the Company has a proper production plan as well as lost time reporting system implementing monthly/daily basis.

Management Systems:	
<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 A1: Please give details: No fines and prosecution ae imposed on the factory in last 12 months.</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility has its own policies and procedures on forced labour, child labour, discrimination, harassment & abuse and the policies are posted for worker’s reference. The facility conducts training to the workers on legal requirements and ETI base code requirements. The facility does not retain any original documents of the employees and checks with a valid age proof document at the time of hire.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>On Audit day, no traces of forced labour, child labour, discrimination, harassment & abuse was observed. All interviewed employees reported that they are treated with dignity and respect. The facility conducts training to all employees related to health and safety, legal requirements etc. and maintains all training records.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: MR (Management Representative) training was out sourced. Workers were provided training by MR (Management Representative) for social responsibilities, legal rights and national and international social compliance norms and ethic practices.</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 E1: Please give details: Training records were available that shows the effective training was provided to workers on social practices, and ethics. Training Effectiveness was assessed by interviewing workers and was well understood by the workers.</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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details:</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 G1: Please give details: Company has appointed Mr. Muhammad Abubakar, as HR Manager the department are looked by him to ensure the effective human resource is in place and workers are aware of their legal rights, company policies. Training plans are being developed and trainings are being provided on regular basis for the awareness of employees.</p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

	H1: Please give details: Mr. Muhammad Abubakar serving the company as HR Manager responsible for implementation of the social codes.
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: All workers information is kept in their personal files which remain confidential and only accessed by HR staff.
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: Facility has developed the procedure for worker data confidentiality
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Health and safety risks identified through risk assessment practices carried by management and there is also implemented a mechanism to identify potential risk factors audits and monthly inspection of facility.
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: If any risk identified, there was the plan to eliminate or reduce with issuing notification concerned department or individual.
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 management developed their own supplier code of conduct in form of supplier evaluation which is carried out when suppliers are being selected for their company. Also, these suppliers are maintaining under companies approve suppliers list and evaluated periodically under their company quality management system.
Land rights	
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 approved building plan which is showing the legal land rights
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No O1: Please give details: Not required by local laws
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: The facility premises are owned by the company owner and has all the approvals of land rights

<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: This is an owned facility by the owner of the company and does not require the approval for the expansion and building approvals.</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: All the alternatives to a 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: This facility is completely legalized. During the audit we did not find any sign of illegal appropriation of land.</p>

<p>Non-compliance: None</p>	
<p>1. Description of non-compliance: Local law and/or ETI requirement: Recommended corrective action:</p>	<p>Objective evidence observed:</p>

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

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

1: Freely Chosen Employment

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

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Based on interview with the workers, management and document review, the employees could freely resign with proper notification in advance 30 days minimum.
2. The employees obtained their job by themselves by seeing advertisement or by recommendation from existing employee; they were not asking or forced to lodge deposits or their identity papers to the Company at time of employment.
3. During facility visit, workers' interview and document review, there were no traces identified of forced, bonded or involuntary prison labour identified.
4. Workers were free to leave at the end of the Company timing as per local law (06:00 pm).

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

Details:

- Checked personnel files of the 10 workers
- Employment agreements
- Terms and conditions.
- Attendance records 10 samples April 2022 (recent month), 10 samples from August 2021(random month) and 10 samples from May 2021 (initial month).
- Social Policy.

Any other comments:

The overall observation shows that the employees are free to leave the Company when they resign from the services, with payment. There is no restriction on workers' movement within the premises. The workers are not forced to stay back once they get authorized leave from the management.

<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 A1: If yes, please give details and category of workers affected: No such incident reported by the interviewed worker where original ID documents were retained.</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected: No scheme is in operation</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected: Interviewed workers and records verification shows that company do not retain wages, although facility</p>

	pays salary before and/or 7 th of every month and there is no deposit fees is being charged.
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: No restrictions on termination of employment and resignation were found.
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding: N/A
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: No evidence found of restriction on leaving the site at the end of the shift it was verified through worker interview and attendance record generated by face & thumb scanning time keeping equipment.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: Facility has communicated abolition or forced labour policy with their partners to understand the risk of bonded labour
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: Facility is working and implementing on forced labour policy.

Non-compliance: None	
1. Description of non-compliance: Local law and/or ETI requirement: Recommended corrective action:	Objective evidence observed:

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

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

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

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. Worker Council Committee was established in the Company, 06 workers representatives were the members of this council. Workers representatives were elected on 03rd March 2022 for open attitude and communication between the Company management and workers.
2. Workers representative's meetings were in practice to discuss any issues, demands and suggestions of employees and to address the issues or suggestions to management. Last meeting was conducted on 14th March 2022.
3. The workers can complaint to their supervisors directly, through their representatives, or as per open door policy; directly to the management, although the suggestion box was available in the Company for collecting workers complaints and suggestions.

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

Details:

- Worker Council Committee Document
- Election Records
- Worker Council Committee Meeting records
- Suggestion Boxes Record
- Safety committee meeting records

Any other comments:

The Company has established a complete policy and procedures in place to ensure workers right to Freedom of Association and Right to Collective Bargaining are Respected collectively. No worker was found who is directly involved with any trade union. (discussed during interviews).

<p>A: What form of worker representation/union is there on site?</p>	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee Worker Council Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None	
<p>B: Is it a legal requirement to have a union?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p>C: Is it a legal requirement to have a worker's committee?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>D1: Please give details: Company has defined workers communication policy, for which suggestion and complaint boxes were installed in the Company. Company have also open-door policy or to convey through their department in-charge and directly to management. Worker council committee gives awareness to the labour about the proper use age of these channels so they can raise their voice against any issue they are having.</p> <p>D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>E1: Please give details: There is no preferential or discriminatory behavior practiced with workers' committee members. They work in their departments as per their assigned jobs.</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>No registered union in the Company.</p>	<p>F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p>	<p>Worker Council Committee</p>	<p>G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>H: Are all workers aware of who their representatives are?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Workers are aware with their all representatives.</p>
<p>I: Were worker representatives freely elected?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Date of last election: 03rd March 2022</p>
<p>J: Do workers know what topics can be raised with their representatives?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>K: Were worker representatives/union representatives interviewed?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>If Yes, please state how many: 01</p>	
<p>L: Please describe any evidence that union/worker's committee is effective?</p>	<p>Worker Council Committee is effective and helpful to workers.</p> <p>Workers representative's meetings were in practice to discuss any issues, demands and suggestions of employees and to address the issues or suggestions to management.</p>	

Specify date of last meeting; topics covered; how minutes were communicated etc.	Last meeting was conducted on 14 th March 2022.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes, what percentage by trade Union/worker representation	M1: ___ % workers covered by Union CBA	M2: ___ % workers covered by worker rep CBA
M3: If Yes, does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Non-compliance: None		
1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: Recommended corrective action:	Objective evidence observed:	

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

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

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

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

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined

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

Current systems:

1. Workers and management interview show the Company had provided health and safety training to workers. The Company provided relevant records for review.
2. The Company had planned and arranged the fire drill twice a year, which included the evacuation exercise. The Company provided relevant records for review. Last fire drill was conducted on 15th March 2022.
3. Based on on-site observation, the first aid kits were available in each department of each floor. Trained first aiders were available.
4. The Company provided potable drinking water and adequate number of toilets.
5. Mr. Mansoor Ahmed Aziz is appointed as H&S Manager for responsible all H&S issues in the Company.
6. Approved Building Map and building stability certificate was available.
7. The Company had established health and safety policy. Injury record was maintained.
8. Emergency contact numbers were displayed prominently in production, management and main gate.

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

Details:

- Fire Drill Record
- Water Test Report
- Electrical Inspection Record
- Boiler Inspection Report
- Injury Record
- Health & Safety Procedure
- Training Records
- Building Map
- Risk Assessment
- Fire Extinguishers Inspection
- Fire Alarm Inspection
- Illuminating Exit Sign and Emergency Lights Inspection
- Electrical installation inspection Checklist
- Machine Maintenance inspection record

- Safety Warning Signs Inspection

Any other comments:

The overall observation shows that the Company has established a complete 'health & safety' policy procedures. The production floor was quite clean. Evacuation maps were available in all areas. Sufficient drinking water was available in the production floors. Fire extinguishers were also properly charged and ready for use. The overall health & safety condition of the Company was found to be good

<p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Procedures and policies were available; Workers and management interview shows the Company had provided health and safety training to workers. The Company provided relevant records for review.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Factory does have social compliance manual which include the following policies. Child Labour Discrimination policy Forced Labour Working hours Overtime hours Hiring policy Firing policy/ retrenchment Wages policy Working hours policy Environmental policy Social compliance policy</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 C1: Please give details: Factory did not do any structural additions without permit and legalized documents.</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Yes provided (Face Mask and ear muffs).</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: Facility has trained first aiders in each section to act on any case of emergency.</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 F1: Please give details: Factory has trained first aiders on each department and floors.</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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: Transport is not provided by the facility.</p>

H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: Factory has not provided any living space for workers
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Factory management conducted periodic risk assessment to evaluate the risks on every aspect.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility has developed the policy for Environment protection and natural resource preservation, facility has an agreement with waste management company for disposal of waste
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No K1: Please give details: Facility has listed all the chemicals and also provided safety data sheets for chemicals being used.

Non-compliance: 4

<p>1. Description of non-compliance:</p> <p>It was noted during factory visit that diesel drums were found stored without secondary containment for spillage control at generator room.</p> <p><input type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement <u>In Accordance with: Hazardous Substances Rules 2003, Rule 12. Safety Precautions for workers and PPEPCA</u></p> <p>Recommended corrective action: It was agreed by the facility management that they would provide secondary containment for diesel drums for spillage control.</p> <p>2. Description of non-compliance:</p> <p>It was noted during factory visit that rubber mat not kept beneath under 01 out of 01 electrical panel in garment stitching hall # 1 at first floor and also rubber mat was not kept beneath under electrical panel at generator area.</p> <p><input type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement: <u>In Accordance with: Electricity rules 1937, 49. Construction, insulation and earthing of apparatus. (1) All apparatus shall be sufficient in power and size and of sufficient mechanical strength for the work it may be required to do, and so far, as is practicable, shall be so constructed, installed, protected, worked and maintained as to prevent danger.</u></p> <p>Recommended corrective action: It was agreed by the facility management that they would make sure the availability of rubber mats beneath under electrical panels at garment stitching hall and generator area.</p>	<p>Objective evidence observed:</p> <p>1. Noted during factory visit. (See NC Photo #01)</p> <p>2. Noted during factory visit. (See NC Photo #02).</p>
---	--

<p>3. Description of non-compliance: It was noted during factory visit that belt covers and eye guards were not installed on 10 out of 30 stitching machines in stitching hall on first floor.</p> <p><input type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement: <u>In accordance with Factory Act 1934, Section 26, In every factory the following shall be securely fenced by the safeguards of substantial construction which shall be kept in position while the parts of machinery required to be fenced are in motion or in use</u></p> <p>Recommended corrective action: It was agreed by the facility management that they would install missing belt covers and eye guards on all stitching machines.</p> <p>4. Description of non-compliance: It was noted during factory visit that signs in local language were not posted on toilets near garments stitching hall on first floor.</p> <p><input type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement: <u>In Accordance with: Factory Act 1934, Latrines and Urinals (Section 21). If females are employed, separate latrines, screened from, these for males and marked in Urdu in conspicuous letters "For women only" shall be provided on the scale laid down in rule 43 (5). Those for males shall be similarly marked "For men only" A poster showing the figure of a man and a woman shall also be exhibited at the entrance of latrines for each sex</u></p> <p>Recommended corrective action: It was agreed by the facility management that they would label the workers washrooms with signs in local language.</p>	<p>3. Noted during factory visit. (See NC Photo #03).</p> <p>4. Noted during factory visit. (See NC Photo #04).</p>
---	---

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

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

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:

1. There are no apparent concerns related to child labour at the facility.
2. The facility has a policy in place to participate in and contribute to programmes that provide for the transition of a child found to performing child labour in order to enable the child to attend and remain in quality education until no longer a child.
3. No juvenile workers (under the age of 18) are employed at the facility.
4. All practices regarding youth employment at the facility appear to be in line with ILO conventions.

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

Details:

- Social Policy Manual
- Recruitment notices
- Policy on child labour and remediation
- Verification of 10 personnel files for a valid age proof document.

Any other comments:

During factory tour, no person found to be hired under the age of 18 years.

A: Legal age of employment:	Legal minimum age: 15 Years (with restriction) On site: 18 years / adult workers (without restriction)
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 %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details: No young workers under 18 hired in the facility

Non-compliance: None	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: Recommended corrective action:	Objective evidence observed:

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

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

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. There were no deductions made for disciplinary practices.
2. There were no reports of non-compliances regarding wages at the facility and the payroll of the facility workers showed that wages were paid in line with legal requirements.
3. Wages are paid before the expiry of 07th of every month and a copy of wage slips is issued to the employees at least a day prior to the disbursement of wages.
4. All employees are guaranteed with minimum wages and are provided with all legal benefits like Annual leave and Employees Life Insurance.
5. No illegal deductions noticed nor reported by workers.

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

Details:

- Social Policy Manual
- Employment Agreements
- Payrolls records 10 samples April 2022 (recent month), 10 samples from August 2021(random month) and 10 samples from May 2021(initial month) for review.
- Attendance records 10 samples April 2022 (recent month), 10 samples from August 2021(random month) and 10 samples from May 2021(initial month) for review.
- Production records (from work floors to check for discrepancies)
- Leave records
- Settlement records
- EOBI (Employees Old Age Benefit Institutions)
- Attendance records of 10 workers were checked.
- Payroll and Payment records of 10 workers were checked.
- Social Security for workers
- Group Insurance Policy

Any other comments: None

Non-compliance: None	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: Recommended corrective action:	Objective evidence observed:

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

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

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 48 hours per week	A1: 48 hours per week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 2 hours per day and 12 hours per week	B1: 0 hours per day	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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: PKR 20,000 / month	C1: PKR 20,000 / month	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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: Double the ordinary rate of wages	D1: Double the ordinary rate of wages	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Wages analysis: (Click here to return to Key Information)			
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
A1: If No, why not?	All the records were shown at the first request.		
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>	10 samples April 2022 (recent month), 10 samples from August 2021(random month) and 10 samples from May 2021(initial month) (initial month) for review.		
C: Are there different legal minimum wage grades? If Yes, please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If Yes , please give details: Unskilled: PKR 20,000 / month And these wages are applicable with effect from 01 July, 2021	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	D1: If No , please give details: N/A	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> Company paid 20,000 PKR as lowest minimum wage which is as per law.	
F: Please indicate the breakdown of workforce per earnings:	F1: 00 % of workforce earning under minimum wage F2: 60 % of workforce earning minimum wage F3: 40 % of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc. full-time employees and please state hour / week / month etc. All employees are paid annual bonus as per law.</i>		
H: What deductions are required by law e.g. social insurance? Please state all types:	Income tax, EOBI (Employee Old Age Benefit Institution). As per discretion of employer.		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made.	1. Taxes 2. EOBI Please describe: Taxes and EOBI deductions were made from salaries.
		I2: Please list all deductions that have not been made.	1. late comings 2. Please describe: Late comings were not deducted

J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Records verified that equal rate is being paid as per work done	
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please specify amount/time: Facility has wage calculation method and also compensating the workers as per their skill level to fulfil the food basket.	
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: None	
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Factory is paying minimum wage as per law and reviews the salaries on annual basis.	
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: As observed during the review of the pay roll records for the month of 10 samples April 2022 (recent month), 10 samples from August 2021(random month) and 10 samples from May 2021(random month) and 10 samples from for review. The employees are paid equally for the equal work depending upon the experience.	
Q: How are workers paid:	<input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain: Workers are paid in form of cash.	

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The facility has installed thumb and face scanning system to track the working hours of the facility.
2. As per the reviewed attendance records for the month of 10 samples April 2022 (recent month), 10 samples from August 2021(random month) and 10 samples from May 2021(initial month) for review.
3. The regular working hours are maintained as per the legal requirement of 48 hours a week.
4. Overtime is observed to be not conducted in the facility for the sampled months.
5. 7th day rest is observed to be guaranteed to all sampled employees reviewed for the sampled months of 10 samples April 2022 (recent month), 10 samples from August 2021(random month) and 10 samples from May 2021(initial month) for review.

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

Details:

- Employment agreements
- Payrolls (for 10 employees) for the month of 10 samples April 2022 (recent month), 10 samples from August 2021(random month) and 10 samples from May 2021(initial month) for review.

- Attendance records for 10 samples April 2022 (recent month), 10 samples from August 2021(random month) and 10 samples from May 2021(initial month) for review.
- Working records (from computers, to check for discrepancies)
- Leave Records

Any other comments:

The overall observation shows that the Company has a working hour policy posted in all prominent places in the premises. As per records provided by the Company, the Company uses face and thumb scanning system for attendance to track the workers daily in and out time. As per provided records, the highest working hours is 8 hours/day and 48 hours/week which was within the legal limit of working hours. The maximum continuous working days were noted 6 days.

Non-compliance: None

1. Description of non-compliance:

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

Local law and/or ETI requirement: None

Recommended corrective action: None

Objective evidence observed: None

Observation: None

Description of observation: None

Local law or ETI requirement: None

Comments: None

Objective evidence observed: None

Good Examples observed: None

Description of Good Example (GE): None

Objective Evidence Observed: None

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe: The facility has electronically (thumb & face) scanning time keeping system to track the working hours of the employees				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details: 10 samples April 2022 (recent month), 10 samples from August 2021(random month) and 10 samples from May 2021 (initial month) for review				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:			
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:			
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If yes, please detail hours, %, types of workers affected and frequency Please give details: None			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
	Maximum number of days worked without a day off (in sample):				
	6 days				
Standard/Contracted Hours worked					

G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency: None
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details: None
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 0 hours per day 0 hours per week 0 hours per 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:	00%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a 200% of standard wages:
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency:
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input checked="" type="checkbox"/> Other	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	

	None
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:
	N/A: There is no such overtime work observed during the review of the pay roll records.
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details: No such excessive overtime hours are observed
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. There are no apparent concerns with regard to discrimination in any form at the facility. It was observed that promotion & training opportunity is based on the worker's willingness and competency.
2. Further all the interviewed employees reported that they are treated with dignity and respect and they receive same and similar treatment like other workers

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

Details:

- Social Policy Manual
- Labour contracts
- Payrolls (check for equal remuneration is paid for equal work done)
- Attendance records (attendance checked check for equal opportunities to work overtime)
- Policy on Discrimination
- Notice board

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 89 % A2: Female 11 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	01
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 signs of discrimination found in the facility (documents reviews, workers interview and factory tour). Factory has strict policy against discrimination in the facility.

Professional Development

A: What type of training and development are available for workers?	The company has provided trainings on Professional Development to newly and existent employees on periodically basis.
---	---

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: All decisions were made on competency criteria and ability of the workers.
--	--

Non-compliance: None

1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: Recommended corrective action:	Objective evidence observed:
--	------------------------------

Observation: None

Description of observation: Local law or ETI requirement: Comments:	Objective evidence observed:
---	------------------------------

Good Examples observed: None

Description of Good Example (GE):	Objective Evidence Observed:
-----------------------------------	------------------------------

8: Regular Employment Is Provided

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

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

ETI

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

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Employees have Employment Agreements which are equivalent to labour contracts as they outline their rights as employees, their remuneration, etc.
2. All interviewed employees have informed the auditor that they have a received copy of Labour Contract. There were no apparent concerns on the day of assessment.
3. The facility does not have temporary employees.

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

Details:

- Social Policy Manual
- Labour contracts (for 10 employee)
- Payrolls (for 10 employees)
- Leave records
- Employment Agreements

Any other comments:

The overall observation shows that the facility follows all the requirement of local law related to employment. During the employees' interview, employees stated that they sign Labour Contract with the facility and obtained the copies of their Employment Agreement prior to joining.

Non-compliance: None	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: Recommended corrective action:	Objective evidence observed:

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

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

Responsible Recruitment

All Workers	
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions A1: If any are unchecked, please describe finding and specific category (ies) of workers affected: No workers effected
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category (ies) of workers affected: No fees is being charged from workers

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: None
D: If any checked, give details:	N/A

Migrant Workers: <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:	N/A		
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: B2: Total number of (outside of local country) recruitment agencies used:		
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: 60%;"> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please describe finding: No migrant workers on site </td> <td style="width: 40%;">C2: Observations:</td> </tr> </table>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please describe finding: No migrant workers on site	C2: Observations:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please describe finding: No migrant workers on site	C2: Observations:		
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 checked="" type="checkbox"/> No D1: If yes, number and example of roles: No migrant workers are employed		

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other B1 – If other, please give details: None
C: If any checked, give details:	

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: Names if available: No agency workers are being used on site
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please give details: No agency is being used
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: No agency is being used

Contractors:	
<p><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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details: No contractors are being used
B: If Yes, how many workers supplied by contractors?	None
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please describe finding: No contractors are being used
D: If Yes, please give evidence for contractor workers being paid per law:	No contractors are being used

8A: Sub-Contracting and Homeworking

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

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

8A.1 There should be no sub-contracting unless previously agreed with the main client.

8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.

Note to auditor on homeworking:

Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.

Note to auditor on subcontracting: auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers

Current Systems and Evidence Examined

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

Current systems:

1. As confirmed by the facility management and as observed during the facility walk through it was confirmed that the facility has most of the production process in-house like cutting, stitching, and quality checking and packing.
2. Verified through document review, factory tour, management interview and employee interview that no sub-contracting & Home-working was used by this factory.

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

- Production process flow diagram
- Inward and Outward receipts
- Subcontractor policy
- Internal audit records for subcontractor

Details: None

Non-compliance: None

1. Description of non-compliance:

Local law and/or ETI /Additional Elements requirement:

Recommended corrective action:

Objective evidence observed:

Observation: None

Description of observation:

Local law or ETI/Additional elements requirement:

Comments:

Objective evidence observed:

Good Examples observed: None

Description of Good Example (GE):

Objective Evidence Observed:

Summary of sub-contracting – if applicable

Not Applicable please x

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

Yes
 No
 A1: Please describe:

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

Yes
 No
 B1: If Yes, summarise details:

C: Number of sub-contractors/agents used:

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

Yes
 No
 D1: If Yes, summarise details:

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

Summary of homeworking – if applicable

Not Applicable please x

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

Yes
 No
 A1: If Yes, summarise details:

B: Number of homeworkers

B1: Male:

B2: Female:

Total:

C: Are homeworkers employed direct or through agents?

Directly
 Through Agents

C1: If through agents, number of agents:

D: Is there a site policy on homeworking?

Yes
 No

E: How does the site ensure worker hours and pay meet local laws for homeworkers?

F: What processes are carried out by homeworkers?	
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

ETI

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

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The factory provided access to a confidential grievance mechanism for all workers.</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>All employees were trained on the facility confidential grievance mechanism.</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>Suggestion box and employees also could communicate to HR staff and top management directly as there is an open-door policy</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: The grievance mechanism includes a provision for non- retaliation, and it allows workers to report issues anonymously. The facility has placed a suggestion box outside the facility for the communities to raise their issues and also meets the communities time to time in person. For suppliers, at the time of signing the agreement it is told that they can raise their issues by filling a complaint application easily available on the main gate or HR department.</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: No open disputes were observed</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: Facility has established effective disciplinary procedure which is designed as per prescription of local law.</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: Workers are trained and addressed over disciplinary procedure also it is a part of their worker handbook.</p>
<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No I1: If yes, please give details: Disciplinary procedure doesn't allow to make deductions.</p>

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:

- As per the interviewed employee's testimony, all employees are treated with dignity and respect and there were no signs of physical abuse, sexual or other harassment and verbal abuse.

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

Details:

- Social Policy Manual
- Disciplinary Policy
- Personal Files (10 personnel files were checked for proof of identity documentation).
- Payroll records for the month of 10 samples

Any other comments: None

Non-compliance: 1

1. Description of non-compliance:

It was noted during factory visit that complaint registering instructions for lodging complaints and suggestions were not posted near complaint / suggestion box at gloves checking & packing hall on ground floor.

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

Local law and/or ETI requirement:

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

Recommended corrective action:

It was agreed by the facility management that they would post the complaint registering instructions for lodging complaints and suggestions near the suggestions box.

Objective evidence observed:

1. Noted during factory visit. (See NC photo #5).

Observation: None

Description of observation:

Local law or ETI requirement:

Comments:

Objective evidence observed:

Good Examples observed: None

Description of Good Example (GE):

Objective Evidence Observed:

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

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

Additional Elements

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

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

Current Systems and Evidence Examined

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

Current systems:

1. There are no foreign nationals employed onsite.
2. All employees' personal data files have photocopies of documentation showing that they have local citizenship and do not need special permission to work in the factory.
3. The facility does also have contractual employees and all employees are on facility payroll.

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

Details:

- Social Policy Manual
- Employee muster roll
- Personal data files (10 personnel files were checked for proof of identity documentation).

Any other comments: None

Non-compliance: None

1. Description of non-compliance:

Local law and/or ETI requirement:

Recommended corrective action:

Objective evidence observed:

Observation: None

Description of observation:

Local law or ETI/Additional Elements requirement:

Comments:

Objective evidence observed:

Good examples observed: None

Description of Good Example (GE):

Objective Evidence Observed:

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The facility has its policy on environmental protection
2. Facility has agreement with waste management company for arrangements of solid waste
3. Facility has obtained NOC (No Objection Certificate) from Environmental Protection Agency

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

Details:

- Social Policy Manual
- Waste disposal records
- The factory is measuring their energy consumption per month.
- The factory had written environmental policy.

Any other comments: None

Non-compliance: None

1. Description of non-compliance:

Local law and/or ETI/Additional Elements requirement:

Recommended corrective action:

Objective evidence observed:

Observation: None

Description of observation:

Local law or ETI/additional elements requirement:

Comments:

Objective evidence observed:

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

Other findings

Other Findings Outside the Scope of the Code
None

Community Benefits <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>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."</p> <p style="text-align: center;"><input checked="" type="checkbox"/> Not Applicable please x</p>	
<p><i>NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</i></p>	<p><i>Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.</i></p>
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
<p>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</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>	
<p>0.B. Management Systems & Code Implementation</p>	<p>0.B. Management Systems & Code Implementation</p>
<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>ETI 1. Forced Labour</p>	<p>ETI 1. Forced Labour</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>ETI 2. Freedom of association and the right to collective bargaining are respected</p>	<p>ETI 2. Freedom of association and the right to collective bargaining are respected</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</p>	

development of parallel means for independent and free association and bargaining.	
ETI 3. Working conditions are safe and hygienic	ETI 3. Working conditions are safe and hygienic
<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 & 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 & Safety to a senior management representative.</p>	
ETI 4. Child labour shall not be used	ETI 4. Child labour shall not be used
<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>	
ETI 5. Living wages are paid	ETI 5. Living wages are paid
<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</p>	

<p>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>ETI 6. Working Hours are not excessive</p>	<p>ETI 6. Working Hours are not excessive</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 <u>all</u> of the following are met:</p> <ul style="list-style-type: none"> - 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. <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>ETI 7. No discrimination is practised</p>	<p>ETI 7. No discrimination is practised</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>ETI 8. Regular employment is provided</p>	<p>ETI 8. Regular employment is provided</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 provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p>Additional Elements: Responsible Recruitment</p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p> <p>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.</p> <p>8.5 Employment agencies must only supply workers registered with them.</p> <p>8.6 Workers pay no recruitment fee at any stage of the recruitment process.</p> <p>8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
<p>8A: Sub-Contracting and Homeworking</p>	<p>8A: Sub-Contracting and Homeworking</p>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.</p> <p>8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<p>ETI 9. No harsh or inhumane treatment is allowed</p>	<p>ETI 9. No harsh or inhumane treatment is allowed</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>10. Other Issue areas: 10A: Entitlement to Work and Immigration</p>	
<p>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.</p>	
<p>10. Other issue areas 10B2: Environment 2–Pillar</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>	

Photo Form

Non-Compliance Photos:










<p>NC Photo #1: Diesel drums were found stored without secondary containment for spillage control at generator room.</p>	<p>NC Photo #2: Rubber mats was not kept beneath under electrical panels in garment stitching hall.</p>	<p>NC Photo #2: Rubber mats was not kept beneath under electrical panels in generator area.</p>
<p>NC Photo #3: Belt covers were not installed on stitching machines in stitching hall on first floor.</p>	<p>NC Photo #3: Eye guards were not installed on stitching machines in stitching hall on first floor.</p>	<p>NC Photo #4: Signs in local language were not posted on toilets near garments stitching hall on first floor.</p>










	<p>Nil</p>	<p>Nil</p>
<p>NC Photo #5: Complaint registering instructions for lodging complaints and suggestions were not posted near complaints/suggestion box.</p>	<p>Nil</p>	<p>Nil</p>

General Photos

		
<p>Factory main gate</p>	<p>Factory Name Board</p>	<p>Factory building</p>

		
<p>No Child Labour Notice</p>	<p>COVID-19 Safety Precautions</p>	<p>Attendance machine</p>

		
<p>Complaint box</p>	<p>Toilet</p>	<p>Fire hose reel and hydrant</p>
		
<p>Fire extinguishers</p>	<p>Fire buckets</p>	<p>First aid box</p>
		
<p>Evacuation map</p>	<p>Emergency exit light</p>	<p>Emergency exit</p>

		
<p>Assembly Area</p>	<p>Company policy</p>	<p>ETI Base code</p>
		
<p>Drinking water point</p>	<p>Parking area</p>	<p>Packing section</p>
		
<p>Cutting section</p>	<p>Stitching section</p>	<p>Pressing section</p>

		
<p>Finishing section</p>	<p>Smoke detector</p>	<p>Fire alarm call point</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:](#)

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PO52ehCo3Inq5lw_3d_3d

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

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

[Click here for Auditors:](#)

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