

Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details						
Sedex Company Reference: (only available on Sedex System)	(only available on Sedex System)			ZS100	00012377	
Business name (Company name):	MAITREE APPARELS	•			•	
Site name:	MAITREE APPARELS					
Site address:	2 nd floor,shalimar complex al-habib estate,B/H-evergreen hotel nr-narol circle narol,ahmedabad,gujara t 382405 IN		Country:		IN	
Site contact and job title:	Mr. Jasvant Patel / F	Prop				
Site phone:	9825784898		Site e-mail:		jash_patel16@yahoo.co m	
SMETA Audit Pillars:	Standards		Health and Safety (plus Environment 2-Pillar)	Environ 4-pillar	iment	Business Ethics
Date of Audit:	2023-09-25					

Audit Company Name:
DQS CFS GmbH

Audit Conducted By						
Affiliate Audit Company	N	Purchaser		Retailer		
Brand owner		NGO		Trade Union		
Multi- stakeholder			Combined Audit (select all that apply)		ly)	

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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 (March 2019) 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 transformer code in compliance between ETI code / SMETA Additions/ local law and shall be noted in the observations section of the CAPR.

Auditor Team						
Lead Auditor:	Jasvinder Singh	APSCA Number:	21704663			
Additional Auditors:	Kaushik Laha		21701571			
Date of declaration:	2023-09-25	-				

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.

Site Representation			
Full Name:	Mr. Jasvant Patel		
Title:	Prop		
Date of declaration:	2023-09-25		
. .			

Comments:

Any exceptions to this must be recorded here (e.g. different sample size): Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just

started last Sep 2020). The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives



Summary of Findings

Issue	Area of Non-Conformity		Number of issues		sues	Findings
(please click on the issue title to go direct to the appropriate audit results by clause)	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
<u>0B - Management systems and code</u> implementation	0.B.3		1	0	0	NC - ZAF600210410
<u>1 - Freely chosen employment</u>			0	0	0	
2 - Freedom of association and right to <u>collective bargaining are respected</u>			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.3	§1 §2 §3	7	0	0	NC - ZAF600210411 NC - ZAF600210412 NC - ZAF600210413 NC - ZAF600210414 NC - ZAF600210415 NC - ZAF600210416 NC - ZAF600210417
<u>4 - Child labour shall not be used</u>			0	0	0	
<u>5 - Living wages are paid</u>			0	0	0	
<u>6 - Working hours are not excessive</u>			0	0	0	
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
<u>9 - No harsh or inhumane treatment is</u> <u>allowed</u>			0	0	0	
<u> 10A - Entitlement to work and immigration</u>			0	0	0	
10B2 - Environment 2-pillar			0	0	0	
10B4 - Environment 4-pillar			0	0	0	
<u> 10C - Business ethics 4-pillar</u>			0	0	0	

Local Law Issues

Issue	Description
§1	In accordance with Factories Act 1948, Section 38 (1) In every factory, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and to provide and maintain (a) safe means of escape for all persons in the event of a fire, and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory all the workers are familiar with the means of escape in case of fire and have been adequately trained in the routine to be followed in such cases.



§ 2	In accordance with Factories Act 1948, Section 38 (1) In every factory, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and to provide and maintain (a) safe means of escape for all persons in the event of a fire, and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory all the workers are familiar with the means of escape in case of fire and have been adequately trained in the routine to be followed in such cases.
§ 3	In accordance with Factories Act 1948, Section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include- (a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, (b) the arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handing, storage and transport of articles and substances, (c) the provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.





Site Details

Site Details					
Company Name	MAITREE APPARELS	MAITREE APPARELS			
Site Name	MAITREE APPARELS				
GPS location	GPS Address:	22.95	N, 72.80 E		
(if available)	Coordinates:	Al- Ha Everg Circle	loor, Shalimar Complex , bib Estate, Behind reen Hotel, Near Narol , Narol, Ahmedabad, at, India -382405		
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Factoy License 48796 for 50 employees 100 HP dated 23.9.2022 valid till 31.12.2026. Fire NOC is not required as the height of the building is less than 15 m (notification number Urban Development & Urban Housing Department and notification Sachivalaya, Gandhinagar-22, dated 22.1.2021 number GH/V/9 of 2021/AGN-102021-100-100-l1. The factory is in exempted category vide GBCB/P-1/12/352040 dated 12.4.2016. The building plan approval seen vide JDISH/Plan part 1/2022/1401 dated 18.8.2022.				
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacture of Readymade Demin garments.				
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The organization started from 1/6/2022. The building is in second floor of 3 storied building. the first two floors are rented to other garment manufacturing units. The distance of airport from this factory is 21 km. The factory runs in single shift 930 am to 1830 pm, lunch break 1300-1400 pm, tea break 1030-1045 am and 1545 pm to 1600 hours. Weekly off Sunday. The total number of employees is 55. The male is 25 and the female is 30. The age of the youngest worker is 19 years.				
Structure and number of buildings	Building Name:	1			
	Floor	Description	Remark		
	Ground floor	Shalimar Accessories- Two wheeler accessor			
	First Floor	Shruti Garments - shirt manufacturing	T NA		
	Second floor	Cutting, Stitching Finishing, Packin Dispatch, Conference hall, admin Office, Director office ar trim stores	g,		
Visible structural integrity issues (large cracks) observed?	🗆 Yes 🗹 No				
	Please give details:				
	There are no cracks				



Does the site have a structural engineer evaluation?	✓ Yes □ No				
	Please give details:				
	The building stability certificate seen vide form 1 A valid from 19/10/222 to 18/10/2027.				
Site function	□ Agent	 Factory Processing/Manufacturer 			
	Finished Product Supplier	Grower			
	Homeworker	Labour Provider			
	Pack house	Primary Producer			
	Service Provider	Sub-contractor			
Months of peak season	July to December				
Process overview	The process flow is demin- cutting- stitching- finishing- inspection- packing- dispatch. The machines are Single needle - 45, Double deedle-3, Bartech -2, Five thread machine-2, FO machine- 3, cuting machine-2, Fusing Machine-1. The production line is 3 lines.				
What form of worker representation is	🗆 Union	Worker Commitee			
there on site?	🗆 Other	None			
Please give details:	There are 2 from the Manageme	nt and 3 from Workers			
Is there any night production work at the site?	🗆 Yes 🗹 No				
Are there any on site provided worker	🗆 Yes 🗹 No				
accommodation buildings	Please give details:				
Are there any off site provided worker accommodation buildings	🗆 Yes 🖂 No				
	Please give details:				
Were all site provided accommodation buildings included in this audit	🗆 Yes 🗹 No				
	Please give details:				
	NA				

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Audit Parameters				
Time in and time out	Day 1			
	In	09:00		
	Out	16:30		
Audit type:	FULL_INITIAL			
Was the audit announced?	ANNOUNCED			
Was the Sedex SAQ available for review?	Yes			
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No			
Who signed and agreed CAPR	Mr. Jasvant Patel / Prop		/ Prop	
Is further information available	No			





Audit attendance	Management	Worker Representatives		
	Senior management	Worker Committee representatives	Union representatives	
A: Present at the opening meeting?	Yes	Yes	No	
B: Present at the audit?	Yes	Yes	No	
C: Present at the closing meeting?	Yes	Yes	No	
Reason for absence at the opening meeting	The ere is no trade Union			
Reason for absence during the audit	The ere is no trade Union			
Reason for absence at the closing meeting	The ere is no trade Union			





Worker Analysis

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

Worker Analysis								
	Local		Migrant*		Home			
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	workers	Total
Worker numbers – male	25	0	0	0	0	0	0	25
Worker numbers – female	30	0	0	0	0	0	0	30
Total	55	0	0	0	0	0	0	55
Number of Workers interviewed – male	6	0	0	0	0	0	0	6
Number of Workers interviewed – female	4	0	0	0	0	0	0	4
Total – interviewed sample size	10	0	0	0	0	0	0	10





	Nationalities Structure	
Nationality of Management	Indian	
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationaility 1: INDIAN	approx %: 100%
Was this list completed during peak season?	☑ Yes □ NoPlease give details:	
Worker remuneration	Workers on piece rate:	0%
	Paid hourly:	0%
	Salaried:	100%
Payment cycle	Paid daily:	0%
	Paid weekly:	0%
	Paid monthly:	100%
	Other:	0%
	Details for other:	NA





W	orker Interview Summary
Were workers aware of the audit?	🗹 Yes 🗆 No
Were workers aware of the code?	🗆 Yes 🗵 No
Number of group interviews:	1 group of 4
Number of individual interviews:	Male: 6 Female: 0
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.	 ✓ Yes □ No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☑ Yes □ No
In general, what was the attitude of the workers towards their workplace?	☑ Favorable
What was the most common worker complaint?	None
What did the workers like the most about working at this site?	Timely salary, no health and safety issues, positive Management- easily approachable, clean working place, no abusive language, no case of any harassment
Any additional comment(s) regarding interviews:	None
Attitude of workers to hours worked:	There are no Overtime since the work is not much. The workers vouched that the overtime is voluntary and if there is any need for overtime, permission is sought from them and the working hours are noted for overtime and the payment is made for the overtime work hours @ 200% of the basic salary.
Is there any worker survey information available?	 □ Yes ☑ No Please give details:





Attitude of workers:

10 workers were selected for interview, they were interviewed as 1 group of 4 employees and balance 06 workers were interviewed individually. The workers were assured of confidentiality, and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory and that they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors who treated them with respect. They were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used. They felt able to complain directly to their supervisors but also felt free to give their general concerns to their grievance representative who would take it to the management.

Attitude of worker' s committee/union reps:

Based on the interaction with workers committee representative, it was noted that workers committee representative is not discriminated, and their grievances stated by the workers were effectively solved by the facility management. Further no negative comments were received. No Union does exist.

Attitude of managers:

During the audit days, the management of establishment was very cooperative and very transparent to share the issues & information, Attitude of the management was found positive towards the audit and the audit process. The establishment was found aware of the requirements of a social audit & its applicable ETI and local law. The management was very transparent and cooperative during audit. The management was receptive to the findings and was very keen to implement all the measures to achieve compliance in their facility.





0A - Universal Rights covering UNGP [Summary of Findings]

0A: Compliance Requirements

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.Based on review of records facility has established a policy covering human rights Policy No- MA/HRP/22 impacts and issues and it is displayed 2.Prop is responsible for implementing standards concerning Human rights. 3.Facility has established a policy endorsed at the highest level, covering human rights impacts and issues, and ensures it is communicated to all appropriate parties, including its own suppliers. 4.Facility has not identified their stakeholders and salient issues. 5.Facility has measured direct, in-direct and potential impacts on stack holder' s human rights. 6.The Whistle blowing policy number vide MA/WBP/39 is available

Evidence examined:

Interaction with Management and Interview with employees Employee Handbook was reviewed. It stipulates complying with written policies and procedure that being provided individually to employees. Company Manual contains details of Code and Business Ethics with the commitment of being compliant in all aspects of business and integrity aligned with the client's requirement and local law. Employees' training records showed the facility conducted training for employees about the social compliance when they enter the facility

Any other comments:

NA

Policy statement that expresses commitment to respect human rights?	☑ Yes □ No
communent to respect numur rights.	Please give details:
	Facility has a policy on Universal Rights covering UNGP - 20
Are the policies included in workers' manuals?	🗹 Yes 🗆 No
manuals?	Please give details:
	The polices are included in the workers' manual.



Does the business have a designated person responsible for implementing	🗹 Yes 🗆 No
standards concerning Human Rights?	Please give details:
	The Prop is responsible for implementing standards concerning Human rights
Does the business have a transparent system in place for confidentially	🗹 Yes 🗆 No
reporting, and dealing with human rights impacts without fear of reprisals towards	Please give details:
the reporter?	Facility has provided a following grievance mechanism for confidential reporting anonymously without fear of retaliation and any breaches of policies and procedures. 1.Workforce Representative 2.Works committee. 3.Grievance Committee 4.Suggestion and Complaint Box
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	☑ Yes □ No
Does the business demonstrate effective	🗹 Yes 🗆 No
data privacy procedures for workers' information, which is implemented?	Please give details:
	Seen the data privacy policy vide MA/DPP/0906 dated 1.06.2023 The data privacy are for the personal files, which are kept under lock and key in HR's room, the salary of the employees, since all the salary are bank transfer, the computers are password protected. The health check-up reports are kept Confidential
Me	easuring Workplace Impact
Annual worker turnover (Number of	Last year 0.0%
workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	This year 0.0%
Current % quarterly (90 days) turnover(Number of workers leaving from	0.0%
the first of the 90 day period through to the last day of the 90 day period /	
[(number of employees on the 1st day of 90 day period + number of employees on	
the last day of the 90 day period) / 2])	
Annual % absenteeism(Number of days lost through job absence in the year /	Last year 10.0%
[(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	This year 10.0%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	10.0%

 Start Date:
 E

 2023-09-25
 2





Are accidents recorded?	🗹 Yes 🗆 No	
	Please give details:	
	Seen the data privacy policy vio 18.01.2022 The data privacy are kept under lock and key in HR's employees, since all the salary computers are password prote reports are kept Confidential	e for the personal files, which are s room, the salary of the are bank transfer, the
Annual Number of work related accidents	Last year	0.0%
and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	This year	0.0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%	
Lost day work cases per 100	Last year	0.0%
workerś([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	This year	0.0%
% of workers that work on average more	6 month	0.0%
than 48 standard hours / week in the last 6 / 12 months	12 month	0.0%
% of workers that work on average more	6 month	0.0%
than 60 total hours / week in the last 6 / 12 months	12 month	0.0%





0B - Management Systems and code Implementation [Summary of Findings]

0B: Compliance Requirements

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code. 0.B.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.

0.B.3 Suppliers are expected to communicate this Code to all employees. 0.B.4 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.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:

Based on facility tour and review of records, facility has implemented the ETI base code and the code has been displayed in notice board and communicated to all the employees during induction training. Prop is responsible for compliance with the code.

Based on review of records that facility had obtained legally required Business license and approved plant layout.

The facility communicates this Code to all employees by training as confirmed by training records and employee interviews.

The ETI based code was posted on-site for employee review. The facility had set up policy and appointed HR Head to update labor law requirements. The ETI code of conduct were signed off with the suppliers.

There are evidences of the supplier audit for the year 2022-23 as per the audit plan.

The social risk assessment is done on 1.6.2023.

The training of the ETI code of the conduct is not effective.

Evidence examined:

1.Facility Policy and Procedures

2.Employee Handbook was reviewed. It stipulates complying with ETI Code, written policies and procedure that being provided individually to employees.

3.Company Manual contains détails of Code and Business Ethics with the commitment of being compliant in all aspects of business and integrity aligned with the client' s requirement and local law

Any other comments:

NA

Management Systems		
In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	□ Yes ☑ No Please give details:	
	There is no prosecution.	





Do policies and/or procedures exist that reduce the risk of forced labour, child	🗹 Yes 🗆 No
labour, discrimination, harassment & abuse?	Please give details:
abuse:	The child labour policy MA/CLP/06 Child remediation policy MA/CRP/08, young workers policy MA/NCYWP/25, forced labour policy MA/FLP/16, anti harassment policy, MA/ASHP/04 zero abuse policy MA/ZAP/41, ethical policy MA/EBBP/15, anti- discrimination policy MA/ADP/03, Anti Bribery Policy MA/ABP/1,Enviornmental Policy MA/EAP/13, Health and safety policy MA/EHSP/12, Supplier policy MA/SP/37 seen and the policies are displayed in the local language
If Yes, is there evidence (an indication) of effective implementation? Please give details.	The policies are displayed. The personal files of 10 employees on sample basis seen. The age proof are there. There is no evidence of forced labour in the files. No part of salary is withheld as inferred from the salary record. Interview with 10 employee's shows there is no discrimination, nor there are no cases of any harassment.
Have managers and workers received training in the standards for forced	🗹 Yes 🗆 No
labour, child labour, discrimination, harassment & abuse?	Please give details:
	All the employees have undergone induction training where the social compliance policies and procedures were explained. The ETI training was conducted on 5.9.2023, not all persons are imparted training
If Yes, is there evidence (an indication) that training has been effective e.g.	🗆 Yes 🗹 No
training records etc.? Please give details	Please give details:
	The training is not effective
Does the site have any internationally recognised system certifications e.g. ISO	🗆 Yes 🗹 No
9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	Please give details:
	NA
Is there a Human Resources manager/department?	☑ Yes □ No HR Manager is taking care of the Human Resources.
Is there a senior person /manager	✓ Yes □ No
responsible for implementation of the code?	
code:	Please give details: The Prop is taking care of the implementation of the code.
Is there a policy to ensure all worker	✓ Yes □ No
Is there a policy to ensure all worker information is confidential?	
	Please give details: The policy of confidentiality vide MA/DPP/09 dated 1.06.2023
	available.
Is there an effective procedure to ensure confidential information is kept	🗹 Yes 🗆 No
confidential?	Please give details:
	All the information about the personal files are kept confidential. The salaries are transferred to the banks and the individual notifications are sent by the bank to the respective mobile phones. The health check up is kept confidential





Are risk assessments conducted to evaluate policy and procedure	🗹 Yes 🗆 No
effectiveness?	Please give details:
	The social risk assessment is done on 1.6.2023.
Does the facility have a process to address issues found when conducting	🗹 Yes 🗆 No
risk assessments, including	Please give details:
implementation of controls to reduce identified risks?	The internal audit is done on 1.6.2023. There were 3 NCRs and all are closed.
Does the facility have a policy/code which require labour standards of its own	🗹 Yes 🗆 No
suppliers?	Please give details:
	The ETI code of conduct were signed off with the suppliers.
	Land Rights
Does the site have all required land rights licenses and permissions (see SMETA	🗹 Yes 🗆 No
Measurement Criteria)?	Please give details:
	Facility has copy of building occupation certificate with land registry papers as required by law. All approvals were verified.
Does the site have systems in place to conduct legal due diligence to recognize	🗹 Yes 🗆 No
and apply national laws and practices	Please give details:
relating to land title?	Facility has systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title
Does the site have a written policy and procedures specific to land rights?	🗹 Yes 🗆 No
procedures specific to tand rights.	Please give details:
	Facility has compensated the owner for the land prior to the facility being built
Is there evidence that facility/site compensated the owner/lessor for the	🗹 Yes 🗆 No
land prior to the facility being built or	Please give details:
expanded?	Facility has written policy to check all legal aspects before taking any land. Facility has taken legal opinion before taking the land.
Does the facility demonstrate that	🗹 Yes 🗆 No
alternatives to a specific land acquisition were considered to avoid or minimize	Please give details:
adverse impacts?	Facility has written policy to check all legal aspects before taking any land. Facility has taken legal opinion before taking the land.
Is there any evidence of illegal appropriation of land for facility building	🗆 Yes 🗹 No
or expansion of footprint?	Please give details:
	NA

End Date: 5 2023-09-25





	Evidence		
[Back to findings summary]			
	Non-Compliance		
Status	OPEN		
Reference	ZAF600210410		
Clause	0B - Management Systems and code I	mplementation	
Issue Title	687 - The ethical Code (i.e. ETI Base Co audits) is not communicated to the sit	ode for SMETA te's employees	
Subcategory	Site's Awareness of Code/Legal Requi	rements	
New or carried over?	☑ New □ Carried	d Over	
Root cause	Training System	n	
	Costs Lack of	f workers	
	Other		
Root cause - Other			
ETI code	0.B.3 - Suppliers are expected to communicate this Code to all employees.		
Explanation to the non compliance	The training on the ETI Code of Conduct is not effective., 6 of10 employees were not able to explain the code.		
Follow up method	Follow up audit Ø Deskto	op audit	
Timescale	□Immediate □ 30 days	⊡ 60 days	
	□ 90 days □ 120 days [□ 180 days	
	□ 365 days □ Other		
Actions	The training will be imparted to all the the evaluation of the effectiveness wil	e workers and Il be checked.	

ate:End Date:0-252023-09-25





1 - Freely chosen Employment [Summary of Findings]

1: Compliance Requirements

nents

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. The factory has a policy which prohibits forced labour and this was available for review. 2. There was a non-formalised application procedure which states that workers must present their ID's for proof of age but that only copies must be kept in the personnel files and the original given back to the workers.

3. The employee handbook – given to all workers on joining, states that workers within their probation period are free to leave without any notice and once a worker is permanent (this is out of probation) they can resign from the factory with one month's prior written notice, given to their supervisor or the personnel office. The handbook also states that they will be given their full wages on their last day of work. 4. The terms and conditions of employment in the handbook state that the workers are free to leave the workplace outside of their working hours.

5. The factory did not require any payment for work tools, IC/staff card, training, etc.

6. The factory did not use prison labour.

7. The above was confirmed in management and employee interview

8. The standing order approved by Labor commissioner of Gujurat dated 1.06.2023

Evidence examined:

1. Personnel files (all were checked)

2. Resignation records of recent 3 months

3. Factory rules

4. Employee handbook

5. Management and employee interview

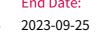
Any other comments:

NA

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	□ Yes ☑ No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	□ Yes ☑ NoPlease give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	□ Yes ☑ NoPlease give details:
Are there any restrictions on workers' freedom to terminate employment?	 □ Yes ☑ No Please give details: There is no restrictions on workers' freedom to terminate employment as both gives 1 month's notice.



If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	 □ Yes □ No ☑ Not Applicable Please give details: NA
Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	 ☐ Yes ☑ No Please give details: There evidence of any restrictions on workers' freedoms to leave the site at the end of the work day as inferred by the workers interview.
Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	 □ Yes ☑ No □ Not Applicable Please give details: Te supplier audit based on the ETI Code of Conduct is not done.
Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	 ✓ Yes □ No Please give details: There are evidence of the background verification of the employees done.





2 - Freedom of Association and Right to Collective Bargaining are Respected [Summary of Findings]

2: Compliance Requirements

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:

There is no union at the site

There is workers committee at the site, worker representatives were elected by employees. Based from employee's interview, employees can approach top management directly to report their grievances and necessary corrective action is taken by the management.

their grievances and necessary corrective action is taken by the management. Facility has formed a Workers Committee and Grievance committee and conducted meetings once in three months and the minutes of meetings are recorded for verification and future reference. Based from employee's interview, the facility does not restrict employees from organizing trade unions and has an open mind approach towards the activities of trade unions and their organizational activities. Based from the employee's interview and interaction with facility management, works committee employee representatives are not discriminated and they are free to carry out their functions like meetings

on periodical basis

Evidence examined:

1 Social compliance system program and procedure

2. Suggestion box complain feedback

3. Meeting minutes

4. Works Committee Minutes dated 29/08/2022 and 27.5.2023

5. Employee interview and management interview

6. Employee handbook and employment contracts were reviewed. They both stated that employees are free to form trade unions. Nobody will be treated differently whether they are members of the union. 7. The election of the Worker representatives is done on 25.2.2023

Any other comments:

NA

What form of worker representation/union is there on site? (Please add the name of the union or	□ Union □ Other	☑ Worker Commitee□ None
committee in the textbox)		
Other details:	There are 2 from the Manageme	nt and 3 from the workers
Is it a legal requirement to have a union?	🗆 Yes 🗵 No	
Is it a legal requirement to have a worker's committee?	🗆 Yes 🗹 No	

Start Date:End Date:2023-09-252023-09-25

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Is there any other form of effective worker/management communication channel? (Other than union/worker	✓ Yes □ NoPlease give details:				
committee e.g. H&S, sexual harassment)	5				
	The health and safety committee held on 6.9.2023 , the grievance committee held on 6.9.2023 and worker committee held on 29.8.2023, ICC held on 4.9.2023.				
Is there evidence of free elections?	☑ Yes □ No				
Does the supplier provide adequate facilities to allow the Union or committee	🗹 Yes 🗆 No				
to conduct related business?	Please give details:				
	Based from the employee's interview and review of records that, works committee employee representatives are free to carry out their functions like meetings with adequate facilities on periodical basis and the record of the same was maintained				
Name of union and union representative, if applicable:	NA				
Is there evidence of free elections?	🗆 Yes 🗆 No 🖂 Not Applicable				
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Worker committees existed in facility				
Is there evidence of free elections?	🗹 Yes 🗆 No 🗆 Not Applicable				
Are all workers aware of who their representatives are?	☑ Yes □ No				
	Please give details:				
	Based on workers interview it was noted that all workers are aware about the workers representative,				
Were worker representatives freely elected?	🗹 Yes 🗆 No				
Date of last election:	2023-02-25				
Do workers know what topics can be raised with their representatives?	🗹 Yes 🗆 No				
Were worker representatives/union representatives interviewed?	🗹 Yes 🗆 No				
If Yes, please state how many:	1.0				
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The Participation Committee is arranging meeting within three months and gathering problems coming from workers' end and approaching them to the management. Last meeting was conducted on 28.08.2023. Minutes of works committee was continued 20 minutes.				
Are any workers covered by Collective Bargaining Agreement (CBA)?	□ Yes 🗹 No				

 Start Date:
 End Date:

 2023-09-25
 2023-09-25





3 - Working Conditions are Safe and Hygienic Summary of Findings

3: Compliance Requirements

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:

All electrical points were properly insulated. The factory has posted the evacuation plans on work floors. Drinking water was available. Worker's toilets were found not clean. Facility conducts fire drill on regular basis and adequate number of fire equipment (18 Fire Extinguishers, drinking water point 01) Were found basis and adequate number of fire equipment (18 Fire Extinguishers, drinking water point 01) Were found on floors. Dining space for the workers was found clean and sitting arrangement was found adequate as per requirement. Washroom WC male – 1. WC -2 female WC- 02. Workers' working condition was found safe and clean. First aid box (01 No.). There are 10 persons trained in first aid by Red Cross Society on 8.8.2023. Escape route were found obstacle free All machine and electrical equipment was maintained in good condition. But there are pulley guard missing in two stitching machines. There is the electrician. Seen the Diploma certificate. Facility had obtained periodic inspection certificate for all the machinery used. The facility has Admin manager, who is responsible for H&S at work. The fire drill training done on 07/07/2023 and 5.9.2023 by Niyati Enterprises. The Time taken is 2 min. The trained fire fighters are 15. The mock drill cover all the occupants of the building. The testing reports seen. The drinking water is tested on 6.4.2023 by Metro Enviro Chem Associates. The ambient air testing is done on 16.6.2023 by Metro Enviro Chem Associates, the work zone monitoring done on 16.6.2023 by Metro Enviro Chem Associates, the work zone monitoring done on 16.6.2023 by Metro Enviro Chem Associates. The law of the earth pit testing is done on 16.6.2023 by Metro Electric & Engg Works . The Pandemic risk assessment is done on 1.6.2023. Factory has developed risk assessment analysis for all areas and functions and takes effective steps to reduce the associated risks. The risks identified on areas and functions and takes effective steps to reduce the associated risk. The risks identified on 01.06.2023 are burn injury, electric shock, Fire, Gangway block, Block stairs, emergency gate closed. There is risk assessment pertaining to overtime. The training imparted are Social awareness training / ETI Base code on 5.09.2023, Training on anti-bribery on 1.9.2023, training on Waste Management and use of PPE on 7.8.2023, Emergency preparedness done on 7.6.2023, Training on HSE done on 13.1.2023, training on human rights on 22.8.2023, HIRA training on 1.8.2023.

Evidence examined:

- Health and Safety Policy No MA/EHSP/12
- Health and safety manual
- Stability Certificate is valid until no change in structure. Industrial accident records Updated till August 2023
- There were 20 first aiders and they had been trained through St. John Ambulance Association on
- 12/12/2020 valid for one year
- Health & Safety Committee meeting minutes dated 6/09/2023
- Test reports

Any other comments:

NA

Start Date: End Date: 2023-09-25 2023-09-25

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Does the facility have general and procedures that are fit for purpose and procedures that are fit for purpose and are these communicated to workers? Pease give details: Facility had established general Health & Safety, occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers during induction training. Are the policies included in workers' manuals? Pease give details: Facility had included the social compliance policies in worker's manual Pease give details: Facility had included the social compliance policies in worker's manual Pease give details: Facility had included the social compliance policies in worker's manual Pease give details: Facility had included the social compliance policies in worker's manual worker's manual Pease give details: The building plan and Building stability certificate is available and no change in the structure. Pease give details: Are visitors to the site informed on H&S and provide with personal protective equipment, The auditor wore his own PPE. Pease give details: Is a medical room or medical facility provides where appropriate) Pes © No Please give details: NA Is there a doctor or nurse on site or there is easy access to first aider / trained medical aid? Pes © No Please give details: Na Neese the facility provides worker transport – is if if tor purpose, safe, maintained and op		
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nearby places	to reduce identified risk?	Factory has developed risk assessment analysis for all areas and functions and takes effective steps to reduce the associated risks. The risks identified on 1.06.2023 are burn injury, electric shock, Fire, Gangway block, emergency gate closed. There is no overtime and all the workers come from

Date:End Date:09-252023-09-25





Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	✓ Yes □ NoPlease give details:
	The organization is in exempted category,
Is the site meeting its customer requirements on environmental	🗆 Yes 🗵 No
standards, including the use of banned	Please give details:
chemicals?	There are no banned chemicals being used.





	Non-Co	ompliance		Evidence
[Back to findings	summary]			
	Non-Co	ompliance		
Status	OPEN			
Reference	ZAF600210411			
Clause	3 - Working Con	ditions are Safe a	nd Hygienic	
Issue Title	214 - No evacua exit route	tion plan or desig	gnated emergency	
Subcategory	Fire Safety - Fire	alarms & Evacua	ition	
New or carried over?	☑ New		arried Over	
Root cause	🗆 Training		/stem	
	🗆 Costs	🗆 La	ack of workers	
	🗆 Other			
Root cause - Other				
Local law issue	In every factory, taken to preven internally and ex maintain (a) safe the event of a fin and facilities for measures shall I factory all the w escape in case of	, all practicable m t outbreak of fire xternally, and to p e means of escap re, and (b) the neo extinguishing fire be taken to ensur orkers are familia of fire and have be	and its spread, both provide and e for all persons in cessary equipment e. (2) Effective re that in every ar with the means of	h
ETI code	be provided, be knowledge of th hazards. Adequa accidents and ir associated with by minimising, s	aring in mind the ne industry and of ate steps shall be njury to health ari , or occurring in t	taken to prevent sing out of, he course of work, ably practicable, th	ie
Explanation to the non compliance	There is no evac	cuation plan in the	e facility.	
Follow up method	🗆 Follow up au	dit 🗵 De	esktop audit	
Timescale	🗆 Immediate	⊠ 30 days	□60 days	
	🗆 90 days	🗆 120 days	□180 days	
	🗆 365 days	□ Other		
Actions	The evacuation	plan will be displ	ayed.	

Report reference: ZAA600026500

Start Date: 2023-09-25

End Date: 2023-09-25





Audit company: DQS CFS GmbH

Report reference: Start Date: End Date: ZAA600026500 2023-09-25

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	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	OPEN	
Reference	ZAF600210412	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	192 - Absence of functional fire alarms / smo detectors	ke
Subcategory	Fire Safety - Fire alarms & Evacuation	
New or carried over?	☑ New □ Carried Over	
Root cause	🗆 Training 🛛 System	
	🗆 Costs 🔅 Lack of worke	ers
	🗆 Other	
Root cause - Other		
Local law issue	In accordance with Factories Act 1948, Section In every factory, all practicable measures shat taken to prevent outbreak of fire and its spre- internally and externally, and to provide and maintain (a) safe means of escape for all per- the event of a fire, and (b) the necessary equi- and facilities for extinguishing fire. (2) If measures shall be taken to ensure that in ever factory all the workers are familiar with the necessary escape in case of fire and have been adequated trained in the routine to be followed in such	all be bad, both sons in ipment Effective ery neans of cely
ETI code	3.1 - A safe and hygienic working environmer be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to pro accidents and injury to health arising out of, associated with, or occurring in the course of by minimising, so far as is reasonably practic causes of hazards inherent in the working environment.	c event f work,
Explanation to the non compliance	There are no fire alarms or smoke detectors i facility.	in the
Follow up method	🗆 Follow up audit 🛛 🖂 Desktop audit	t
Timescale	□Immediate ☑ 30 days □ 60 da	ys
	□ 90 days □ 120 days □ 180 d	ays
	□ 365 days □ Other	
Actions	The fire alarms and smoke detectors will be i	nstalled

Report reference: ZAA600026500

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	Non-Compliance	Evidence
[Back to findings	s summary]	
	Non-Compliance	
Status	OPEN	
Reference	ZAF600210413	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	209 - Not all emergency exits are properly marked and lighted	
Subcategory	Fire Safety - Fire exits	
New or carried over?	☑ New □ Carried Over	
Root cause	🗆 Training 🛛 🖂 System	
	Costs Lack of workers	
	🗆 Other	
Root cause - Other		
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	There is no emergency lights in the exits	
Follow up method	🗆 Follow up audit 🛛 🗹 Desktop audit	
Timescale	□ Immediate □ 30 days □ 60 days	
	□ 90 days □ 120 days □ 180 days	
	□ 365 days □ Other	
Actions	The emrgency lights will be installed.	

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Non-Compliance				Evidence
[Back to findings	summary]			
	Non-Compli	iance		
Status	OPEN			
Reference	ZAF600210414			
Clause	3 - Working Conditior	ns are Safe a	nd Hygienic	
Issue Title	224 - Isolated occurre insulation in electrica wiring and plugs	ence of inco als including	rrect / damaged ; burnt / damaged	
Subcategory	Electrical risk			
New or carried over?	☑ New	🗆 Ca	arried Over	
Root cause	Training	⊡ Sy	/stem	
	🗆 Costs	🗆 La	ack of workers	
	🗆 Other			
Root cause - Other				Nc- Loose wires.jpg
Local law issue	In accordance with Fa every occupier shall e practicable, the healt workers while they ar Without prejudice to of sub-section (1), the extends, shall include maintenance of plant factory that are safe a the arrangements in t and absence of risks use, handing, storage substances, (c) the pr instruction, training a to ensure the health a work.	ensure, so fa th, safety an re at work in the generali e matters to e- (a) the pro t and system and without the factory f to health in e and transp rovision of si and supervis	ir as is reasonably d welfare of all the factory. (2) ty of the provisions which such duty ovision and ts of work in the risks to health, (b) for ensuring safety connection with the ort of articles and uch information, sion as are necessary	Nc- Loose wires (2).jpg
ETI code	3.1 - A safe and hygien be provided, bearing knowledge of the ind hazards. Adequate st accidents and injury t associated with, or or by minimising, so far causes of hazards inh environment.	in mind the ustry and of eps shall be to health ari ccurring in t as is reason	prevailing any specific taken to prevent sing out of, he course of work, ably practicable, the	
Explanation to the non compliance	In three places , loose production area,	e wires were	found in the	
Follow up method	□ Follow up audit	⊡ De	esktop audit	
Timescale	□Immediate □3	30 days	⊡ 60 days	
	□ 90 days □ 1	120 days	□180 days	

Audit company: DQS CFS GmbH

Report reference: ZAA600026500

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	□ 365 days □ Other	
Actions	All loose wires will be removed.	





	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	OPEN	
Reference	ZAF600210415	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt / hand guards on other machines)	
Subcategory	Machinery	
New or carried over?	☑ New □ Carried Over	
Root cause	🗆 Training 🛛 System	
	Costs Lack of workers	
	Other	
Root cause - Other		
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	NC- No Pulley Guard.jpg
Explanation to the non compliance	In accordance with the Factories Act 1948, Section 26 (1) All machinery driven by power and installed in any factory (a) every set screw, bolt, or key on any revolving shall, spindle, wheel or pinion shall be so sunk, encased or otherwise effectively guarded as to prevent danger.	
Follow up method	Follow up audit Desktop audit	
Timescale	□ Immediate □ 30 days □ 60 days	
	□ 90 days □ 120 days □ 180 days	
	□ 365 days □ Other	
Actions	In one of the stitching machine, pulley guard were not available.	
	·	

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	Non-Co	ompliance			Evidence
[Back to findings	summary]				
	Non-Co	ompliance			
Status	OPEN				
Reference	ZAF600210416				
Clause	3 - Working Con	ditions are Safe a	nd Hygienic		
Issue Title	214 - No evacua exit route	tion plan or desig	nated emergency		
Subcategory	Fire Safety - Fire	alarms & Evacua	tion		
New or carried over?	🗹 New	🗆 Ca	arried Over		
Root cause	🗆 Training	⊡ Sy	rstem		
	Costs	🗆 La	ick of workers		
	🗆 Other				
Root cause - Other					<u>Nc- No arrow</u> marking.jpg
ETI code	accidents and in associated with by minimising, s	nurv to nealth ari	he course of work, ably practicable, th	le	Nc- No arrow mark.jpg
Explanation to the non compliance	The arrow mark section.	ing was not done	in the stitching		
Follow up method	🗆 Follow up au	idit 🖂 De	esktop audit		
Timescale	🗆 Immediate	⊠ 30 days	🗆 60 days		
	□90 days	□ 120 days	□180 days		
	□ 365 days	□Other			
Actions	The arrow mark	ing will be done.			

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	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	OPEN	
Reference	ZAF600210417	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	329 - Sanitary facilities (e.g. toilets, hand basins) are unhygienic / not clean	
Subcategory	Hygiene Facilities & Housekeeping	
New or carried over?	☑ New □ Carried Over	
Root cause	🗆 Training 🛛 System	
	Costs Lack of workers	
	🗆 Other	
Root cause - Other		Nc- Unhygienic
ETI code	3.3 - Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.	
Explanation to the non compliance	The male washroom is found to be unhygienic.	
Follow up method	🗆 Follow up audit 🛛 🗹 Desktop audit	
Timescale	□Immediate ☑ 30 days □ 60 days	
	□ 90 days □ 120 days □ 180 days	
	□ 365 days □ Other	
Actions	All the washrooms will be kept clean.	

ate:End Date:9-252023-09-25





4 - Child Labour Shall Not Be Used [Summary of Findings]

4: Compliance Requirements

4.1 There shall be no new recruitment of child labour.

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.Based from interaction with the factory management, all employees are hired by the Human Resource Department only.

2.Based from review of hiring policy documents, employee's ID for age proof such as Voter ID, Aadhar Card, PAN Card and School Certificate was checked by HR department prior to hiring. The employees without valid ID certificates are not being hired.

3.Based from the policy review, the minimum hiring age of the facility is above 18 years old.

4.Based from employees' interview, any suspect of child labor can be reported to facility management.

5.Based on the employee interviews, review of facility' s Anti Child Labor& Hiring Policy and age proof documents, the facility has complied with ILO Standards for Child Labor

Evidence examined:

1. Child Labor and Child Labor Remediation Policy. 2.Age Proof records of 10 out of 10 selected samples. 3. Interaction with Management and Interview with employees

Any other comments:

NA

Legal age of employment:	15
Age of youngest worker found:	18
Are there children present on the work floor but not working at the time of audit?	□ Yes 🗵 No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	□ Yes ☑ No Please give details:
	NA





5 - Living Wages are Paid [Summary of Findings]

5: Compliance Requirements

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.Based from review of wage records, the facility has paid the applicable minimum wages to all the employees.

2.Based from employee' s interview, wages are fixed on daily rated, calculated and paid on monthly basis on or before 7th of respective month.

3.Based from employee' s interview, wage slips are provided to all the employees and employees are aware of their wage calculations.

4. Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules. 5.Based on employee's interview and record review all the employees are received appointment letter

with written and understandable information about their employment conditions in respect to wages

Evidence examined:

- Facility Policy
- Salary registers

• Pay slip and Time records for 10 selected samples for 03 months September 2022, December 2022 and August 2023

Leave with wage records (Form No: 15) and Leave encashment

Any other comments:

NA

Summary Information			
Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: null Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO





Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 452.0 Per Week: null Per Month: 11752.0	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 11800.0	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO
	Wages Analysis:		
Were accurate records shown at the first request?	☑ Yes 🗆 No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)		ords for 10 selected s 022, December 2022 a	
Are there different legal minimum wage grades? If Yes, please specify all.	✓ Yes □ No Effective from 1st Ap Rs. 452.00 INR per da Rs. 474 per day, 9653	ril '2023 (Monthly w y Semi-Skilled: Rs. 46 3.8 per month.	ages rate) Unskilled: 2 per day , Skilled:
If there are different legal minimum grades, are all workers graded and paid correctly?	✓ Yes □ No □Please give details:	Not Applicable	
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	Below legal minAbove	☑ Meet	
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	contracted salary is 2	the month of July 202 21200 INR per day, day eduction is 0 , ESI dec	/s worked is
Please indicate the breakdown of workforce per earnings	0.0% of workforce ea 0.0% of workforce ea 100.0% of workforce	rning under minimun rning minimum wage earning above minim	n wage um wage
Bonus Scheme found: Please specify details:	is 1 year's old. Note: type of employ	l:The bonus is not app ee (e.g. full time, tem . /hour /week /month	p, etc.) and please
What deductions are required by law e.g. social insurance? Please state all types:	ESI, PF		
Have these deductions been made?	🗹 Yes 🗆 No		
Please list all deductions that have been made.	ESI, PF		
Please list all deductions that have not been made.	None		
Were appropriate records available to verify hours of work and wages?	☑ Yes 🗆 No		
Were any inconsistencies found? (if yes describe nature)	🗆 Yes 🗹 No		

Start Date: 2023-09-25





Do records reflect all time worked? (For	🗹 Yes 🗆 No
instance, are workers asked to attend	
meetings before or after work but not paid for their time)	Please give details:
	The peak seasons were checked
Is there a defined living wage:	🗆 Yes 🗵 No
This is not normally minimum legal wage. If answered yes, please state amount and	Please give details:
source of info:	
Please see SMETA Best Practice Guidance and Measurement Criteria.	
If yes, what was the calculation method	ISEAL/Anker Benchmarks Asia Floor Wage
used.	□ Figures provided by □ Living Wage Foundation Unions UK
	Fair Wear Wage Ladder Fairtrade Foundation
	Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is	🗹 Yes 🗆 No
consideration to basic needs of workers	Please give details:
plus discretionary income).	Facility is located in State of Gujarat. Where government revise applicable minimum wage rate twice per after consideration to basic needs of workers plus discretionary income and issue minimum wage notification for the factories to follow. Facility revises wages of the employees accordingly.
Are workers paid in a timely manner in line with local law?	🗆 Yes 🗹 No
Is there evidence that equal rates are	🗹 Yes 🗆 No
being paid for equal work:	Please give details:
	Based on employee's interview and record review all the employees irrespective of caste creed, sex are receiving equal rates for equal work.
How are workers paid:	🗆 Cash 🛛 Cheque
	🖂 Bank Transfer 🛛 🗆 Other





6 - Working Hours are not Excessive [Summary of Findings]

6: Compliance Requirements

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

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:

In this audit, auditor had randomly selected production record, such as: Material in/out records, daily production reports, and crosschecked these records with payroll records and attendance records, no inconsistency was noted. In addition, through employee interview, no inconsistency was noted either. Based on provided attendance records, the working hours analysis as below: During employee interview, all the 10 randomly selected employees stated that they worked overtime on voluntary basis. The facility has implemented electronic system to record IN/OUT time recording for all the employees. Based on the provided attendance records, the no overtime hours worked.

over time nours worked

Evidence examined:

Facility Policy In/Out time records Salary registers Pay slip and Time records for 10 selected samples for 03 months September 2022, December 2023 and August 2023. Interaction with management and Employees. Employees contracts Production Records Any other comments:

NA

Working hours' analysis

Systems & Processes	
What timekeeping systems are used?	Manual
Is sample size same as in wages section?	☑ Yes □ No
	Please give details:





Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	☑ Yes □ No	
Are there any other types of contracts/employment agreements used?	🗆 Yes 🗵 No	
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	□ Yes ☑ No	
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day- period?	☑ 1 in 7 days	
Is this allowed by local law?	🗹 Yes 🗆 No	
Maximum number of days worked without a day off (in sample):	6	
Stand	ard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	 □ Yes ☑ No % of workers: null% Frequency: 	
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	□ Yes ☑ No	
	Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	0	
Combined hours (standard or contracted + overtime hours = total) over 60 found?	 □ Yes ☑ No Please give details: NA 	
Approximate percentage of total workers on highest overtime hours:	0.0%	
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	 ✓ Yes □ No □ Conflicting Information Please give details: Tere are no overtime in the sampled months. The overtime is 200% of the wage rate. 	
Overtime premium		
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	 ✓ Yes □ No □ N/A – there is no legal requirement to OT premium Please give details: 	
	200% of the standard wages.	

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Is overtime paid at a premium?	🗹 Yes 🗆 No		
	The overtime is paid @200% of the wage rate. there were no overtime for the sampled months.		
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	☑ No □ Other	□ Consolidated pay	Collective Bargaining agreements
Please give details	NA		
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any	☑ Overtime is voluntary	 Onsite Collective bargaining allows 60+ hours/week is voluntary 	Safeguards are in place to protect worker's health and safety
checked boxes above e.g. detail of consolidated pay / CBA or Other)	 Site can demonstrate exceptional circumstances 	 Other reasons (please specify) 	
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	NA		
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	□ Yes ☑ No		
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	🗆 Yes 🗹 No		





7 - No Discrimination is Practiced [Summary of Findings]

7: Compliance Requirements

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:

Based from review of wage records and employees' interview, no discrimination was noted in hiring, compensation, access to training, promotion, termination or retirement. Prop is responsible for the investigation and disposal of discrimination case. Based from wage records review, the facility provides the same pay for male/female employees for same work of similar nature. No employee was required to do the examination of the Pregnancy, hepatitis B virus and HIV. Anti-discrimination procedure on hiring, compensation, promotion and access to training is available during the audit. Gender divisions did not exist in the facility; both female and male employees were distributed in all types of work. There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any

discrimination cases

Evidence examined:

Facility Policy. The hiring and termination procedure Leave application records and employee handbook. Time in and out records, Full and final settlement records and training records. Appointment letter with terms and conditions for 10 out 10 selected samples. Salary and other benefit records. Interaction with management and Employee

Any other comments:

NA

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 100.0%		Female: 0.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	0		
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	□ Hiring	□ Compensation	Access to training
	Promotion	Termination or retirement	No evidence of discrimination found
Please give details	NA		
Professional Development			

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What type of training and development are available for workers?	he training imparted are Social awareness training / ETI Base code on 5.09.2023, Training on anti-bribery on 1.9.2023, training on Waste Management and use of PPE on 7.8.2023, Emergency preparedness done on 7.6.2023, Training on HSE done on 13.1.2023, training on human rights on 22.8.2023, HIRA training on 1.8.2023.
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	





8 - Regular Employment Is Provided [Summary of Findings]

8: Compliance Requirements

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:

Based on record review and employee's interview appointment letters issued to all 10 out of 10 selected employees. Based from interaction with the facility management, it was noted that all employees are employed on regular basis and through different contractors; and no casual, agency and apprentice employees were engaged. Facility does not employ any migrant workers. Based on interaction with employees, no recruitment fee is required at any stage of the recruitment process

Evidence examined:

Facility Policy Appointment letter with terms and conditions for 10 out of 10 selected samples. Salary and other benefit records. Interaction with management and Employees.

Any other comments:

NA

Responsible Recruitment			
All Workers	All Workers		
Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	 ☑ Terms & Conditions presented ☑ Understood by workers ☑ Same as actual conditions 		
Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	□ Yes 🗹 No		
Migrant Workers			

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Type of work undertaken by migrant workers:	NA	
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0	
Are migrant workers' voluntary deductions (such as for remittances)	🗆 Yes 🗵 No	
confirmed in writing by the worker and is evidence of the transaction supplied by	Please give details:	
the facility to the worker?	NA	
Is there any observation on this finding?	NA	
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	□ Yes 🗵 No	
	Non-employee workers	
Recruitment Fees		
Are there any fees?	🗆 Yes 🗵 No	
Agency Workers (if applicable) (Workers sour by the agency. Usually the agencies are paid	rced from a local agent who are not directly paid by the site, but paid d by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	0	
Please provide the names of agencies if applicable	NA	
Were agency workers' age / pay / hours included within the scope of this audit?	🗆 Yes 🖂 No	
Were sufficient documents for agency workers available for review?	🗆 Yes 🖂 No	
Is there a legal contract agreement with	🗆 Yes 🖂 No	
all agencies?	Please give details:	
	NA	
Does the site have a system for checking	🗆 Yes 🗵 No	
labour standards of agencies?	Please give details:	
	NA	
Contractors (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.)		
Any contractors on site?	🗆 Yes 🖂 No	
	Please give details:	
	NA	
Do all contractor workers understand	🗆 Yes 🗵 No	
their terms of employment?	Please give details:	
	NA	



Audit company: DQS CFS GmbH

Report reference: Start Date: End Date: ZAA600026500 2023-09-25

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8A - Sub–Contracting and Homeworking [Summary of Findings]

8A: Compliance Requirements

8.A.1 There should be no sub-contracting unless previously agreed with the main client. 8.A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.

Current Systems and Evidence Examined

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

Current Systems:

Through the management interview, workers interview; facility is doing all production process in factory Premises. Verified through document review, factory tour, management interview and employee interview that no subcontracting & Home-working was used by this factory

Evidence examined:

Facility Policy. Inward and outward material, register. Production records. Interaction with management

Any other comments:

NA

Summary of sub-contracting – if applicable		
Is there any sub-contracting at this site?	🗆 Yes	☑ No
Summary of homeworking – if applicable		
Is homeworking used at this site?	🗆 Yes	☑ No





9 - No Harsh or Inhumane Treatment is Allowed [Summary of Findings]

9: Compliance Requirements

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.

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

Based from the interaction with the facility management and employee' s interview, it is noted that no case of abuse or discipline has happened in the facility and the facility has a written disciplinary procedure that is displayed in the notice board of the facility. According to the documentation, the facility management had established a disciplinary procedure for employees' misbehavior which included oral warning, written warning and finally termination and the site, had developed a training program for all employees on the procedure.

Employees on the procedure. Employee interview confirmed that employees were aware of the disciplinary procedure As per management interview, document review and employees' interview, there was a policy on Harsh Treatment. There is an internal process for grievance and suggestion box has been provided, where employees can report a grievances (harassment, bullying, discrimination etc.), any received complaint will be handled by management, without any reprisal for the employee in question. All sampled employees were aware this system. The POSH committee was done on 6th July 2023. There is an agreement with the external agency Naari Kala Vrund dated 1.1.2023 and is still valid.

Evidence examined:

Facility Policy The relevant policy on prevention of harassment and abuse Internal grievance procedure documentation. Training records

Interaction with management and Employees

Any other comments:

NA

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?	🗹 Yes 🗆 No	
	Please give details:	
	Works committee,, Health & Safe Committee and Anti-Sexual Hara Suggestion box	ety Committee, Grievance assment Committee and
If yes, are workers aware of these channels and have access? Please give details.	Workers are familiar with these of express their own feeling throug suggestion box and the whistle b	
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism,comment box etc. Please give details.	Suggestion box which is opened the WR and whistle blowing poli	every fortnight in presence of cies
Which of the following groups is there a grievance mechanism in place for?	☑ Worker	Communities
	☑ Suppliers	□ Other
Please provide grievance mechanism details	There is Whistle Blowing Policy.	

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Are there any open disputes?	🗆 Yes 🗵 No
	Please give details:
Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	 ✓ Yes □ No Please give details:
Is there a published and transparent disciplinary procedure?	✓ Yes □ NoPlease give details:
If yes, are workers aware of these the disciplinary procedure?	✓ Yes □ NoPlease give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	 □ Yes ☑ No Please give details:





10A - Entitlement to Work and Immigration [Summary of Findings]

10A: Compliance Requirements

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

Based from the review of employee attendance records and employee's interview, the facility has not employed any foreign nationals. Based from the review of employee personal files, all the employees are holding the legal rights to work.

Evidence examined:

Hiring procedure Personnel files Employee Handbook Interaction with Management and Employees

Any other comments:

NA





10B4 - Environment 4-Pillar [Summary of Findings]

10B4: Compliance Requirements

10.B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.

10.B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc. 10.B4.3 Businesses shall be aware of their end client, s environmental standards/code requirements

10.B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is

communicated to all appropriate parties, including its own suppliers. 10.B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 10.B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details)

10.B4.7 Businesses shall make continuous improvements in their environmental performance. 10.B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation

10.B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.

10B4: Guidance for Observations 10.B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.

10.B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in place. Following this assessment the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)

Current Systems and Evidence Examined

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

Current Systems:

The factory is in exempted category vide GBCB/P-1/12/352040 dated 12.4.2016. The testing reports seen. The drinking water is tested on 6.4.2023 by Metro Enviro Chem Associates. The ambient air testing is done on 16.6.2023 by Metro Enviro Chem Associates, the work zone monitoring done on 16.6.2023 by Metro Enviro Chem Associates. The lux monitoring is done on 16.6.2023 by Metro Enviro Chem Associates. The noise monitoring done on 16.6.2023 by Metro Enviro Chem Associates. The earth pit testing is done on 16.6.2023 by Metro Electric & Engg Works

Evidence examined:

- All legally required environmental documents were provided for review.
- Environmental policy:
- Energy bills:
- Water bill:
- Worker and management interview

- Site tour

Any other comments:

NA

Environmental Analysis	
Is there a manager responsible for Environmental issues (Name and Position):	Mr. J. Patel, Prop

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Has the site conducted a risk assessment on the environmental impact of the site,	🗹 Yes 🗆 No
including implementation of controls to reduce identified risks?	Please give details:
	Risk assessment conducted vide MA/ER/01 dated-01.06.2023
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	🗆 Yes 🖂 No
	Please give details:
	NA
Does the site have an Environmental	🗹 Yes 🗆 No
policy? If yes, is it publicly available?	☑ Yes □ No
If yes, does it address the key impacts	\checkmark Yes \square No
from their operations and their	
commitment to improvement?	Please give details:
	The aspect and impact is analyzed on MA/ER/01 dated 01/06/2023
Does the site have a Biodiversity policy?	🗹 Yes 🗆 No
Is there any other sustainability systems	🗆 Yes 🖂 No
present such as Chain of Custody, Forest Stewardship Council (FSC), Marine	Please give details:
Stewardship Council (MSC) etc.?	NA
Have all legally required permits been	🗹 Yes 🗆 No
shown?	Please give details:
	The factory is in exempted category vide GBCB/P-1/12/352040 dated 12.4.2016.
Is there a documentation process to	🗆 Yes 🗆 No 🗵 Not Applicable
record hazardous chemicals used in the manufacturing process?	Please give details:
	There are Zero hazardous items.
Is there a system for managing client's	🗹 Yes 🗆 No
requirements and legislation in the destination countries regarding	Please give details:
environmental and chemical issues?	No such requirements.
Facility has reduction targets in place for	🗹 Yes 🗆 No
environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	Please give details:
	The targets for the reduction of electricity is is by 2% The target for the water consumption is by 5%
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	🗆 Yes 🗵 No
	Please give details:
	No Waste is recycled.
Does the facility have a system in place	🗹 Yes 🗆 No
for accurately measuring and monitoring consumption of key utilities of water,	Please give details:
energy and natural resources that follows recognised protocols or standards?	The energy meter and water meter.
-	





Has the facility checked that any Sub- Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	 □ Yes ☑ No Please give details: NA 	
U	sage/Discharge analysis	
Criteria	Previous year: 2022	Current year: 2023
Electricity Usage: Kw/hrs	56760	37840
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	0	0
Has site completed any carbon Footprint Analysis?	No	No
If Yes, please state result		
Water Sources	Municipal	Municipal
Water Volume Used	312	234
Water Discharged	Drain	Drain
Water Volume Discharged	270	187
Water Volume Recycled	0	0
Total waste produced	Fabric- 250 Kg Paper- 25 Kg Plastic- 10 Kg	Fabric- 208 Kg Paper- 17 Kg Plastic- 8 Kg
Total hazardous waste produced	0	0
Waste to recycling	0	0
Waste to landfill	500 kg	320 kgs
Waste to other	58kg	38 kgs
Total Product Produced	540000 pieces	600000 pieces





10C - Business Ethics – 4-Pillar Audit [Summary of Findings]

10C: Compliance Requirements

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

10.C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices. 10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all

fiscal legislative requirements.

10.C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter. 10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of

fraudulent Business Practice,

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

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

10C: Guidance for Observations

10.C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers. 10.C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been

implemented

Note for auditors and readers. This Business Ethics section is intended to take not more than 0.25 auditor days. It is an assessment not an audit.

Current Systems and Evidence Examined

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

Current Systems:

The company manager was the designated person responsible for implementing standards concerning Business Ethics and it was observed that the site does not indulge incorrupt and discriminative practices. The company has established a business ethics policy which was communicated to workers through posters and training

The site had received and read the business ethics policy of the auditor/audit company

Evidence examined:

The company business ethics policy including:

Company Éthical Policy MA/EBBP/

Anti Bribery Policy - MA/ABP/01
 Anti-Corruption Policy- MA/ACP/02

Any other comments:

NA

Does the facility have a Business Ethics Policy and is the policy communicated	\checkmark	Internal Policy
and applied internally, externally or both, as appropriate?		Policy for third parties including suppliers
	Please give details:	
	Busin	ess Ethical Policy No AP-011 Dated 1.06.2023



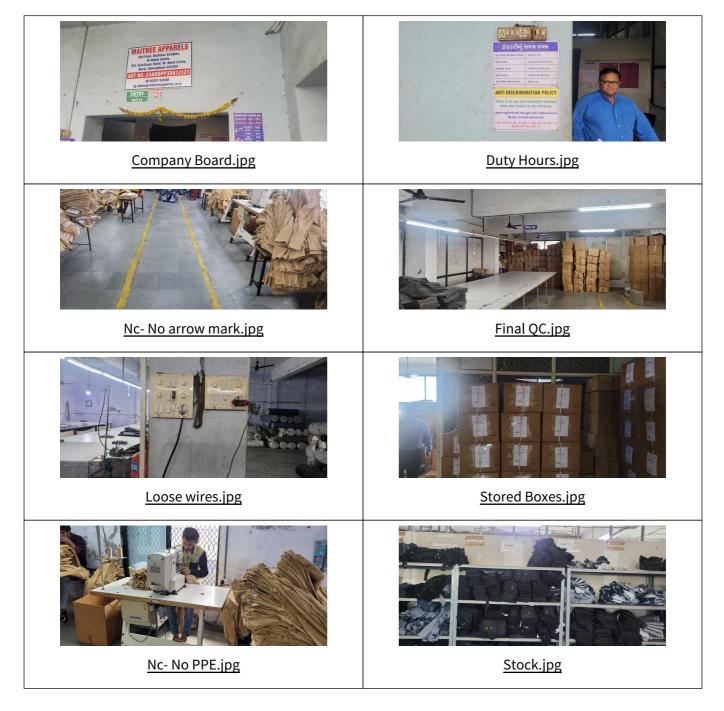


Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	🗹 Yes 🗆 No
business ethics issues?	Please give details:
	The training on anti bribery given on 1.9.2023
Is the policy updated on a regular (as needed) basis?	🗹 Yes 🗆 No
	Please give details:
	Last updation done on 1.06.2023
Does the site require third parties including suppliers to complete their own business ethics training	🗹 Yes 🗆 No
business ethics training	Please give details:
	Acceptance are taken from the supplier on Anti bribery.





Attachments



Report reference: ZAA600026500

 Start Date:
 Er

 2023-09-25
 20







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Start Date: 2023-09-25













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