




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 1047350	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 1009338	
Business name (Company name):	Ananta Jeans Wear Ltd.			
Site name:	Ananta Jeans Wear Ltd.			
Site address: <i>(Please include full address)</i>	227/2 (123 Old), Kabi Jashim Uddin Road, Tongi, Gazipur	Country:	Bangladesh	
Site contact and job title:	Ashim Kumar Majumder- Sr. DGM-Compliance			
Site phone:	+8801613199524	Site e-mail:	ashim@ananta.com.bd	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	17 November 2019			

Audit Company Name & Logo: ITS Labtest Bangladesh Ltd. 	Report Owner (payer): Ananta Jeans Wear Ltd.
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size): The audit was conducted within the expected duration as the management was very prompt and supportive and no inconsistency found.

Auditor Team (s) (please list all including all interviewers): E.M. Saber in Bhuiyan-Auditor (RA 21700585), Khadiza Parvin-Auditor (ASCA 21701361), Shahina Kader-Auditor (ASCA 21703704), Mazharul Anwar-Auditor (ASCA- 21703702), Musfic Hossain-Auditor (ASCA- 21703878), Tanzil Islam-Auditor (In Progress)

Lead auditor: E.M. Saber in Bhuiyan-Auditor (RA 21700585)

Team auditor: Khadiza Parvin-Auditor (ASCA 21701361), Shahina Kader-Auditor (ASCA 21703704), Mazharul Anwar (ASCA- 21703702), Musfic Hossain (ASCA-21703878), Tanzil Islam-Auditor (In Progress)

Interviewers: E.M. Saber in Bhuiyan-Auditor (RA 21700585), Khadiza Parvin-Auditor (ASCA 21701361), Shahina Kader-Auditor (ASCA 21703704) Tanzil Islam-Auditor (In Progress)

Report writer: E. M. Saber in Bhuiyan

Report reviewer: Shahida Akhtar (Senior Report Reviewer)

Date of declaration: 17 November 2019

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

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

Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.		Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
		ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>				
0B	Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
1.	Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
2	Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
3	Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	07			Non-Compliance: <ul style="list-style-type: none"> Evacuation plan found mismatched at ground floor in Production building-B Facility did not install interconnected addressable fire detection system in Building- A Facility generator waiver certificate has been expired on 11th November 2019. Needle guard and eye guard was found displaced. Aisles mark and arrow mark was faded in the production building. Insufficient first aid kits were found in the randomly checked 2 out of 2 first aid boxes.

									<ul style="list-style-type: none"> Workers were not used personal protective equipment.
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>			04	Good example: <ul style="list-style-type: none"> Facility has provided attendance bonus to all employees as per company policy. Facility arranges annual picnic for all the employees. Facility provides production incentive bonus for all the employees as per company policy. Facility provides job to physically challenged employees.
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
8	<u>Regular Employment</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	02			Non-Compliance: <ul style="list-style-type: none"> nominee form was missing around 50% workers personal file as per requirement. 20% Identity Cards were not found as per rule and not written in local language.
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

10A	Entitlement to Work		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
10B2	Environment 2-Pillar		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	01			Non-Compliance: <ul style="list-style-type: none"> Wastages such as plastics, cartons, Fabrics items, etc. stored in the wastage room located in the ground floor was found without proper segregation.
10B4	Environment 4-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
10C	Business Ethics		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

General observations and summary of the site:

- The product manufactured at this site is all kind of Woven Bottom items.
- Overall responsibility for meeting the standards is taken by Ashim Kumar Majumder- Sr. DGM-Compliance.
- Total 3500 employees are working in the facility including 540 non-production employees. Out of 2960 employees, 1910 are female employees and 1050 are male employees.
- All the employees are local (Bangladeshi).
- Site has completed SAQ.
- The youngest worker on site was 19-year-old.
- Facility have Worker Participation committee and safety committee.
- There is no union and collective bargaining at this factory. It also not mandatory by Local Law.
- There is evidence of both male and female in management and among supervisor.
- Site has rounded the year same for production.
- Site uses no sub-contractors.
- Facility has all permanent employees.
- Generally, the facility operates in one general shift starting from 8:00 am to 5:00 pm with lunch break starting from 1:00 pm to 2:00pm and 1:20 pm to 2:20 pm.
- Friday is the facility weekly holiday.
- Standard working hours on site was in average 208 hours/month with 1 day off in every 7-day-period.
- Legal minimum pays (BDT 8000.00) was paid to all employees and facility provides minimum wage as per Bangladesh Government Gazette dated 24th January 2019.

- Correct Overtime hours were paid; Employees were paid 200% of minimum hourly wage for Overtime.
- Employee's wages are calculated monthly. The payment method of the salary is Cash Pay within 7 working days of following month and the payment cycle is 1-30/31.
- Audit scope is 01 year (from November 2018 to October 2019).
- Audit sample is 80 according to the man power of the facility.
- 80 Records to show wages and hours were taken from October 2019 (Current paid month), June 2019 (Random Month) and February 2019 (Random Month)
- 80 employees were selected for interview including 52 female and 28 male employees; they were interviewed as 8 groups of 5 including some mixed groups and 40 employees were interviewed individually.

80 samples taken from October 2019 (Current paid month)

80 samples taken from June 2019 (Random Month)

80 samples taken from February 2019 (Random Month)

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

Site Details

Site Details								
A: Company Name:	Ananta Jeans Wear Ltd.							
B: Site name:	Ananta Jeans Wear Ltd.							
C: GPS location: (If available)	GPS Address: 227/2 (123 Old), Kabi Jashim Uddin Road, Tongi, Gazipur.	Latitude: 23.731392 Longitude: 90.424049						
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Factory license: 12614/ Gazipur 'k' category, issued by Deputy Chief Inspector General of Industries (Govt. Of the People's Republic of Bangladesh), which is valid till 30th June 2020.</p> <p>Fire License: Fire License No: DD/Dhaka/22518//2011 issued by Bangladesh Fire Service & Civil Defence Authority which is valid till 30th June 2020.</p> <p>Trade License: Trade License No: 43-157/822, issued by Gazipur City Corporation, which is valid till 30th June 2020.</p>							
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	All kind of Woven Bottom items.							
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Ananta Jeans Wear Ltd. is located at 227/2 (123 Old), Kabi Jashim Uddin Road, Tongi, Gazipur. The facility has started its operation in 2010. Total land area of the facility premises 47720 square feet, production area is 160000 square feet and warehouse area is 45000 square feet.</p> <p>The facility premises consist of only requested facility; no other sister concern or entity was found during audit.</p> <p>Total 3500 employees are working in the facility including 540 non-production employees. Out of 3500 employees, 2030 are female employees and 1470 are male employees.</p> <p>The facility premises consist of total 02 buildings and 3 sheds. The facility is made up off steel and concrete. Details description provided as below:</p> <table border="1"> <thead> <tr> <th>Production Building /shed</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>		Production Building /shed	Description	Remark, if any			
Production Building /shed	Description	Remark, if any						

Building - A (06 Storied)		
Ground Floor	Transformer 1 & 2, Fire Pump Room, ETP, Meter room, RMU room, ATS, LT Panel, ETP Control Room, PLC room, Medical Room	None
1 st Floor	ETP Tank, Day-care, Workers dining.	None
2 nd Floor	ETP Tank, General Store, Lab Room, Office Room, Workers dining.	None
3 rd Floor	Storage area	None
4 th Floor	Leftover Storage area	None
5 th Floor	Leftover Storage area	None
Roof top	Vacant	None
Building - B (08 Storied)		
Ground Floor	Finish Goods Store, Accessories Store, Fabric Inspection, Fabric Store, Wash Removing Room, Compressor Room, Workshop.	None
1 st Floor	Cutting Section, Cad Room, Development Sample, Maintenance Room, Fusing Section, Admin Desk.	None
2 nd Floor	Finishing (06 Units), Packing Zone, Finished Goods, Spot Remover Room, Inspection Room, Office & Admin Desk, GM (Quality) Room.	None
3 rd Floor	Finishing (06 Units), Packing Zone, Finish Goods, Inspection Room, Admin Room. Rejection	None
4 th Floor	Sewing (06 Line), Conference Room & ICT Room, Eyelet & Special Room, Maintenance Room, GM (Production) Room, PM+QM Desk.	None
5 th Floor	Sewing (06 Lines), Work-study Dept. (Ie) & Meeting Room, Maintenance Room, Admin Room, Directors & Office Room, Pm+Qm Desk.	None
6 th Floor	Sewing (06 Lines), Maintenance Room, Office Room, Agm Qa Room, Pm+Qm Desk, Welfare Desk Admin Room.	None
7 th floor	Sewing (05 Lines), Training Room, Conference Room, Pm+Qm Desk, Admin Desk, Sample Room, Maintenance Room, Idle Machin Room	None
Roof top	Vacant	None

	<table border="1"> <tr> <td colspan="3">Shed 01</td></tr> <tr> <td>Ground Floor</td><td>Fire Control Panel, Security, Boiler</td><td>None</td></tr> <tr> <td colspan="3">Shed 02</td></tr> <tr> <td>Ground Floor</td><td>Wastage Room & Driver Room</td><td>None</td></tr> <tr> <td colspan="3">Shed 03</td></tr> <tr> <td>Ground Floor</td><td>ATM Booth</td><td>None</td></tr> </table> <p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F2: Please give details: No such cracks were found during audit.</p> <p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F4: Please give details: Facility has structural engineering permission from concern authority.</p>	Shed 01			Ground Floor	Fire Control Panel, Security, Boiler	None	Shed 02			Ground Floor	Wastage Room & Driver Room	None	Shed 03			Ground Floor	ATM Booth	None
Shed 01																			
Ground Floor	Fire Control Panel, Security, Boiler	None																	
Shed 02																			
Ground Floor	Wastage Room & Driver Room	None																	
Shed 03																			
Ground Floor	ATM Booth	None																	
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input checked="" type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor																		
H: Month(s) of peak season: (if applicable)	Round the year same production going on.																		
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<p>Product manufactured: All kind of Woven Bottom items.</p> <p>Main production process: Cutting, Sewing, Finishing & Packing.</p> <p>Production Capacity: 700000 pieces.</p> <p>Production Lines: 23</p> <p>Machines used: Single Needle M/C, Double Needle (Lock Stc), Over Lock M/C (5 Thd), M/C Multi Needle Chain Stc, Feet Of The Arm, D/ Needle Chine Stitch M/C, Three Needle Chain Stc, Loop Make M/C, Loop Make M/C, Blind Stitch, Zigzag, Button</p>																		

	<p>Hole, Button Stc(Convalt), Snap Button, Bartack M/C, Patten Desi, Thd Recone, End Cutter M/C, Needle Ditector Mc, Vaccuam Iron Table, Strapping, Btn Pull Tst M/C, Velcro Cut Machine, Are Compressor, Are Compressor, Fusing(Hasima), Fabric Inspection M/C, Inspection Table, Marker Print M/C, Fabric Relux M/C, Pattern Cut M/C, Thrd Sucking, Boiler M/C, Bon Pkt, Designing M/C, Drill M/C, Thread Recone, Coton Bunding M/C, Loop Attach, W/B Loop Join &Close, Sarging Heat Press Seal Mc, Pkt. Attach, Needle Dector, Thread Sucking.</p> <p>Chemical used: Puli Mak, Silicon Oil, Lubricant Diesel, Machine Oil, Coolant, Solvy, R-Pen, Sh Ring, Dalil, Remove Oil-2, Print, Yellow, Marco.</p>
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details: There were no accommodation given to the employees.

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 09.35 AM A2: Day 1 Time out: 17.00 PM	A3: Day 2 Time in: NA A4: Day 2 Time out: NA	A5: Day 3 Time in: NA A6: Day 3 Time out: NA
B: Number of auditor days used:	06 Auditor in One Day (06 Man Days)		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Ashim Kumar Majumder-Sr. DGM, Compliance.		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	November 28&29, 2018		
J: Previous audit type:	Periodic		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A		

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

A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Not applicable		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	There is no trade union at this facility, and it is not mandated by law.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	1470	0	0	0	0	0	0	1470
Worker numbers – female	2030	0	0	0	0	0	0	2030
Total	3500	0	0	0	0	0	0	3500
Number of Workers interviewed – male	28	0	0	0	0	0	0	28
Number of Workers interviewed – female	52	0	0	0	0	0	0	52
Total – interviewed sample size	80	0	0	0	0	0	0	80



A: Nationality of Management	Bangladeshi	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i>	Nationalities: B1: Nationality 1: ___ Bangladeshi ___ B2: Nationality 2: ___ NA ___ B3: Nationality 3: ___ NA ___	Was the list completed during peak season? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If no, please describe how this may vary during peak periods: There was no any peak season found at the audited facility, round the year same production process goes on.
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 ___ 100 ___ C1: approx % total workforce: Nationality 2 ___ NA ___ C2: approx % total workforce: Nationality 3 ___ NA ___	
D: Worker remuneration (management information)	D: ___ % workers on piece rate D1: ___ % hourly paid workers D2: ___ 100 ___ % salaried workers Payment cycle: D3: ___ % daily paid D4: ___ % weekly paid D5: ___ 100 ___ % monthly paid D6: ___ % other D7: If other, please give details	



Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	08 groups of 05	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 14	D2: Female: 26
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	None	
I: What did the workers like the most about working at this site?	Wages are paid on time, working condition is hygienic, Benefits are provided more than law requirement and management are very supportive and well behaved.	
J: Any additional comment(s) regarding interviews:	Workers were happy to work at the audited facility as they are having positive working environment and proper hygienic health and safety system.	
K: Attitude of workers to hours worked:	Very favourable as total working hour is within their limit and overtime is fully voluntary.	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes		

☒ No

L1: If yes, please give details:

M: Attitude of workers:

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

Interviewed workers were happy to work at the audited facility as they are having positive working environment and proper hygienic health and safety system is maintained regular basis with monitoring.

Employees were asked about their leave procedure and legal benefit. Also, about management and employee communication handling, all information found positive from the facility employee.

Employees grievance mechanism system found very effective and workers were knowledge regarding this through training process.

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

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

The Participation Committee members were positive about the facility and looking forward to developing relationships with the management team.

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

O: Attitude of managers:

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

The facility management showed a positive attitude to this audit and during the whole audit process, Ashim Kumar Majumder- Sr. DGM-Compliance along with his team were present through the audit process and co-operated the whole audit. Facility management respects client's requirement and allowed auditor to take photographs of all production process, best practices and non-conformities. They also provided required documents' photocopy and allowed auditors to interact with the employees confidentially. At the closing meeting, the facility management agreed with all the findings and suggested corrective actions.

Audit Results by Clause:

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The responsible person for implementation and monitoring is Ashim Kumar Majumder- Sr. DGM- Compliance
- The facility has policy and procedures for human rights.
- The facility communicates this code of conduct to the employees through notice board and orientation training.
- It is communicated to all appropriate parties, including suppliers through the responsible person.

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

Details:

- Facility code of conduct.
- All policies of facility.
- Management, employee training / meeting records

Any other comments: None

A: Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility has a social compliance policy which is a commitment to respect human rights.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Ashim Kumar Majumder Job title: Sr. DGM-Compliance
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The facility has an independent compliance team for reporting and dealing with human rights impact without fear and it is a completely transparent system.
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details: Facility has an effective grievance handling procedure. Workers can submit their grievance verbally or in written through welfare officer or complaint box.
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility uses software for keeping privacy of workers information. Moreover, facility has an IT policy for data safety.

Findings		
Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/> Description of observation: None observed Local law or ETI/Additional elements / customer specific requirement: Not applicable Comments: None		Objective evidence observed: None observed

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

Measuring Workplace Impact:

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: November-17 to October- 18 ___3___ %	A2: This year: November-18 to October- 19 ___3.69___ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	August-19 to October- 19 4.2%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: November-17 to October- 18 ___4.8___ %	C2: This year November-18 to October- 19 ___4.9___ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	August-19 to October- 19 3.2%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe:	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: November-17 to October- 18 1.56%	F2: This year: November-18 to October- 19 2.70%
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	August-19 to October- 19 0.75%	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: November-17 to October- 18 1.5%	H2: This year: November-18 to October- 19 1%
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months ___0___% workers	I2: 12 months ___0___% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ___0___% workers	J2: 12 months ___0___% workers

0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

- Responsibility for meeting the legal and client code requirements is taken by Ashim Kumar Majumder- Sr. DGM-Compliance
- The facility communicates this Code to all employees by training as confirmed by training records and employee interviews.
- The ETI based code was posted on-site for employee's review.
- The facility had set up policy and pointed one staff to update labour law requirements.
- Implementation of any necessary changes is then given to the individual department heads after agreement with the facility manager.
- Social compliance policy statement appropriate for the nature of the facility's operation and aligned with the company's vision and an integral part of the company's strategy.
- The facility conducts orientation training for all new employees and last orientation training was conducted on 13 November 2019 with 15 participants.

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

Details:

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

Any other comments: None

Management Systems:

A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?

- ☐ Yes
☒ No

A1: Please give details: At the last 12 months the site has not been subjected to any fine or

	prosecution for non-compliance to any regulations.
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: It was noted through documentation review, facility has policies, and procedure for force labour, child labour, discrimination harassment and abuse.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	It was noted through management and worker interview that overtime is voluntary for all employee. No child labour is found in the facility during the facility tour. And age verification certificate found in all the reviewed personal file.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Managers and workers were communicated the written standards for forced labour, child labour, discrimination, harassment & abuse by notification board and training. Last Mid-level management Training training was held on 28 September 2019, with 82 participants and conducted by Senior Director.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Training record were found including pictures and attendance sheet.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: BSCI, Higg Index FEM. BSCI (Expired on 12 September 2021)
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Ashim Kumar Majumder-Sr. DGM-Compliance leads HR department with 03 officers.
H: Is there a senior person / manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Ashim Kumar Majumder-Sr. DGM-Compliance
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The facility has an IT security policy which ensures worker information is confidential.

J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The facility has an effective key control procedure to keep the information confidential.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility conducts risk assessment which evaluates effectiveness of every policy and procedure department wise. Last conducted on 31 August 2019.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: The facility has an internal system to identify the issue raised in risk assessment and to implement the way of reducing it.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Facility has a supplier selection policy which ensures labour standard of its own supplier.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The facility has all the required licenses and permissions as per legal requirements.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: The facility has a system to conduct and monitor the system and applies national law and practices.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC: Not applicable as this is not legally required.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: The management owned the whole building complying with all legal procedure and projects requirement.

R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: The facility maintaining all legal procedure and specific land acquisition were considered to avoid or minimize adverse impacts.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: Not applicable

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: None	Objective evidence observed: None observed

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

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

1: Freely Chosen Employment

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

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

- The facility has policies which prohibits forced labour, and this was also available for review.
- Factory doesn't have system to recruit employees from manpower agency. All employees are directly recruited by the factory. Age verification documents (National ID card copy, educational certificate, nationality certificates) were available in employee personal files and have been verified by the auditors.
- Service book is provided to all employee.
- Overtime is voluntary
- The terms and conditions of employment stated that the workers are free to leave the workplace outside of their working hours.
- Facility does not recruit any prison labour.
- Facility did not require any payment for work tool/P.P.E, ID card, training.
- All the above was confirmed in management and employee interview.

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

Details:

- Facility policy rules and regulations.
- Sampled employee personal files.
- Service book.
- Employee handbook.
- Time record.

Any other comments: None

A: Is there any evidence of retention of original documents, e.g. passports/ID's

☐ Yes

☒ No

A1: If yes, please give details and category of workers affected: Not applicable

B: Is there any evidence of a loan scheme in operation

☐ Yes

☒ No

B1: If yes, please give details and category of worker affected: Not applicable

C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected: : Not applicable
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: Facility has a policy mentioning employees are free to terminate employment from the facility.
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding: Yearly Production turn over 60 Million USD.
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: No such evidence of restriction.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: Facility has established forced labour and bonded labour policy; also, they have no such type of labour.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: Not applicable The facility has policy on forced/trafficked labour to raises awareness among employees. The facility communicates it through notice board on production floor. Overtime is totally voluntary. Employees can leave their workplace freely after their respective jobs.

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: None

Objective evidence observed:

None observed

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

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

2: Freedom of Association and Right to Collective Bargaining are Respected
(Click here to return to summary of findings) (Click here to return to Key Information)
<p align="center">ETI</p> <p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.</p>

Current Systems and Evidence Examined
<p><i>To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.</i></p>
<p>Current systems:</p> <ul style="list-style-type: none"> All the employees can form or join the trade union of their choice. There is no trade union in the facility but there is a participation committee formed by election on 26 July 2018. There are 22 members in participation committee (13 members on behalf of employees and 09 members from management side). Participation Committee meeting arranges in every two months interval as per legal requirement. Last meeting of Participation Committee was held on 03 October 2019. PC members are not treated less favourably than other workers and can carry out their duties within working hours without affecting their remuneration. <p>Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):</p> <p>Details:</p> <ul style="list-style-type: none"> Freedom of association policy review. PC formation records.

- PC committee member list.
- PC meeting register.
- PC meeting minutes.
- PC meeting attendance register.

Any other comments: None

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None	
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Facility has an effective grievance handling procedure. Workers can submit their grievance verbally or in written through welfare officer or complaint box. D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility has a policy regarding Freedom of Association. The committee members are involved in the development part of the facility. Besides, facility conducts regular meeting with the members of Worker Committee (Participation Committee) and the meeting minutes were communicated with the workers through notice board.	
F: Name of union and union representative, if applicable:	Not applicable	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	A participation committee consists of 22 members, where 13 members on behalf of employee side and 09 members on behalf of facility management.	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Participation committee members name with picture are posted in the notice board.

I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 26 July 2018
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: 04	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	Participation committee meeting held in every two months. Last meeting held on 03 October 2019 and meeting topic was as below- 1. Discussion about creating awareness about using water and electricity 2. Discussion about leave during puja.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes , what percentage by trade Union/worker representation	M1: ____% workers covered by Union CBA Not applicable	M2: ____% workers covered by worker rep CBA Not applicable
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable	

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: None

Objective evidence observed:

None observed

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: None

Objective evidence observed:

None observed

Good Examples observed:

Description of Good Example (GE): None observed

Objective evidence observed:

None observed

3: Working Conditions are Safe and Hygienic

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

ETI

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1.General Health and Safety management

- Ashim Kumar Majumder- Sr. DGM-Compliance as (President) looks after Health & Safety issues for the site.
- Potable water was freely available in all areas and Last test done on 02 April 2019 by Department of Public Health Engineering
- Enough clean toilets (60 for male 94 for female) segregated by gender were always available for workers.
- Ventilation, temperature and lighting were adequate for the production processes.
- Facility has a safety committee of 12 members (06 on behalf of employees and 06 from management side).
- Minutes of meetings show that there are monthly H&S committee held. Last meeting on 02 September 2019.

. Fire Safety

- There are 02 or more exit in each room.
- Enough assembly area was found in front of the facility building.
- Firefighting equipment was adequate, and checks were up-to-date. Facility checked all fire equipment monthly schedules wise. Fire equipment last checking was done on 02 November 2019.
- Public Address system, fire hose and fire alarm found active throughout the facility.
- Aisles exit way and employees were found free from any blockage.
- Facility has one responsible Fire safety officer.
- Facility has a firefighting team of 720 members, and all are trained by Fire Service & Civil Defence.

Fire drill Information:

Last fire drill	Date	Time took	Employee was present	Fire drill monitored by
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Day (internal)	06 October 2019	4 min 00 Sec	3331	Ashim Kumar Majumder-Sr. DGM, Compliance.
FSCD	03 February 2019	3 min 55 sec	3444	Ware house inspector Fire service and Civil Défense

Fire Equipment:

Fire Equipment name		Total	Fire Equipment name	Total
Fire extinguisher	CO ₂	146	Hand Gloves	65
	DCP	439	Helmet	82
	others	08	Gong Bell	15
Landing Valve		44	Lock Cutter	14
Hose Box		27	Fire Bitter	24
Fire Hydrant		04	Fire Hook	21
Fire Blanket		58	First Aid Box	35
Water Bucket		88	Stretcher	15
Fire Equipment Box		23	PA system	113
Gas Mask		88	Smoke Detector	40
Visual Fire Alarm		35	Smoke Detector	40

Electrical equipment checking information:

(Name) Inspection record	Last inspection date	Done by (designation)	Frequency of inspection
DB/SDB/MDB	05 November 2019	Asst. Manager Utility	Monthly
Machine maintenance	16 November 2019	Technician	Monthly
Generator Maintenance	17 November 2019	Generator Operator	Monthly
Compressor	16 November 2019	Senior Executive Utility.	Monthly

Facility provide bellow training to employees:

Training Type	Last Date of training	Participant	Trainer Designation	Frequency of training
Orientation Training to factory rules	13 November 2019	15	Assistant Executive (Welfare)	As required
Fire Fighting Training (Internal)	13 October 2019	27	Senior Executive (Compliance)	As required
Fire Fighting Training (External)	23 & 24 September 2019	40	Ware House Inspector	As required
First Aid Training	13 November 2019	24	Assistant Medical Officer.	As required
PPE Training	10 October 2019	10	Executive Compliance	As required
Mid-level management Training	28 September 2019	82	Senior Director	As required
Health & Safety Training	15 November 2019	15	Executive Welfare	As required
Chemical Handling Training	10 October 2019	10	Executive (compliance)	As required
Electrical Safety Training	28 September 2019	16	Executive - Utility	As required

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

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

Any other comments: None

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility has general health & safety and Occupational health & safety policy and procedures which are fit for purposes and these policies are communicated through orientation training.
B: Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility provides workers manual to the workers where all the policies and applicable government law are included.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: No additional structures were found with building construction approval.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: All the visitors to the site are informed on Health and Safety and personal protective equipment were provided to the visitor where necessary.
E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility has a medical room for the employees. Equipment is provided as per legal requirements.

F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: Facility has appointed 2 Doctor who sits in the facility six days in a week and 01 Nurse and 01 Medical Assistant who are available all the time. They also arranged monthly first aid training with first aider.
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: Facility does not provide transport to employees.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: The facility provides personal storage space for all the employees and they are fit for purposes.
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The facility conducts risk assessment and their people are in control to reduce identified risk.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The facility management has conducted noise and air quality assessment as required by law.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: The facility meets all legal obligations on environmental requirements including required permits for use and disposal of natural resources like gas, water etc.

Non-compliance:

1. Description of non-compliance:

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

It was noted through facility visit and management interview that evacuation plan found mismatched at Accessories and finished goods store located at ground floor in Production building-B.

Local law and/or ETI requirement:

Working condition are safe and hygienic 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.

Bangladesh Labor Rules 2015, Rule 55 (8):

The arrangement should be made to show evacuation plan of exit in one or more places easily visible in each floor of each floor of the factory.

Objective evidence observed:

(where relevant please add photo numbers)

1. Facility visit

Recommended corrective action: It is recommended that the facility should update the evacuation plan in mentioned area.

Action by: Ashim Kumar Majumder- Sr. DGM-Compliance

Timeframe: 30 days

Verification Method: Desktop

2. Description of non-compliance:

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

It was noted through facility visit and management interview that facility did not install interconnected addressable fire detection system in Building- A with fire alarm control panel and the manual fire alarm of 4th and 5th are not functional.

Local law and/or ETI requirement:

Working condition are safe and hygienic 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.

Bangladesh National Building Code 2006, Part 4, Chapter 4.4[The installation of automatic fire and smoke detection system shall be a necessity when the size, arrangement and occupancy of a building become such that a fire itself cannot provide adequate warning to its occupants.]

Recommended corrective action: It is recommended that the facility management should Set up addressable alarm system in the facility.

Action by: Ashim Kumar Majumder- Sr. DGM-Compliance

Timeframe: 180 days

Verification Method: Desktop

3. Description of non-compliance:

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

It was noted through management interview, facility tour and document review that facility has four diesel generators for power generation of total capacity of 816 KW (640KW+ 176KW) for Ananta Jeanswear Ltd. and 966KW (640KW + 326KW) for Paradise Washing Plant Limited but the waiver certificate for this generator has been expired on 11th November 2019.

Note that the facility has applied for renewal of waiver certificate to the Bangladesh Energy Regulatory Commission on 23 October 2019.

Local law and/or ETI requirement:

Working condition are safe and hygienic 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.

2. Management interview & Facility visit

3. Management interview & Document Review

Bangladesh Energy Regulatory Commission Act, 2003, Section 27(1):

[No person shall engage himself in the following business unless he is empowered by a licence or exempted from having it under this Act or any other Act, such as: - (a) power generation; (b) energy transmission; (c) energy distribution and marketing; (d) energy supply; and (e) energy storage.]

Recommended corrective action: It is recommended that facility should collect valid waiver certificate for the generator from concern authority.

Action by: Ashim Kumar Majumder- Sr. DGM-Compliance

Timeframe: 180 days

Verification Method: Desktop

4. Description of non-compliance:

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

It was noted through facility tour that,

- Needle guard was found displaced with approximately 20% of sewing machine in sewing section located at 3rd ,4th 5th, 6th & 7th floor of building B.

- Eye guard was found displaced with approximately 10% of over lock, kansai, bar tack and flat lock machine in sewing section located at 3rd ,4th 5th, 6th & 7th floor of building B.

Local law and/or ETI requirement:

Working condition are safe and hygienic 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.

Bangladesh Labour Law 2006, Section 63(1) D (3): Every dangerous part of any machinery: Provided that for the purpose of determining whether any part of machinery is safe as aforesaid, any occasion of examination or operation made or carried out in accordance with the provisions of section 64 shall not be taken into account.

Recommended corrective action: It is recommended that the facility management should ensure awareness building program for the employees, concerning careful using of related machine guards.

Action by: Ashim Kumar Majumder- Sr. DGM-Compliance

Timeframe: 30 days

Verification Method: Desktop

5. Description of non-compliance:

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

It was noted through facility visit and management representative interview that, aisles mark and arrow mark was faded in the mentioned areas.

-03 out of 08 aisles at cutting section located at 1st floor of building-B.

-04 out of 09 aisles in Finishing Section located at of building-B.

4.Facility visit
NC Photo -01

5.Facility visit
NC Photo -02

Local law and/or ETI requirement:

Working condition are safe and hygienic 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.

Bangladesh Labour law 2006, Section 62(4): [In every establishment every window or other exit affording means of escape of fire, other than the means of ordinary use, shall be distinctively marked in Bengali and in red leers of adequate size or by some other effective and clearly understood sign]

Recommended corrective action: It is recommended that facility should ensure clearly marked exit as per local law.

Action by: Ashim Kumar Majumder- Sr. DGM-Compliance

Timeframe: 30 days

Verification Method: Desktop

6. Description of non-compliance:

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

It was noted through facility tour and management interview that sufficient first aid kits were not found in the randomly checked 2 out of 2 first aid boxes in 7th & 6th floor of building B and 3 out of 3 first aid boxes in 2nd, 3rd and 4th Floor of building A as per local legislation. Note that the missing kits were 1 bottle of rectified Spirit, weighing 1 ounce, Instruments of clogging/stopping bleeding such as Tunicate, 1 pair of scissors, 1 copy of leaflet regarding primary aid, 3 packs of edible saline etc.

Local law and/or ETI requirement:

Working condition are safe and hygienic 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.

Bangladesh Labour Rules 2015, Rule-76(2):

2) If the number of workers/employees is not more than 10 in the concerned institute, department, section and floor where mechanical power is used or if the number of workers/employees is not more than 50 in the workplace where mechanical power is not used, the following equipment's must be each cupboard or almirah of those workplaces: a) 6 small sterile bandages; b) 3 packets of disinfected cotton, weighing 0.5 ounce each; c) 3 medium sized disinfected bandages; d) 3 large sized sterile bandages; e) 3 large sized sterile bandages that are used in case of burns; f) 1 bottle of Hibisol or Hexasol, weighing 1 ounce; g) 1 bottle of rectified Spirit, weighing 1 ounce; h) 1 pair of scissors;

6.Facility visit
NC Photo -03

- i) 1 copy of leaflet regarding primary aid;
j) Analgesic and antacid type of tablets, ointments used for burnt parts, ointments for eyes and antiseptic solution appropriate for surgery and
k) 3 packs of edible saline.

Recommended corrective action: It is recommended that facility management should provide sufficient first aid kits and ensure their availability as per law.

Action by: Ashim Kumar Majumder- Sr. DGM-Compliance

Timeframe: 30 days

Verification Method: Desktop

7. Description of non-compliance:

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

It was noted through facility visit that personal protective equipment were not used in the following areas

- Approximately 08 out of 20 workers working near exhaust fan were not using face mask at 4th & 5th floor of Sewing Section in the building B.
- Around 4 out of 8 workers working in Snap button area were not using eye goggles in Snap Attaching area located at 2nd floor of building B.

Local law and/or ETI requirement:

Working condition are safe and hygienic 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.

Bangladesh Labour rules 2015, rule 67 (2): In addition to the arrangement of safety and health protection measures mentioned in Sub-section (1), the concerned manufacturing institute must provide necessary equipment's, including safety shoes, helmets, goggles, masks, hand gloves, ear muffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage.

Recommended corrective action: It is recommended that the facility should ensure to use personal protective equipment (PPE) for all the employees.

Action by: Ashim Kumar Majumder- Sr. DGM-Compliance

Timeframe: 30 days

Verification Method: Desktop

7.Facility visit
NC Photo -04

Observation:

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Comments: None

Objective evidence observed:

None Observed

Good Examples observed:

Description of Good Example (GE):

None Observed

Objective evidence observed:

None Observed

4: Child Labour Shall Not Be Used

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

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

ETI

- 4.1 There shall be no new recruitment of child labour.
 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
 4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined

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

Current systems:

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

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

Details:

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

Any other comments: None

A: Legal age of employment:

18

B: Age of youngest worker found:	19
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details Not applicable

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI requirement: Not applicable

Recommended corrective action: None

Objective evidence observed:

(where relevant please add photo numbers)
 None observed

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: None

Objective evidence observed: None observed

Good Examples observed:

Description of Good Example (GE): None

Objective Evidence Observed: None observed

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The facility is providing local legal minimum wage BDT 8000/month for all the employees.
- Time keeping system is Electronic face detection.
- All employees are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- All social insurance payments were passed on to the relevant authorities in a timely manner.
- Each employee was given a pay slip and signed for their wages.
- Employees are aware of their minimum wage.
- Wages have been recorded according to documents checked.
- There are good practices by the facility; see below GE section.
- Salary sheet and Time cards review; October 2019 (Current paid Month), June 2019 (Random Month), February 2019 (Random Month)

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

Details:

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

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI requirement: Not Applicable

Recommended corrective action: None

Objective evidence observed:

(where relevant please add photo numbers)

None Observed

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: None

Objective evidence observed:

None observed

Good Examples observed:

Description of Good Example (GE):

1. Facility has provided attendance bonus to all employees as per company policy.
2. Facility arranges annual picnic for all the employees.
3. Facility provides production incentive bonus for all the employees as per company policy.
4. Facility provides job to physically challenged employees.

Objective Evidence Observed:

Documents review, management and employees' interview

Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 08 hours per day 48 hours per week 208 hours per month	A1: 08 hours per day 48 hours per week 208 hours per month (For all sample months)	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Not mandated by Local Law)
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 04 hours per day 24 hours per week 104 hours per month	B1: -2 hours/day, 12 hours/week, 54 hours/month in October 2019	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	(With legal waiver of 02 hours per day):	(Current paid Month) -2 hours/day, 12 hours/week, 36 hours/month in June 2019 (Random Month) -2 hours/day, 12 hours/week, 44 hours/month in February 2019 (Random Month)	
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: BDT 8000.00 per month	C1: BDT 8000.00 per month	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: Per hour 200% of basic hourly rate	D1: Per hour 200% of basic hourly rate	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Not mandatory by Local Law)

Wages analysis: (Click here to return to Key Information)															
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No														
A1: If No , why not?	Not Applicable														
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	<ul style="list-style-type: none"> - 80 samples taken from October 2019 (Current paid month), - 80 samples taken from June 2019 (Random Month) - 80 samples taken from February 2019 (Random Month) 														
C: Are there different legal minimum wage grades? If Yes , please specify all.	<div> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </div> <div> C1: If Yes, please give details: The Government announced pay structure on 24th January 2019 for the workers of the Garments Industries with effect from December 2018. <table border="1"> <thead> <tr> <th>Grades</th> <th>Basic wage (BDT)</th> <th>House rent (50% × basic) (BDT)</th> <th>Meal (BDT)</th> <th>Medical (BDT)</th> <th>Travel (BDT)</th> <th>Gross monthly wage (BDT)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> </div>	Grades	Basic wage (BDT)	House rent (50% × basic) (BDT)	Meal (BDT)	Medical (BDT)	Travel (BDT)	Gross monthly wage (BDT)							
Grades	Basic wage (BDT)	House rent (50% × basic) (BDT)	Meal (BDT)	Medical (BDT)	Travel (BDT)	Gross monthly wage (BDT)									

		<table border="1"> <tr><td>Grade 1</td><td>10938</td><td>5469</td><td>900</td><td>600</td><td>350</td><td>18257</td></tr> <tr><td>Grade 2</td><td>9044</td><td>5422</td><td>900</td><td>600</td><td>350</td><td>15416</td></tr> <tr><td>Grade 3</td><td>5330</td><td>2665</td><td>900</td><td>600</td><td>350</td><td>9845</td></tr> <tr><td>Grade 4</td><td>4998</td><td>2499</td><td>900</td><td>600</td><td>350</td><td>9347</td></tr> <tr><td>Grade 5</td><td>4683</td><td>2342</td><td>900</td><td>600</td><td>350</td><td>8875</td></tr> <tr><td>Grade 6</td><td>4380</td><td>2190</td><td>900</td><td>600</td><td>350</td><td>8420</td></tr> <tr><td>Grade 7</td><td>4100</td><td>2050</td><td>900</td><td>600</td><td>350</td><td>8000</td></tr> <tr><td>Apprentice</td><td>2750</td><td>1375</td><td>900</td><td>600</td><td>350</td><td>5975</td></tr> </table>	Grade 1	10938	5469	900	600	350	18257	Grade 2	9044	5422	900	600	350	15416	Grade 3	5330	2665	900	600	350	9845	Grade 4	4998	2499	900	600	350	9347	Grade 5	4683	2342	900	600	350	8875	Grade 6	4380	2190	900	600	350	8420	Grade 7	4100	2050	900	600	350	8000	Apprentice	2750	1375	900	600	350	5975
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Grade 7	4100	2050	900	600	350	8000																																																				
Apprentice	2750	1375	900	600	350	5975																																																				
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	D1: If No , please give details:																																																								
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc</i> Lowest gross salary is 8000.00 BDT In the Month of September 2019. This is minimum legal wage.																																																								
F: Please indicate the breakdown of workforce per earnings:	F1: ____% of workforce earning under minimum wage F2: _10_% of workforce earning minimum wage F3: __90_% of workforce earning above minimum wage																																																									
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i> Facility management provides attendance bonus as per company policy.																																																									
H: What deductions are required by law e.g. social insurance? Please state all types:	As per section 125 of the Bangladesh Labour Law, 2006, factory may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc As per Bangladesh Stamp Act 1899 (Amendment 2010) factory may deduct BDT 10 for Government Revenue Stamp.																																																									
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made. 1. Un-authorized absence 2. Revenue Stamp Please describe: As per section 125 of the Bangladesh Labour Law, 2006, facility may deduct																																																								

		wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc. As per Bangladesh Stamp Act 1899 (Amendment 2010) factory may deduct BDT 10 for Government Revenue Stamp. tax, provident fund, etc.	
		I2: Please list all deductions that have not been made.	Deduction is only made for un-authorized absent which is done as per law.
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: The facility shows all real records which reflect all scenarios.		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info:</i> Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: Facility did not define living wages as it is not required by law.		
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: Not applicable		
N: Are there periodic reviews of wages? If Yes give details (include whether	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: Please give details: There are no periodic reviews of wages.		

there is consideration to basic needs of workers plus discretionary income).	
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Facility gives increment, promotion based on performance and skill at work.
Q: How are workers paid:	<input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- Through employees' interview, overtime is voluntary.
- Time keeping system is Electronic face detection.
- All overtime is compensated at a premium rate for all employees.
- Facility remains closed on Friday.
- Salary sheet and Time cards review; Salary sheet and Time cards review; October 2019 (Current paid Month), June 2019 (Random Month), February 2019 (Random Month)

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

Details:

- Employees' interviews
- Management interview

- local laws
- Facility policy on working hours
- Salary sheet
- Payslip
- Job card
- Attendance register
- Production record
- Quality and production records to cross check hours

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

None Observed

Local law and/or ETI requirement: Not Applicable

Recommended corrective action: None

Objective evidence observed:

(where relevant please add photo numbers)

None Observed

Observation:

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Comments: None

Objective evidence observed:

None Observed

Good Examples observed:

Description of Good Example (GE):

None Observed

Objective evidence observed:

None Observed

Working hours' analysis

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

Systems & Processes

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

Describe: Electronic card punch

B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details					
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:			
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		D1: If YES, please complete as appropriate:			
			<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
			If "Other", Please define:			
			Not applicable			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		E1: If yes , please detail hours, %, types of workers affected and frequency Please give details:			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input checked="" type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:		F3: Is this allowed by local law?			
			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
			Maximum number of days worked without a day off (in sample): 06 days			
Standard/Contracted Hours worked						
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		G1: If yes, % of workers & frequency:			
			Not applicable			
	<input checked="" type="checkbox"/> Yes		H1: If yes, please give details:			

H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> No	As per Circular on 14 October 2019 from Bangladesh Labour and Employment Ministry; Facility can do 4 hours overtime in a day and 24 hours overtime in a week with the consent of employees which is valid till 14 April 2020.
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: -2 hours/day, 12 hours/week, 54 hours/month in October 2019 (Current paid Month) -2 hours/day, 12 hours/week, 36 hours/month in June 2019 (Random Month) -2 hours/day, 12 hours/week, 44 hours/month in February 2019 (Random Month)	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	_80_%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	<i>L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:</i> Based on employees' interviews, employee can do overtime as per their willingness and it's not mandatory. Facility management never forces employees to do overtime.
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	<i>M1: Please give details of normal day overtime premium as a % of standard wages:</i> 200% of standard wages
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<i>N1: If yes, please describe % of workers & frequency:</i> Overtime payments for employees are as per legal requirement
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	

complete the boxes where relevant.	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other
	Not applicable
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:
	Not applicable
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details:
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 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.
- Gender discrimination was also absent in the facility; both female and male workers were distributed in all types of work.
- There was no evidence of sexual harassment.
- There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
- The factory provides the same wage amount to male/female employees of the same rank.
- There is no restriction for formation of trade union in the factory.

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

Details:

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

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: <u>40</u> % A2: Female <u>60</u> %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	No such women are present in this facility.
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability,	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion

gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Termination or retirement <input type="checkbox"/> No evidence of discrimination found C1: Please give details: No such evidence found
---	---

Professional Development	
A: What type of training and development are available for workers?	Orientation Training First Aid Training PPE Training Chemical Handling Training Health & Safety training Electrical Safety Training

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

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: None	Objective evidence observed: <i>(where relevant please add photo numbers)</i> None observed

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

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

8: Regular Employment Is Provided

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

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

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

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

Details:

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

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

It was noted through documents review and management interview that nominee form was missing around 50% workers personal file as per requirement.

Local law and/or ETI requirement:

In accordance with Regular employment is provided, 8.1:

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

Bangladesh Labour Rules 2015, Rule (136) Nomination of heir/legal representative in order for receiving compensation: As per Sub-section (2) of Section 155, the worker must nominate a heir/legal representative at the time of joining the workforce, in accordance with Form-41, in order for receiving the compensation money after his/her death.

Recommended corrective action:

It is recommended that the facility should maintain employee's nominee form as per rules.

Action by: Ashim Kumar Majumder- Sr. DGM-Compliance

Timeframe: 30 days

Verification Method: Desktop

2. Description of non-compliance:

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

It was noted through Identity Card (ID) review and management interview that facility issued Identity Card to the employees, but the information of 20% Identity Cards were not found as per rule and not written in local language. Few required information / criteria were missing & not mentioned in the employee ID card like permanent address, & emergency contact number.

Local law and/or ETI requirement:

In accordance with Regular employment is provided, 8.1:

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

Bangladesh Labor Rules, 2015, section 19(5): Giving letter of appointment and identity card and maintaining the confidentiality: Each owner will provide identity card with the photograph to each worker working in the firm at the costs of the owner as per Form-6.

Recommended corrective action: It is recommended that facility should maintain ID card of employees as per prescribed format.

Action by: Ashim Kumar Majumder- Sr. DGM-Compliance

Timeframe: 30 days

Verification Method: Desktop

Objective evidence observed:

(where relevant please add photo numbers)

1.Document review & Management interview

2. Facility visit, Document review & Management interview

Observation:

Description of observation: None observed Local law or ETI requirement: Not applicable Comments: None	Objective evidence observed: None observed
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Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: None observed

Responsible Recruitment

All Workers	
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category(ies) of workers affected:
C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details: Not applicable

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

Migrant Workers:		
<p>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</p>		
A: Type of work undertaken by migrant workers:	There are no migrant workers in the facility.	
B: Please give details about recruitment agencies for migrant workers:	<p>B1: Total number of (in country recruitment agencies) used: Not Applicable.</p> <p>B2: Total number of (outside of local country) recruitment agencies used: Not Applicable.</p>	
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No <p>C1: Please describe finding: Not Applicable</p>	C2: Observations: Not Applicable.
<p>D: Are Any migrant workers in skilled, technical, or management roles</p> <p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <p>D1: If yes, number and example of roles: Not Applicable.</p>	

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer

	<input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other B1 – If other, please give details: Not Applicable
C: If any checked, give details:	Not applicable, no fees required

Agency Workers (if applicable) <i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	There is no agency worker in the facility. A1: Names if available: Not Applicable
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Not applicable as site does not use agencies.
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Not applicable as site does not use agencies.

Contractors: <i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details:

B: If Yes , how many workers supplied by contractors?	Not applicable
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please describe finding:
D: If Yes , please give evidence for contractor workers being paid per law:	Not applicable

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

- No Sub-contracting and Home-working was used by this facility.

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

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

Not applicable

Details:

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

Non-compliance:

1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: None	Objective evidence observed: <i>(where relevant please add photo numbers)</i> None observed
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Observation:	
Description of observation: None observed Local law or ETI requirement: Not applicable Comments: None	Objective evidence observed: None observed

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

Summary of sub-contracting – if applicable <input checked="" type="checkbox"/> Not Applicable please x	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe:
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: If Yes , summarise details:
C: Number of sub-contractors/agents used:	
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If Yes , summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	

Summary of homeworking – if applicable			
<input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If Yes , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?			
F: What processes are carried out by homeworkers?			
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

9: No Harsh or Inhumane Treatment is Allowed

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

ETI

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

Additional elements:

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

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

H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: If yes, please give details

Current Systems and Evidence Examined

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

Current systems:

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

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

Details:

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

Any other comments: None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code:

None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: None

Objective evidence observed:

(where relevant please add photo numbers)
None observed

Observation:

Description of observation: None observed Local law or ETI requirement: Not applicable Comments: None	Objective evidence observed: None observed
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Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: None observed

10. Other Issue areas: 10A: Entitlement to Work and Immigration (Click here to return to NC-table)
Additional Elements 10A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined
<i>To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.</i>
Current systems: <ul style="list-style-type: none"> Only employees with a legal right to work shall be employed or used by the factory. The youngest age was 19 years old. Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate): Details: <ul style="list-style-type: none"> Factory recruitment policy. Employees personal file. Any other comments: None

Non-compliance:

1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: None	Objective evidence observed: <i>(where relevant please add photo numbers)</i> None observed
--	--

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- Facility has a written environmental policy.
- Facility has done environmental impact assessment.
- Facility has wastage agreement with the licensed vendor to provide and recycle the solid waste of the facility.

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

Details:

- Facility environment policy and procedure
- Environment management system documents
- Air and noise test report.
- Contract for wastage disposal

Any other comments: None

Non-compliance:

1. Description of non-compliance:

☒ NC against ETI/Additional Elements ☒ NC against Local Law

It was noted through facility visit that the wastages such as plastics, cartons, Fabrics items, etc. stored in the wastage room located in the ground floor was found without proper segregation.

Local law and/or ETI/Additional Elements requirement:

Environment 2–Pillar: ETI base code 10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.

Bangladesh labor law 2006, Section 54 Effective arrangements shall be made in every establishment for the disposal of wastes and effluents due to the manufacturing process carried on therein.

Objective evidence observed:

(where relevant please add photo numbers)

1. Facility visit
NC Photo - 05

Recommended corrective action:

It is recommended that the facility should ensure proper segregation for all wastages.

Action by: Ashim Kumar Majumder- Sr. DGM-Compliance

Timeframe: 30 days

Verification Method: Desktop

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: None

Objective evidence observed:

None observed

Good examples observed:

Description of Good Example (GE): None observed

Objective Evidence Observed:

None observed

Other findings
Other Findings Outside the Scope of the Code

None observed

Community Benefits

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

None observed

Appendix 1

<p>Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."</p> <p><input checked="" type="checkbox"/> Not Applicable please x</p>	
<p>NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p>Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
<p>0.A. Guidance for Observations</p> <p>0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.</p> <p>0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.</p>	
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p>	

<p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	
ETI 1. Forced Labour	ETI 1. Forced Labour
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.</p>	
ETI 2. Freedom of association and the right to collective bargaining are respected	ETI 2. Freedom of association and the right to collective bargaining are respected
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.</p>	
ETI 3. Working conditions are safe and hygienic	ETI 3. Working conditions are safe and hygienic
<p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p>	

<p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.</p>	
ETI 4. Child labour shall not be used	ETI 4. Child labour shall not be used
<p>4.1 There shall be no new recruitment of child labour.</p> <p>4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	
ETI 5. Living wages are paid	ETI 5. Living wages are paid
<p>5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</p> <p>5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.</p> <p>5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.</p>	
ETI 6. Working Hours are not excessive	ETI 6. Working Hours are not excessive
<p>6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p>	

<p>6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:</p> <ul style="list-style-type: none"> – this is allowed by national law; – this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; – appropriate safeguards are taken to protect the workers' health and safety; and – The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies. <p>6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.</p>	
ETI 7. No discrimination is practised	ETI 7. No discrimination is practised
<p>7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p>	
ETI 8. Regular employment is provided	ETI 8. Regular employment is provided
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or</p>	

<p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p>Additional Elements: Responsible Recruitment</p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p> <p>8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.</p> <p>8.5 Employment agencies must only supply workers registered with them.</p> <p>8.6 Workers pay no recruitment fee at any stage of the recruitment process.</p> <p>8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
8A: Sub-Contracting and Homeworking	8A: Sub-Contracting and Homeworking
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.</p> <p>8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
ETI 9. No harsh or inhumane treatment is allowed	ETI 9. No harsh or inhumane treatment is allowed
<p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.</p> <p>Additional elements:</p> <p>9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
10. Other Issue areas: 10A: Entitlement to Work and Immigration	
<p>Additional Elements</p> <p>10A.1 Only workers with a legal right to work shall be employed or used by the supplier.</p> <p>10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
10. Other issue areas 10B2: Environment 2-Pillar	

<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p>10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.</p> <p><i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	
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SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
Environment Section	Environment Section
<p>B.4. Compliance Requirements</p> <p>10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.</p> <p>10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.</p> <p>10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements</p> <p>10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.</p> <p>10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.</p> <p>10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).</p> <p>10B4.7 Businesses shall make continuous improvements in their environmental performance.</p> <p>10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation</p> <p>10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.</p> <p>B4. Guidance for Observations</p> <p>10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.</p> <p>10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p>	
Business Practices Section	

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations






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

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

Photo Form:

General Side Photo:

		
Facility gate	Facility name	Facility building
		
Security check post	Staircase	No smoking sign
		
Assembly point	Evacuation plan	Fabric store
		

Cutting section	Sewing	Finishing
		
Packing	Finished goods area	Dining area
		
Fire door	Fire equipment	Fire sprinkler
		
Fire alarm	Exit sign	Fire alarm switch
		
Public Address system	Fog light	Fire hose cabinet
		

		
Hose pipe checked	Emergency light	Fire fighter
		
Fire rescuer	Distribution board	Personal Protective Equipment used
		
Fire extinguisher	Time keeping machine	Notice board
		
Pure drinking water area	First aid box	Toilet area

		
Complain box	Medical room	Child care room
		
Fire pump room	Fire control panel	Sub station
		
Compressor	Generator	Boiler
		
Transformer	Spot removing area	Eye wash station

Non-Compliance Photo:

		
<p>Needle guards were found displaced</p>	<p>Aisles mark found faded</p>	<p>Insufficient first aid kits found in the first aid boxes</p>
		<p>NA</p>
<p>Workers working near exhaust fan were not using face mask</p>	<p>Wastage were not segregate</p>	<p>NA</p>

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End of report.



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