



SMETA Corrective Action Plan Report (CAPR)

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC:4474322	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS:4646081	
Business name (Company name):	Paradise Washing Plant Limited			
Site name:	Paradise Washing Plant Limited			
Site address: <i>(Please include full address)</i>	277/4 Kabi Jashim Uddin Road, Pagar, Tongi, Gazipur-1710	Country:	Bangladesh	
Site contact and job title:	Mr. Ashim Kumar Majumder (Sr. Deputy General Manager-Compliance)			
Site phone:	Mr. Ashim Kumar Majumder (Sr. Deputy General Manager-Compliance) Mobile No. 01613199524	Site e-mail:	ashim@ananta.com.bd compliance_pwpl@ananta.com.bd ,	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	16 th June, 2020			

Audit Company Name & Logo: 	Report Owner (payee): Paradise Washing Plant Limited <i>(If paid for by the customer of the site please remove for Sedex upload)</i>
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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 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

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

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

Lead auditor: Md. Ripon Uddin (APSCA No. RA21701540)

Team auditor: 1. Md. Shahinul Islam (APSCA No. RA21701537)
2. Md. Nazirul Islam Tutul (APSCA No. RA21701541)
3. Shimul Kar (APSCA No. ASCA21704639)

Interviewers: Md. Shahinul Islam (APSCA No. RA21701537)

Report writer: Md. Ripon Uddin (APSCA No. RA21701540)

Report reviewer:

Date of declaration: 16th June, 2020

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.

Audit Parameters

Audit Parameters			
A: Time in and time out	Day 1 Time in: 9:00am Day 1 Time out: 4:00pm	Day 2 Time in: Day 2 Time out:	Day 3 Time in: Day 3 Time out:
B: Number of auditor days used:	4 auditors in one day (3.5 man-day)		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define:		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: Three weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Ashim Kumar Majumder (Sr. Deputy General Manager-Compliance)		
H: Is further information available (if yes, please contact audit company for details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
I: Previous audit date:	17 th June, 2018		
J: Previous audit type:	It was initial audit (4 Pillars)		
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input 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 type="checkbox"/> Yes <input checked="" 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 <i>(only complete if no worker reps present)</i>	During opening and closing meeting Worker representatives were present as the facility does not have any union. PC representative name is Mr. Masud Rana (Washing Operator)		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	N/A as No union found in factory.		

Guidance

The Corrective Action Plan Report summarises the site audit findings and a corrective, and preventative action plan that both the auditor and the site manager believe is reasonable to ensure conformity with the ETI Base Code, Local Laws and additional audited requirements. After the initial audit, the form is used to re-record actions taken and to categorise the status of the non-compliances.

N.B. observations and good practice examples should be pointed out at the closing meeting as well as discussing non-compliances and corrective actions.

To ensure that good practice examples are highlighted to the supplier and to give a more 'balanced' audit a section to record these has been provided on the CAPR document (see following pages) which will remain with the supplier. They will be further confirmed on receipt of the audit report.

Root cause (see column 4)

Root cause refers to the specific procedure or lack of procedure which caused the issue to arise. Before a corrective action can sustainably rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

See SMETA BPG Chapter 7 'Audit Execution' for more explanation of "root cause".

Next Steps:

1. The site shall request, via Sedex, that the audit body upload the audit report, non-compliances, observations and good examples. If you have not already received instructions on how to do this then please visit the web site www.sedexglobal.com.
2. Sites shall action its non-compliances and document its progress via Sedex.
3. Once the site has effectively progressed through its actions then it shall request via Sedex that the audit body verify its actions. Please visit www.sedexglobal.com web site for information on how to do this.
4. The audit body shall verify corrective actions taken by the site by either a "Desk-Top" review process via Sedex or by Follow-up Audit (see point 5).
5. Some non-compliances that cannot be closed off by "Desk-Top" review may need to be closed off via a "1 Day Follow Up Audit" charged at normal fee rates. If this is the case, then the site will be notified after its submission of documentary evidence relating to that non-compliance. Any follow-up audit must take place within twelve months of the initial audit and the information from the initial audit must be available for sign off of corrective action.
6. For changes to wages and hours to be correctly verified it will normally require a follow up site visit. Auditors will generally require to see a minimum of two months wages and hours records, showing new rates in order to confirm changes (note some clients may ask for a longer period, if in doubt please check with the client).

Corrective Action Plan

Corrective Action Plan – non-compliances

Non-Compliance Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new non-compliance identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Non-Compliance <i>Details of Non-Compliance</i>	Root cause <i>(completed by the site)</i>	Preventative and Corrective Actions <i>Details of actions to be taken to clear non-compliance, and the system change to prevent re-occurrence (agreed between site and auditor)</i>	Timescale <i>(Immediate, 30, 60, 90, 180, 365)</i>	Verification Method <i>Desktop / Follow-Up [D/F]</i>	Agreed by Management and Name of Responsible Person: <i>Note if management agree to the non-compliance, and document name of responsible person</i>	Verification Evidence and Comments <i>Details on corrective action evidence</i>	Status <i>Open/Closed or comment</i>
OB: Management system and Code Implementation NC-1	<p align="center">New</p>	<p>NC Title: - The facility management has not approved Organogram from Inspector General.</p> <p>Description of finding:- During documentation review and management interview it was noted that the facility management yet not collected approval of Organogram from Inspector General mentioning the class, number and type of he workers will be mentioned in the organogram.</p> <p>Local Law requirement:- In accordance with Bangladesh labor rule 2015 section 18</p>	<input type="checkbox"/> Training <input type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input checked="" type="checkbox"/> Other – please give details: Lack of awareness	<p>The facility management informed they have organogram ready and waiting for getting authority approval. Facility top management approved the organogram.</p>	<p align="center">180</p>	<p align="center">Desktop</p>	<p>Agreed</p> <p>Mr. Ashim Kumar Majumder (Sr. Deputy General Manager- Compliance)</p>		<p align="center">Open</p>
OB: Management system and Code Implementation	<p align="center">New</p>	<p>NC Title: - The facility layout plan was not found updated.</p> <p>Description of finding:- During the facility tour and document review</p>	<input type="checkbox"/> Training <input type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers	<p>The facility management informed they are in touch with concern authority and receive</p>	<p align="center">180</p>	<p align="center">Desktop</p>	<p>Agreed</p> <p>Mr. Ashim Kumar Majumder (Sr. Deputy General</p>		<p align="center">Open</p>

<p>NC-2</p>		<p>it was noted that approved machineries layout plan is not matched with actual floor layout at 7th floors of main building. 7th floor of the building is approved as worker dining and canteen but the facility using 20% portion of the floors as cartoon store.</p> <p>The facility management applied for updated layout approval dated on 10th May, 2020</p> <p>Local Law requirement:- In accordance with Bangladesh labor rule 2015 section 353 (4)</p>	<p><input checked="" type="checkbox"/> Other – please give details: Lack of awareness</p>	<p>the approved layout plan.</p>			<p>Manager-Compliance)</p>		
<p>3: Working Conditions are Safe and Hygienic</p> <p>NC-1</p>	<p>Carried Over</p>	<p>NC Title-The facility does not have night medical support for night operation.</p> <p>Description of finding: - During the management and worker interview it was observed that currently the facility has night production operation but currently they do not have night shift medical support from 1st June, 2020.</p> <p>Local Law requirement: - In accordance Bangladesh labor rule 2015 section 76.</p>	<p><input type="checkbox"/> Training <input type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input checked="" type="checkbox"/> Other – please give details: Lack of awareness</p>	<p>The facility management informed they appointed one medical assistant for night medial support but from 1st June, 2020 he is absent in work station.</p>	<p>90</p>	<p>Desktop</p>	<p>Agreed</p> <p>Mr. Ashim Kumar Majumder (Sr. Deputy General Manager-Compliance)</p>		<p>Open</p>
<p>3: Working Conditions are Safe and Hygienic</p> <p>NC-2</p>	<p>Carried Over</p>	<p>NC Title-Fire Fighter Team members were not found identified property.</p> <p>Description of finding- During the facility tour Fire fighters team members were not found</p>	<p><input type="checkbox"/> Training <input type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input checked="" type="checkbox"/> Other – please give details: Lack of awareness</p>	<p>The facility informed they would provide specified dress code to fire fighter</p>	<p>90</p>	<p>Desktop</p>	<p>Agreed</p> <p>Mr. Ashim Kumar Majumder (Sr. Deputy General Manager-Compliance)</p>		<p>Open</p>

		<p>identified by different dress code as per legal specification.</p> <p>But It was observed that the facility management provided specified dresses codes First aid responder and rescuers but they were not found aware about wearing dresses specified codes.</p> <p>Law requirement:- In accordance Bangladesh labor rule 2015 section 76 (4)</p>						
<p>3: Working Conditions are Safe and Hygienic</p> <p>NC-3</p>	Carried Over	<p>NC Title- Aisles and arrow indicators were found faded.</p> <p>Description of finding- During the facility tour it was observed that the aisles and arrow indicators were found faded at dry sections at 3rd, 4th & 5th floors and wet section and 1st ground, 1st and 2nd floors.</p> <p>Law requirement:- In accordance with Bangladesh Law 2006 section-72 (c)</p>	<input type="checkbox"/> Training <input type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input checked="" type="checkbox"/> Other – please give details: Lack of awareness	The facility management informed they would highlighted all faded aisles marking in mentioned sections.	90	Desktop	<p>Agreed</p> <p>Mr. Ashim Kumar Majumder (Sr. Deputy General Manager- Compliance)</p>	Open
<p>3: Working Conditions are Safe and Hygienic</p> <p>NC-4</p>	New	<p>NC Title- Safety record book was found maintained and but was not found updated.</p> <p>Description of finding- During documentation review it was observed that the facility management has maintained safety record book as specified in law but it was not found updated.</p>	<input type="checkbox"/> Training <input type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input checked="" type="checkbox"/> Other – please give details: Lack of awareness	The facility management informed they update safety record book as per the legal requirement.	90	Desktop	<p>Agreed</p> <p>Mr. Ashim Kumar Majumder (Sr. Deputy General Manager- Compliance)</p>	Open

		Law requirement:- In accordance with Bangladesh rules 2015 section-80(1)							
3: Working Conditions are Safe and Hygienic NC-5	New	NC Title:- Designated Canteen boy was found available. Description of finding- During the facility tour it was noted that worker Dining hall and Canteen are located at 7 th floor of building one. During audit facility canteen was found functional and seating accommodation was found meeting the legal requirement but designated canteen by was not found currently Canteen is operated by Security guards. Law requirement:- In accordance with Bangladesh labor law 2006 section 92. And rules 2015 section 87-88	<input type="checkbox"/> Training <input type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input checked="" type="checkbox"/> Other – please give details: Lack of awareness	The facility management informed they update safety record book as per the legal requirement.	90	Desktop	Agreed Mr. Ashim Kumar Majumder (Sr. Deputy General Manager- Compliance)		Open
2: Freedom of Association and Right to Collective Bargaining are Respected NC-1	New	NC Title- Participation committee (PC) meeting minutes were not found shared with labor inspector Description of finding- During documentation review and management interview it was observed that the facility management conducted last Participation committee (PC) meeting on 10 th May, 2020 but they has not shared the PC meeting minutes with labor inspector as specified in law. Law requirement:- In accordance with Bangladesh labor law 2006 section 207	<input type="checkbox"/> Training <input type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input checked="" type="checkbox"/> Other – please give details: Lack of awareness	The facility management informed they would share PC meeting minutes with labor inspector timely basis.	90	Desktop	Agreed Mr. Ashim Kumar Majumder (Sr. Deputy General Manager- Compliance)		Open

Corrective Action Plan – Observations

Observation Number <i>The reference number of the observation from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Observation <i>Details of Observation</i>	Root cause <i>(completed by the site)</i>	Any improvement actions discussed <i>(Not uploaded on to SEDEX)</i>
01. Observation	New	<p>During the documentation review and management interview it was noted the facility has not yet declared Policy regarding Universal Rights Covering UNGP (UN Guiding Principles).</p> <p>ETI requirement: - 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>ETI requirement: - 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>	Lack of awareness	The facility management informed they would introduce Policy regarding Universal Rights Covering UNGP (UN Guiding Principles).

Good examples

Good example Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	Details of good example noted	Any relevant Evidence and Comments
01.	The facility has an internal audit team to conduct internal audit to maintain the standard and audit is conducted in three every month.	Reviewed monthly internal audit report
02.	The facility is doing yearly picnic for worker refreshment	Through worker and management interview

03.	The facility has tree plantation program	Worker and management interview
04.	The facility is giving Eid Dresses to all worker in every year	Worker and management interview
05.	The facility is giving is giving attendance bonus BDT 450, 350, 325 and 300 for full attendance	Documentation review and worker interview
06.	Celebrating new year and Bangla New	Through worker and management interview
07.	The facility is reusing 48% treated water and also has water harvesting system.	Management interview.
08.	The facility has Solar power panel system and getting 5kw.	Management interview.
09.	The facility has on Anti-Harassment, sexual harassment prevention & corruption committee to monitoring Harassment and Abuse issues. The facility is also maintaining report.	Through worker and management interview
10.	The facility management installed Incineration Boiler.	

Confirmation

Please sign this document confirming that the above findings have been discussed with and understood by you: (site management)
If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.

A: Site Representative Signature:	Mr. Ashim Kumar Majumder	Title: (Sr. Deputy General Manager-Compliance) Date: 16 th June, 2020
B: Auditor Signature:	Md. Ripon Uddin	Title: Lead Auditor Date: 16 th June, 2020
C: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes.		
D: I dispute the following numbered non-compliances:		
E: Signed: <i>(If <u>any</u> entry in box D, please complete a signature on this line)</i>		Title Date
F: Any other site Comments:		

Guidance on Root Cause

Explanation of the Root Cause Column

If a non-compliance is to be rectified by a corrective action which will also prevent the non-compliance re-occurring, it is necessary to consider whether a system change is required.

Understanding the root cause of the non-compliance is essential if a site is to prevent the issue re-occurring.

The root cause refers to the specific activity/ procedure or lack of activity /procedure which caused the non-compliance to arise. Before a corrective action can rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

Since this is a new addition, it is not a mandatory requirement to complete this column at this time. We hope to encourage auditors and sites to think about Root Causes and where they are able to agree, this column may be used to describe their discussion.

Some examples of finding a "root cause"

Example 1

Where excessive hours have been noted the real reason for these needs to be understood, whether due to production planning, bottle necks in the operation, insufficient training of operators, delays in receiving trims, etc.

Example 2

A non-compliance may be found where workers are not using PPE that has been provided to them. This could be the result of insufficient training for workers to understand the need for its use; a lack of follow-up by supervisors aligned to a proper set of factory rules or the fact that workers feel their productivity (and thus potential earnings) is affected by use of items such as metal gloves.

Example 3

A site uses fines to control unacceptable behaviour of workers.

International standards (and often local laws) may require that workers should not be fined for disciplinary reasons.

It may be difficult to stop fines immediately as the site rules may have been in place for some time, but to prevent the non-compliance re-occurring it will be necessary to make a system change.

The symptom is fines, but the root cause is a management system which may break the law. To prevent the problem re-occurring it will be necessary to make a system change for example the site could consider a system which rewards for good behaviour

Only by understanding the underlying cause can effective corrective actions be taken to ensure continuous compliance.

The site is encouraged to complete this section so as to indicate their understanding of the issues raised and the actions to be taken.



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

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

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

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

[Click here for Supplier \(B\) members:](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d

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

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