



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: (only available on Sedex System)	ZC: 409016261	Sedex Site Reference: (only available on Sedex System)	ZS: 409127135	
Business name (Company name):	Ratan Textiles Pvt. Ltd.			
Site name:	Ratan Textiles Pvt. Ltd.			
Site address: (Please include full address)	F 200-201, RIICO Industrial Area, Sitapura, Jaipur – 302022, Rajasthan	Country:	India	
Site contact and job title:	Mr. Girindra Mohan Singh / Factory Manager			
Site phone:	+91-7727827470	Site e-mail:	hrd@ratantextiles.com	
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:	March 05, 2022			

Audit Company Name & Logo: 	Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i> Ratan Textiles Pvt. 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)			

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact grievance@sedex.com.

To confirm the validity of this report, please visit <https://www.sedex.com/audit-verifier/>

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g., different sample size): None.

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

Lead auditor: Shivendra Kumar Dubey APSCA number: RA 21704833

Lead auditor APSCA status: Registered Auditor (In Good Standing)

Team auditor: Sahil Kukreja & Rajeev Singh APSCA number: RA 21703822 & ASCA 21704254

Interviewers: Sahil Kukreja APSCA number: RA 21703822

Report writer: Rajeev Singh

Report reviewer: Meeta Pednekar / Intertek Report Reviewer CSR

Date of declaration: March 05, 2022.

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

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

Summary of Findings

Issue (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"/>		00	00	None observed.
0B Management systems and code implementation		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	00	01	00	Observation: 1. Facility has not provided SAQ for review to auditor on the day of audit.
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None observed.
2. Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None observed.
3. Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	02	00	00	NC: 1. It was noted that only 01 solvent container (used in the process of spotting) was found kept near staircase without secondary containment, MSDS (material safety data sheet) and access restriction. Further it was noted that facility has not defined a chemical storage area in the facility premises. 2. Facility has not conducted hydraulic testing of 01 steam boiler installed at terrace of facility building as required by law.
4. Child Labour	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None observed.

5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None observed.
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None observed.
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None observed.
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	01	00	00	NC: 1. Facility has obtained principal employer registration certificate dated 12/02/2020 for employing contracted employees which was found valid till 31/12/2020. Further facility has applied for renewal with amendments in the obtained registration certificate on 12/02/2022, renewal of which was found awaited on the day of audit.
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None observed.
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None observed.
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None observed.
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-	-	-	Not applicable in 4-Pillar audit.
10B4	<u>Environment 4-Pillar</u>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	01	00	00	NC: 1. Facility has not conducted stack emission testing of 01 steam boiler installed at terrace of facility building as require by law.
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None observed.
General observations and summary of the site:									

This periodic audit was conducted by three (03) auditors of Intertek India Pvt. Ltd. who assessed facility's operation against ETI based code and Local law requirements on sampling basis in one day (2.5 man-days).

Site Summary:

1. This facility was established at current location in December 2011. Facility is involved in manufacturing of Home Textile Products having Raw Material Receiving, Fabric Checking, Cutting, Stitching, Finishing, Packing and Dispatch as main production process.
2. Overall responsibility for meeting the standards is taken by Mr. Girindra Mohan Singh / Factory Manager.
3. Facility has employed total of 180 employees (126 male & 54 female) at site, which includes 140 production employees (106 male & 34 female) and 40 non-production employees (24 male & 16 female). Facility has employed total 162 employees under company roll on permanent basis and 18 employees through 06 different contractors.
4. No casual, temporary, seasonal or internationally migrant employees are employed at site.
5. Facility operates 06 days a week in 01 shift as per below details –
General Shift – 09:30 am to 06:30 pm
Lunch Break – 13:00 pm to 13:30 pm
Tea Break – 02 Breaks for 15 minutes each
6. No child labour was found at audited site. As per available records and audit process, the youngest employee on site was 23 years completed as per review of records.
7. Facility has formed legally required grievance committee to resolve workers grievance and have also formed works committee which was found as per the legal requirements. Facility has provided suggestion box provision for the employees to report their grievances. Further, employees can directly reach to management for their personal grievance/issue.
8. Facility has employed 54 female employees at site. Facility does not discriminate female employees in hiring.
9. As per discussion with Management, there peak season is from October to December.
10. Facility does sub-contract its production process of Dyeing & Printing to its sister concern.
11. Total of 26 employees were randomly selected for interview, they were interviewed in 04 groups of 05 employees each and the balance of 06 employees was interviewed individually. In general, interviewed employees were satisfied with working environment and no negative concern was raised.
12. Out of last 12 pay periods, time and wage records of randomly sampled 26 employees' IN/OUT time records and payrolls (January 2022 – Most Recent paid month, October 2021 – Peak month and March 2021 – Random month) were reviewed for checking on status of wages and working hours.
13. As per available wage records and audit process, applicable minimum wage is paid to all the employees in the recent paid month. Facility has paid INR 7850.00 per month against applicable minimum wage of INR 6734.00 per month in the month of January 2022. Regular Wages and Benefits provided to the employees were verified during audit process.
14. Facility has policy to compensate overtime at the rate of 200% of regular wage rate. However, no overtime was found performed in the sampled months. Working hours and weekly rest was verified during audit process and review of records.
16. All employees are paid on monthly basis through bank transfer. Bank statement proofs of company were available for review. As per available bank statements of company employees and audit process, wages were found paid latest by 7th of every month.

17. No piece rate employee employed at site.
18. No forced labor is employed.
19. No harassment reported by the employees.
20. No dormitory provided for the employees.

Summary of Non-Compliance:

3 Safety and Hygienic Conditions

1. It was noted that only 01 solvent container (used in the process of spotting) was found kept near staircase without secondary containment, MSDS (material safety data sheet) and access restriction. Further it was noted that facility has not defined a chemical storage area in the facility premises.
2. Facility has not conducted hydraulic testing of 01 steam boiler installed at terrace of facility building as required by law.

8 Regular Employment

1. Facility has obtained principal employer registration certificate dated 12/02/2020 for employing contracted employees which was found valid till 31/12/2020. Further facility has applied for renewal with amendments in the obtained registration certificate on 12/02/2022, renewal of which was found awaited on the day of audit.

10B4 Environment 4-Pillar

1. Facility has not conducted stack emission testing of 01 steam boiler installed at terrace of facility building as require by law.

Summary of Observation:

0B Management systems and code implementation

1. Facility has not provided SAQ for review to auditor on the day of audit.

Good Example:

None observed.

Auditor Remarks:

None.

**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:	Ratan Textiles Pvt. Ltd.																									
B: Site name:	Ratan Textiles Pvt. Ltd.																									
C: GPS location: (If available)	GPS Address: F 200-201, RIICO Industrial Area, Sitapura, Jaipur – 302022, Rajasthan	Latitude: 26° 47' 12.4" N Longitude: 75° 50' 08.4" E																								
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business License Number (Factory License) – RJ/27079 for employing maximum 450 workers and the Factory Licence is Valid till March 31, 2022.																									
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturing of Home Textiles Products																									
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Facility was established at this location in December 2011. The total land area occupied is 4000.00 square meter and the carpet area is 16000.00 square meter. The facility building descriptions are as under:</p> <table border="1"> <thead> <tr> <th>Production Building no 1</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Basement</td> <td>Fabric Store, Stitching, Checking, Pressing and Storage.</td> <td>NA</td> </tr> <tr> <td>Ground Floor</td> <td>Office, Sampling, Showroom and Finished Goods Storage.</td> <td>NA</td> </tr> <tr> <td>First Floor</td> <td>Cutting, Stitching, Finishing and Packing.</td> <td>NA</td> </tr> <tr> <td>Second Floor</td> <td>Finishing, Checking, Thread Cutting, Spotting and Packing.</td> <td>NA</td> </tr> <tr> <td>Terrace</td> <td>Boiler Section.</td> <td>NA</td> </tr> <tr> <td>Periphery</td> <td>Security Section, Electrical Panel Section, Air Compressor, Assembly Area and Toilet Provision.</td> <td>NA</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>NA</td> </tr> </tbody> </table> <p>For below, please add any extra rows if appropriate. F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F2: Please give details: No visible cracks observed. F3: Does the site have a structural engineer evaluation?</p>		Production Building no 1	Description	Remark, if any	Basement	Fabric Store, Stitching, Checking, Pressing and Storage.	NA	Ground Floor	Office, Sampling, Showroom and Finished Goods Storage.	NA	First Floor	Cutting, Stitching, Finishing and Packing.	NA	Second Floor	Finishing, Checking, Thread Cutting, Spotting and Packing.	NA	Terrace	Boiler Section.	NA	Periphery	Security Section, Electrical Panel Section, Air Compressor, Assembly Area and Toilet Provision.	NA	Is this a shared building?	No	NA
Production Building no 1	Description	Remark, if any																								
Basement	Fabric Store, Stitching, Checking, Pressing and Storage.	NA																								
Ground Floor	Office, Sampling, Showroom and Finished Goods Storage.	NA																								
First Floor	Cutting, Stitching, Finishing and Packing.	NA																								
Second Floor	Finishing, Checking, Thread Cutting, Spotting and Packing.	NA																								
Terrace	Boiler Section.	NA																								
Periphery	Security Section, Electrical Panel Section, Air Compressor, Assembly Area and Toilet Provision.	NA																								
Is this a shared building?	No	NA																								

	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F4: Please give details: Facility has obtained stability certificate after review from competent person on 30/03/2017.
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
H: Month(s) of peak season: (if applicable)	October to December
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	The facility is involved in the manufacturing of Home Textile Products having Raw Material Receiving, Fabric Checking, Cutting, Stitching, Finishing, Packing and Dispatch as main production process.
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (specify) – Grievance Committee <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 type="checkbox"/> No N1: If no, please give details - Not applicable.

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 11:00 A2: Day 1 Time out: 18:30	A3: Day 2 Time in: NA A4: Day 2 Time out: NA	A5: Day 3 Time in: NA A6: Day 3 Timeout: NA
B: Number of auditor days used:	2.5 Auditor Days (03 Auditors x 01 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 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If No, why not? – Facility did not provide SAQ for review		
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. Girindra Mohan Singh / Factory Manager		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	February 20, 2021		
J: Previous audit type:	Periodic Audit (Smeta-2 Pillar)		
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 type="checkbox"/> Yes <input checked="" 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 type="checkbox"/> Yes <input checked="" 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>	Workers Representatives were busy in production work.		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	No Union exists in the facility: Not required 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	116	00	14	00	00	00	00	130
Worker numbers – female	46	00	04	00	00	00	00	50
Total	162	00	18	00	00	00	00	180
Number of Workers interviewed – male	13	00	03	00	00	00	00	16
Number of Workers interviewed – female	08	00	02	00	00	00	00	10
Total – interviewed sample size	21	00	05	00	00	00	00	26



A: Nationality of Management	Indian	
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: ___Indian___ B2: Nationality 2: _____ B3: Nationality 3: _____	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: It may extend up to an allowable limit of employing 450 employees on any working day.
C: Please provide more information for the three most common nationalities.	C: approx. % total workforce: Nationality 1 ___Indian___ 100%___ C1: approx. % total workforce: Nationality 2 _____ C2: approx. % total workforce: Nationality 3 _____	
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: Not applicable.	



Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	04 groups of 05 employees each	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 06	D2: Female: 00
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: Not applicable	
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?	Employees did not report any complaints.	
I: What did the workers like the most about working at this site?	Good working environment with no restrictions.	
J: Any additional comment(s) regarding interviews:	None.	
K: Attitude of workers to hours worked:	No negative comments came from the workers.	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details: Not applicable.		

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

Total of 26 employees (Male -16 and female -10) were selected for interview. All of them spoke freely of their views for the facility. All employees said that they were satisfied with their employment practices and current wages structure. They reported freedom to leave after proper notice period. They had good relationships with their supervisors who treated them with respect. They were able to make suggestions to their supervisors and team leaders and sometimes they have seen these suggestions used. They are able to complain directly to their supervisors and also felt free to give their general concerns to their grievance representative who would take it to the management.

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

There was no union at site. Facility has formed workers committee and grievance committee to resolve workers grievance. During interaction with the workers representatives, it was noted that there was no restriction from the management, and they were allowed to do their works committee related task independently in required manner. There was no discrimination reported at the time of interaction with the workers representatives.

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 during the whole process. All documentation requested for review were provided. Locked areas encountered during the audit were unlocked timely. At the end of the audit, all the non-compliance were accepted by the facility. No negative information reported.

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- 1) Mr. Girindra Mohan Singh / Factory Manager is responsible for implementing standards concerning Human rights.
- 2) Facility has identified their stakeholders and salient issues.
- 3) Facility has measured direct, in-direct and potential impacts on stack holder's human rights. Further remedial action was found in place.
- 4) Facility does have transparent system in place for confidential reporting and dealing with human rights impacts without fear of reprisal towards the reporter.
- 5) No discrimination related to human rights observed regardless of gender, nationality, place of residency, sex, ethnicity, religion, colour or and other categorization and all are treated equally.
- 6) No Slavery, forced labour and human trafficking observed. All employees are of Indian nationality.
- 7) Employees are free to quit if they are not willing to work.
- 8) The facility has policy on "Human Right" which is duly endorsed by Management and management representative is responsible for implementation.

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

Details:

- Documented policy on human rights.
- Supplier's social compliance monitoring records.
- Interaction with Management and Interview with employees

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: Facility has documented human right policy which express 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: Mr. Ganesh Tiwari Job title: Head HR
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: Facility does have a transparent system in place for data privacy or confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.
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: Not applicable.
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: Factory has formed a Data privacy policy which ensures all employees, supplier and customer information remains confidential.

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

Good examples observed: Nil	
Description of Good Example (GE): None Observed.	Objective Evidence Observed: Not applicable.

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: __04__ %	A2: This year __05__ %
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]	05 %	
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: __09__ %	C2: This year __10__ %
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	10 %	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: No accidents recorded in the accident register in previous year.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: Number: Nil.	F2: This year: Number: Nil.
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]	Nil.	
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: Nil.	H2: This year: Nil.
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months __Nil__% workers	I2: 12 months __Nil__% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months __Nil__% workers	J2: 12 months __Nil__% workers

0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

- 1) Mr. Girindra Mohan Singh / Factory Manager is responsible to ensure compliance with these code requirements.
- 2) Based on interaction with the factory management, it was understood that factory management has developed management system for implementing & maintaining social compliance code.
- 3) Facility managers are well aware of the compliance requirements and have adequate knowledge on the legal requirements.
- 4) Facility has obtained Factory License including approved building layout plan and stability certificate.
- 5) Facility has obtained all the required documents for the facility building. All required documents were available for review and found in compliance.
- 6) Employees were found aware about the Ethical Trade Initiative (ETI) base code requirements.
- 7) Facility has communicated ETI base code requirement to their suppliers.
- 8) Facility has conducted risk assessment and internal audit to monitor effectiveness of social management system implemented at audited site.
- 9) Facility has system in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.
- 10) Facility was found to have appropriate land rights.

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

Details:

- Facility Policy and Procedures.
- All statutory licenses including factory License and building plan approvals with stability certificate.
- Factory license of facility is valid till 31/03/2022.
- Building Stability certificate obtained from competent person on 30/03/2017.
- Approved layout plan of facility on 19/11/2012.
- ETI Training to employees on 04/02/2022.

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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: No such fine imposed on the site till date.
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 B1: Please give details: The facility has established the policies and procedure with respect to social compliance on forced labour, child labour, discrimination, harassment & abuse.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Facility has conducted internal audit to monitor implementation of social compliance policies and procedures to ensure effectiveness of implemented system.
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: All the employees have undergone an induction training where the social compliance policies and procedures were explained.
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: Based on interaction with the employees, it was noted that facility has a program to train relevant individuals regarding the standards for forced labour, child labour, discrimination, harassment & abuse and changes of any Laws or revisions to existing Laws & regulations. Provided training was found effective.
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: No system certification was available.
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: Facility has defined HR Departments which monitor and control all HR related activities.
H: Is there a senior person / manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Mr. Girindra Mohan Singh / Factory Manager is responsible.
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: Facility has HR policy as per which the document and employee information is kept 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: As per the facility procedures, the data received from the employees are kept confidential. The data will not be disclosed to others without consent.
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 has system to conduct risk assessment to evaluate the effectiveness of policy and procedures and update the same if required.
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: Corrective action is taken against identified risk. Further, implementation of corrective action against risk assessment is verified during internal audit.
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 communicated ETI code requirement to their suppliers.
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: Facility has obtained required documents for the land. In future if land or Buildings are extended factory has to obtain approval from concern authority.
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: Facility has compliance officer internally to check this requirement.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: Facility have written policy and procedures specific to land rights.
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 premises is owned by the facility and documents related to it was evident on the day of audit.
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: Facility owns the premises on government approved industrial land to avoid adverse impact.
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: Nil	
1. Description of non - compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code: None observed. Local law and/or ETI requirement Not applicable. Recommended corrective action: Not applicable.	Objective evidence observed: Not applicable.

Finding - 1	
Finding: Observation <input checked="" type="checkbox"/> Company NC <input type="checkbox"/> Description of observation: Based on interaction with management and review of records, it was noted that facility has not provided SAQ for review to auditor on the day of audit. Local law: Not applicable. ETI/Additional elements: O.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code. Comments: It is recommended that facility shall ensure to complete and provide SAQ for review as required.	Objective evidence observed: Documents review & interaction with management. Observation Photo# Not applicable.

Good Examples observed: Nil	
Description of Good Example (GE): None observed.	Objective evidence observed: Not applicable.

1: Freely Chosen Employment

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

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

- 1) Mr. Girindra Mohan Singh / Factory Manager is responsible to oversee that no forced, bonded, involuntary or prison labor is employed.
- 2) There was no presence of forced / bonded or prison labor at the work place.
- 3) Employees are not required to lodge any deposits, identity papers with the facility before or after joining the services.
- 4) All interviewed employees reported that there are no such illegal deposits to be deposited to the facility for recruitment and they are free to resign from the facility after serving a specified notice period of 01 month.
- 5) Employees are free to leave at the end of their shift and there is no compulsion to work overtime.

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

Details:

- Facility Policy and Procedures.
- Personal files with application form and bio data including employment contract.
- Interaction with Management and Interview with employees.

Any other comments: None.

A: Is there any evidence of retention of original documents, e.g. passports/ID's	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:
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:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: Workers may resign and leave after serving a month notice period as agreed under employment terms
E: If any part of the business is UK based or registered there & has a	<input type="checkbox"/> Yes <input type="checkbox"/> No

turnover over £36m, is there a published a 'modern day slavery statement?	<input checked="" type="checkbox"/> Not applicable E1: Please describe finding:
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: Workers may leave after completion of standard working hours or early if required in case of an urgency.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: Facility understand the risks of forced / trafficked / bonded labour in its supply chain
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: Facility has drafted policy and procedure to reduce the risk of forced / trafficked labour.

Non-compliance: Nil

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

Description of observation: None observed. Local law or ETI requirement: Not applicable. Comments: None.	Objective evidence observed: Not applicable.
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Good Examples observed: Nil

Description of Good Example (GE): None observed.	Objective evidence observed: Not applicable.
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2: Freedom of Association and Right to Collective Bargaining are Respected

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 1) Mr. Girindra Mohan Singh / Factory Manager is responsible to ensure that 'Freedom of Association and Right to Collective Bargaining' is respected by the management.
- 2) Factory recognizes and encourages the right to freedom of association and collective bargaining under the law provision.
- 3) Facility encourages and respects all employees' rights to join union freely.
- 4) At present, there was no union / trade union in the facility.
- 5) Facility has formed works committee and grievance committee to resolve workers grievances.
- 6) Facility has provided suggestion box through which employees can report grievances. Further, employees can also approach management with their grievance and adequate actions are taken.
- 7) There was no evidence of suppression of employees' rights.

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

Details:

- Facility Policy and Procedures.
- Interaction with Management and Interview with employees.
- Last works committee meeting conducted on 23/02/2022.
- Last grievance committee meeting conducted on 24/02/2022.

Any other comments: None.

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

- ☐ Union (name)
- ☒ Worker Committee
- ☒ Other (specify) - Grievance Committee.
- ☐ 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 formed grievance committee to resolve workers issues and grievances. Further, suggestion box is provided for confidential reporting of grievances. 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: Based on the conducted audit process and interaction with management, it was noted that adequate facility is provided to the committee members to perform their duties without any restriction.	
F: Name of union and union representative, if applicable:	No union at site.	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?	Works committee and grievance committee.	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	
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 07/08/2021.
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: 01.	
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Based on the audit process and review of records, it was noted that workers committee was effective. As per employee's interview and interaction with workers representatives it was noted that issue reported during committee meeting was taken seriously and effective actions are taken to resolve the issue.	
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: __Nil__% workers covered by Union CBA	M2: __Nil__% workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable. No CBA at site.	

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

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

Good Examples observed: Nil	
Description of Good Example (GE): None observed.	Objective evidence observed: Not applicable.

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. General Health and Safety management

- Mr. Girindra Mohan Singh / Factory Manager is responsible for Health & Safety aspects for the site.
- Drinking water was freely available in the facility and test certificates were up-to-date. Drinking water points were maintained in hygienic condition.
- Sufficient number of toilets were available at all times for workers. Toilets were maintained in hygienic condition.
- Ventilation, temperature and lighting were adequate in all section of the facility.
- Housekeeping was found in good condition throughout the facility.
- Construction of the building was found safe.
- Facility has formed health and safety committee to resolve safety issues at site.
- Adequate Personal Protective Equipment's (PPE's) were used by the employees working in production area.

2. Fire Safety

- There were at least 2 exits from each work area from the building.
- Facility has installed 39 fire extinguishers and 12 hydrant & 08 hose reels covering all section/floor of the site. Fire extinguishers and hydrant & hose pipes were found in maintained condition.
- Facility has installed 10 Fire alarm call points which were found in operational condition.
- Facility has installed 46 fire water sprinkler points.
- Facility has 20 emergency lights installed at site.
- Evacuation maps were posted in all section/floor of the facility.
- Fire drills were organized and recorded.
- Facility has marked illuminated exit sign on all around the exits for employee's reference.
- Facility has obtained Fire-NOC from local authorized body as required.
- Fire safety training is provided to sufficient number of employees by competent person.
- Evacuation aisles were found marked in all required areas with directional arrows leading towards exit.

3. Machine & Electrical safety

- All machines and electrical equipment's were found maintained in good condition.

- Safety sign was posted near machines/equipment's for employee's reference.
- Facility has provided adequate safety guard on all required plant and machines.

4. Chemical safety

- Facility does use chemicals in the production process which were found stored with proper labelling and secondary containment at usage area. However, facility has not defined a storage section for the same. Deviation noted has been reported below.
- Chemical containers were found to have hazard and identification labels.
- Material Safety Data Sheet (MSDS) in local language was found posted nearby chemical usage area for employee's reference.
- Adequate Personal Protective Equipment's (PPE's) were used by the employee handling chemicals.
- Occupational health check-up was conducted for employees handling chemicals.
- PPE's and chemical handling trainings were provided to the employees as required.

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

Details:

- Health and Safety Policy.
- Fire NOC of building was found valid till 27/12/2022.
- Industrial accident records – Updated and no accident occurred in last year.
- First aid training was provided to 04 employees having certificates as required.
- Drinking Water Test conducted on 25/12/2021.
- Fire Drill conducted once in every three months. Last drill was conducted on 24/12/2021, for employees working at site.
- Firefighting equipment inspection conducted on monthly basis.
- Fire training was provided to 24 employees on 25/01/2022.
- Personal Protective Equipment (PPE's) training and chemical handling training provided on 04/02/2022.
- Interaction with Management and Interview with employees.

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: Facility has established general Health & Safety, occupational Health & Safety policies and procedures that are fit for purpose and these are communicated to workers through training and notice board.
B: Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Facility has included the social compliance policies in worker's manual.
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: Facility has obtained approved plant layout as per the current setup.
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: Visitors are provided health and safety guidelines before giving access to the facility. Personal protective equipment's (PPE's) are provided to the visitors as per requirement.
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: Facility does not require the same as legally not required.
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 provided first aid provisions in the facility as required by law and all applicable employees are covered under Employee State Insurance.
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: Transport facility is not provided to the employees. Further, it is not a legal requirement.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Not applicable.
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: Facility has conducted risk assessment to take appropriate corrective and preventive action for the identified risks.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility is meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources.
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: Facility does not use any banned chemicals. Facility does meet all the environmental standards based on customer requirement.

Non-compliance: 1

Description of non-compliance:

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

Based on the audit process and facility tour it was noted that only 01 solvent container (used in the process of spotting) was found kept near staircase without secondary containment, MSDS (material safety data sheet) and access restriction. Further it was noted that facility has not defined a chemical storage area in the facility premises.

Local law:

In accordance with Factories Act 1948, Section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include- (a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, (b) the arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances, (c) the provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.

ETI/additional requirement:

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 minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

Recommended corrective action:

It is recommended that facility shall ensure to define a chemical storage area to store chemicals with secondary containment, access restriction and shall display MSDS in language understood by handlers.

Action By: Mr. Girindra Mohan Singh / Factory Manager

Timescale: 30 days

Verification Method: Desktop

Objective evidence observed:

Facility Tour

NC Photo# 01.

Non-compliance: 2

Description of non-compliance:

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

Based on the audit process and documents review it was noted that facility has not conducted hydraulic testing of 01 steam boiler installed at terrace of facility building as required by law. Further it was noted that last hydraulic testing was conducted on 30/09/2017 which was found valid till 29/09/2019.

Local law:

In accordance with Rajasthan Factories Rules, 1951, Pressure Plant, Rules prescribed under sub-section (2) of section 31. (7) In service test and

Objective evidence observed:

Documents review and Interaction with management.

NC Photo# Not applicable.

examinations.— Every pressure vessel or plant in service shall be thoroughly examined by a competent person—(a) externally, once in every period of six months; (b) internally, once in every period of twelve months; If by reason of the construction of a pressure vessel or plant, a thorough internal examination is not possible this examination may be replaced by a hydrostatic test which shall be carried out once in every period of two years: Provided that for a pressure vessel or plant in continuous process which cannot be frequently opened, the period of internal examination may be extended to four years; (c) hydrostatically tested once in every period of four years; and (d) The hydrostatic pressure to be carried out for the purpose of this rule shall be 1.25 times the design pressure or 1.5 times the maximum permissible working pressure whichever is less:

ETI/additional requirement:

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 minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

Recommended corrective action:

It is recommended that facility shall ensure to conduct hydraulic testing of installed boiler as required by law.

Action By: Mr. Girindra Mohan Singh / Factory Manager

Timescale: 30 days

Verification Method: Desktop

Observation: Nil

Description of observation:

None observed.

Local law or ETI requirement:

Not applicable.

Comments:

None.

Objective evidence observed:

Not applicable.

Good Examples observed: Nil

Description of Good Example (GE):

None observed.

Objective evidence observed:

Not applicable.

4: Child Labour Shall Not Be Used

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 1) Mr. Girindra Mohan Singh / Factory Manager is responsible to oversee that no child is employed at site.
- 2) There was no evidence of child labor or young labor throughout the facility.
- 3) No juvenile workers (under the age of 18) are employed at the facility.
- 4) Age proof records were maintained in the form of Aadhar card and Pan card. Age proof was maintained for 26 of 26 sampled employees.
- 5) As per available records, age of youngest worker was 23 years completed.
- 6) Based on the employee interviews, review of facility's Anti Child Labour & Hiring Policy and age proof documents, the facility has complied with ILO Standards for Child Labor.

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

Details:

- Child Labor and Child Labor Remediation Policy.
- Age Proof records of 26 of 26 selected samples.
- Interaction with Management and Interview with employees.

Any other comments: None.

A: Legal age of employment:	14 years completed.
B: Age of youngest worker found:	26 years completed.
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)	Nil %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: If yes, give details: Not applicable.

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

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

Good Examples observed: Nil	
Description of Good Example (GE): None observed.	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:

- 1) Mr. Girindra Mohan Singh / Factory Manager is responsible to ensure that all employees are paid legal minimum wages with all legal benefits on time as per law
- 2) Based on employee's interview, wages are fixed on monthly wage and paid once in a month.
- 3) All employees are paid on monthly basis through bank transfer by 7th of every month regularly in past 12 months.
- 4) Based on employee's interview, it was noted that pay slip is provided to all employees regularly as per law.
- 5) Based on wage record review, all eligible employees are covered under social security benefit of Employee Provident Fund (EPF) and Employee State Insurance (ESI). Payment receipts for the same were found remitted on time as legally required.
- 6) Facility has extended Leave with Wage benefits to the employees. Leave with wage were found calculated accurately during full and final payment of left employees.
- 7) Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules.

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

Details:

- Facility Policy.
- Wage record, Pay slip and Time records for 26 selected samples for 03 months i.e., January 2022 – Most Recent paid month, October 2021 – Peak month and March 2021 – Random month.
- Provident Fund (EPF) remittance receipts.
- Employee State Insurance (ESI) remittance receipts.
- Leave with wage records (Form No: 15).
- Full and final Settlement paid records.
- List of National and Festival Holidays (Form 1A).
- Interaction with management and Employees.

Any other comments: None.

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

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

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

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.	A1: 08 hours per day / 48 hours per week.	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 02 hours per day / 12 hours per week.	B1: No overtime was found worked.	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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 Maximum: The legal minimum wages applicable in the state of Rajasthan as applicable to this facility for the recent sampled month are as under: Unskilled - INR 6734.00 per month Semi-skilled - INR 7046.00 per month Skilled - INR 7358.00 per month.	C1: Wages are paid to employees as per below – Unskilled - INR 7850.00 per month Semi-skilled – INR 8000.00 per month Skilled – INR 8600.00 per month. As per available records.	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: 200% of regular wage.	D1: No overtime was found worked.	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Wages analysis: (Click here to return to Key Information)		
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
A1: If No , why not?	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)	26 sampled employees from January 2022 (Recent Month) 26 sampled employees from October 2021 (Peak Month) 26 sampled employees from March 2021 (Random Month)	
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If Yes , please give details: The legal minimum wages applicable in the state of Rajasthan as applicable to this facility for the recent sampled month are as under: Unskilled - INR 6734.00 per month Semi-skilled – INR 7046.00 per month Skilled – INR 7358.00 per month.
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: Not applicable.
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 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> Minimum wages paid by the facility are as under Unskilled - INR 7850.00 per month Semi-skilled – INR 8000.00 per month Skilled – INR 8600.00 per month. As per available records.
F: Please indicate the breakdown of workforce per earnings:	F1: ____% of workforce earning under minimum wage F2: ____% of workforce earning minimum wage F3: _100_% 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> The employees are paid the bonus at the rate of 8.33% of applicable minimum wages amount as per the legal requirement.	
H: What deductions are required by law e.g. social insurance? Please state all types:	Employees Provident Fund and Employees State Insurance.	

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. EPF Please describe: EPF at the rate of 12% of basic earned wage and ESI at the rate of 0.75% of the gross earned wages.
		I2: Please list all deductions that have not been made.	Not applicable.
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: Based on audit process, it was noted that all required meeting/training are conducted during working hours for which employees are paid. Employees do not attend any meeting/training for which they will not be paid.		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: Facility does not define any living wages. At present facility is following the applicable minimum wages as notified by the State Government.		
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 there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The local government revises the minimum wage once in every six months which the facilities have to comply.		
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: From the review of available records it was noted that equal pay is given for same nature of work.
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain: Not applicable.

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Mr. Girindra Mohan Singh / Factory Manager is responsible for ensuring compliance with regular and overtime hours as per law.
2. Facility records time in/out through electronic attendance system of all company and contract employees.
3. "IN/OUT" time record was maintained for all 26 of 26 randomly selected employees.
4. During audit process and review of records, working hours, overtime hours and weekly rest was found to be in compliance with the legal requirements.
5. Facility has no compulsion on overtime work. It is purely voluntary. However, no overtime was found worked in the sampled months.

Based on review of time records, the working hours could be summarized as follows:

- For January 2022 (recent month), the maximum working hours per week was 48 hours (48 hours regular + 00 hours overtime).

- For October 2021 (peak month), the maximum working hours per week was 48 hours (48 hours regular + 00 hours overtime).
- For March 2021 (random month), the maximum working hours per week was 48 hours (48 hours regular + 00 hours overtime).

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

Details:

- Facility Policy.
- In/Out time records for 26 selected samples for 03 months i.e., January 2022 – Most recent paid month, October 2021 – Peak month and March 2021 – Random month.
- Production records (from work floors to check for discrepancies)

Any other comments: None.

Non-compliance: Nil
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:

Not applicable.

Objective evidence observed:

Not applicable.

Observation: Nil
Description of observation:

None observed.

Local law or ETI requirement:

Not applicable.

Comments:

None.

Objective evidence observed:

Not applicable.

Good Examples observed: Nil	
Description of Good Example (GE): None observed.	Objective evidence observed: Not applicable.

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: Facility records time in/out through Electronic Time Recording System.				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details: Not applicable.				
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: Not applicable.			
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: Not applicable.			

F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No In accordance with Factories Act 1948, Chapter VI, Section 52 (1), No adult worker shall be required or allowed to work in a factory on the first day of the week (hereinafter referred to as the said day) unless- (a) He has or will have a holiday for a whole day on one of the three days immediately before or after the said day, and (b) The Manager of the factory has, before the said day or the substituted day under clause (a) whichever is earlier, - (i) Delivered a notice at the office of the Inspector of his intention to require the worker to work on the said day and of the day which is to be substituted, and (ii) Displayed a notice to that effect in the factory: Provided that no substitution shall be made which will result in any worker working for more than ten days consecutively without a holiday for a whole day.
	Maximum number of days worked without a day off (in sample):	
	As per available electronic IN/OUT time records maximum number of days worked without a day off is 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.
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details: Not applicable.
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: No Overtime hours found worked by any sampled employee.	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 48 hours per week (48 standard + 00 overtime). No Overtime hours found worked by any sampled employee.	
K: Approximate percentage of total	_Nil_%	

workers on highest overtime hours:		
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> As per policy, overtime will be performed voluntarily.
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> As per policy overtime will be paid at the rate of 200% of regular wage rate. However, no overtime hours found worked by any sampled employee.
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> As per policy overtime will be paid at the rate of 200% of regular wage rate. However, no overtime hours found worked by any sampled employee.
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other As per policy overtime will be paid at the rate of 200% of regular wage rate. However, no overtime hours found worked by any sampled employee.	
	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) Not applicable.	
	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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details: Not applicable.	

increased order volumes?	
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 <p>Facility has sufficient man power employed to perform the production and non-production activities.</p>

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 1) Mr. Girindra Mohan Singh / Factory Manager is responsible to check discrimination issue in the facility.
- 2) No discrimination reported / observed in hiring, compensation, promotion and termination based on race, caste, national origin, religion, age, disability, gender, marital status and sexual orientation.
- 3) All employees have fairly equal opportunity for training in their respective departments.

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

Details:

- Facility Policy.
- Appointment letter with terms and conditions of employment for 26 of 26 selected sampled employees.
- Salary and other benefit records.
- Interaction with management and employees.

Any other comments: None.

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: <u>70</u> % A2: Female <u>30</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:	Nil.
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found C1: Please give details: Not applicable.

Professional Development	
A: What type of training and development are available for workers?	Facility provides on job skill training to the unskilled workers if they are willing to develop their skills.
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: Not applicable.

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

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

Good Examples observed: Nil	
Description of Good Example (GE): None observed.	Objective evidence observed: Not applicable.

8: Regular Employment Is Provided

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

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

- 1) Mr. Girindra Mohan Singh / Factory Manager is responsible to ensure compliance with these code requirements.
- 2) Employment contracts (appointment letters) were available and maintained for 26 of 26 selected employees. Terms and conditions of employment were clearly defined in appointment letter issued to the employees.
- 3) Facility does not follow and believe in the fixed term employment.
- 4) Facility understands recruitment process. Facility has engaged 06 employees from 01 contractor in housekeeping, 01 employee from 01 contractor in canteen and 11 employees from 04 other contractors in production. All recruitment process of were monitored by facility management only.
- 5) Facility does not employ any migrant workers.
- 6) Based on interaction with employees, no recruitment fee is required at any stage of the recruitment.
- 7) Photo identification card is issued to all the employees.

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

Details:

- Facility Policy.
- Appointment letter with terms and conditions for 26 of 26 selected samples.
- Salary and other benefit records.
- Interaction with management and Employees.

Any other comments: None.

Non-compliance: 1

Description of non-compliance:

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

Based on the audit process and documents review it was noted that facility has obtained principal employer registration certificate dated 12/02/2020 for employing contracted employees which was found valid till 31/12/2020. Further facility has applied for renewal with amendments in the obtained registration certificate on 12/02/2022, renewal of which was found awaited on the day of audit.

Local law:

In accordance with Contract Labour Regulation and Abolition Act 1970, Section 7 (1) every principal employer of an establishment to which this Act applies shall, within such period as the appropriate Government may, by notification in the Official Gazette, fix in this behalf with respect to establishments generally or with respect to any class of them, make an application to the registering officer in the prescribed manner for registration of the establishment: Provided that the registering officer may entertain any such application for registration after expiry of the period fixed in this behalf, if the registering officer is satisfied that the applicant was prevented by sufficient cause from making the application in time.

ETI/additional requirement:

Not applicable.

Recommended corrective action:

It is recommended that facility shall ensure to obtain renewal of registration certificate as required by law.

Action By: Mr. Girindra Mohan Singh / Factory Manager

Timescale: 30 days

Verification Method: Desktop

Objective evidence observed:

Documents review and Interaction with management.

NC Photo# Not applicable.

Observation: Nil

Description of observation:

None observed.

Local law or ETI requirement:

Not applicable.

Comments:

None.

Objective evidence observed:

Not applicable.

Good Examples observed: Nil	
Description of Good Example (GE):	Objective evidence observed:
None observed.	Not applicable.

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: Not applicable.
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: Not applicable.
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:	Facility does not employ any migrant workers.	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: None. B2: Total number of (outside of local country) recruitment agencies used: None.	
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 C1: Please describe finding: Not applicable. Facility does not employ any migrant workers.	C2: Observations: Facility does not employ any migrant workers.
D: Are Any migrant workers in skilled, technical, or management roles <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, number and example of roles: Not applicable. Facility does not employ any migrant workers.	

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.

Agency Workers (if applicable) <i>(worker sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	A1: Names if available: Not applicable – No agency worker employed at site.
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No No agency worker employed at site.
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No No agency worker employed at site.
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: No agency worker employed at site.
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: No agency worker employed at site.

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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: If yes, how many contractors are present, please give details: 06 contractor were found engaged at site.
B: If Yes , how many workers supplied by contractors?	Facility has engaged 06 employees from 01 contractor in housekeeping, 01 employee from 01 contractor in canteen and 11 employees from 04 other contractors in production.
C: Do all contractor workers understand their terms of employment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: As per interaction with contracted employees it was noted that they are aware of their employment terms.
D: If Yes , please give evidence for contractor workers being paid per law:	As per reviewed records of contracted employees for the sampled months it was noted that they were paid in accordance with the local law.

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:

At present, facility was found to have subcontracted Dyeing & Printing as subcontracted production processes to one of its another unit located in the same district. Further facility does not use home workers for any of the production process. All production processes except dyeing & printing are done in-house. Facility has a system to take clients approval before subcontracting any of its production process.

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

Details:

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

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

Process Subcontracted	Dyeing & Printing
Name of factory	Ratan IMPEX
Address	Plot No. 50-54, Ramanuj Colony, Near Daal Meel, Sanganer, Jaipur Rajasthan, India

Any other comments: None.

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

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

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

Summary of sub-contracting – if applicable <input 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe: Based on review of production records, the capacity with workers workload found balanced, hence no chance of unrecorded work hours.

B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If Yes , summarise details: Facility has policy and procedure to communicate it to the client if they use subcontractor for any of its production.
C: Number of sub-contractors/agents used:	01
D: Is there a site policy on sub-contracting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If Yes , summarise details: Facility is subcontracting at the mentioned sites with adequate agreement and the social compliance audit is also conducted there internally and externally.
E: What checks are in place to ensure no child labour is being used and work is safe?	Internal and External audit conducted for Monitoring the compliance of subcontracting Unit.

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: Suggestion box, Works committee and Grievance committee.
B: If Yes, are workers aware of these channels and have access? Please give details.	Workers are familiar with these channels. The workers could express their own feeling through suggestion box and committees. Further, workers can approach the management directly for any grievance.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion box.
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: Facility has effective grievance mechanism in place where workers can express their grievance through committees and Suggestion box.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details: Not Applicable.
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: Not Applicable.
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain: Not Applicable.
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: Not Applicable.

I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?

☐ Yes
☒ No

II: If yes, please give details: Not Applicable.

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) Mr. Girindra Mohan Singh / Factory Manager is responsible to ensure no harsh or inhumane treatment is practised in facility.
- 2) There is no evidence of harsh or inhumane treatment of employees.
- 3) All employees are treated with respect and dignity.
- 4) Facility's disciplinary policies are explained to all employees and all employees were well aware about their rights.
- 5) No evidence of physical abuse, sexual or any other harassment / verbal abuse is observed / reported.
- 6) Facility has a written disciplinary procedure that is displayed on the notice board of the facility.

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

Details:

- Facility Policy.
- Interaction with management and Employees.

Any other comments: None.

Non-compliance: Nil

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:

Not applicable.

Objective evidence observed:

Not applicable.

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

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

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

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

Additional Elements

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

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

Current Systems and Evidence Examined

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

Current systems:

- 1) Mr. Girindra Mohan Singh / Factory Manager is responsible to ensure compliance with this code.
- 2) Facility has not employed any foreign employees.
- 3) Facility has not employed any agency labour.
- 4) Facility has employed 18 employees through 06 different contractors for housekeeping, canteen and for production.
- 5) Facility has maintained personnel files for all sampled 26 employees with photocopies of documentation showing that they have local citizenship and do not need any special permission to work in India.

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

Details:

- Recruitment policies.
- Interaction with management and employees.
- Personal data files (26 personnel files were checked for proof of identity documentation).

Any other comments: None.

Non-compliance: Nil

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:

Objective evidence observed:

Not applicable.

Not applicable.

Observation: Nil

Description of observation:

None observed.

Local law or ETI requirement:

Not applicable.

Comments:

None.

Objective evidence observed:

Not applicable.

Good Examples observed: Nil

Description of Good Example (GE):

None observed.

Objective evidence observed:

Not applicable.

10. Other issue areas 10B4: Environment 4–Pillar

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

To be completed for a 4–Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar

B.4. Compliance Requirements

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

10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.

10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements

10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.

10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details).

10B4.7 Businesses shall make continuous improvements in their environmental performance.

10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation

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

B4. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Mr. Girindra Mohan Singh / Factory Manager is responsible for all environmental issues.
2. Facility has drafted an environmental policy.
3. Environment policy and procedure available with factory are concerning environmental issues.
4. Facility has a system to provide environmental awareness through notice board post to relevant employees.
5. Facility has obtained an exemption from getting consent to operate under Air and Water from the pollution control board on 15/12/2015.
6. Facility disposes the e-waste generated if any to an authorized body, ETCO E-Waste Recycler Pvt Ltd.
7. Facility has conducted necessary noise test and ambient air quality test once in a period of 12 months.
8. Facility has not conducted air stack emission testing for 01 steam boiler.
9. No official complaints or legal recommendations found for the past years.

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

Details:

- Facility Policies.
- Interaction with management and Employees.
- Exemption from obtaining consent to operate under Air & Water 15/12/2015.
- Noise assessment test and ambient air quality test report obtained on 25/12/2021.
- Agreement with e-waste collector which is valid till 05/01/2025.

Any other comments: None.

Non-compliance: 1

Description of non-compliance:

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

Based on the audit process and documents review it was noted that facility has not conducted stack emission testing of 01 steam boiler installed at terrace of facility building as require by law.

Local law:

In accordance with The Environment (Protection) Rules 1986, Under Rule 3, sub rule 3(A) i) Notwithstanding anything contained in sub-rules (1) & (2) of Rule 3, emission or discharge of environmental pollutants from the industries, operations or processes (other than those industries, operations or processes for which standards have been specified in schedule-I), shall not exceed the relevant parameters and standards specified in schedule VI.

ETI/additional requirement:

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

Recommended corrective action:

It is recommended that facility shall ensure to conduct stack emission testing of installed boiler as require by law.

Action By: Mr. Girindra Mohan Singh / Factory Manager

Timescale: 30 days

Verification Method: Desktop

Objective evidence observed:

Documents Review and Interaction with management.

NC Photo#
Not applicable.

Observation:

Description of observation:

None observed.

Local law or ETI requirement:

Not applicable.

Comments:

Not applicable.

Objective evidence observed:

Not applicable.

Good Examples observed: Nil	
Description of Good Example (GE): None observed.	Objective evidence observed: Not applicable.

Environmental Analysis <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Mr. Girindra Mohan / Factory Manager
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Site has conducted Aspect & Impact Assessment and has Documented OCP & WI for all processes / activities to reduce risk.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: No system certifications.
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available?: Facility have an Environment Policy which was provided for review on the day of audit.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The policy highlights the key impacts on the environment and to comply with the legal requirements.
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: Not applicable.
H: Have all legally required permits been shown? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Facility has obtained exemption from getting Air and Water Pollution consent from the pollution control board.
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: Facility maintains the log for the chemical used in the manufacturing.
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility have a system for managing local government requirement and also ensure the requirements are being fulfilled.
K: Facility has reduction targets in place for environmental aspects e.g. water consumption	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

and discharge, waste, energy and green-house gas emissions:	K1: Please give details: No targets found as confirmed by the management.	
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: Please give details: Facility does not recycle any waste generated from production process.	
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Facility does have a system in place for measuring and monitoring consumption.	
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Not applicable.	
Usage/Discharge analysis		
Criteria	Previous year: Please state period: (2021)	Current Year: Please state period: (2022)
Electricity Usage: Kw/hrs	348000	28119
Renewable Energy Usage: Kw/hrs	126000	19845
Gas Usage: Kw/hrs	Not applicable.	Not applicable.
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes , please state result	Not applicable.	Not applicable.
Water Sources: Please list all sources e.g. lake, river, and local water authority.	Municipality.	Municipality.
Water Volume Used: (m ³)	1 620 KL	240 KL
Water Discharged: Please list all receiving waters/recipients.	Not applicable.	Not applicable.
Water Volume Discharged: (m ³)	Zero Discharge	Zero Discharge
Water Volume Recycled: (m ³)	1 440 KL	230 KL
Total waste Produced (please state units)	80 Kg	20 Kg

Total hazardous waste Produced: (please state units)	Used Drums – 40 Cans	Used Drums – 05 Cans
Waste to Recycling: (please state units)	Not applicable	Not applicable
Waste to Landfill: (please state units)	Not applicable	Not applicable
Waste to other: (please give details and state units)	Not applicable	Not applicable
Total Product Produced (please state units)	467000 pieces	56000 pieces

10C: Business Ethics – 4-Pillar Audit

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

To be completed for a 4-Pillar SMETA Audit

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Mr. Girindra Mohan Singh / Factory Manager is responsible to ensure compliance and for implementing standards concerning Business Ethics.
2. Factory has established a written policy and procedures based on Business Ethics which concerned bribery, corruption, or unethical Business Practice.
3. Every department are responsible to conduct their business ethically without bribery, corruption, or any type of fraudulent business practice as stipulated in Business ethic policy.
4. All employees were aware of business ethics policy and procedures.

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

Details:

- Facility Policy.
- Interaction with management and Employees.

Any other comments: None.

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

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

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

A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	<input checked="" type="checkbox"/> Internal Policy <input type="checkbox"/> Policy for third parties including suppliers
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	A1: Please give details: Facility has communicated their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.
B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Factory has 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.
C: Is the policy updated on a regular (as needed) basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: As per management, facility regularly updates the policy as required.
D: Does the site require third parties including suppliers to complete their own business ethics training	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Facility requires third parties including suppliers completes their own business ethics training and same is verified on the day of audit.

Other findings

Other Findings Outside the Scope of the Code
None observed.

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

Appendix 1

<p>Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."</p> <p><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	

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.

SMETA Extra Sections for 4 Pillar Audit:

Environment Section

B.4. Compliance Requirements

10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.
10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.
10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements
10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.
10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.
10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).
10B4.7 Businesses shall make continuous improvements in their environmental performance.
10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation
10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.
B4. Guidance for Observations
10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.
10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

Business Practices Section

SMETA Extra Sections for 4 Pillar Audit:

Environment Section

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

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

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

Photo Form

Non-Compliance Photos



NC Photo # 1 - Chemical container without secondary containment, MSDS and access restriction

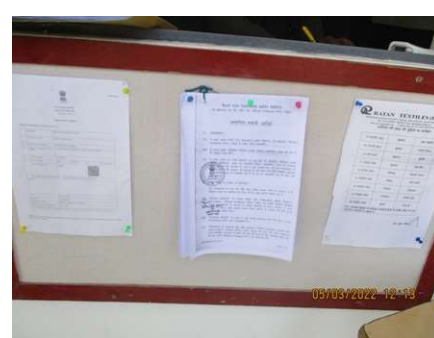
General Photos



Factory Name Displayed



Factory Building Overview



Standing Order Displayed













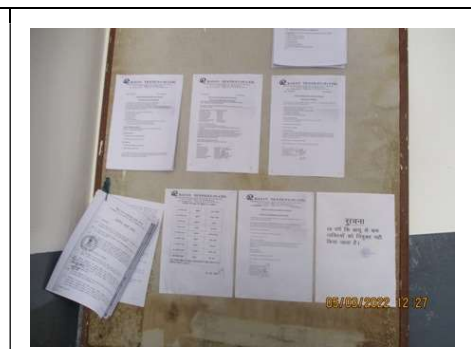
Policies Displayed


























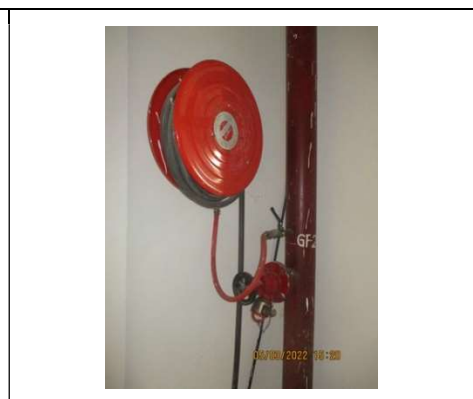
Master Evacuation Map of Factory



Emergency Contact number displayed

		
Factory act abstracts displayed	Fire Alarm Control Panel	First Aid Box
		
Two wheeler Parking	Sewage Treatment Plant	Emergency Assembly Point
		
Meter Room	Diesel Generator	Workers Canteen
		
Suggestion Box	Transformer Area	Factory Information Displayed

		
Smoke Detectors installed	Aisles Marking	Goods Lift (Capacity 1000 Kg)
		
Grey Fabric Storage	Fabric Inspection Machine	Electric Stacker
		
Stitching Section	Fabric Cutting Section	Drinking Water Station
		
Eye Wash Station	Pressing section	Thread Cutting Section

		
Needle Detection Machine	Packing Section	Finished Goods Storage
		
Solar Panels Installed	Crèche Room	Showroom
		
Steam Boiler	Workers Toilets	Fire Extinguisher
		
Fire Alarm Call Point	Biometric Attendance System	Fire Hose Reel



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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:

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http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw_3d_3d

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

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

[Click here for Auditors:](#)

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