




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 404591398	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 405032198
Business name (Company name):	Sahil Plastic Pvt. Ltd.		
Site name:	Sahil Plastic Pvt. Ltd.		
Site address: <i>(Please include full address)</i>	Gut No. 184, Jogeshwari, Near to "L" Sector, MIDC Waluj, Aurangabad, Maharashtra – 431136.	Country:	India
Site contact and job title:	Mr. Atul Patil – Plant Manager		
Site phone:	+91 - 96730 06606	Site e-mail:	atul.patil@sahilplastics.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:	23 rd August 2022		

Audit Company Name & Logo: 	Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i> Sahil Plastic 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): Pralhad Magdum Lead Auditor
Lead auditor: Pralhad Magdum APSCA number: RA 21705304
Lead auditor APSCA status: Registered Auditor (In Good Standing)
Team auditor: None APSCA number: Not applicable
Interviewers: Pralhad Magdum APSCA number: RA 21705304

Report writer: Pralhad Magdum
Report reviewer: Pooja Nayyar – Report Reviewer SM

Date of declaration: 23rd August 2022

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

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

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> <i>Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		00	00	None observed
0B Management systems and code implementation		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	01	00	00	<i>Summary of Non-Compliance finding 1</i> It was noted from records, management interaction & workers interview that facility has not provided training on ETI base code to all the employees in last one year. Last training was provided on dated 13.07.2022 to 28 employees only. Further, from worker interviews it was noted that workers were not aware of the ETI base code.
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	<i>Summary of Non-Compliance finding 1</i> It was noted from review of records & management interaction that facility has not conducted hydraulic test for 03 out of 03 air compressor pressure vessels as required by law. Last hydraulic test was conducted in 2016

									(verified as per the previous pressure vessel test report dated 23.06.2022). <i>Summary of Non-Compliance finding 2</i> It was noted from review of records & management interaction that facility has not conducted annual medical examination of all the employees. Last medical examination was conducted on dated 10.08.2022 for 28 employees only. Total average employee count in last 12 months is 85 to 90.
4	<u>Child Labour</u>	<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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None observed
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"/>	00	00	00	None observed
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	Not applicable since 2-Pillar Audit
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	Not applicable since 2-Pillar Audit

General observations and summary of the site:

Audit Process:

This Periodic Onsite Audit was conducted on semi-announced basis on 23rd August 2022. This was 1.0 Manday audit wherein 01 Auditor for 1.0 day was assigned to verify the overall compliance status of the facility based on SMETA 4-Pillar systems.

Overview of opening meeting & facility management interaction:

Auditor started the audit process at 09:05 AM on 23rd August 2022 and conducted an opening meeting with facility management according to the ETI Base Code. Auditors & facility team introduced each other and then Auditor briefed 01 Manday audit process, audit plan & also ETI standard requirements.

Following members were present in the opening meeting -

Mr. Atul Patil - Plant Manager, Mr. Rahul Patil – HR Manager, Mr. Azim Shaikh – Coordinator, Mr. Sabir Pathan – PPC Executive & Mr. Mohd. Shabbir – Accounts & Admin Incharge.

Facility management & staff present in the opening meeting assured full co-operation & full access to this audit. After the opening meeting management interaction was done to understand the facility details like building layout & number of labour contractors for worker sampling before proceeding with the facility tour.

Site Summary:

- Facility deals in manufacturing of Polypropylene Multipurpose Mats & also Recycled Plastic Mats.
- Overall responsibility for meeting the standards is taken by Mr. Atul Patil – Plant Manager.
- The facility started its operations at this location since 2013.
- The audited facility is operating on pre-owned land near the industrial area (of Waluj MIDC). Sale deed agreement for Gut no. 184 between facility management & previous land occupier dated 21.12.2009 & no objection certificate from CIDCO (urban development authority) dated 08.09.2009 was verified as per the requirement of land rights section in ETI base code. Sale deed agreement also includes details & receipts of land compensation being paid to the previous land occupier.
- There are total 98 (all 98 male) employees employed at the facility; out of which 67 (all 67 male) are directly hired by the facility & 31 (all 31 male) are hired through 01 labour contractor & 01 security agency. From total 98 employees, 48 (all 48 male) are production workers, 31 (all 31 male) are non-production workers i.e., housekeeping & security whereas 19 (all 19 male) are in the role of management / staff.
- There were only male employees employed at the facility. However, facility has open attitude towards female employment & has also documented non-discrimination policy. As per facility management due to remote location female employees are not approaching the factory for employment.
- No seasonal / casual / temporary labour employed by the facility. All the employees were covered under regular employment. Appointment letters were issued to all workers including contractual workers – verified from all the sampled employee's personal files & worker interviews.
- Based on the physical appearance of employees during walk through and Interviews with employees, there was no evidence of child labour or young labour observed / reported.
- 10 out of 10 sampled employee's personnel files were reviewed and copy of valid age proof documents were maintained. The youngest worker on site is 20 years old employee.

- Facility has obtained legally required fire no objection certificate from the fire department of local municipal corporation. Also, facility has maintained adequate fire-fighting equipment's like fire extinguishers, hose reels, fire hydrants, sprinklers, smoke detectors & fire alarm system.
- Regular trainings on firefighting, first aid, mock drills, health and safety, social policies & PPE usage are provided to all the relevant employees.
- Six monthly electrical inspection is carried out through competent electrician. Verified last inspection report dated 01.07.2022.
- No imminent or potential safety hazard observed in the facility. Workstations & common facilities were found safe & hygienic.
- Hygiene & cleanliness level maintained at the common facilities like dining hall, toilets, etc. including production areas were adequate.
- Hand sanitisers are installed at main entrance of the facility.
- All employees found wearing appropriate face mask to prevent the spread of Infection. COVID prevention & awareness posters are posted throughout the facility. Employees are daily checked for fever, cold & cough.
- Illumination level & air ventilation / temperature on the production floor was ambient. Same was regularly monitored through external laboratory.
- It was noted from records, management interaction & workers interview that facility has not provided training on ETI base code to all the employees in last one year. Last trainings was provided on dated 13.07.2022 to 28 employees only. Further, from worker interviews it was noted that workers were not aware of the ETI base code.
- Facility did not have any labour union; however, facility has formed works committee with elected representatives which includes company & contract workers. Regular meetings are conducted by the committee members to address workers concerns.
- Facility has also formed grievance committee for employees to report any grievances or suggestion. Minutes of meeting were verified and no any major grievances were reported. Same confirmed from worker interviews.
- There is no evidence of any inhumane / harsh / verbal / physical abuse treatment reported from complaint log records or worker's interview.
- As per the management interaction there is no subcontracting process carried out by facility.
- There are no homeworkers working with the facility.
- There was no evidence of any discriminations or unfair disciplinary practices.
- Appointment letters with detailed terms & conditions specified were issued to all the 10 out of 10 sampled employees.
- The facility has declared no peak or lean season and has confirmed consistent production throughout the year.
- 10 employees were selected for interview. Out of which 06 employees were interviewed individually and remaining 04 employees were interviewed in one group.
- All employees said they were satisfied with their employment at the facility. Workers were happy with the wage's facility pays and found more than government notified minimum wages in the region.
- 10 records to verify wages and working hours section were taken for 03 sampled months from the period of August 2021 to July 2022.
- The legal minimum wages (including HRA) applicable in Maharashtra for Plastic Industry under Zone-I with effect from 01.07.2022 to 31.12.2022 is as follows – Unskilled Labour: INR 11,290.00 per month, Semi-Skilled Labour: INR 11,815.00 per month & Skilled Labour: INR 12,340.00 per month.
- Legal minimum wages are paid to all the sampled employees; INR 12,090.00 per month was lowest paid to packing helper & sweeper (of unskilled category), INR 13,520.00 per month was lowest paid to parker i.e., asst. operator (of semi-skilled category) & INR 15,600.00 per month was lowest paid to loom operator (of skilled category) in July 2022 from the sampled employees.
- No deductions other than legal requirement were identified in the sampled wage records. Same also confirmed from worker interviews.
- Employees' wages are calculated on monthly basis and paid through bank transfers only on or before 7th of the month.

- Statutory benefits like provident fund, employee state insurance scheme, leave with wages & bonus were paid to all the eligible employees.
- Leave with wages is paid as per the factory act, 1948 i.e., one leave entitled for every 20 days worked by worker. Similarly, bonus is paid as per the bonus act i.e., at the rate of 8.33 % on the minimum wages.
- Wage slips were provided to all the employees. Verified sampled wage slips of all the contractors & confirmed from worker interviews too.
- Facility works 06 days a week in one general + three rotational shifts as detailed below –
 - General Shift: 09:30 am to 06:00 pm – Staff employees
 - Shift 1: 07:00 am to 3:30 pm – All production / non-production workers & security guards
 - Shift 2: 03:00 pm to 11:30 pm – All production / non-production workers & security guards
 - Shift 3: 11:00 pm to 07:30 am – Only security guards
 - Rest Break: 30 minutes each staggered in each shift
 - Tea Breaks – 2 Tea Breaks of 10 minutes each in general shift
- Friday is weekly holiday for all staff & workers employees (due to power cut in that region). All the employees are provided with one day off in every week / seven-day period.
- Facility has installed biometric machine to record In Out time / attendance of all the employees including security guards.
- Standard working hours are within the legal limits i.e., 08 hours duty. Worker's interview confirmed that overtime was voluntary. However, no overtime hours observed in the sampled employees records in sampled months. Same confirmed from worker interviews.
- Working hours of employee includes the break timings & as well as any trainings / committee meetings conducted in the facility.
- Overall facility was very quick & ready with providing all the requested documents due to continuous audits and audit was completed well within the time.
- Closing meeting was conducted with the facility management & staff wherein all the audit findings were discussed on which they agreed to take the required corrective actions for all the non-compliances raised.

Summary of Findings (Positive and Negative)

Positive Finding:

Facility management was very proactive with the audit process & had positive approach towards this audit. All the documents / records were well arranged by the HR & Admin team as per the compliance requirements due to which audit process was completed within the time. Wages paid were more than government notified wages for that region.

Negative Findings:

Few Non-compliances were noted in the areas of “**0B: Management System & Code Implementation**” & “**03: Safety & Hygienic Conditions**” with reference to local law & ETI base code. Details are given below:

0B: Management System & Code Implementation

Summary of Non-Compliance finding 1

It was noted from records, management interaction & workers interview that facility has not provided training on ETI base code to all the employees in last one year. Last trainings was provided on dated 13.07.2022 to 28 employees only. Further, from worker interviews it was noted that workers were not aware of the ETI base code.

03: Safety & Hygienic Conditions

Summary of Non-Compliance finding 1

It was noted from review of records & management interaction that facility has not conducted hydraulic test for 03 out of 03 air compressor pressure vessels as required by law. Last hydraulic test was conducted in 2016 (verified as per the previous pressure vessel test report dated 23.06.2022).

Summary of Non-Compliance finding 2

It was noted from review of records & management interaction that facility has not conducted annual medical examination of all the employees. Last medical examination was conducted on dated 10.08.2022 for 28 employees only. Total average employee count in last 12 months is 85 to 90.

Summary of Observations

None observed

Good Example

None observed

Audit Notes

None observed

**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:	Sahil Plastic Pvt. Ltd.													
B: Site name:	Sahil Plastic Pvt. Ltd.													
C: GPS location: (If available)	GPS Address: SAHIL PLASTIC PVT LTD (FACTORY), Address: Gut No. 184, Jogeshwari, Adjacent to 'L' Sector, MIDC Waluj, Aurangabad, Maharashtra 431136.	Latitude: 19.82632, Longitude: 75.20033												
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Factory license no. 14047 valid till 31 st December 2022 for 500 HP and 150 employees.													
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Facility deals in manufacturing of Polypropylene Multipurpose Mats & also Recycled Plastic Mats.													
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Facility started operations at Gut No. 184, Jogeshwari, Near to "L" Sector, MIDC Waluj, Aurangabad, Maharashtra – 431136 since 2013. Land is owned by facility management with total land / plot area occupied is 6206.61 square meters and constructed / built-up area is 3947.75 square meters as per the approved layout plan. There is only one building with ground + mezzanine floor. Details of the same are given in below table.</p> <table border="1"> <thead> <tr> <th>Production Building no. 1</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground floor</td> <td>Warping, Mixing, Extrusion, Weaving, Recycling of plastic waste, Cutting, Finishing, Stitching, Packing, Stores, Electrical panel, Metal detector machine, UPS batteries, RM & FG Storage.</td> <td>None</td> </tr> <tr> <td>Mezzanine floor</td> <td>Rest room, Sampling, Inspection area, Sample storage area, Finished good / Semi-finished good storage area.</td> <td>None</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>None</td> </tr> </tbody> </table> <p>Periphery / Utilities – 1) Security cabin</p>		Production Building no. 1	Description	Remark, if any	Ground floor	Warping, Mixing, Extrusion, Weaving, Recycling of plastic waste, Cutting, Finishing, Stitching, Packing, Stores, Electrical panel, Metal detector machine, UPS batteries, RM & FG Storage.	None	Mezzanine floor	Rest room, Sampling, Inspection area, Sample storage area, Finished good / Semi-finished good storage area.	None	Is this a shared building?	No	None
Production Building no. 1	Description	Remark, if any												
Ground floor	Warping, Mixing, Extrusion, Weaving, Recycling of plastic waste, Cutting, Finishing, Stitching, Packing, Stores, Electrical panel, Metal detector machine, UPS batteries, RM & FG Storage.	None												
Mezzanine floor	Rest room, Sampling, Inspection area, Sample storage area, Finished good / Semi-finished good storage area.	None												
Is this a shared building?	No	None												

	<ol style="list-style-type: none"> 2) Changing room 3) Dining hall 4) Maintenance workshop 5) Fire hydrant system pumps 6) Chemical storage (machine oil only) 7) Transformer yard 8) Toilet block 9) Air compressors <p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: No cracks were observed on the day of audit.</p> <p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F4: Please give details: Facility has obtained stability certificate on dated 26.11.2020 from competent structural engineer.</p>
<p>G: Site function:</p>	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
<p>H: Month(s) of peak season: (if applicable)</p>	<p>Facility has declared consistent production.</p>
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>Facility deals in manufacturing of Polypropylene Multipurpose Mats & also Recycled Plastic Mats.</p> <p>Main production process flow: Mixing of Raw material – Extrusion of Tubes – Warping – Loom Weaving – Cutting – Finishing – Taping - Packing.</p> <p>Main machines & equipment's used:</p> <ol style="list-style-type: none"> 1) Warping Machines – 02 no. 2) Mixer machines – 03 no. 3) Extruders – 50 no. 4) Weaving – 73 no. 5) Cutting machines – 05 no. 6) Sewing – 10 no. 7) Zigzag – 02 no. 8) Bag Closer – 04 no. 9) Bale Press – 02 no. 10) Reprocessing / recycling machine – 01 no.

	<p>11) Metal Detector – 1 no. 12) Water Pump – 03 no. 13) Air Compressors – 03 no.</p>
J: What form of worker representation / union is there on site?	<p><input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Grievance committee, Suggestion box, Open door policy) <input type="checkbox"/> None</p>
K: Is there any night production work at the site?	<p><input checked="" type="checkbox"/> Yes – 2nd shift only till 11:30 PM. <input type="checkbox"/> No</p>
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation</p>
M: Are there any off site provided worker accommodation buildings	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers</p>
N: Were all site-provided accommodation buildings included in this audit	<p><input type="checkbox"/> Yes <input type="checkbox"/> No N1: If no, please give details Not applicable as facility has not provided accommodation to its employees.</p>

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 09:05 AM A2: Day 1 Time out: 05:05 PM	A3: Day 2 Time in: N/A A4: Day 2 Time out: N/A	A5: Day 3 Time in: N/A A6: Day 3 Time out: N/A
B: Number of auditor days used:	1.0 Manday audit i.e., 01 Auditor for 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 type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 02 weeks i.e., 10 th August 2022 to 25 th August 2022 <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Atul Patil – Plant 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:	24 th August 2021		
J: Previous audit type:	Periodic / Semi-Announced / Onsite		
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input 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>	Worker representatives were busy in their routine production activities during opening and closing meeting.		
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.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	67	00	31	00	00	00	00	98
Worker numbers – female	00	00	00	00	00	00	00	00
Total	67	00	31	00	00	00	00	98
Number of Workers interviewed – male	06	00	04	00	00	00	00	10
Number of Workers interviewed – female	00	00	00	00	00	00	00	00
Total – interviewed sample size	06	00	04	00	00	00	00	10



A: Nationality of Management	Indian	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: _ Indian _____</p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p>	<p>Was the list completed during peak season?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: Not Applicable as facility has declared consistent production throughout the year</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 __100 %_____</p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: _____% workers on piece rate</p> <p>D1: _____% hourly paid workers</p> <p>D2: __100___% salaried workers</p> <p>Payment cycle:</p> <p>D3: _____% daily paid</p> <p>D4: _____% weekly paid</p> <p>D5: __100___% monthly paid</p> <p>D6: _____% other</p> <p>D7: If other, please give details</p>	



Worker Interview Summary		
A: Were workers aware of the audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
B: Were workers aware of the code?	<input type="checkbox"/> Yes <input checked="" 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 male employees in 01 group	
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?	None	
I: What did the workers like the most about working at this site?	Based on employee's interaction, it was observed that all of them were favourable with the management and facility environment. Overall, an inexplicit attitude towards the management and the workplace was observed. Wages paid were more than government notified wages.	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	Positive. Overtime is voluntary. However, no overtime work carried out at facility. Confirmed from time records & interview.	
L. Is there any worker survey information available?		

Yes

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

A total of 10 employees were interviewed and same numbers of records were reviewed for the month of July 2022 (Current), January 2022 (Random) & September 2021 (Random).

All workers said they were satisfied with their employment at the factory and that they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect.

They were able to make suggestions to their supervisors and sometimes they had seen these suggestions used. They felt able to complain directly to their supervisors but also felt free to give their general concerns, such as arrangement of cold water to their worker representative who would take it to the worker management committee.

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

Members from grievance committee and workers committee looked very positive towards the management. Further noted that employees are not discriminated, and their grievances stated by the workers were effectively solved by the facility management. Further no negative comments were received.

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 towards this audit during the whole audit process. All documentation requested for review was delayed since this was the first social audit conducted. At the end of the audit, all the non-compliances were accepted by the facility and further the facility management stated that they will take corrective actions on the non-compliances noted during the audit.

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. Facility has established policy on human rights covering UNGP principles and is endorsed by the Top management. Policy also includes transparent system of confidential reporting for concerns related to human rights.
2. Facility has designated Mr. Atul Patil – Plant Manager responsible for implementing standards on human rights.
3. No human rights violation was observed in the facility. Same also confirmed from worker interviews.
4. Facility has identified its stakeholders & their salient issues. Also, facility has evaluated direct, indirect & adverse impact on human rights through its stakeholders & its process.
5. Facility has provided training on human rights on dated 13.07.2022 to 21 employees.
6. Further, facility has communicated ETI base code to its stake holders like suppliers & labour contractors.

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

Details:

- Human rights policy & procedure
- Communication of ETI base code to contractors
- Human rights training record dated 13.07.2022
- Interaction with Management and Interview with employees

Any other comments:

None

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility policy expresses commitment to respect human rights.</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Mr. Atul Patil Job title: Plant Manager</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Facility has provided following grievance mechanism for confidential reporting and anonymously without fear of retaliation.</p> <ol style="list-style-type: none"> 1. Works committee & Grievance Committee representatives 2. Suggestion / complaint Box 3. Open door policy
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details: Not applicable</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility has documented IT / data privacy policy which ensures all employees, supplier and customer information remains confidential.</p>

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

Good examples observed:

Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable
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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: January 2021 to December 2021 ___10___ %	A2: This year: January 2022 to July 2022 ___12___ %
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]	2 %	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2]* number available workdays in the year	C1: Last year: ___2___ %	C2: This year ___3___ %
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	2 %	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Facility has maintained accident register in the prescribed format of Form 30.	
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: January 2021 to December 2021 Number: Nil	F2: This year: January 2022 to July 2022 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 ___0___ % workers	I2: 12 months ___0___ % workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ___0___ % workers	J2: 12 months ___0___ % workers

0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Mr. Atul Patil – Plant Manager is responsible for implementation of all the social compliance activities in the facility.
2. The facility has communicated the code to their stakeholders like labour contractors. Verified acknowledgement copies on ETI base code.
3. It was noted from records, management interaction & workers interview that facility has not provided training on ETI base code to all the employees in last one year. Last trainings was provided on dated 13.07.2022 to 28 employees only. Further, from worker interviews it was noted that workers were not aware of the ETI base code.
4. The audited facility is operating on pre-owned land near the industrial area (of Waluj MIDC). Sale deed agreement for Gut no. 184 between facility management & previous land occupier dated 21.12.2009 & no objection certificate from CIDCO (urban development authority) dated 08.09.2009 was verified as per the requirement of land rights section in ETI base code. Sale deed agreement also includes details & receipts of land compensation being paid to the previous land occupier.
5. Facility has obtained all the legally required licenses / permits.

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

Details:

- Facility Policy and Procedures
- Factory license valid till 31.12.2022 for 150 employees & 500 H.P. power.
- Building stability certificate dated 26.11.2020.
- Factory approved plan no. 12150000022556 dated 15.10.2020.
- Employees' training records showed the facility conducted training for employees about the social compliances & ETI base code when they enter the facility.

Any other comments:

None

Management Systems:

<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> A1: Please give details: The Facility has not been subject to any fines in last 12 months</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Facility has maintained policy and procedure to reduce the risk of forced labour, Child labour, discrimination, harassment & abuse.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>These policies are displayed at notice board and communicated to all employees. However, from worker interviews it was noted that awareness on social policies & ETI Base Code was inadequate.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please give details: It was noted from records, management interaction & workers interview that facility has not provided training on ETI base code to all the employees in last one year. Last trainings was provided on dated 13.07.2022 to 28 employees only. Further, from worker interviews it was noted that workers were not aware of the ETI base code.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: It was noted from records, management interaction & workers interview that facility has not provided training on ETI base code to all the employees in last one year. Last trainings was provided on dated 13.07.2022 to 28 employees only. Further, from worker interviews it was noted that workers were not aware of the ETI base code.</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: 1. ISO 9001:2015 Quality Management System Certificate no. FEA11122IQ valid up to 11.05.2024. 2. ISO 14001:2015 Quality Management System Certificate no. 224EO7AX valid up to 19.07.2025.</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Facility has Human Resource Department. Mr. Rahul Patil is appointed as HR Executive who deals with all the HR activities for this site.</p>

<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Mr. Atul Patil – Plant Manager</p>
<p>I: Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Facility have a data privacy policy to ensure all worker information remain confidential.</p>
<p>J: Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility has a procedure to ensure that confidential information remain confidential and share on need basis only.</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility has established potential risk analysis system with necessary corrective actions to reduce these evaluated risks. Last risk assessment conducted on 04.01.2022.</p>
<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1 Please give details: Yes. Facility has a process to address issues found when conducting risk assessments during periodic management meetings.</p>
<p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Facility has documented social policies on labour standards for its own employees & suppliers too.</p>
<p>Land rights</p>	
<p>N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The audited facility is operating on pre-owned land near the industrial area (of Waluj MIDC). Sale deed agreement for Gut no. 184 between facility management & previous land occupier dated 21.12.2009 & no objection certificate from CIDCO (urban development authority) dated 08.09.2009 was verified as per the requirement of land rights section in ETI base code. Sale deed agreement also includes details & receipts of land compensation being paid to the previous land occupier.</p>

<p>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?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: The site has a separate legal department at group level to conduct legal due diligence to recognize and apply national laws and practices relating to land title.</p>
<p>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</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: Facility has documented policy on land rights covering FPIC consent.</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: The audited facility is operating on pre-owned land near the industrial area (of Waluj MIDC). Sale deed agreement for Gut no. 184 between facility management & previous land occupier dated 21.12.2009 & no objection certificate from CIDCO (urban development authority) dated 08.09.2009 was verified as per the requirement of land rights section in ETI base code. Sale deed agreement also includes details & receipts of land compensation being paid to the previous land occupier.</p>
<p>R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: Facility is operating at the industrial area developed by government having no adverse impact.</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: Not applicable</p>

<p style="text-align: center;">Non-compliance:</p>	
<p>1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: It was noted from review of records, management interaction & workers interview that facility has not provided training on ETI base code to all the employees in last one year. Last trainings was provided on dated 13.07.2022 to 28 employees only. Further, from worker interviews it was noted that workers were not aware of the ETI base code. Local law and/or ETI requirement:</p>	<p>Objective evidence observed: (where relevant please add photo numbers) Records, management interaction & workers interview</p>

<p>In accordance with the ETI Base code 0.B.4 Suppliers are expected to communicate this Code to all employees.</p> <p>Recommended corrective action: It is recommended to the facility to ensure that ETI training is provided to all the employees & employees are also aware of the same.</p> <p>Action By: Mr. Atul Patil – Plant Manager Time Scale: 30 days Verification Method: Desktop</p>	
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Observation:	
<p>Description of observation: None observed</p> <p>Local law or ETI requirement: Not applicable</p> <p>Comments: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective evidence observed: Not applicable</p>

1: Freely Chosen Employment

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

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Facility has a policy which prohibits forced labour, and this was available for review.
2. There was a formalised application procedure & recruitment policy which states that workers must present their identity cards for proof of age but only copies to be kept in the personnel files and the originals were given back to the workers.
3. The terms and conditions of employment state that the workers are free to leave the workplace outside of their working hours.
4. The factory did not require any payment for work tools, PPE, Identity card, trainings, etc.
5. The factory did not use prison labour.

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

Details:

- Personnel files including application forms & appointment letters for 10 out of 10 sampled employees.
- Resignation records.
- Time records.
- Management interaction & employee interview.

Any other comments:

None

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected: Not applicable</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected: Not applicable</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

	C1: If yes, please give details and category of worker affected: Not applicable
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: Not applicable
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding: Not applicable
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: Not applicable
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: Facility has documented social policies like forced labour, bonded labour. No such types of employees are noticed in 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 policy not to employ forced / trafficked labour. Facility has implemented system like suggestion box, work committee and grievance committee to identify and resolve issues related to forced/trafficked labour.

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

Observation:

<p>Description of observation: None observed</p> <p>Local law or ETI requirement: Not applicable</p> <p>Comments: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>
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<p>Good Examples observed:</p>	
<p>Description of Good Example (GE): None observed</p>	<p>Objective evidence observed: Not applicable</p>

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. Facility encourages and respects all employees' rights to join union freely & legally.
- 2. Facility recognizes and encourages the right to freedom of association and collective bargaining under the law provision.
- 3. The facility does not restrict employees on organizing trade unions and has an open approach to get associated with trade unions and their organizational activities without management interference.
- 4. Facility has formed Works committee which consists of 13 members (05 staff & 08 workmen). Meeting is held once in three months. Last meeting was conducted on 04.08.2022 & previous meeting on 14.05.2022. Election of works committee representatives was conducted on 02.01.2021.
- 5. Facility has also formed grievance committee which consists of 06 members (03 staff & 03 workmen). Meeting is held once in three months. Last meeting was conducted on 02.08.2022 & previous meeting on 12.05.2022.
- 6. Facility has installed suggestion boxes at accessible location where employees can share their concerns anonymously. Log of suggestion / compliant box is maintained.
- 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:

- Policy & procedures
- Minutes of meeting of works committee record dated 04.08.2022 & 14.05.2022.
- Minutes of meeting of Grievance committee record dated 02.08.2022 & 12.05.2022.
- Election record of works committee elected representative dated 02.01.2021.
- Interaction with Management and Interview with employees

Any other comments:

None

<p>A: What form of worker representation/union is there on site?</p>	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Grievance committee, Suggestion box, Open door policy) <input type="checkbox"/> None	
<p>B: Is it a legal requirement to have a union?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p>C: Is it a legal requirement to have a worker's committee?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>D1: Please give details: Facility has formed works committee & grievance committee and also provided suggestion/ complaint box where employees are free to express their problems / suggestions / complaints for any grievances. While interviewing, all employees reported that they are free to approach the management for any problem.</p> <p>D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>E1: Please give details: Based on the employees' interaction, it was observed that, works cum grievance committee representatives are free to carry out their functions and meetings on periodic basis and the records for the same were maintained.</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>Not Applicable as no Union at the facility</p>	<p>F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p>	<p>Facility has formed works committee</p>	<p>G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>H: Are all workers aware of who their representatives are?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>All workers were found aware.</p>
<p>I: Were worker representatives freely elected?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Date of last election: 02.01.2021</p>
<p>J: Do workers know what topics can be raised with their representatives?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>K: Were worker representatives/union representatives interviewed?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>If Yes, please state how many: 01</p>	

<p>L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.</p>	<p>Following topics were discussed during works committee last meeting dated 04.08.2022 & 14.05.2022 -</p> <ol style="list-style-type: none"> 1) Water jar leakage 2) New hand gloves to be provided 3) New finger gloves to be provided 4) Discussion on general health & safety 	
<p>M: Are any workers covered by Collective Bargaining Agreement (CBA)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>If Yes, what percentage by trade Union/worker representation</p>	<p>M1: <u> 0 </u>% workers covered by Union CBA</p>	<p>M2: <u> 0 </u>% workers covered by worker rep CBA</p>
<p>M3: If Yes, does the Collective Bargaining Agreement (CBA) include rates of pay?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable</p>	

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

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

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

	Not applicable
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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. Mohd. Shabbir – Accounts & Admin Incharge is responsible for Health & Safety aspects for the site.
- Potable water was freely available in all areas. Last test was conducted on 19.04.2022 by external laboratories.
- Adequate & clean toilets were always available to the workers all the time.
- Ventilation, temperature, and lighting were adequate for the production processes
- The building appeared safe and no crack was noted in any of the pillar or wall.
- The facility including its workstations, storage areas, utilities were generally neat and clean & found safe.
- Facility does regular pest control through recognised pest control agency M/s. Shree Vidyanand Pest Control. Rodent boxes & fly catcher are installed at relevant locations.
- Facility has documented onsite emergency plan dated 01.09.2021 & also facility evaluates health & safety risk assessment based on their processes. Last risk assessment was conducted on 04.01.2022.
- Facility has formed health & safety committee wherein quarterly meetings are conducted to review health & safety aspects of the facility. Last meetings conducted was on 09.08.2022 & 10.05.2022.

2. Fire Safety

- Secondary exits provided at all the required workplaces & all exits found free from obstructions.
- Adequate firefighting equipment installed such as 40 Fire extinguishers, 08 fire alarm call points, 09 fire siren, 11 Emergency lights, 12 Fire Hydrants, 12 Hose reels, 03 fire pumps for hydrant system (1 main pump, 1 standby pump & 01 jockey pump), 08 emergency exit doors, 20 smoke detectors, 01 Fire alarm control panels, 10 sprinklers points, 06 Sand buckets and 04 UPS connected lights were provided in the facility.
- Evacuation maps were posted in all areas and understood by all workers interviewed.
- Mock drills were organized and recorded every 03 months. Last fire drill was done on 05.07.2022 at 07:00 PM in night shift. Mock drills are conducted in both day & night shift. Evacuation time observed

at facility was approx. 1.5 minutes for 16 employees. Previous mock drill was conducted on 03.03.2022 at 02:15 PM.

- Facility has marked all the exits and emergency exits in a language understood by majority of the employees
- Firefighting Training was provided by Advantage Sai Projects Pvt. Ltd. to 60 employees on 18.08.2022.
- Monthly checking of fire-fighting equipment like fire extinguisher, smoke detector, sprinkler points, emergency lights, hydrant points, hose reel boxes, etc. were done by the facility safety Incharge. Verified last inspection report dated 18.08.2022.
- Based on the facility tour it was noted that operating instructions were posted near the fire equipment's.
- Emergency light was tested on auditor's request and it was found working.
- Fire hydrant line was tested and found adequate pressure maintained in hydrant line.
- Final fire "No Objection Certificate" no. AMC/FIRE/988/2022 dated 03.01.2022 from local fire department was obtained. Same fire NOC is valid for 01 year from date of issue.

3. Machine & Electrical safety

- All machine and electrical equipment were maintained in good conditions.
- There were competent mechanic & electricians at the site to do the electrical work
- Annual electrical inspection was carried out through competent electrician on dated 01.07.2022.
- Six monthly inspection of pressure vessel machines were carried out by competent person. Form-13 (for 03 air compressors) dated 23.06.2022 & previous report dated 29.11.2021 verified on the day of audit.
- It was noted from review of records & management interaction that facility has not conducted hydraulic test for 03 out of 03 air compressor pressure vessels as required by law. Last hydraulic test was conducted in 2016 (verified as per the previous pressure vessel test report dated 23.06.2022).
- Rubber matt were placed below the electrical panels.
- Emergencies stop buttons were available at all the machines.
- Machines or motors having pulley guards were found guarded.
- No imminent safety concern observed.

4. Chemical safety

- Facility do not use any chemicals. Facility is engaged only in manufacturing of plastic matts requiring no chemicals.
- PPE & hygiene training is provided to all the employees. Last training was conducted on 05.07.2022.
- Facility has provided adequate PPE & hygiene kits like safety shoes, shoe cover, apron, hygiene caps, hand gloves & face mask and same was fund used by all the employees.
- Machine oil is stored in secondary containment along with provision of MSDS & eye wash station nearby.

5. Medical services

- Facility has provided well equipped with adequate supplies 06 no. first aid box.
- Facility had trained 22 employees from St. John Ambulance training institute on dated 07.09.2019. Training is valid for 3 years & so on the day of audit.
- It was noted from review of records & management interaction that facility has not conducted annual medical examination of all the employees. Last medical examination was conducted on dated 10.08.2022 for 28 employees only through Dr. Rahul Khedekar (MBBS, Certifying Surgeon). Total average employee count in last 12 months is 85 to 90.

COVID -19 Safety

- Facility following social distancing norms on the work floor and in their common areas such as dining and drinking water section. The approximate spacing found between each individual employee on the work floor is approximate 1.5 mts.
- Hand sanitizer are stationed at multiple location of the facility for employees' access.
- Employees are checked for fever cough and cold each day at the time of entry.

- All employees are always wearing appropriate face mask to prevent the spread of infection.
- Covid – 19 prevention and awareness posters are posted throughout the facility.

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

Details:

- Health and Safety Policy
- Fire NOC issued by Aurangabad Municipal Corporation
- Stability Certificate
- Industrial accident records – Updated till July 2022.
- First aid training certificates
- Medical examination reports & health register i.e., Form no. - 7.
- Drinking Water Test report
- Mock Drill records
- Fire equipment maintenance records
- Machine maintenance records
- Firefighting training records
- Pressure vessel test reports form-13.
- Electrical inspection report.
- General health & safety training records
- Interaction with Management and Interview with employees.

Any other comments:

None

<p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility had established general health & safety policy and procedures that are fit for purpose and are communicated to workers during trainings.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Facility includes this policy during every training.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: Not applicable</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Facility has procedure of briefing Health & Safety instructions to visitors & has also displayed visitor safety instructions.</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: Not a legal requirement. However, facility has provide training on first aid to its employees.</p>

rooms suitable for the number of workers.	
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 training on first aid to its employees.
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Facility has provided transport / bus service and found safe / fit for purpose. In Female employee's bus security guards are employed during transit to ensure safety of women's.
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 as facility does not provide accommodation to its employees
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 H&S risk assessment including all the processes. Last conducted on 04.01.2022
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. Facility has obtained valid pollution consent order from the Maharashtra pollution control board under green category.
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: Based on interaction with facility management that the facility does not use any banned chemicals and meet all the environmental standards based on customer requirement.

Non-compliance:

1. Description of non-compliance:

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

It was noted from review of records & management interaction that facility has not conducted hydraulic test for 03 out of 03 air compressor pressure vessels as required by law. Last hydraulic test was conducted in 2016 (verified as per the previous pressure vessel test report dated 23.06.2022).

Local law and/or ETI requirement:

In accordance with The Maharashtra Factories Rules, 1963 rule no. 65. Safety measures for pressure plant and vessels operated under pressure over atmospheric Pressure, (4) Ever pressure plant in service shall be thoroughly examined by a competent person, (c) hydraulic test once in a period of four years.

Objective evidence observed:

(where relevant please add photo numbers)

Review of records & management interaction

<p>In accordance with the ETI Base Code 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Recommended corrective action: It is recommended to the facility to conduct hydraulic test for 03 out of 03 air compressor pressure vessels as required by law.</p> <p>Action By: Mr. Atul Patil – Plant Manager Time Scale: 30 days Verification Method: Desktop</p>	
<p>2. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI/Additional Elements <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>It was noted from review of records & management interaction that facility has not conducted annual medical examination of all the employees. Last medical examination was conducted on dated 10.08.2022 for 28 employees only. Total average employee count in last 12 months is 85 to 90.</p> <p>Local law and/or ETI requirement: In accordance with The Maharashtra Factories Rules, Amendment 2010, rule no. 4. After rule 18 of the principal Rules, in Chapter III, after the heading "Health", the following shall be inserted, namely: "18-A. Medical examination of workers - All the workers in a factory shall be medically examined once in a year by a Certifying Surgeon appointed or recognised by the Government under section 10 of the Act. In accordance with the ETI Base Code 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Recommended corrective action: It is recommended to the facility to conduct medical examination of all the employees annually as required by law.</p> <p>Action By: Mr. Atul Patil – Plant Manager Time Scale: 30 days Verification Method: Desktop</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>Review of records & management interaction</p>

Observation:	
<p>Description of observation: None observed</p>	<p>Objective evidence observed:</p>

<p>Local law or ETI requirement: Not applicable</p> <p>Comments: Not applicable</p>	Not applicable
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Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective evidence observed: Not applicable</p>

4: Child Labour Shall Not Be Used (Click here to return to summary of findings) (Click here to return to Key Information)
ETI
<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>

Current Systems and Evidence Examined
<p><i>To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.</i></p>
<p>Current systems:</p> <ol style="list-style-type: none"> 1. Facility has displayed "No Child labour" board outside the Main Gate. 2. Based on the physical appearance of employees during walk through and Interviews with employees, there was no evidence of child labour or young labour observed / reported. 3. Based on review of facility recruitment policy, employee's ID for age proof such as Pan Card or Aadhar card was checked by HR department prior to hiring. 4. Based on the policy review, the minimum hiring age of the facility is 18 years old. 5. The age of youngest worker found in the facility through audit process is 20 years. 6. Personnel files of 10 sampled employees were reviewed to check the age proof documents. <p>Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):</p> <p>Details:</p> <ul style="list-style-type: none"> • No child labour and child labour remediation Policy. • Age Proof records of 10 out of 10 selected samples. • Interaction with Management and Interview with employees.

Any other comments:
None

A: Legal age of employment:	14 Years old for young employees and 18 years old for adult workers
B: Age of youngest worker found:	20 years completed from sampled employees.
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details: Not applicable

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

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

Good Examples observed:

Description of Good Example (GE):
None observed

**Objective evidence
observed:**
Not applicable

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. 10 employees were selected for interview. Out of which 06 employees were interviewed individually and remaining 04 employees were interviewed in one group.
2. All employees said they were satisfied with their employment at the facility. Workers were happy with the wage's facility pays and found more than government notified minimum wages in the region.
3. 10 records to verify wages and working hours section were taken for 03 sampled months from the period of August 2021 to July 2022.
4. The legal minimum wages (including HRA) applicable in Maharashtra for Plastic Industry under Zone-I with effect from 01.07.2022 to 31.12.2022 is as follows – Unskilled Labour: INR 11,290.00 per month, Semi-Skilled Labour: INR 11,815.00 per month & Skilled Labour: INR 12,340.00 per month.
5. Legal minimum wages are paid to all the sampled employees; INR 12,090.00 per month was lowest paid to packing helper & sweeper (of unskilled category), INR 13,520.00 per month was lowest paid to parker i.e., asst. operator (of semi-skilled category) & INR 15,600.00 per month was lowest paid to loom operator (of skilled category) in July 2022 from the sampled employees.
6. No deductions other than legal requirement were identified in the sampled wage records. Same also confirmed from worker interviews.
7. Employees' wages are calculated on monthly basis and paid through bank transfers only on or before 7th of the month.
8. Statutory benefits like provident fund, employee state insurance scheme, leave with wages & bonus were paid to all the eligible employees.
9. Leave with wages is paid as per the factory act, 1948 i.e., one leave entitled for every 20 days worked by worker. Similarly, bonus is paid as per the bonus act i.e., at the rate of 8.33 % on the minimum wages.
10. Wage slips were provided to all the employees. Verified sampled wage slips of all the contractors & confirmed from worker interviews too.
11. Based on employee's interview and record review all the employees received appointment letter with written and understandable information about their employment conditions in respect to wages.
12. No inconsistency was noted between the provide records and production records and worker interview.
13. From sampled months July 2022, January 2022 & September 2021, no overtime work was done in all the sampled employees.

14. Full & Final settlement of left employees were checked.

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

Details:

- Wages and benefits policy
- 10 payroll records for July 2022 (most recent paid month), 10 payroll records for January 2022 (random month) & 10 payroll records were reviewed for September 2021 (random month).
- All attendance records pertaining to the corresponding 10 payroll records were reviewed.
- Leave records were maintained as per the legal requirement.
- Bonus records i.e., Form-C.
- Social security benefit like Provident Fund & employee state insurance was provide to all the eligible employees. Provident fund contribution & employee state insurance contribution was remitted on time to the concerned authority of all the sampled month & contractors.
- Employment contracts for all employees (to examine agreed wage rates)
- Pay slips of all reviewed corresponding payroll records.
- List of National and Festival Holidays.
- Minimum wages notification.
- Bank statements of salary paid (of sampled months), last bonus paid & leave encashment.
- Interaction with management and Employees.

Any other comments:
None

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

(where relevant please add photo numbers)
Not applicable

Observation:

Description of observation:

None observed

Local law or ETI requirement:

Not applicable

Comments:

Not applicable

Objective evidence observed:

Not applicable

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

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 8 hours / day and 48 hours / week	A1: 08 hour / day & 48 hours / week in month of July 2022	A2: <input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 2 hours / day, 12 hours / week & 50 hours / quarter	B1: No overtime work carried out in any sampled month	B2: <input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: The legal minimum wages (including HRA) applicable in Maharashtra for Plastic Industry under Zone-I with effect from 01.07.2022 to 31.12.2022 is as follows – Unskilled Labour: INR 11,290.00 per month, Semi-Skilled Labour: INR 11,815.00 per month & Skilled Labour: INR 12,340.00 per month.	C1: Legal minimum wages are paid to all the sampled employees; INR 12,090.00 per month was lowest paid to packing helper & sweeper (of unskilled category), INR 13,520.00 per month was lowest paid to paker i.e., asst. operator (of semi-skilled category) & INR 15,600.00 per month was lowest paid to loom operator	C2: <input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable

		(of skilled category) in July 2022 from the sampled employees.	
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 200% of normal rate of wages	D1: No overtime work carried out in any sampled month. However, facility has policy to pay 200% of normal rate of wages for overtime work if done.	D2: <input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable

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 <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	10 sample employee attendance and wage records for July 2022 (Current month), 10 sample employee attendance and wage records for January 2022 (Random Month) & 10 sample employee attendance and wage records for September 2021 (Random month) were reviewed in this audit.	
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 (including HRA) applicable in Maharashtra for Plastic Industry under Zone-I with effect from 01.07.2022 to 31.12.2022 is as follows – Unskilled Labour: INR 11,290.00 per month, Semi-Skilled Labour: INR 11,815.00 per month & Skilled Labour: INR 12,340.00 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	<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>

(excluding overtime) below or above the legal minimum?	Legal minimum wages are paid to all the sampled employees; INR 12,090.00 per month was lowest paid to packing helper & sweeper (of unskilled category), INR 13,520.00 per month was lowest paid to parker i.e., asst. operator (of semi-skilled category) & INR 15,600.00 per month was lowest paid to loom operator (of skilled category) in July 2022 from the sampled employees.		
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> Statutory Bonus paid at 8.33 % of earned minimum wages during Diwali festival.		
H: What deductions are required by law e.g. social insurance? Please state all types:	Provident fund, Employee State Insurance and Professional Tax		
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. Provident fund (12% on minimum wage) 2. Employee State Insurance (0.75% on earned gross salary) 3. Professional tax Please describe:
		I2: Please list all deductions that have not been made.	1. 2. Please describe: 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: Not applicable	
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: Confirmed form time records & worker interviews.		

<p>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></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: Facility did not define any living wages. At present facility is following the applicable minimum wages as notified by the State Government.</p>
<p>M2: If yes, what was the calculation method used.</p>	<p><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</p>
<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Maharashtra Government will revise the minimum wages two times in a year (on the month of January and on the month of July) and the same will be paid to the employees accordingly.</p>
<p>O: Are workers paid in a timely manner in line with local law?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No All the workers are paid on or before 7th of every month as per the law.</p>
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: It was confirmed through verification of records and employee interaction that equal rates are being paid for equal work.</p>
<p>Q: How are workers paid:</p>	<p><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</p>

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. Facility works 06 days a week in one general + three rotational shifts as detailed below –
 - o General Shift: 09:30 am to 06:00 pm – Staff employees
 - o Shift 1: 07:00 am to 3:30 pm – All production / non-production workers & security guards
 - o Shift 2: 03:00 pm to 11:30 pm – All production / non-production workers & security guards
 - o Shift 3: 11:00 pm to 07:30 am – Only security guards
 - o Rest Break: 30 minutes each staggered in each shift
 - o Tea Breaks – 2 Tea Breaks of 10 minutes each in general shift
2. Friday is weekly holiday for all staff & workers employees (due to power cut in that region). All the employees are provided with one day off in every week / seven-day period.
3. Facility has installed biometric machine to record In Out time / attendance of all the employees including security guards.
4. Standard working hours are within the legal limits i.e., 08 hours duty. Worker's interview confirmed that overtime was voluntary. However, no overtime hours observed in the sampled employees records in sampled months. Same confirmed from worker interviews.

5. Working hours of employee includes the break timings & as well as any trainings / committee meetings conducted in the facility.
6. 10 attendance records for July 2022 (most recent paid month) corresponding to payroll records, 10 attendance records for January 2022 (random month) and 10 attendance records for September 2021 (random month) corresponding to payroll records were reviewed.
7. Based on review of time records, the working hours analysis is summarized as follows:
 - In July 2022 (Current month), the average working hours of 10 selected samples were 44.19 hours / week. Maximum working hours per week were 48.00 hours.
 - In January 2022 (Random month), the average working hours of 10 selected samples were 42.00 hours / week. Maximum working hours per week were 48.00 hours.
 - In September 2021 (Random month), the average working hours of 10 selected samples were 34.18 hours / week. Maximum working hours per week were 48.00 hours.

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

Details:

- Working hours policy.
- In / Out time records for 10 selected samples for each of 03 sampled payroll months.
- List of holidays
- 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:
None observed

Local law and/or ETI requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

(where relevant please add photo numbers)
Not applicable

Observation:

Description of observation:

None observed

Local law or ETI requirement:

Not applicable

Comments:

Not applicable

Objective evidence observed:

Not applicable

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Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable

Working hours' analysis	
Please include time e.g. hour/week/month <i>(Go back to Key information)</i>	
Systems & Processes	
A. What timekeeping systems are used: time card etc.	<i>Describe:</i> Facility has installed biometric machine to record In Out time / attendance of all the employees including security guards.
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:
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: Not applicable
	<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
	Maximum number of days worked without a day off (in sample):	
	06 days working week	
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 work carried out by the sampled employees in all the three sample months.	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	___0___%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Confirmed from worker interviews & record review.
Overtime Premiums		

<p>M: Are the correct legal overtime premiums paid?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	<p>M1: Please give details of normal day overtime premium as a % of standard wages: No overtime work carried out by the sampled employees in all the three sample months, hence not applicable.</p>
<p>N: Is overtime paid at a premium?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable	<p>N1: If yes, please describe % of workers & frequency: No overtime work carried out by the sampled employees in all the three sample months, hence not applicable.</p>
<p>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.</p>	<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 <hr/> <p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p> <hr/> <p>No overtime work carried out by the sampled employees in all the three sample months, hence not applicable.</p>	
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<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) <hr/> <p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> <hr/> <p>No overtime work carried out by the sampled employees in all the three sample months, hence not applicable.</p>	
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Q1: If yes, please give details: Not applicable</p>	
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable	

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. Based on review of wage records and employee's interview, no discrimination was noted in hiring, compensation, access to training, promotion, termination or retirement.
2. Mr. Atul Patil – Plant Manager is responsible for the investigation and disposal of discrimination case.
3. Based on wage records review, the facility provides the same pay for employees doing same work of similar nature.

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

Details:

- Facility anti-discrimination Policy.
- Appointment letter with terms and conditions for 10 out 10 selected samples.
- 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>100</u> % A2: Female <u>0</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 conducts various trainings on ETI base code, Health & Safety, social policies, material handling, which develop the employee's skill.
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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
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Non-compliance:

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

Observation:

<p>Description of observation: None observed</p> <p>Local law or ETI requirement: Not applicable</p> <p>Comments: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>
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Good Examples observed:

<p>Description of Good Example (GE): None observed</p>	<p>Objective evidence observed: Not applicable</p>
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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. Based on record review and worker interviews appointment letters were issued to all 10 out of 10 sampled employees.
2. Employment terms & conditions in the appointment letters found to be as per the legal requirement.
3. Based on interaction with the facility management, it was noted all employees are hired either directly or through labour contractors only; No temporary workers, part time workers, seasonal workers & casual workers were engaged.
4. Facility does not employ any migrant workers.
5. Based on interaction with employees, no recruitment fees are required at any stage of the recruitment.
6. Facility is paying benefits to the employees which they are legally entitled to.
7. Facility has a system of checking contractor labour records every month as per the legal requirement.
8. Agreement with labour contractor & security agency were found valid up to 31.12.2022.
9. Facility has obtained legally required valid registration certificate to employ contract labours.
10. Labour Contractor license is not applicable due to less than 50 employees employed.

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

Details:

- Facility hiring policy.
- Appointment letters with terms and conditions for 10 out of 10 selected samples.
- Salary and other benefit records.

- Contractor agreements with facility management valid up to 31.12.2022.
- Principal employer registration certificate valid up to 31.12.2022.
- Interaction with management and Employees.

Any other comments:
None

Non-compliance:

1. Description of non-compliance:

NC against ETI/Additional Elements

NC against Local Law

NC against customer code:

None observed

Local law and/or ETI requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

(where relevant please add photo numbers)

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:

Description of Good Example (GE):

None observed

Objective evidence observed:

Not applicable

Responsible Recruitment

All Workers

<p>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?</p>	<p><input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: Not applicable</p>
<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>B1: If yes, please describe details and specific category(ies) of workers affected: Not applicable</p>
<p>C: If yes, check all that apply:</p>	<p><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 –</p> <p>C1: If other, please give details: Not applicable</p>
<p>D: If any checked, give details:</p>	<p>Not applicable</p>

<p>Migrant Workers:</p> <p><i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i></p>			
<p>A: Type of work undertaken by migrant workers:</p>	<p>Not applicable as no migrant workers hired by the facility.</p>		
<p>B: Please give details about recruitment agencies for migrant workers:</p>	<p>B1: Total number of (in country recruitment agencies) used: Not applicable as no migrant workers hired by the facility. B2: Total number of (outside of local country) recruitment agencies used: Not applicable as no migrant workers hired by the facility.</p>		
<p>C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and</p>	<table border="1" style="width: 100%;"> <tr> <td data-bbox="627 1906 933 2027"> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> </td> <td data-bbox="933 1906 1500 2027"> <p>C2: Observations: Not applicable as no migrant workers hired by the facility.</p> </td> </tr> </table>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>C2: Observations: Not applicable as no migrant workers hired by the facility.</p>
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>C2: Observations: Not applicable as no migrant workers hired by the facility.</p>		

<p>is evidence of the transaction supplied by the facility to the worker?</p>	<p>C1: Please describe finding: Not applicable as no migrant workers hired by the facility.</p>	
<p>D: Are Any migrant workers in skilled, technical, or management roles</p> <p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: If yes, number and example of roles: Not applicable as no migrant workers hired by the facility.</p>	

NON-EMPLOYEE WORKERS

<p>Recruitment Fees:</p>	
<p>A: Are there any fees?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>B: If yes, check all that apply:</p>	<ul style="list-style-type: none"> <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 <p>B1 – If other, please give details: Not applicable</p>
<p>C: If any checked, give details:</p>	<p>Not applicable</p>

<p align="center">Agency Workers (if applicable) <i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i></p>	
<p>A: Number of agencies used (average):</p>	<p>A1: Names if available:</p>

	Facility has employed 06 security guards (all 06 male) through M/s. Chetna Intelligence Pvt. Ltd.
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Legal agreement with legal terms & conditions between facility management & security agency found valid till 31.12.2022.
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility has a system of checking contractor labour records every month as per the legal requirement.

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: Facility has employed 25 (all 25 male) employees through 01 labour contractors M/s. Nilesh Enterprises for various production & nonproduction activities.
B: If Yes , how many workers supplied by contractors?	Facility has employed 25 (all 25 male) employees through 01 labour contractors M/s. Nilesh Enterprises for various production & nonproduction activities.
C: Do all contractor workers understand their terms of employment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:
D: If Yes , please give evidence for contractor workers being paid per law:	Verified payroll records of sampled contractual employees

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:

- Facility does not carry any sub-contracting processes or engage any home workers.

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

- Inward / Outward material records, Invoices.
- Interaction with management & employee interview

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

<i>Process Subcontracted</i>	<i>Process 1</i>	<i>Process 2</i>
<i>Name of factory</i>		
<i>Address</i>		

<i>Process Subcontracted</i>	<i>Process 3</i>	<i>Process 4</i>
<i>Name of factory</i>		
<i>Address</i>		

<i>Process Subcontracted</i>	<i>Process 5</i>	<i>Process 6</i>
<i>Name of factory</i>		
<i>Address</i>		

Details:
Not Applicable

Non-compliance:

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

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective evidence observed: Not applicable</p>

Summary of sub-contracting – if applicable	
<input checked="" type="checkbox"/> Not Applicable please x	
<p>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</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe: Not applicable</p>
<p>B: If sub-contractors are used, is there evidence this has been agreed with the main client?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No B1: If Yes, summarise details: Not applicable</p>
<p>C: Number of sub-contractors/agents used:</p>	<p>Not applicable</p>

D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If Yes , summarise details: Not applicable
E: What checks are in place to ensure no child labour is being used and work is safe?	Not applicable

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: Not applicable		
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 Not applicable		C1: If through agents, number of agents:
			Not applicable
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?	Not applicable		
F: What processes are carried out by homeworkers?	Not applicable		
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Not applicable		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable		

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

ETI

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

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>A1: Please give details: Facility has open door policy, works committee & grievance committee for any complaints/suggestions.</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>Yes, workers are aware of these channels & committee representatives, confirmed from worker interviews. Facility has also displayed committee members list in the facility premises.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<ol style="list-style-type: none"> 1. Reporting directly to committee representative 2. Suggestion / complaint box 3. Open door policy
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other <p>D1: Please give details: Facility has effective grievance mechanism in place where workers, communities & suppliers can express their grievance through Suggestion box, Committee, meetings etc. Suppliers & business partners are communicated with ETI base code.</p>
<p>E: Are there any open disputes?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>E1: If yes, please give details: Not applicable</p>
<p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>F1: If no, please give details: Suppliers & business partners are communicated with ETI base code.</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>G1: If no, please explain: Not applicable</p>

<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>H1: If no, please give details: Disciplinary procedures are displayed on the notice board & in appointment letters.</p>
<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>I1: If yes, please give details: Not applicable</p>

Current Systems and Evidence Examined

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

Current systems:

1. Facility has formed Works committee which consists of 13 members (05 staff & 08 workmen). Meeting is held once in three months. Last meeting was conducted on 04.08.2022 & previous meeting on 14.05.2022. Election of works committee representatives was conducted on 02.01.2021.
2. Facility has also formed grievance committee which consists of 06 members (03 staff & 03 workmen). Meeting is held once in three months. Last meeting was conducted on 02.08.2022 & previous meeting on 12.05.2022.
3. Facility has installed suggestion boxes at accessible location where employees can share their concerns anonymously. Log of suggestion / complaint box is maintained.
4. Based on the interaction with the facility management and employee's interview, it is noted that no case of abuse or discipline has happened in the facility and the facility has a written disciplinary procedure that is displayed in the notice board of the facility.
5. From both the committee minutes of meeting no complaints were raised by the workers. Also, verified Log register of suggestion & complaint box.

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

Details:

- Policy & procedures
- Minutes of meeting of works committee record dated 04.08.2022 & 14.05.2022.
- Minutes of meeting of grievance committee record dated 02.08.2022 & 12.05.2022.
- Interaction with Management and Interview with employees

Any other comments:

None

Non-compliance:

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

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective evidence observed: Not applicable</p>

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

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

Details:

- Hiring procedure
- Personnel files of 10 out of 10 sampled employees
- Interaction with Management and Employees

Any other comments:

None

Non-compliance:

1. Description of non-compliance:

NC against ETI/Additional Elements

NC against Local Law

NC against customer code:

None observed

Local law and/or ETI requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

(where relevant please add photo numbers)

Not applicable

Observation:

<p>Description of observation: None observed</p> <p>Local law or ETI requirement: Not applicable</p> <p>Comments: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>
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<p>Good Examples observed:</p>	
<p>Description of Good Example (GE): None observed</p>	<p>Objective evidence observed: Not applicable</p>

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Mr. Atul Patil – Plant Manager is responsible for all environmental related issues.
2. Facility is aware of the legal environmental requirements.
3. Facility has obtained legal consent i.e., pollution consent order under green category from the regional pollution control board which is found valid up to 30.04.2024.
4. Facility has conducted necessary ambient air, noise level on regular intervals & results were within limits.
5. The last ambient air, noise level test & illumination test monitoring was conducted on 26.07.2022 through M/s. Green Envirosafe Labs.
6. The land on which facility is operating is industrial area & does not have any adverse impact on environment in terms of land acquisition.
7. Facility conducts environmental risk assessment & aspect impact analysis annually. Last conducted in 04.01.2022.

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

Details:

- Facility environmental policy.
- Pollution consent order under The Air Act, The Water Act & Hazardous Waste Management Act.
- Ambient air quality, noise level & D.G. stack monitoring test report.
- Environmental risk assessment report.
- Waste disposal records.
- Interaction with management and Employees.

Any other comments:

None

Non-compliance:

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

Good examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective Evidence Observed: Not applicable</p>

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 observed

Appendix 1

<p>Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."</p> <p><input 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>	
<p>ETI 1. Forced Labour</p>	<p>ETI 1. Forced Labour</p>
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.</p>	
<p>ETI 2. Freedom of association and the right to collective bargaining are respected</p>	<p>ETI 2. Freedom of association and the right to collective bargaining are respected</p>
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.</p>	
<p>ETI 3. Working conditions are safe and hygienic</p>	<p>ETI 3. Working conditions are safe and hygienic</p>
<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>	
<p>ETI 4. Child labour shall not be used</p>	<p>ETI 4. Child labour shall not be used</p>
<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>	
<p>ETI 5. Living wages are paid</p>	<p>ETI 5. Living wages are paid</p>
<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>	
<p>ETI 6. Working Hours are not excessive</p>	<p>ETI 6. Working Hours are not excessive</p>
<p>6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p>	

<p>6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where 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>	
<p>ETI 7. No discrimination is practised</p>	<p>ETI 7. No discrimination is practised</p>
<p>7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p>	
<p>ETI 8. Regular employment is provided</p>	<p>ETI 8. Regular employment is provided</p>
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or</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 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.</p>	
<p>8A: Sub-Contracting and Homeworking</p>	<p>8A: Sub-Contracting and Homeworking</p>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client. 8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<p>ETI 9. No harsh or inhumane treatment is allowed</p>	<p>ETI 9. No harsh or inhumane treatment is allowed</p>
<p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Additional elements: 9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<p>10. Other Issue areas: 10A: Entitlement to Work and Immigration</p>	
<p>Additional Elements 10A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
<p>10. Other issue areas 10B2: Environment 2-Pillar</p>	

<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits. 10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. <i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	
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SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
<p>Environment Section</p>	<p>Environment Section</p>
<p>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.</p>	
<p>Business Practices Section</p>	

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-Compliances Photographs

Note: No site tour non-compliances observed on the day of audit

General Photographs

<p>Facility name board</p>	<p>Facility main entrance</p>	<p>Security cabin</p>
<p>Visitor instructions displayed</p>	<p>Assembly area</p>	<p>Fire alarm control panel</p>
<p>Emergency number displayed</p>	<p>Fire extinguisher installed</p>	<p>First aid box</p>



Safety policy



Biometric machine



Suggestion box



Facility building overview



Fire hydrant point tested



Fire hydrant system pumps



Tool / maintenance room



Warping reel



Reprocessing machine















Plastic waste



Work instructions displayed



Suggestion box

 <p>23/08/2022 13:04</p>	 <p>23/08/2022 13:04</p>	 <p>23/08/2022 13:03</p>
<p>Exit signage</p>	<p>Fire alarm siren</p>	<p>Fire alarm call point</p>
 <p>23/08/2022 13:04</p>	 <p>23/08/2022 13:05</p>	 <p>23/08/2022 13:03</p>
<p>Gender wise toilets – male toilet</p>	<p>Gender wise toilets – female toilet</p>	<p>Clean urinals</p>
 <p>23/08/2022 13:05</p>	 <p>23/08/2022 13:03</p>	 <p>23/08/2022 13:07</p>
<p>Clean toilets</p>	<p>Fire hydrant & hose reel</p>	<p>Air compressors</p>
 <p>23/08/2022 13:07</p>	 <p>23/08/2022 13:03</p>	 <p>23/08/2022 13:03</p>

Rolling shutters with latch / holding mechanism	Employee using appropriate PPE (heat resistant gloves at cutting machine)	Cutting / Checking area
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Mezzanine floor	Mezzanine floor – semi finished goods storage	Raw material stores – polymers
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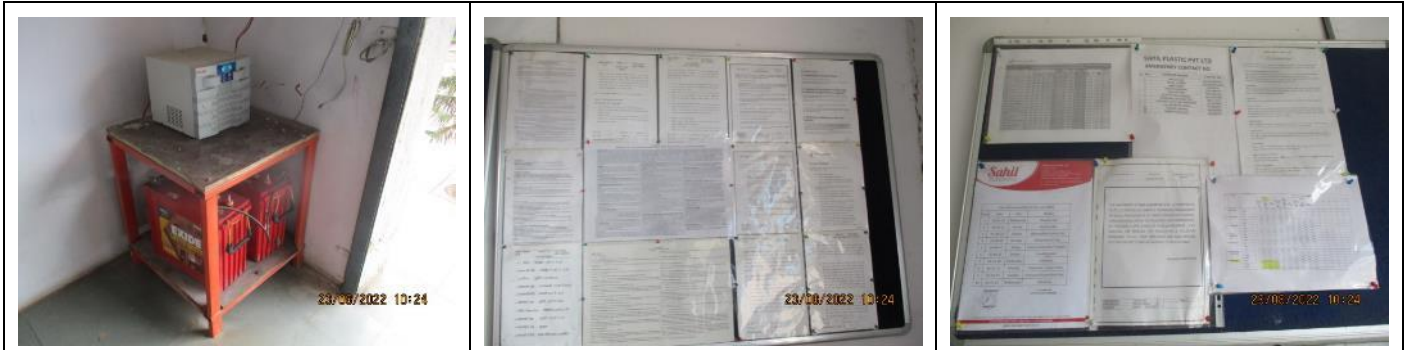
Evacuation map posted	Metal detector machine	Exit doors & pathways free from blockages
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Secondary containment to machine oil cans	Machine oil MSDS	Eye wash station
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Transformer yard Sand / fire bucket Drinking water point












UPS batteries Law abstracts Notice board – list holidays, minimum wages, etc, displayed



Loom shed Aisle marking done Rubber matt below electrical panel



Emergency exit sign Safety instruction sign in mixing dept. Worker in factory setting

Emergency light installed above exit doors	SOP displayed	Mixing room
		
Extrusion machines	Drying area	Pathways free from blockages
		
Machine pulley guarded	Smoke detector installed	Emergency light tested
		
Fire alarm hooter	Secondary exit from mezzanine floor	Covid 19 posters



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

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

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

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

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

[Click here for Supplier \(B\) members:](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

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

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