



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC404261344	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS404263086
Business name (Company name):	INDIA INTERNATIONAL LEGACY		
Site name:	INDIA INTERNATIONAL LEGACY		
Site address:	VILLAGE LADAWALI CHAK JOGWALI MILAK ROAD MORADABAD 244001 IN	Country:	IN
Site contact and job title:	Mr. Amarjeet Singh / HR Head		
Site phone:	9837073143	Site e-mail:	info@iilegacy.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2024-07-25		

Audit Company Name:
Benchmarks Company Limited

Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Sandeep Kumar	APSCA Number:	32200710
Additional Auditors:	Chetan Gupta		32400016
Date of declaration:	2024-07-25		

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

Site Representation	
Full Name:	Mr. Amarjeet Singh
Title:	HR Head
Date of declaration:	2024-07-25
Comments: <i>Any exceptions to this must be recorded here (e.g. different sample size): Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020). The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i>	
Nil	

Summary of Findings

Issue <small>(please click on the issue title to go direct to the appropriate audit results by clause)</small>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>0A - Universal rights covering UNGP</u>			0	0	0	
<u>0B - Management Systems and code implementation</u>	0.B.4 0.B.4 0.B.4 0.B.4	§1 §2 §3 §4	4	0	0	NC - ZAF600571332 NC - ZAF600571343 NC - ZAF600571346 NC - ZAF600571349
<u>1 - Freely chosen employment</u>			0	0	0	
<u>2 - Freedom of association and right to collective bargaining are respected</u>			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1	§10 §11 §12 §13 §14 §15 §16 §17 §18 §5 §6 §7 §8 §9	14	0	0	NC - ZAF600571331 NC - ZAF600571333 NC - ZAF600571334 NC - ZAF600571335 NC - ZAF600571336 NC - ZAF600571337 NC - ZAF600571338 NC - ZAF600571339 NC - ZAF600571340 NC - ZAF600571341 NC - ZAF600571342 NC - ZAF600571344 NC - ZAF600571345 NC - ZAF600571351
<u>4 - Child labour shall not be used</u>			0	0	0	
<u>5 - Living wages are paid</u>			0	0	0	
<u>6 - Working hours are not excessive</u>			0	0	0	
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>			0	0	0	
<u>8A - Subcontracting and homeworking</u>			0	0	0	
<u>9 - No harsh or inhumane treatment is allowed</u>			0	0	0	
<u>10A - Entitlement to work and immigration</u>			0	0	0	
<u>10B2 - Environment 2-pillar</u>			0	0	0	
<u>10B4 - Environment 4-pillar</u>	10.B4.1 10.B4.1 10.B4.2	§19 §20 §21	3	0	3	NC - ZAF600571347 NC - ZAF600571348 NC - ZAF600571353 GE - ZAF600571350 GE - ZAF600571352 GE - ZAF600571354
<u>10C - Business ethics 4-pillar</u>			0	0	0	

Local Law Issues

Issue	Description
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§1	"In accordance with Factories act 1948: Section 6 - Approval, licensing and registration of factories - (1) The State Government may make rules - (a) requiring for the purposes of this Act, the submission of plans of any class or description of factories to the Chief Inspector or the State Government ; (aa) requiring the previous permission in writing of the State Government or the Chief Inspector to be obtained for the site on which the factory is to be situated and for the construction or extension of any factory or class or description of factories; (b) requiring for the purpose of considering applications for such permission the submission of plans and specifications; (c) prescribing the nature of such plans and specifications and by whom they shall be certified;"
§2	In accordance with the Uttar Pradesh Factories Rules 1950, Chapter XI Supplemental, Section 118 – Display of notices, The abstract of the Act and the rules required by Section 108(1) to be displayed in every factory shall be in the prescribed Form No. 20.
§3	In Accordance with the Uttar Pradesh (Standing Order) Rules 1946 Whereas the State Government is of the opinion that the provisions of the Industrial Employment (Standing Orders) Act, 1946 (Act No. XX of 1946), should be applied to all Industrial Establishments which are factories within the meaning of clause (m) of Section 2 of the Factories Act, 1948 (Act No. LXIII of 1948), and where twenty or more workman are working or were working on any day of the preceding twelve months, subject to the conditions that the provisions of the Industrial Employment (Standing Orders) Act, 1946 shall continue to apply to all the Electric Supply Undertakings and all the Waterworks where 10 or more workman are working or were working on any day of the preceding twelve months, as made applicable under Government Notification No. 4751(v)/XXXVI-3-23 (V)-73 dated May 30, 1978.
§4	In accordance with the Uttar Pradesh Factories Rules 1950, Chapter IX Special provisions, Section 120 – Returns, The owner, occupier or Manager of every factory shall furnish to the Chief Inspector of Factories and any other officer or officers designated by Government the following returns namely: (i) On or before January 15, every year an annual return in duplicate in the Form No. 21: (ii) 50[On or before July 15, each year, a half-yearly return for the period January 1 to June 30 in duplicate in the Form No. 22:] Provided that in the case of a factory in which work is carried on only during a certain season or seasons of the year, the occupier or Manager shall submit the return within 15 days after the close of that season or last of these seasons, as the case may be.
§5	In accordance with Indian Electricity Rules 1956, Rule 46, 47, 47(a) and 63, factory should taken prior approval from appropriate Government Authority before using diesel generator sets.

§6	<p>"In accordance with Factories Act 1948, Chapter V, Section 45 (1) there shall in every factory be provided and maintained so as to be readily accessible during all working hours' first aid boxes equipped with the prescribed contents. First aid boxes with prescribed medicines and number of such first aid boxes to be provided and maintained shall not be less than one for every 150 workers. (2) Nothing except the prescribed contents shall be kept in a first-aid box or cupboard.</p> <p>Contents of First Aid Box:</p> <ul style="list-style-type: none"> a. 24 small sterilized dressings. b. 12 medium size sterilized dressings. c. 12 large size sterilized dressings. d. 12 large sizes burn dressings. e. Twelve (15 ml.) packets of sterilized cotton wool. f. One (200 ml.) bottle of cetrimide solution (1%) or a suitable antiseptic solution. g. One (200 ml.) bottle of mercurochrome (2%) solution in water. h. One (120 ml.) bottle of sal volatile having the dose and mode of administration on the label. i. One pair of scissors. j. One roll of adhesive plaster (6 cm x 1 meter) k. Two rolls of adhesive plaster (2 cms. x 1 meter). l. Twelve pieces of sterilized eye pads in separate sealed packets. m. A bottle containing 100 tablets (each of 5 grains) of aspirin or any other analgesic. n. 01 polythene wash bottle (500 cc) for washing eyes. o. Twelve roller bandages 10 cms. Wide. p. Twelve roller bandages 5 cms. Wide. q. Six triangular bandages. r. One tourniquet. s. A supply of suitable splints. t. Two packets of safety pins. u. Kidney tray. v. A snakebite lancet. w. One (30 ml.) bottle containing potassium permanganate crystals. x. First aid leaflet issued by the Directorate General of Factory, Advise Service and Labour Institutes, Bombay.
§7	<p>"In accordance with Uttar Pradesh Factories Rules 1950, Rule 61 (11) (i) each first-aid fire fighting equipment shall be allotted a serial number by which it shall be referred to in the records. The following details shall be painted with white paint on the body of each equipment: 1. Serial Number 2. Date of last refilling 3. Date of last inspection In accordance with Uttar Pradesh Factories Rule 1950, Rule 61 (11) (h) All other extinguishers shall be charged appropriately in accordance with the instructions of the manufacturer.</p>
§8	<p>"In accordance with Factories Act 1948 Section 7-A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory (2) Without prejudice to the generality of the provisions of sub-section(1), the matters to which such duty extends, shall include-(a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, (b) The arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances, (c) The provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work."</p>
§9	<p>In accordance with the Uttar Pradesh Factories Rules 1950, Rule 61 (10) (ff) hand rails shall be provided with a minimum height of 100 cm. and shall be firmly supported; and where necessary shall be provided on both sides of the staircase.</p>
§10	<p>In accordance with UP Factories Rules 1950 Section 61(10) (e) The exits shall be clearly visible and suitably illuminated with suitable arrangement whatever artificial lighting is to be adopted for this purpose, to maintain the required illumination in case of failure of the normal source of electric supply.</p>

§11	In accordance with Factories Act 1948, Section 38 (1) In every factory, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and to provide and maintain (a) safe means of escape for all persons in the event of a fire, and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory all the workers are familiar with the means of escape in case of fire and have been adequately trained in the routine to be followed in such cases.
§12	" In accordance with Factories Act 1948, Section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include- (a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, (b) the arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances, (c) the provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.
§13	"In accordance with Uttar Pradesh Factories (control of industrial major accident hazards rules 1996) Rule 3 (2), an occupier, who has control of an industrial activity in terms of sub-rule (1) of this rule, shall arrange to obtain or develop detailed information on hazardous chemical in the form of a material safety data sheet as indicated in Schedule 5. The information shall be accessible to workers upon request for reference. Rule 3 (4) every container of a hazardous chemical shall be clearly labelled or marked to identify: (a) the contents of the container; (b) the name and address of the manufacturer or importer of the hazardous chemical; and (c) the physical, chemical and toxicological data as per the criteria given in Part I of Schedule 1.
§14	"In accordance with Factories Act 1948 Section 7-A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory (2) Without prejudice to the generality of the provisions of sub-section(1), the matters to which such duty extends, shall include-(a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, (b) The arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances, (c) The provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work."
§15	In accordance with Environmental Protection Act 1986, Factory should ensure quality of ambient air meets the standards prescribed by pollution control board.
§16	In accordance with the Noise Pollution (Regulation and Control) Rules, 2000. Rule 4: (1) The noise levels in any area/zone shall not exceed the ambient air quality standards in respect of noise as specified in the Schedule. (2) The authority shall be responsible for the enforcement of noise pollution control measures and the due compliance of the ambient air quality standards in respect of noise
§17	In accordance with the Factories Act 1948, Chapter III Health, Section 17 – Lighting, (1) In every part of a factory where workers are working or passing there shall be provided and maintained sufficient and suitable lighting, natural or artificial or both.

§18	In accordance with the Factories Act 1948, Section 31, (1) if any factory , any plant or machinery or any part thereof is operated at pressure above atmospheric pressure , effective measures shall be taken to ensure that the safe working pressure of such plant or machinery or part is not exceeded (2) The state Government make rules providing for the examination and testing of any plant or machinery such as is referred in sub-section (1)
§19	In accordance with Factories Act 1948, Chapter IV, Section 12 (1), effective arrangements shall be made in every factory for the treatment of wastes and effluent due to the manufacturing process carried on therein so as to render the innocuous and for the disposal. The state government may make rules prescribing the arrangements to be made in this regard. It may also require that such arrangements to be made are approved by such authority as may be prescribed. In accordance with the Water (Prevention and Control of pollution) Act, 1974. Section 26: Provision regarding existing discharge of sewage or trade effluent - Where immediately before the commencement of this Act any person was discharging any sewage or trade effluent into a stream or well or sewer or on land, the provisions of section 25 shall, so far as may be, apply in relation to such person as they apply in relation to the person referred to in that section subject to the modification that the application for consent to be made under sub-section (2) of that section shall be made on or before such date as may be specified by the State Government by notification in this behalf in the Official Gazette In accordance with the Water (Prevention and Control of pollution) Act, 1974. Section 25. RESTRICTIONS ON NEW OUTLETS AND NEW DISCHARGES, (1) Subject to the provisions of this section, no person shall, without the previous consent of the State Board. - (a) establish or take any steps to establish any industry, operation or process, or any treatment and disposal system or an extension or addition thereto, which is likely to discharge sewage or trade effluent into a stream or well or sewer or on land (such discharge being hereafter in this section referred to as discharge of sewage); or (b) bring into use any new or altered outlets for the discharge of sewage; or (c) begin to make any new discharge of sewage;
§20	In accordance with the Hazardous and other Wastes (Management and Transboundary Movement) Rules 2016, Chapter II Procedure for management of Hazardous and other Wastes, Section 6 – Grant of Authorization for managing hazardous and other wastes, (1) Every occupier of the facility who is engaged in handling, generation, collection, storage, packaging, transportation, use, treatment, processing, recycling, recovery, pre-processing, co-processing, utilisation, offering for sale, transfer or disposal of the hazardous and other wastes shall be required to make an application in Form 1 to the State Pollution Control Board and obtain an authorisation from the State Pollution Control Board within a period of sixty days from the date of publication of these rules. Such application for authorisation shall be accompanied with a copy each of the following documents, namely: (a) consent to establish granted by the State Pollution Control Board under the Water (Prevention and Control of Pollution) Act, 1974 (25 of 1974) and the Air (Prevention and Control of Pollution) Act, 1981 (21 of 1981); (b) Consent to operate granted by the State Pollution Control Board under the Water (Prevention and Control of Pollution) Act, 1974 (25 of 1974) and/or Air (Prevention and Control of Pollution) Act, 1981, (21 of 1981)
§21	In accordance with Environment (Protection) Act, 1986. Section 95C Genset run on Diesel and Natural Gas (NG) or Diesel and Liquid Petroleum Gas (LPG): C General conditions, 10. (a) All genset engines operating on diesel and NG or LPG shall be tested for Type Approval and COP of emission and noise limits compliance as per system and procedure published from time to time by the Central Pollution Control Board.

Site Details

Site Details		
Company Name	INDIA INTERNATIONAL LEGACY	
Site Name	INDIA INTERNATIONAL LEGACY	
GPS location (if available)	GPS Address:	VILLAGE- LADAWALI CHAK, JOGWALI, MILAK ROAD, MORADABAD, UTTAR PRADESH- 244001, INDIA
	Coordinates:	Latitude: N28.86022931336387 Longitude: E78.73529384458679
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>A) Factory Licence: - Licence Registration No. UPFA4002654, Issued for 250 Persons & 1000 HP, as on 01/01/2020 Valid till 31/12/2024. B) Fire NOC: - No. UPFS/2024/124584/MRB/MORADABAD/2153/DD, Obtained from fire department as on 12/07/2024 valid till 20/07/2027. C) Air Consent: - No. 114987/UPPCB/Moradabad (UPPCBRO)/CTO/air/MORADBAD/2020, Obtained from UPPCB as on 08/03/2021 valid till 31/12/2025. D) Water Consent: - No. 115000/UPPCB/Moradabad (UPPCBRO)/CTO/water/MORADBAD/2020, Obtained from UPPCB as on 08/03/2021 valid till 31/12/2025. E) Hazardous Waste Management Consent: - On the day of the audit, it was applied for. F) Building Plan Lay Out: - No. F/Plan/Lic/3604. Plan Number: - SPR00003994. Dated 30/12/2017 obtained from Deputy Director of factories. U.P G) Stability Certificate: Obtained from Er. S.K.Mishra (Registered Structural Engineer) as on 16/12/2017. H) GST Certificate: - Registration No: 09AAGF11461B1ZR, dated 01/07/2017, issued from the Central Board of Indirect Taxes and Customs (CBIC), Government of India I) IEC Certificate: 0517506939, dated 13/04/2017, issued from Director General of Foreign Trade, Ministry of Commerce and Industry, Government of India J) ESIC Code: 30000655880000506, Obtained from Concern Department. K) EPF Code: - DSNHP1678226000, obtained from concern department.</p>	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturer of Handicrafts Items. The main processes are Kora Checking, Processing, Fitting, Finishing, Checking, Packing & Dispatch.	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	INDIA INTERNATIONAL LEGACY is located at VILLAGE LADAWALI CHAK JOGWALI MILAK ROAD, MORADABAD 244001 UP. The main processes are Kora Checking, Processing, Fitting, Finishing, Checking, Packing & Dispatch. The Company has a suitable storage to preserve the incoming & finished goods. The factory has total area of 9792.69 Sq. Meter. and covered area 7549.08 Sq. Meter. The facility has two buildings, building no.1 has three floors for production which is as described.	

Structure and number of buildings	Building Name:		INDIA INTERNATIONAL LEGACY
	Floor	Description	Remark
	Basement	Assembling, Sampling & Packing Area.	Nil
	Ground Floor	hand and spray plating, Kora Store	Nil
	Periphery area	Drinking water point, Garden, Assembly area, Glass Silver plating area, Electric panel, DG set area, ETP (Effluent Treatment Plant), STP (Sewage Treatment Plant), RO plant (Reverse Osmosis plant), Diesel store area, Chemical store, Fire pump, Waste storage.	Nil
	First Floor	Packing, Warehouse & Showroom	Nil
	Terrace	Solar Plant	Nil
	Building Name:		INDIA INTERNATIONAL LEGACY No. 2
	Floor	Description	Remark
	Ground Floor	Meeting and server room	Nil
	First Floor	Director office	Nil
	Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No large crack was found in the factory.	
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Stability Certificate: - Obtained from Er. S.K.Mishra (Registered Structural Engineer) as on 16/12/2017.		
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor		
Months of peak season	August to November		

Process overview	Manufacturer of Handicrafts Items. The main processes are Kora Checking, Processing, Fitting, Finishing, Checking, Packing & Dispatch. Main Equipment used like Cutting Machine, Compressor Machine, Oven, Power Coat Booth, Drill Machine, Buffing Machine, and Grinding Machine.		
What form of worker representation is there on site?	<input type="checkbox"/> Union	<input checked="" type="checkbox"/> Worker Committee	
	<input checked="" type="checkbox"/> Other	<input type="checkbox"/> None	
Please give details:	Health & Safety Committee, Internal Complaint Committee, Grievance Committee.		
Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:		
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:		
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The site did not provide any accommodation buildings to its employees.		

Audit Parameters			
Time in and time out	Day 1		
	In	10:00	
	Out	17:45	
Audit type:	PERIODIC		
Was the audit announced?	SEMI_ANNOUNCED		
Was the Sedex SAQ available for review?	Yes		
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No		
Who signed and agreed CAPR	Mr. Amarjeet Singh / HR Head		
Is further information available	No		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	Not Applicable as no union formed in the facility.		
<i>Reason for absence during the audit</i>	Not Applicable as no union formed in the facility.		
<i>Reason for absence at the closing meeting</i>	Not Applicable as no union formed 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	52	0	10	0	0	0	0	62
Worker numbers – female	0	0	0	0	0	0	0	0
Total	52	0	10	0	0	0	0	62
Number of Workers interviewed – male	8	0	2	0	0	0	0	10
Number of Workers interviewed – female	0	0	0	0	0	0	0	0
Total – interviewed sample size	8	0	2	0	0	0	0	10

Nationalities Structure		
Nationality of Management	Indian	
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Indian	approx %: 100%
Was this list completed during peak season?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:	
Worker remuneration	Workers on piece rate:	0%
	Paid hourly:	0%
	Salaried:	100%
Payment cycle	Paid daily:	0%
	Paid weekly:	0%
	Paid monthly:	100%
	Other:	0%
	Details for other:	N/A

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	01 group of 04 workers each
Number of individual interviews:	Male: 6 Female: 0
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
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
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	No complaints were found. The workers reported a high level of job satisfaction and expressed contentment with their working conditions.
What did the workers like the most about working at this site?	Timely payment of wages, a pleasant workplace, and cooperative management. In addition to these elements, the employees valued the chances for development and promotion inside the facility. The workplace offered consistent training programs and skill-development activities, enabling staff members to improve their professional talents and advance in their careers.
Any additional comment(s) regarding interviews:	Most workers enjoyed working at this facility, they felt they had sufficient work and had a good relationship with management in general. The facility provided ample opportunities for growth and development, allowing workers to enhance their skills and advance in their careers. Additionally, the positive work environment fostered a sense of camaraderie among colleagues, creating a supportive and collaborative atmosphere.
Attitude of workers to hours worked:	They expressed satisfaction with the balance between their personal and professional lives, as the working hours allowed them to maintain a healthy work-life balance. Additionally, they appreciated the flexibility provided by the facility in terms of adjusting their schedules when necessary, which further contributed to their positive attitude towards the hours worked.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:
The workers were assured of confidentiality and they spoke freely of their views of the facility. All workers said they were satisfied with their employment at the facility and that they were satisfied with the current wages which in their view were in line with Indian Labour Law.. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors who treated them with respect. They were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used. They felt able to complain directly to their supervisors, but also felt free to give their general concerns to their grievance representative who would take it to the management.
Attitude of worker's committee/union reps:
The workers committee representatives expressed their satisfaction with the facility management's responsiveness and commitment to addressing their concerns. They also mentioned that the open communication channels between the workers and management had fostered a positive work environment, resulting in increased productivity and employee morale.
Attitude of managers:
The facility management was found to be cooperative throughout the audit and accepted to take necessary corrective action for any non-compliances noted.

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

0A: Compliance Requirements

0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.
0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights
0.A.3 Businesses shall identify their stakeholders and salient issues.
0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.
0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined

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

Current Systems:

- The facility had published a comprehensive human rights statement, which was prominently displayed on the notice board for all employees to see.
- The statement emphasized the company's commitment to upholding and promoting human rights in all aspects of its operations.
- HR Head of the facility had taken the responsibility of implementing the standard related to human rights.
- Training on human rights policy was also provided to workers.
- Transparent and fair terms and conditions were established for all employees, and comprehensive training was provided to ensure that workers are aware of their rights and the grievance procedure.
- This ensured that any concerns or issues related to human rights can be effectively addressed and resolved.
- The facility had implemented a transparent system for confidentially reporting any human rights violations or concerns. Workers were protected against any kind of reprisal.

Evidence examined:

- Human rights policy
- Appointment letter
- Grievance records

Any other comments:

Nil

Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: <ul style="list-style-type: none"> The facility had developed an extensive policy statement that clearly articulated its steadfast commitment to human rights preserving and respect. This policy served as the site's fundamental guiding concept for all activities and decisions, aiming to prioritize and preserve human rights in every facets of its operations. The policy statement effectively portrayed the site's commitment and is in accordance with international human rights standards, demonstrating a strong commitment to social responsibility and ethical practices.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: <ul style="list-style-type: none"> The policies were included in workers' manual and served an essential role in providing employees with easy access to all the relevant information regarding corporate rules and processes. These manuals acted as a valuable resource that employees can refer to whenever they require assistance or clarification on specific regulations. By having these manuals readily available, it helped to maintain consistency and clarity within the workplace.
Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: <ul style="list-style-type: none"> HR Head of the facility was responsible for implementing standards concerning Human Rights. This individual played a crucial role in ensuring that the facility's practices align with international human rights principles and guidelines.
Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: <ul style="list-style-type: none"> The facility prided itself on having a strong and reliable confidential reporting system. This system is intended to provide individuals with a safe and secure place in which to report any human rights violations they may witness or experience. The facility wished to reassure all reporters that their identities were preserved and that there would be absolutely no repercussions or punishment for providing such information. The facility's commitment to safeguarding the well-being and safety of all those involved was steadfast.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

<p>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</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The facility exemplified a strong commitment to data privacy by implementing effective procedures for handling workers' information. • These procedures were designed to securely store and limit access to employees' personal data, ensuring that only authorised personnel can retrieve it. • By regularly updating its privacy policies and providing data protection training to employees, the facility maintained a robust privacy culture that minimized the risk of data breaches or unauthorized access. 				
<p align="center">Measuring Workplace Impact</p>					
<p>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))</p>	<table border="0"> <tr> <td>Last year</td> <td align="right">3.0%</td> </tr> <tr> <td>This year</td> <td align="right">2.0%</td> </tr> </table>	Last year	3.0%	This year	2.0%
Last year	3.0%				
This year	2.0%				
<p>Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])</p>	<p align="right">1.0%</p>				
<p>Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)</p>	<table border="0"> <tr> <td>Last year</td> <td align="right">0.0%</td> </tr> <tr> <td>This year</td> <td align="right">0.0%</td> </tr> </table>	Last year	0.0%	This year	0.0%
Last year	0.0%				
This year	0.0%				
<p>Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)</p>	<p align="right">0.0%</p>				
<p>Are accidents recorded?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <ul style="list-style-type: none"> • All major and minor accidents that occur within the facility were diligently recorded in the "Accident Register" forms, namely Form-15 and Form-26. • However, it is important to note that, to date, no accidents had been reported or recorded in the facility. • This served as a testament to their strong commitment to maintaining a safe and secure environment for all occupants. • They prioritized the well-being and safety of their staff and visitors, and will continue to enforce rigorous safety protocols to prevent and swiftly address any potential accidents in future. 				

Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year	0.0%
	This year	0.0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%	
Lost day work cases per 100 workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year	0.0%
	This year	0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

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

0B: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- The site had knowledge of local labour laws concerning labour standards, health and safety, environment and related clauses that are part of the SMETA scope.
- The site had a system, validated by senior management, to enforce the laws and regulations into the site's policies and procedures.
- HR Head was designated as senior management representative, who was in charge of implementing and updating all social compliance policy and procedure.
- The system to enforce the laws and regulations was regularly reviewed and workers were included in the review process.
- Workers were informed about their rights and also have awareness of the relevant law and code.
- The site was operating legally and had valid business license and permits.
- During interview process, it was observed that the facility has provided Ethical Trading Initiative (ETI Base Code) training to its employees.

Evidence examined:

- Workers' manual was reviewed. It stipulated complying with ETI Code, written policies and procedure that being provided individually to employees.
- Company manual contained details of Code and Business Ethics with the commitment of being compliant in all aspects of business and integrity aligned with the client's requirement and local law.
- Management interview and worker interview.
- Social compliance policy and procedures
- Workers' information about their rights
- Business license and relevant permits like Fire NOC, Building Plan Layout, Building Stability Certificate etc.

Any other comments:

Nil

Management Systems

<p>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"/> No</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The site had maintained a commendable record of compliance with laws and regulations, resulting in no fines or prosecutions for non-compliance. • Their steadfast commitment to upholding all relevant regulations and ensuring compliance at all times was unequivocally meritorious. • To provide a secure and risk-free environment for all persons, the site prioritized the highest legal and ethical standards.
<p>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</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The company placed significant importance on addressing concerns related to forced labor, underage labor, discrimination, harassment, and abuse. • To mitigate these risks, the facility had implemented comprehensive policies and procedures. • These policies encompassed strict restrictions on recruiting procedures, regular audits to ensure compliance, and staff training programs aimed at increasing awareness and knowledge about these issues. • Additionally, the site had established efficient reporting methods for promptly addressing any breaches or complaints. • These measures highlight the institution's commitment to maintaining a safe and inclusive environment for all individuals involved.
<p>If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<ul style="list-style-type: none"> • The facility had successfully implemented a robust social compliance system. • To ensure ongoing compliance, regular audits were conducted to identify any non-compliance issues. • The facility promptly addresses and takes corrective and preventive actions for any findings raised during the audit. • A detailed report documented the audit findings and actions taken were consistently maintained by the facility as part of its commitment to upholding social compliance standards.

<p>Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <ul style="list-style-type: none"> • Both managers and workers had received rigorous training to ensure that they are aware of the rules for forced labor, child labor, discrimination, harassment, and abuse. • The training programs were rigorously designed to ensure a thorough understanding of these critical concerns and to equip both managers and employees with the necessary experience and abilities to recognize and effectively handle any possible workplace infractions. • The goal of this training was to establish a safe and welcoming workplace where all employees are treated with decency and respect and where these inappropriate actions were not permitted.
<p>If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The employees' demonstration of a strong understanding of the ETI Base Code was a clear testament to the effectiveness of the training. • Their ability to apply the code's principles to their work showcased their knowledge and skills in upholding ethical standards. • This indicated that the training programme successfully equipped them with the necessary tools to maintain ethical practices in their roles. • It was evident that the time investment in their training has yielded positive results, ensuring a culture of integrity and responsibility within the organisation. • This ensured that the employees were well-prepared to handle ethical dilemmas and make ethical decisions.
<p>Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The site did not had any internationally recognised system certifications
<p>Is there a Human Resources manager/department?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <ul style="list-style-type: none"> • There was a Human Resources department having a dedicated person, responsible for overseeing various employee-related matters such as recruitment, training, benefits administration, and resolving workplace conflicts • This individual played a crucial role in ensuring the organization's compliance with employment laws and creating a positive work environment for all employees.

<p>Is there a senior person /manager responsible for implementation of the code?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <ul style="list-style-type: none"> • HR Head played a crucial role in the successful implementation of the code. As the senior person responsible for overseeing the implementation, the individual ensured that the code was executed effectively and aligned with the project's goals and requirements. In addition to this supervisory role, the person also provided valuable guidance and support to the development team throughout the entire implementation process. This individual's expertise and leadership contribute significantly to the code's successful deployment and the project's overall success.
<p>Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The company had implemented a comprehensive and stringent policy to ensure the utmost confidentiality of all worker information. • This policy encompassed a range of robust data protection measures and employed stringent access controls, thereby fortifying the security framework and preventing any unauthorized access or disclosure of sensitive employee data. • Through a combination of cutting-edge encryption algorithms, multi-factor authentication protocols, and regular security audits, the company ensured that employee information remains protected at all times. • Furthermore, the policy emphasized the critical importance of maintaining the highest levels of confidentiality, thereby instilling trust and confidence among the workforce.
<p>Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The implementation of strict access controls and encryption techniques was a crucial aspect of safeguarding confidential information. • The company understood the importance of protecting sensitive data and took measures to prevent unauthorized access or disclosure. • Regular training and awareness programs were conducted to educate employees about the significance of confidentiality and the potential consequences of data breaches. • These programs aimed to enhance employees' understanding of their responsibilities in maintaining data privacy and security. • Furthermore, the site also ensured that all worker information was securely stored, such as keeping it locked in files in the personnel office. • This physical measure added an additional layer of protection to the confidentiality of worker information.

<p>Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <ul style="list-style-type: none"> • Hazard Identification and Risk Assessment was an important tool for minimising possible health and safety concerns, and it ensured that suitable practices were in place to prevent accidents and maintain a safe working environment. • The factory had concluded an in-depth Hazardous Identification Risk Assessment in order to analyse possible hazards, identify related risks, and implement essential safety measures. • By extensively scrutinising every area of the factory's operations, the evaluation sought to assure the greatest degree of safety for both workers and visitors.
<p>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</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The facility had a comprehensive and well-established process in place to effectively address issues that were identified during risk assessments. • This process not only involved thorough identification and documentation of the identified risks but also included the implementation of appropriate controls to mitigate or reduce these risks. • Additionally, any problems identified during internal audits were promptly brought to the attention of senior management and the responsible team, ensuring that the necessary corrective actions were taken to rectify the situation. • This systematic approach ensured that all potential risks and issues were effectively managed and resolved, contributing to the overall safety and stability of the facility.
<p>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</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The facility had implemented a comprehensive policy or code that strictly required all its suppliers to adhere to labour standards. • This essential policy guaranteed that the facility only engaged with suppliers who met the necessary labour standards, thereby promoting ethical and fair practices throughout its entire supply chain. • In addition, the facility had taken the initiative to share a copy of the ETI Base Code with its suppliers, further emphasizing its commitment to upholding labour rights and ethical business practices.
<p>Land Rights</p>	

<p>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</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The factory had obtained legal licenses like Factory Licence, Building Stability certificate etc. • These legal licenses and certificates ensured that the factory was compliant with all regulations and standards set by the authorities. • They also demonstrated the factory's commitment to safety, quality, and adherence to guidelines in its operations.
<p>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</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The facility had systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title. • This ensured that the facility operated within the legal framework of the country and avoided any potential conflicts or disputes regarding land ownership. • Additionally, the facility might have engaged legal experts or consultants to stay updated on any changes in land laws and regulations to ensure ongoing compliance.
<p>Does the site have a written policy and procedures specific to land rights?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <ul style="list-style-type: none"> • Free, prior and informed consent (FPIC) was not applicable in India.
<p>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</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The facility had successfully at rent of the land prior to its construction. • This could be confirmed through legal documents such as rent agreements, or property records.
<p>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</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The facility's commitment to legal compliance and risk mitigation was evident through its practice of conducting thorough legal assessments before acquiring any land. • By seeking legal counsel, the facility ensured full compliance with all legal obligations when leasing the land. • This proactive approach allowed the facility to proceed with confidence, knowing that all potential legal implications had been diligently evaluated and addressed.

<p>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</p> <p>Please give details:</p> <ul style="list-style-type: none">• There was no illegal appropriation of land for facility building or expansion of footprint.
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Actions	It is recommended to the factory to obtain UpToDate Approved building plan lay out from concern department.	
Additional comments	<p>Hello They are considered as temporary structure by the department , our renewal is coming up we will request the department to add them.</p> <p>Awaiting for the update evidence.</p> <p>Hello, Please see attached approved building Plan Layout along with all above mentioned ETP, STP and DG area</p> <p>Please see in MAP number 4</p> <p>Pls mark the ETP, STP and DG area on building Plan Layout, and provide separate images for this section.</p> <p>Due to the photos are unclear, not easy to find.</p> <p>Hello, Please see attached approved building Plan Layout along with mark the ETP, STP and DG area .</p> <p>Nil</p>	

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Actions	The facility ensures to obtain the certified standing order from the concerned authority.	
Additional comments	Hello certified standing order Applied For. Awaiting for the update evidence. hello, see attached stability certificate and Registration and license . Nil	

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Actions	The facility ensures to submit the annual returns to the chief inspector of the factories.	
Additional comments	Hello All Returns now we have filed online so no need for annual returns. Please provide evidence documents of the submitted application for review. Hello , See Attached annual returns . Nil	

1 - Freely chosen Employment [Summary of Findings]

1: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

- The site had an adequate management system that ensured employment was freely chosen – this included:
 - o A policy or statement proportionate to the risks of Forced Labour in its production process.
 - o Recruitment practices that supported the policies and allowed mitigation of risks. This included understanding where the workers came from, how they arrived at work and what they had paid to get work at the site being audited.
- Workers were not coerced to work (i.e. without their consent) through the use of abusive contracts, unlawful retention of wages or high unlawful deductions, retention of identity documents (ID), compulsory overtime, deposits and/or use of prison labour.
- Workers were not bound to their workplace through the use of abusive loans, payment of recruitment fees and/or restriction of movement (including after their shift ended, security).
- Workers were not coerced into work through the use of threats, intimidation or physical abuses.
- The employee manual - given to all workers on joining, stated that workers within their probation period were free to leave with 3 days written notice and once a worker was permanent (this was out of probation) they could resign from the factory with one month's prior written notice, given to their supervisor or the personnel office. The manual also stated that they would be given their full wages on their last day of work.
- The terms and conditions of employment in the handbook stated that the workers were free to leave the workplace outside of their working hours.
- Contract for security guards stated that they must not prevent workers from leaving the premises outside of working hours and where they were conducting searches that this was at the request of management, was done on a sample basis and was performed discretely and without significant delay to workers leaving at the end of shift.
- The above was confirmed in management and worker interview.

Evidence examined:

- Contracts
- Personnel files
- Service level agreement with labour
- Security guard checklist
- Wage and hours records
- Resignation / termination records
- Disciplinary records
- The policy on freedom of association and right to collective bargaining.
- Social accountability manual included worker committee selection program and the responsibility of the worker representative.
- Interview with workers
- Interview with management

Any other comments:

Nil

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: <ul style="list-style-type: none"> • The right to resign or quit a job was protected by labor laws, granting workers the freedom to leave their jobs at any time. This right ensured that employees had the autonomy to make decisions about their employment based on their personal circumstances and preferences. Employers generally had the ability to terminate employees "at will" without providing a reason. However, there were exceptions to this rule, such as termination based on discriminatory factors, violation of a contract, retaliation for exercising legal rights, or reporting illegal activities. Workers also had the right to review their personnel files and may have been entitled to penalties if their final wages were delayed. However, no such delay in practice had occurred till date.

<p>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?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The plant scrupulously followed labor laws and regulations, guaranteeing that all workers got fair treatment and enough remuneration. Furthermore, frequent audits were performed to ensure compliance with ethical labor standards, ensuring a slave-free workplace.
<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The terms and conditions of employment in the manual emphasized the importance of work-life balance and acknowledged the personal time of employees outside of work. • The policy stated that employees were free to leave the workplace and engage in activities outside of working hours, promoting a healthy work environment. • This provision aimed to prioritize and support the overall well-being of employees, recognizing the value of their personal lives and encouraging a positive work-life balance.
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The factory had put strong safeguards in place to mitigate the chances of forced, trafficked, or bonded labor entering its supply chain on the basis of the risk assessment. A grievance procedure had been established for employees to submit any issues or breaches, and these measures included extensive supplier audits, frequent monitoring of suppliers' labor practices, and thorough supplier audits. Additionally, the factory actively worked with pertinent stakeholders and business partners to increase the openness of its supply chain and guarantee that ethical sourcing principles were respected.
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The site was taking several steps to mitigate the risk of forced or trafficked labor. • These included implementing strict supplier guidelines and conducting regular audits to ensure compliance with ethical labor practices. • Additionally, the site collaborated with various organizations and industry initiatives to stay updated on best practices and continuously improve their efforts in combating forced or trafficked labor.

2 - Freedom of Association and Right to Collective Bargaining are Respected

[Summary of Findings]

2: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- The site respected local legislation and the ETI Base Code on freedom of association and collective bargaining and did not prohibit, discourage or interfere with workers' right to organise, through a parallel means. This included the set-up of workers' committee, the workers' committee elections, the execution of workers' committee's daily activities and duties.
- The site engaged in meaningful dialogue with the workforce and if the local legislation allowed, bargaining with workers. Meetings happened regularly and effectively addressed workers' concerns. The worker committee met quarterly to summarize the concerns and complaints from production workers. The last meeting was conducted on 10/07/2024.
- Workers could raise their demands to management, whether individually or collectively and were being heard and listened to.
- Workers were aware of the meetings and understood what was being discussed.
- In addition, workers could also respond to their concerns through a suggestion box. And all complaints or suggestions were tackled within a short time.

Evidence examined:

- Minutes from meetings and elections
- Notices
- Status of worker committees
- Policy on Freedom of Association and Collective Bargaining
- Payslips
- Suggestion boxes and other means to gather workers' feedback
- Personal files
- Interview with management
- Interview with workers

Any other comments:

Nil

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	• A worker committee was on-site for effective communication and collaboration between workers and management. It guaranteed that workers' problems and needs were met, providing a harmonious work environment. Furthermore, the worker committee was critical in pushing for worker rights and safety measures, as well as establishing a culture of responsibility and justice. Workers could express their complaints via a worker representative, phone, or suggestion box.	
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

<p>Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The facility was committed to promoting a positive and inclusive work environment for all employees. • They had established several committees to ensure that employee concerns and grievances were addressed in a fair and confidential manner. • The Works Committee and Grievance Committee provided a platform for employees to voice their concerns and ensure that their feedback was heard and acted upon. • These committees worked diligently to resolve any complaints or issues that may have arisen. • In addition to these committees, the site also encouraged open communication between employees and management through their open-door policies and regular team meetings. • This fostered a culture of transparency and collaboration, where everyone's voice was valued and heard. • Furthermore, they prioritized the safety and well-being of their employees by maintaining an Occupational Health and Safety Committee. • This committee was responsible for enforcing safety protocols and regulations in the workplace. • They regularly conducted safety inspections, provided training on safe work practices, and promptly addressed any concerns or incidents related to occupational health and safety. • They also had a dedicated Grievance Redressal Committee in place to address any employee complaints or concerns. • This committee ensured that all grievances were handled impartially and resolved in a timely manner, promoting a harmonious and positive work environment for everyone. • At the facility, the site believed in creating a supportive and inclusive workplace where every employee felt respected, heard, and valued.
<p>Is there evidence of free elections?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: <ul style="list-style-type: none"> • The site emphasized the importance of providing the committee with access to fully equipped meeting rooms and office spaces that were equipped with the necessary technology and amenities. • Furthermore, they prioritized open communication channels and ensured timely responses to facilitate seamless coordination between the supplier and the committee. • Additionally, the facility included a dedicated training area within its premises to cater to any training needs of the committee. • This comprehensive offering aimed to create a conducive environment for productive meetings and efficient collaboration.
Name of union and union representative, if applicable:	
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	<ul style="list-style-type: none"> • Yes, there were several strategies for consulting with workers, one of which was the formation of a grievance committee. • These committees provided a vital forum for employees to express their issues, provide feedback, and actively engage in organizational decision-making processes. • They were critical in encouraging open communication and ensuring that workers' viewpoints were taken into account when making significant decisions. • These committees were an effective technique for increasing employee engagement and fostering a collaborative work atmosphere.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: <ul style="list-style-type: none"> • All workers were aware of who their representatives were as it was a fundamental aspect of their rights and workplace democracy. • The presence of clear communication channels and regular updates ensured that workers had access to this information and could engage with their representatives when needed.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2024-04-09
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	<ul style="list-style-type: none"> • There were meeting minutes and the workers' interview confirmed that they had met with management every 3 months. • Last meeting was done on 10/07/2024. • Meeting minutes were communicated to all employees via the public board. This practice ensured transparency and allowed all employees to stay informed about the discussions and decisions made during these meetings. • Additionally, the public board served as a reference point for employees to review previous meeting minutes and track the progress of ongoing projects or initiatives.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

3 - Working Conditions are Safe and Hygienic [Summary of Findings]

3: Compliance Requirements

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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

1.MANAGEMENT SYSTEMS

- Adequate knowledge of relevant H&S legislation was demonstrated by correct maintenance of legal certificates, inspections, permits and records.
- An effective risk assessment was adapted to the site that ensured safe working conditions for all types of workers, especially the most vulnerable ones, e.g. pregnant and lactating women, young workers, migrant workers.
- Policies and procedures that mitigated the risks identified, that were adequate and proportionate to the size of the site. They were periodically reviewed.
- A H&S team including a responsible and qualified individual, HR Head, and the active participation and engagement of workers in the management of H&S in the workplace was present.
- A well-functioning grievance system whereby workers could raise H&S problems was in place.
- Minutes of meetings showed that there were quarterly meetings between the H&S committee (workers) and the H&S manager, and each point was acted on. The last meeting was conducted on 16/07/2024.
- Health & Safety Awareness Training was provided to the workers. The last training was provided on 16/07/2024.

2.PERSONAL PROTECTIVE EQUIPMENT (PPE)

- Adequate to the risks, adapted to the conditions of work (i.e. easy to wear), Personal Protective Equipment (PPE) was available free of charge or on deposit, and available to all.
- Workers received relevant and effective training about the importance of use.
- Workers implemented the learnings from the training.

3.EMERGENCY RESPONSE / FIRST AID / ACCIDENTS

- Emergency responses were adequate to the risks identified, and well documented. All workers understood and followed the procedures (e.g. drills) and management favored safety over production.
- There were at least 2 exits from each work area.
- Workers could safely and quickly exit the premises.
- Qualified first aiders were sufficient in number.
- The facility had 08 first aiders and they were available in each department.

4.ELECTRICAL SAFETY

- Adequate records of regular and effective electrical inspections, done by an official company and supported by correct installations: i.e. no visible wiring, deteriorated plugs, blocked electrical equipment, etc. were maintained.
- There was a competent electrician at the site and his training certificate was available for review.

5.FIRE SAFETY

- Adequate, up-to-date, and effective firefighting equipment to fight fire, including fire alarms, fire extinguishers, fire hydrants, etc. was available.
- Fire drills were organized and recorded every 3 months for the production unit. The latest fire drill was conducted on 22/06/2024.
- Fire Training had been given to all employees. The latest fire training was conducted on 26/02/2024.

6.MACHINERY, INCL. VEHICLES

- Machines were regularly maintained and were operated in a safe manner. Permits, certificates and vehicle insurance were valid.
- Working instructions were posted for all machines used in the production process.
- Required training was provided to the worker during induction before allowing him/her to use any machine.

7. BUILDING SAFETY

- There were no visible structural defects.

8. HYGIENE

- Facilities were hygienic and relevant permits were valid. This includes workers' toilets.

9. CHEMICALS

- Workers were trained on how to handle chemicals safely and underwent the required health checks.
- Only an authorized person was allowed to enter that room after wearing required PPE. The authorized person's name and photo were posted at the entrance of the chemical room.

10. WORKER HEALTH

- Drinking water was available to workers.
- The drinking water test report was up-to-date and kept in the factory, and the test result was qualified.
- Ventilation, light, temperature, noise, dust, and sound levels were appropriate.
- Workers reported that the work environment was appropriate.

Evidence examined:

- Health and safety policy
- Health and safety manual
- Health and safety committee meeting minutes
- Training records and certificates
- Special equipment inspection reports and qualified operator certificates
- Fire equipment maintenance records
- Fire drill and evacuation records
- Fire safety certificates
- First aider certificates
- Checks on fire equipment
- Accident record
- Electrician certificates
- Potable water testing report
- Interview with H&S manager and committee members
- Interview with workers
- Site tour
- PPE issuance list
- Machine maintenance records
- Chemical list
- MSDS

Any other comments:

Nil

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?

☒ Yes ☐ No


Please give details:

- The facility had both general and occupational Health & Safety policies and procedures that were specifically designed to meet the required standards.
- These policies and procedures were effectively communicated to all workers to ensure their understanding and compliance.
- Regular training sessions were conducted to educate employees about the importance of following these policies and procedures.
- Additionally, the facility had designated safety officers who were responsible for monitoring and enforcing compliance with Health & Safety regulations.


Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: <ul style="list-style-type: none"> • These policies were included in workers' manuals to ensure that employees had easy access to important safety guidelines and procedures. • By adhering to these policies, employees could contribute to promoting a safe working environment and preventing accidents and injuries. • They had generated a comprehensive and informative section that was added to the workers' manual. • This section clearly outlined the key safety policies and guidelines, explained their importance, and provided practical tips and instructions for implementation. • The aim was to empower employees with the necessary knowledge and resources to prioritize safety in the workplace.
Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: <ul style="list-style-type: none"> • No structural addition was found during the audit.
Are visitors to the site informed on H&S and provided with personal protective equipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: <ul style="list-style-type: none"> • Visitors to the site were not only informed about health and safety measures but were also provided with the necessary personal protective equipment (PPE) to ensure their safety during their visit. • The site management took proactive measures to educate visitors about potential hazards and equipped them with the appropriate gear, fostering a secure environment for everyone involved.
Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: <ul style="list-style-type: none"> • A medical room or medical facility was not provided to workers. There was no legal requirement for it.
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 Please give details: <ul style="list-style-type: none"> • There was no doctor on site but there were qualified first aid responders present in each department for medical assistance. • They were immediately ready to give urgent medical aid in the event of an emergency or injury within the institution. • Furthermore, the personnel were subjected to frequent training to ensure that they had the essential skills and expertise to efficiently address a variety of medical circumstances.

Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: • The facility did not provide any transport to its workers.
Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: • The facility had not provided any accommodation to workers.
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 Please give details: • These risk assessments were carried out regularly to ensure that all potential hazards and risks, including those related to workers doing overtime such as driving after a long shift, were properly evaluated. • The controls implemented aimed to minimize the identified risks and create a safe working environment for all employees.
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 Please give details: • The site was compliant with all legal obligations regarding environmental requirements, including obtaining the necessary permits for the use and disposal of natural resources. • Additionally, regular audits and inspections were conducted to ensure ongoing adherence to these obligations. The factory had obtained Air & Water consent from the Uttar Pradesh Pollution Control Board.
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 Please give details: • The site was meeting its customer requirements on environmental standards, including the use of banned chemicals. They had also listed out details of 'Banned Chemicals' which were forbidden by law. • Regular audits and inspections were conducted to ensure compliance with these standards, and any necessary corrective actions were taken promptly. Additionally, the site actively sought out alternative eco-friendly solutions to further minimize its environmental impact.



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	<p>r. One tourniquet.</p> <p>s. A supply of suitable splints.</p> <p>t. Two packets of safety pins.</p> <p>u. Kidney tray.</p> <p>v. A snakebite lancet.</p> <p>w. One (30 ml.) bottle containing potassium permanganate crystals.</p> <p>x. First aid leaflet issued by the Directorate General of Factory, Advise Service and Labour Institutes, Bombay.</p>	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	During factory tour it was found that Eye wash cup and sufficient bandage were not provided in first aid box in Security guard Room.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended to the factory to provide adequate first aid contents in first aid box in Security guard room.	
Additional comments	<p>Hello see attached first aid box in security guard room</p> <p>As per submitted evidence photo, no eye wash cup was found from the photo, pls provide more photos for inspection.</p> <p>Hello, see attached first aid box along with eye wash cup in security Guard Room</p> <p>Nil</p>	

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Actions	It is recommended to the factory to post serial numbers on fire fighting equipment.	
Additional comments	Hello See Attached fire fighting equipment With Post serial number. Nil	

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Actions	It is recommended to the factory to provide eye wash station in ETP, STP & Plating department.	
Additional comments	Hello See Attached installed eye wash station in ETP, STP & Plating department. Nil	

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Actions	It is recommended to the factory to post emergency evacuation plan in the factory.	
Additional comments	Hello See Attached evacuation plan Nil	

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Non-Compliance																															
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Actions	It is recommended to the factory to provide rubber mat below electric panel at basement.	
Additional comments	Hello See Attached rubber mat electric panel at basement. Nil	

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Non-Compliance																																	
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Subcategory	Chemicals																																
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Actions	It is recommended to the factory to post MSDS near chemical storage area at ground floor.	
Additional comments	Hello See Attached msds posted near chemical storage area at ground floor. Insufficient evidence, one MSDS document should included 16 section part content. Hello, see attached MSDS included 16 section part content Nil	

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Non-Compliance																															
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Actions	It is recommended to the factory to provide secondary containers in chemicals store.	
Additional comments	Hello, See Attached secondary containers in ETP chemicals store. Nil	

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

4: Compliance Requirements

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined

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

Current Systems:

- The site had an adequate system for not employing children, in line with the ILO standards and/or local law. This included having a child labour policy and procedure proportionate to the risks of the local sector. The policy and procedure needed to include a remediation plan.
- There was a written policy in regard to prohibition of child labour, which stipulated that no worker under 14 years old would be recruited in the factory.
- The site had an adequate system for managing workers, including an assessment of Health & Safety risk.
- The site had an adequate recruitment system and the personnel in charge of recruitment was trained and aware of the risks, including that current practices and norms may go against the law/Code and took relevant precautions when checking the age of potential recruits.
- The site had adequate filing systems that allowed for managing risks linked to children or young workers. This included personnel files, ID photocopies, young worker registers.
- To prevent hiring child labour, the factory also established an age verification mechanism.
- The HR staffs would authenticate ID card of candidates via physical appearance comparison, questions testing and ID card authentication facility. All these processes ensured no fake ID card was used by potential worker during the hiring process.
- According to review of employees' personal files and employee interview, there was no child labour in the facility.

Evidence examined:

- Personnel files including ID copies for all types of workers
- Recruitment procedures
- Child labour policy and procedure, including remediation
- Latest employee list
- Interview with management and workers
- Site tour

Any other comments:

Nil

Legal age of employment:	14
Age of youngest worker found:	19
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
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: • Not applicable as there were no workers under 18 years of age employed in the factory. The company strictly adhered to labor laws and regulations, ensuring the safety and well-being of all employees. Additionally, the hiring process included thorough age verification to prevent any underage employment

5 - Living Wages are Paid [Summary of Findings]

5: Compliance Requirements

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

- The site had understood and regularly reviewed the legislation related to wage payments and ensured this was applied at all levels.
- The site had an adequate management system to ensure that wages were paid on time accurately and according to legislation or industry norms for all types of workers. This included a transparent and trusted payment system.
- All employees' wages had been calculated on a monthly rate basis by bank transfer before the 07th of each month for the last month. The pay slip with proper information including worker name, department, wage level, regular working hours, regular work payment, overtime hours, overtime payment, gross wages, deductions, net wages, staff signature, etc. had been provided to each worker.
- During the audit, the payroll records and attendance records from July 2023 to June 2024 (the most recent paid month) were provided for review. As per a review of 10 sampled employees' payroll and attendance records from July 2023 to June 2024 (the most recent paid month), it was noted that unskilled workers had been paid at least INR 410 per day i.e., INR 10648 per month which met the legal minimum wage.
- The site had an adequate management system to record wages accurately and promptly. This included related statutory benefits, leave, legal deductions, and final, settlement.
- No deposits or loans were found.
- Workers had understood their wages. This included clear contractual clauses, time recording systems, and payslips.
- No overtime was found in the facility.

Evidence examined:

- Contracts
- Payroll
- Timecards and registers
- Payslips
- Personnel files
- Policies and procedures on wages
- Social insurance / statutory benefits records
- Leave records
- Resignation records
- Local legal minimum wage documents
- Local and national laws

Any other comments:

Nil

Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 12.0 Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 410 Per Week: null Per Month: 10648	Actual Per Day: 410 Per Week: 2460 Per Month: 10648	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 205 Per Week: null Per Month: 4914.46	Actual Per Day: 0 Per Week: 0 Per Month: 0	NO
Wages Analysis:			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 Samples were taken from August 2023 (randomly selected month). 10 Samples were taken from January 2024 (randomly selected month). 10 Samples were taken from June 2024 (the most recent paid month).		
Are there different legal minimum wage grades? If Yes, please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Unskilled: ₹10,648.00 per month (₹410.00 per day) Semi-Skilled: ₹11,713.00 per month (₹451.00 per day) Skilled: ₹13,120.00 per month (₹505.00 per day).		
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"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	INR 10648		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 80.0% of workforce earning minimum wage 20.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found:N/A Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		

What deductions are required by law e.g. social insurance? Please state all types:	The deductions for ESI and EPF were mandated by the regulations outlined in the Factory Act and Minimum Wages Act of 1948 to uphold adherence to labor laws and safeguard the rights of workers and the factory. These deductions play a crucial role in fostering a just and transparent wage management system, while simultaneously facilitating essential contributions towards social security schemes for employees.
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Please list all deductions that have been made.	The Employee State Insurance (ESI) and Employee Provident Fund (PF) contributions were deducted at specified rates from eligible employees' wages in India. ESI deductions were calculated at 0.75% of gross wages, while PF deductions were set at 12% of basic wages. These deductions were obligatory as part of social security measures to support employees' welfare. The ESI scheme aimed to provide various benefits such as medical, disability, and maternity coverage, while the PF scheme facilitated retirement savings for employees.
Please list all deductions that have not been made.	Nil
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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 Please give details: The payroll department meticulously ensured that every employee received their rightful compensation for the hours they worked by diligently reviewing and verifying the accuracy of the time records before processing payments. The accuracy of the payment process was maintained through thorough review and validation of time records submitted by each employee.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:

Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: To uphold equitable remuneration practices, regular salary assessments were undertaken through performance evaluations and other relevant criteria. As per the governmental directive, these assessments were scheduled biannually in April and October to facilitate necessary adjustments. Furthermore, any salary increments or modifications were contingent upon factors including individual performance metrics, prevailing market conditions, and organizational guidelines.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility diligently ensured that all employees were promptly and fairly compensated for the hours they worked. The accuracy of the payment process was upheld through the timely submission of time records by each employee.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

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

6: Compliance Requirements

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

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

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

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

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:

- The site had an adequate management system that ensured working hours met the International Labour standards. This included:
- Documented knowledge of the legislation and international labour standards as part of a policy on working hours
- Adequate procedures for recording and monitoring working hours
- Adequate and accurate recording of working hours
- Adequate monitoring systems that allowed for the regulation of working hours
- The facility had adopted a Biometric Attendance system for attendance record keeping for all employees
- The site ensured that workers were not contracted for more than 48 hours per week as standard.
- The site had ensured that overtime was voluntary.
- The site ensured that workers got sufficient rest including regular rest breaks, sufficient rest times, weekly rest days, annual and other types of leave, and conducted a H&S risk assessment to avoid fatigue.
- The facility operated in a single shift i.e., 09:00 to 17:30 with a half-hour lunch break from 13:00 to 13:30 and two tea breaks, from 11:00 to 11:15 and from 15:00 to 15:15 respectively.
- During the audit, the payroll records and attendance records from July 2023 to June 2024 (the most recent paid month) were provided for review. As per a review of 10 sampled employees' payroll and attendance records from July 2023 to June 2024 (the most recent paid month), it was noted that unskilled workers had been paid at least INR 410 per day i.e., INR 10648 per month which met the legal minimum wage.
- Additionally, all workers who will's to do overtime were entitled to a 200% premium of normal salary which was in line with Indian Labour Law, as overtime pay per hour, the company had ensured that all working hours were recorded accurately and compensated appropriately, adhering to the regulations set by the local labor laws. However, no overtime was found in the facility.
- Additionally, regular audits were conducted to verify compliance and ensure fair treatment of employees in terms of working hours.

Evidence examined:

- Contracts
- Payroll and time recording system
- Policies and procedures on hours and OT
- Other pieces of legislation
- Leave records
- Production records
- Management interview and worker interview

Any other comments:

Nil

Working hours' analysis	
Systems & Processes	
What timekeeping systems are used?	Biometric Attendance System
Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
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):	6
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Overtime Hours worked	

Actual overtime hours worked in sample (State per day/week/month)	<p>The highest OT hours were 00 hours/month</p> <p>10 out of 10 samples from a random month (August 2023): Daily OT: Maximum was 00 Hours Weekly OT: Maximum was 00 Hours Monthly OT: Maximum was 00 Hours</p> <p>10 out of 10 samples from a random month (January 2024): Daily OT: Maximum was 00 Hours Weekly OT: Maximum was 00 Hours Monthly OT: Maximum was 00 Hours</p> <p>10 out of 10 samples from the most recent paid month (June 2024): Daily OT: Maximum was 00 Hours Weekly OT: Maximum was 00 Hours Monthly OT: Maximum was 00 Hours</p>
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: No such case was found.</p>
Approximate percentage of total workers on highest overtime hours:	0.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information</p> <p>Please give details: The contractual documentation, including employment agreements, handbooks, worker interviews, or refusal protocols, clearly stipulated that overtime was voluntary. This allowed employees the discretion to decide if they wished to work beyond their standard hours. It is crucial for both employers and employees to recognize and follow this provision to uphold a just and regulatory workplace environment.</p>
Overtime premium	
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium</p> <p>Please give details: The facility did not practice any overtime.</p>
Is overtime paid at a premium?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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 <input type="checkbox"/> Collective Bargaining agreements</p> <p><input checked="" type="checkbox"/> Other</p>
Please give details	In accordance with legal regulations, the site was required to provide a 200% overtime premium based on the wage rate.

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

7 - No Discrimination is Practiced [Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- The site had ensured there were no discriminatory practices in the workplace. This included being aware of the risks of discrimination in the workplace and developing adequate policies and procedures to mitigate them.
- This included inclusive recruitment policies, non-discriminatory practices and procedures, and fair dismissal procedures e.g. training allocation, wages setting, access to promotion, communication, medical testing for pregnancy or diseases, access to grievances and complaints mechanism – including unfair dismissal, and non-retaliation.
- Workers who may have been more prone to discrimination (e.g. women, disabled, etc), had reported being treated fairly. However, there had been no person with disability found in the facility.
- No employee was required to do the examination of the hepatitis B virus and HIV. Female workers in this factory were not required to take pregnant tests before or during their employment.
- There was no evidence of sexual or physical harassment.

Evidence examined:

- Equal opportunity or anti-discrimination policy
- Disciplinary cases and list of terminated workers
- Payroll & workers attendance list
- Contracts
- Minutes from workers committee and grievances log
- Job postings / advertisements and job application form

Any other comments:

Nil

Gender breakdown of Management + Supervisors (Include as one combined group)

Male: 100.0%

Female: 0.0%

Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)

- There were 02 women working in skilled & technical roles.

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"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement	<input type="checkbox"/> Access to training <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	<ul style="list-style-type: none"> • All employees had been treated fairly and equally, regardless of their race, gender, or background. • The company had implemented strict policies against discrimination and fostered a culture of inclusivity and respect, ensuring a harmonious work environment for everyone and hence, this concludes that discrimination was not found in the facility. 		
Professional Development			
What type of training and development are available for workers?	<ul style="list-style-type: none"> • The facility had a system of professional development of their employees & staff based on character, attendance, any disciplinary action, involvement in training program etc. • This system aimed to enhance the skills and knowledge of the employees, ensuring they were up-to-date with industry standards and best practices. • Additionally, it provided opportunities for career advancement and encouraged a culture of continuous learning within the organization. 		
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

8 - Regular Employment Is Provided [Summary of Findings]

8: Compliance Requirements

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current Systems:

- The site offered regular employment to workers by assessing the site's practices on: . Hiring permanent, part-time, fixed-term and temporary workers and whether their contractual employment met local legislation.

- Meeting its legal obligations by offering the form of employment that offered the highest protection to workers and did not use unlawful temporary or fixed-term workers, apprenticeships schemes and/or extended probationary periods, to avoid entering into a permanent relationship with an employee and avoiding social security obligations.

- All types of workers understood their terms of employment and had a legal contract written in a language they understood.

- All workers who were on site, their contracts and terms and conditions for work met the legal requirements.

- All interviewed employees had informed the assessment team that they had received a copy of the appointment letter. There were no apparent concerns on the day of assessment.

- Based on record review and employee's interview, appointment letters were issued to all 10 out of 10 selected employees.

- The facility did not employ any migrant workers.

- Based on interaction with employees, no recruitment fee was required at any stage of the recruitment process.

Evidence examined:

<ul style="list-style-type: none"> • Contracts • Interview with management interview and workers • Personnel files • Hiring and termination records • Recruitment policy
Any other comments:
Nil

Responsible Recruitment	
All Workers	
Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions
Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Migrant Workers	
Type of work undertaken by migrant workers:	• There were no migrant workers in the factory.
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Is there any observation on this finding?	N/A
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (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.)	
Number of agencies used (average):	1
Please provide the names of agencies if applicable	Sagar Security Company
Were agency workers' age / pay / hours included within the scope of this audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Were sufficient documents for agency workers available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There was a legal contract agreement with the agency. This agreement outlined the terms and conditions that govern the relationship between the parties and ensures that all parties were legally bound to fulfill their obligations.
Does the site have a system for checking labour standards of agencies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Timesheets, pay stubs, and employee contracts were reviewed regularly to ensure compliance with labour standards. Moreover, regular audits are conducted to ensure compliance with labour laws and regulations. This helped to maintain transparency and accountability within the agency's operations.
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)	
Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A

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

8A: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

- A site tour showed that all production processes were present in the unit.
- No sub-contracting or home-working was used in the facility.
- As per management interview and factory tour, there was no homeworker used by the factory.
- The site actively communicates the ETI Base Code to relevant parties

Evidence examined:

- Quality records
- Production records
- Goods in and out records
- Manpower planning

Any other comments:

Nil

Summary of sub-contracting – if applicable

Is there any sub-contracting at this site? ☐ Yes ☒ No

Summary of homeworking – if applicable

Is homeworking used at this site? ☐ Yes ☒ No

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

9: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

- According to the document review, the facility management had constructed a disciplinary process for staff misconduct that included oral warning, written notice, and ultimately termination.
- The site had also prepared a training program for all staff on the procedure.
- Employee interviews supported the finding that workers were informed of the disciplinary process.
- There was a policy against harsh treatment, according to management interviews, document reviews, and staff interviews.
- There was an internal grievance procedure that involved an anonymous suggestion box where workers could file complaints about harassment, bullying, and discrimination.
- Management would deal with any received complaints without taking any action against the complaining employee. Every employee who was sampled was aware of this system.

Evidence examined:

- Non Discrimination and Harassment policy
- Internal grievance procedure documentation
- Disciplinary action records
- Grievance records
- Training records
- Interview with management and workers

Any other comments:

Nil

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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: <ul style="list-style-type: none"> • The facility maintained a Grievance committee & ICC committee & the last committee meeting was conducted on 20-07-2024 & 24-05-2024 respectively. • These committees provided a platform for employees to report any violations or grievances confidentially. • They ensured that the concerns were addressed and appropriate actions were taken to maintain labour standards and ensure health and safety in the workplace. • The facility also maintained an occupational health and safety committee. • The occupational health and safety committee at the facility was responsible for ensuring that all employees adhered to safety protocols and regulations. • They regularly conducted inspections, identified potential hazards, and implemented necessary measures to minimize risks and promote a safe working environment.
If yes, are workers aware of these channels and have access? Please give details.	<ul style="list-style-type: none"> • Facility's grievance committee, ICC committee, and health & safety committee representatives had communicated the details to their employees in their respective section • Workers were aware of these channels and had access to the same.
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	<ul style="list-style-type: none"> • There was an internal process for grievance, which was an suggestion or complaint box, Workers could anonymously report any grievances (harassment, bullying, discrimination etc.) through it.
Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Worker <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other
Please provide grievance mechanism details	<ul style="list-style-type: none"> • Employees could raise their grievances directly to management, worker representatives • They could also drop complaint or suggestion to state their opinions and suggestions in the complaint or suggestion box, • Then, the management would post corresponding feedback or action on the notice board.
Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:

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

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

10A: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

- The site had systematically verified the right to work of all workers, and was familiar with immigration rules and regulations. However, the facility did not have migrant workers.
- The site maintained adequate records for proof of right to work
- As per document review, facility management representation and employee interview, all employees in the facility had been of Indian origin.
- All employees had the proper legal rights to work in this region.
- The youngest age had been 19 years old. All of them had been recruited directly by the facility.
- The facility did not use any foreign employee.

Evidence examined:

- Hiring procedure
- Worker handbook
- Personal files and contracts
- Interview with management and workers

Any other comments:

Nil

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

10B4: Compliance Requirements

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

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

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

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

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

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

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

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

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

10B4: Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

- HR Head had been responsible for coordinating the site's efforts to improve environmental performance.
- The facility management had maintained all legally required environmental documents in place, which proved that the production of the facility was in compliance with the related environmental regulations.
- During document review it was found that factory has agreement for Hazardous Waste Storage permission to the concerned department.
- Based on management and employees' interviews, they had been trained on environmental protection.
- The factory had conducted an Environment Impact & Aspect Assessment (EIA) in the factory.
- The factory had an environmental policy covering its environmental impact, which was communicated to all appropriate parties, including its own suppliers.
- An environmental assessment was carried out as per below.
- Drinking Water Test Report Code: No. W-22022024-01, Date – 26/02/2024, Obtained from ULTR TESTING & RESERCH LABORATORY.

Evidence examined:

- Environmental procedures
- Certifications / permits / licenses
- Official inspections
- Chemical list
- In addition to this, the company has done environment impact assessment and monitors consumption of water and energy on periodical basis.
- The manager and sampled workers have been interviewed about environment management.
- Details: Energy, fuel, water, electricity, recorded for the year of 2023 and 2024 (till the latest records).

Any other comments:

Nil

Environmental Analysis

Is there a manager responsible for Environmental issues (Name and Position):	<ul style="list-style-type: none"> • HR Head was the responsible person designated for handling environmental issues.
Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The site had conducted a comprehensive risk assessment on the environmental impact of its operations. • The assessment included identifying potential risks and implementing appropriate controls to mitigate and minimize those risks. • Additionally, the site regularly monitored and evaluated its environmental performance to ensure compliance with regulations and industry standards. • This proactive approach not only demonstrated the site's commitment to environmental sustainability but also helped identify areas for continuous improvement.
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>The site did not have a recognised environmental system certification such as ISO 14000 or equivalent</p>
Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: <ul style="list-style-type: none"> • Their environmental policy had targeted the most significant effects of their activities and indicated a strong commitment to continual improvement. • They had put in place steps that mitigated waste generation and conserved natural resources. • Furthermore, they periodically reviewed and evaluated the success of their environmental activities to ensure that they were fulfilling their objectives and progressing toward sustainability.
Does the site have a Biodiversity policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Have all legally required permits been shown?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: All legally required permits like Air & Water Consent had been obtained from Uttar Pradesh Pollution Control Board and were shown. However, the facility has not obtained the hazardous consent from Uttar Pradesh Pollution Control Board.
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: Yes, there is a documentation process to record hazardous chemicals used in the manufacturing process
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: <ul style="list-style-type: none"> • Client's requirements and legislation in the destination countries regarding environmental and chemical issues had been included in the site's internal management system. • This ensured that the company complied with all necessary regulations and standards while conducting its operations. • Additionally, regular updates and training sessions had been conducted to keep employees informed about any changes in the legislation and to promote a culture of environmental responsibility within the organization.

Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: <ul style="list-style-type: none"> • By closely monitoring air emissions, water and energy usage, and waste, the company had aimed to not only reduce costs but also minimize its environmental impact. • Implementing reduction targets had allowed for a more efficient use of resources, ultimately leading to improved sustainability practices. • Additionally, this proactive approach had helped the company stay compliant with environmental regulations and enhance its reputation as an environmentally responsible organization.
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: <ul style="list-style-type: none"> • The facility uses Effluent Treatment Plants (ETP) to recycle its wastewater.
Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: <ul style="list-style-type: none"> • The facility had implemented a comprehensive system for measuring and monitoring consumption of key utilities such as water, energy, and natural resources. • This system adhered to recognized protocols and standards to ensure accurate tracking and efficient management of these resources.
Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: <ul style="list-style-type: none"> • The facility had no subcontracting agency. • Nevertheless, the facility had thoroughly vetted all business partners operating on the premises to ensure that they possessed the necessary permits and licenses. • Additionally, the facility regularly monitored and assessed their business practices to ensure compliance with its environmental expectations.
Usage/discharge analysis	
Criteria	Previous year: 2023 Current year: 2024
Electricity Usage: Kw/hrs	257220 173440
Renewable Energy Usage: Kw/hrs	0 0
Gas Energy Usage: Kw/hrs	0 0
Has site completed any carbon Footprint Analysis?	No No
If Yes, please state result	
Water Sources	Ground Water Ground Water

Water Volume Used	3500	1800
Water Discharged	Sewage Treatment Plants (STP) and Effluent Treatment Plants (ETP)	Sewage Treatment Plants (STPs) and Effluent Treatment Plants (ETP)
Water Volume Discharged	2800	1440
Water Volume Recycled	2800	1400
Total waste produced	1500 KG	750 KG
Total hazardous waste produced	ETP/STP Sludge 600 KG, and Used Oil 1000 liters	ETP/STP Sludge 300 KG, and Used Oil 600 liters
Waste to recycling	N/A	N/A
Waste to landfill	N/A	N/A
Waste to other	ETP/STP Sludge 600 KG, and Used Oil 1000 liters	ETP/STP Sludge 300 KG, and Used Oil 600 liters
Total Product Produced	751300 Pieces	170400 Pieces

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600571347	
Clause	10B4 - Environment 4-Pillar	
Issue Title	598 - The site does not have all legally required permits for use and / or disposal of resources e.g. energy, water, air emissions, waste etc.	
Subcategory	General Environmental Permits, & Management systems	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Resolved by audit	ZAA600078522	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	<p>In accordance with Factories Act 1948, Chapter IV, Section 12 (1), effective arrangements shall be made in every factory for the treatment of wastes and effluent due to the manufacturing process carried on therein so as to render the innocuous and for the disposal. The state government may make rules prescribing the arrangements to be made in this regard. It may also require that such arrangements to be made are approved by such authority as may be prescribed. In accordance with the Water (Prevention and Control of pollution) Act, 1974.</p> <p>Section 26: Provision regarding existing discharge of sewage or trade effluent - Where immediately before the commencement of this Act any person was discharging any sewage or trade effluent into a stream or well or sewer or on land, the provisions of section 25 shall, so far as may be, apply in relation to such person as they apply in relation to the person referred to in that section subject to the modification that the application for consent to be made under sub-section (2) of that section shall be made on or before such date as may be specified by the State Government by notification in this behalf in the Official Gazette In accordance with the Water (Prevention and Control of pollution) Act, 1974.</p> <p>Section 25. RESTRICTIONS ON NEW OUTLETS AND NEW DISCHARGES, (1) Subject to the provisions of this section, no person shall, without the previous consent of the State Board. - (a) establish or take any steps to establish any industry, operation or process, or any treatment and disposal system or an extension or addition thereto, which is likely to</p>	

	discharge sewage or trade effluent into a stream or well or sewer or on land (such discharge being hereafter in this section referred to as discharge of sewage); or (b) bring into use any new or altered outlets for the discharge of sewage; or (c) begin to make any new discharge of sewage;	
ETI code	10.B4.1 - Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.	
Explanation to the non compliance	It was noted during the documents review and interaction with the management that the Effluent Treatment Plant (ETP) and stands for Sewage Treatment Plant (STP) inlet and outlet test report was not evident at the time of the audit.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility have an Effluent Treatment Plant (ETP) and stands for Sewage Treatment Plant (STP) inlet & outlet test done & obtain corresponding test reports for the same.	
Additional comments	Hello See Attached ETP inlet and outlet test report. Nil	

Non-Compliance		Evidence																									
[Back to findings summary]																											
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>CLOSED</td></tr><tr><td>Reference</td><td>ZAF600571348</td></tr><tr><td>Clause</td><td>10B4 - Environment 4-Pillar</td></tr><tr><td>Issue Title</td><td>598 - The site does not have all legally required permits for use and / or disposal of resources e.g. energy, water, air emissions, waste etc.</td></tr><tr><td>Subcategory</td><td>General Environmental Permits, & Management systems</td></tr><tr><td>New or carried over?</td><td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td></tr><tr><td>Resolved by audit</td><td>ZAA600078522</td></tr><tr><td>Root cause</td><td><input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td>In accordance with the Hazardous and other Wastes (Management and Transboundary Movement) Rules 2016, Chapter II Procedure for management of Hazardous and other Wastes, Section 6 – Grant of Authorization for managing hazardous and other wastes, (1) Every occupier of the facility who is engaged in handling, generation, collection, storage, packaging, transportation, use, treatment, processing, recycling, recovery, pre-processing, co-processing, utilisation, offering for sale, transfer or disposal of the hazardous and other wastes shall be required to make an application in Form 1 to the State Pollution Control Board and obtain an authorisation from the State Pollution Control Board within a period of sixty days from the date of publication of these rules. Such application for authorisation shall be accompanied with a copy each of the following documents, namely: (a) consent to establish granted by the State Pollution Control Board under the Water (Prevention and Control of Pollution) Act, 1974 (25 of 1974) and the Air (Prevention and Control of Pollution) Act, 1981 (21 of 1981); (b) Consent to operate granted by the State Pollution Control Board under the Water (Prevention and Control of Pollution) Act, 1974 (25 of 1974) and/or Air (Prevention and Control of Pollution) Act, 1981, (21 of 1981)</td></tr><tr><td>ETI code</td><td>10.B4.2 - Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.</td></tr></table>			Non-Compliance		Status	CLOSED	Reference	ZAF600571348	Clause	10B4 - Environment 4-Pillar	Issue Title	598 - The site does not have all legally required permits for use and / or disposal of resources e.g. energy, water, air emissions, waste etc.	Subcategory	General Environmental Permits, & Management systems	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Resolved by audit	ZAA600078522	Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		Local law issue	In accordance with the Hazardous and other Wastes (Management and Transboundary Movement) Rules 2016, Chapter II Procedure for management of Hazardous and other Wastes, Section 6 – Grant of Authorization for managing hazardous and other wastes, (1) Every occupier of the facility who is engaged in handling, generation, collection, storage, packaging, transportation, use, treatment, processing, recycling, recovery, pre-processing, co-processing, utilisation, offering for sale, transfer or disposal of the hazardous and other wastes shall be required to make an application in Form 1 to the State Pollution Control Board and obtain an authorisation from the State Pollution Control Board within a period of sixty days from the date of publication of these rules. Such application for authorisation shall be accompanied with a copy each of the following documents, namely: (a) consent to establish granted by the State Pollution Control Board under the Water (Prevention and Control of Pollution) Act, 1974 (25 of 1974) and the Air (Prevention and Control of Pollution) Act, 1981 (21 of 1981); (b) Consent to operate granted by the State Pollution Control Board under the Water (Prevention and Control of Pollution) Act, 1974 (25 of 1974) and/or Air (Prevention and Control of Pollution) Act, 1981, (21 of 1981)	ETI code	10.B4.2 - Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.	
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ETI code	10.B4.2 - Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.																										


Explanation to the non compliance	It was noted during the documents review and interaction with the management that the factory has not obtained the authorization for managing hazardous and other wastes from the concerned authority.		
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit		
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other		
Actions	The facility ensures to obtain the authorization for managing hazardous and other wastes from the concerned authority.		
Additional comments	Hello See Attached hazardous and other wastes certificate. As per uploaded evidence document, pls resubmit the missing documents. Hello See Attached hazardous and other wastes certificate. Nil		


Non-Compliance


Evidence

[Back to findings summary]

Non-Compliance	
Status	CLOSED
Reference	ZAF600571353
Clause	10B4 - Environment 4-Pillar
Issue Title	637 - No monitoring of air emission limits as per legal requirements
Subcategory	Air emissions & GHG (Green House Gas)
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over
Resolved by audit	ZAA600078522
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other
Root cause - Other	
Local law issue	In accordance with Environment (Protection) Act, 1986. Section 95C Genset run on Diesel and Natural Gas (NG) or Diesel and Liquid Petroleum Gas (LPG): C General conditions, 10. (a) All genset engines operating on diesel and NG or LPG shall be tested for Type Approval and COP of emission and noise limits compliance as per system and procedure published from time to time by the Central Pollution Control Board.
ETI code	10.B4.1 - Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.
Explanation to the non compliance	It was noted during the document review and interaction with the management that the facility was not conducted DG stack emission test in the facility.
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other
Actions	The facility ensures to conduct the DG stack emission test in the facility.
Additional comments	Hello See Attached DG stack emission test report. Nil

Good Example		Evidence																		
[Back to findings summary]																				
<table><tr><th colspan="2">Good Example</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600571350</td></tr><tr><td>Clause</td><td>10B4 - Environment 4-Pillar</td></tr><tr><td>Issue Title</td><td>653 - Presence of reforestation programme</td></tr><tr><td>Subcategory</td><td>Reforestation, Conservation & Biodiversity</td></tr><tr><td>New or carried over?</td><td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td></tr><tr><td>Explanation to the good example</td><td>During factory tour it was found that company has provided Greenery belt in the facility premises & out side of the factory premises.</td></tr><tr><td>Evidence</td><td>During factory tour.</td></tr></table>		Good Example		Status	OPEN	Reference	ZAF600571350	Clause	10B4 - Environment 4-Pillar	Issue Title	653 - Presence of reforestation programme	Subcategory	Reforestation, Conservation & Biodiversity	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	During factory tour it was found that company has provided Greenery belt in the facility premises & out side of the factory premises.	Evidence	During factory tour.	<div></div> <div>Greenery Belt.jpg</div>
Good Example																				
Status	OPEN																			
Reference	ZAF600571350																			
Clause	10B4 - Environment 4-Pillar																			
Issue Title	653 - Presence of reforestation programme																			
Subcategory	Reforestation, Conservation & Biodiversity																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
Explanation to the good example	During factory tour it was found that company has provided Greenery belt in the facility premises & out side of the factory premises.																			
Evidence	During factory tour.																			

Good Example		Evidence																		
[Back to findings summary]																				
<table><tr><th colspan="2">Good Example</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600571352</td></tr><tr><td>Clause</td><td>10B4 - Environment 4-Pillar</td></tr><tr><td>Issue Title</td><td>649 - The sites uses renewable energy (as a significant proportion of their total energy)</td></tr><tr><td>Subcategory</td><td>Energy usage</td></tr><tr><td>New or carried over?</td><td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td></tr><tr><td>Explanation to the good example</td><td>During factory tour it was found that company has installed solar plant on the terrace for energy conservation.</td></tr><tr><td>Evidence</td><td>During factory tour.</td></tr></table>		Good Example		Status	OPEN	Reference	ZAF600571352	Clause	10B4 - Environment 4-Pillar	Issue Title	649 - The sites uses renewable energy (as a significant proportion of their total energy)	Subcategory	Energy usage	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	During factory tour it was found that company has installed solar plant on the terrace for energy conservation.	Evidence	During factory tour.	 <p>Solar Plant.jpg</p>
Good Example																				
Status	OPEN																			
Reference	ZAF600571352																			
Clause	10B4 - Environment 4-Pillar																			
Issue Title	649 - The sites uses renewable energy (as a significant proportion of their total energy)																			
Subcategory	Energy usage																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
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Evidence	During factory tour.																			

Good Example		Evidence																		
[Back to findings summary]																				
<table><tr><th colspan="2">Good Example</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600571354</td></tr><tr><td>Clause</td><td>10B4 - Environment 4-Pillar</td></tr><tr><td>Issue Title</td><td>654 - Policies and procedures in place which recognise and apply national laws referring to nature conservation and deforestation</td></tr><tr><td>Subcategory</td><td>Reforestation, Conservation & Biodiversity</td></tr><tr><td>New or carried over?</td><td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td></tr><tr><td>Explanation to the good example</td><td>During factory tour it was found that company has provided Rain Water Harvesting system in the factory premises.</td></tr><tr><td>Evidence</td><td>During factory tour</td></tr></table>		Good Example		Status	OPEN	Reference	ZAF600571354	Clause	10B4 - Environment 4-Pillar	Issue Title	654 - Policies and procedures in place which recognise and apply national laws referring to nature conservation and deforestation	Subcategory	Reforestation, Conservation & Biodiversity	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	During factory tour it was found that company has provided Rain Water Harvesting system in the factory premises.	Evidence	During factory tour	 Rain Water Harvesting.jpeg
Good Example																				
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Issue Title	654 - Policies and procedures in place which recognise and apply national laws referring to nature conservation and deforestation																			
Subcategory	Reforestation, Conservation & Biodiversity																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
Explanation to the good example	During factory tour it was found that company has provided Rain Water Harvesting system in the factory premises.																			
Evidence	During factory tour																			

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

10C: Compliance Requirements

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

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

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

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

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

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

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

10C: Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

- Factory Manager was the designated person responsible for implementing standards concerning Business Ethics, and as observed, site ethical practices were conducted without any corruption and/or bribery.
- The factory established detailed business ethics policies which were communicated to the stakeholders including workers through display, training and endorsement.
- During the audit, the factory was briefed about Business Ethics policy of the audit company.
- The Business Ethics policy, workers' handbook and related training records were provided to auditor during the audit.
- The facility has access to a transparent system for confidentially reporting and dealing with unethical business ethics without fear of reprisals towards the reporter.
- The facility ensured 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.

Evidence examined:

- Policies and procedures
- Training record

Any other comments:

Nil

<p>Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy</p> <p><input checked="" type="checkbox"/> Policy for third parties including suppliers</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The facility had a Business Ethics Policy that was both communicated and applied internally. The policy outlined the ethical standards and guidelines that all employees were expected to adhere to in their day-to-day operations. Additionally, regular training sessions and workshops were conducted to ensure that employees understood and complied with the policy effectively.
<p>Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The site had provided comprehensive training programs for relevant personnel such as sales and logistics teams, focusing specifically on business ethics issues. • These training sessions aimed to enhance their understanding of ethical practices and equip them with the necessary knowledge and skills to make ethical decisions in their day-to-day operations.
<p>Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The Business ethics policy was regularly reviewed and updated to ensure it remained relevant and aligned with evolving ethical standards and industry best practices. • This proactive approach helped us maintain a strong ethical framework that guided our business operations.
<p>Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <ul style="list-style-type: none"> • The site had required third parties, including suppliers, to complete their own business ethics training in order to ensure compliance with ethical standards and promote responsible business practices. • This training helped to establish a culture of integrity and transparency throughout the supply chain, fostering trust and accountability among all stakeholders involved.

Attachments



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INTERNATIONAL
LEGACY_Periodic_25.07.2024_Photo Form_4P.pdf



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INTERNATIONAL
LEGACY_Periodic_25.07.2024_Signed CAPR_4P.pdf



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

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

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