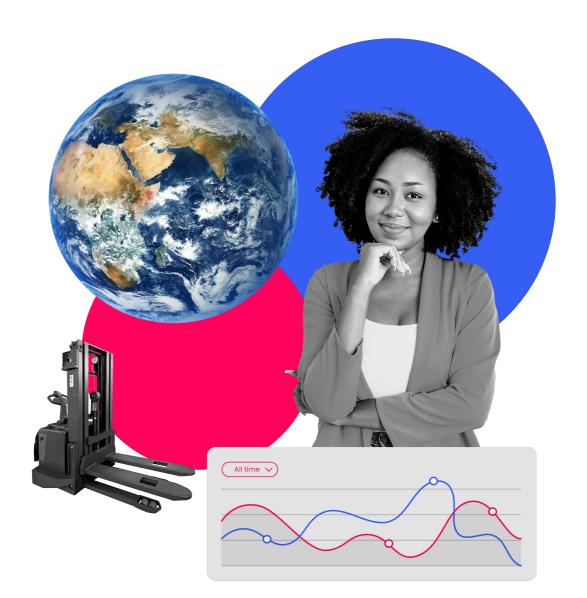


Sedex Members Ethical Trade Audit Report

Version 7





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8.A. Sub-contracting and homeworkers are used responsibly

9. No harsh or inhumane treatment is allowed

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Attachments



Audit content

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Minimum Requirements were applied and the SMETA Auditor Manual was followed. 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.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the following Code Areas:

Included in a 2-Pillar audit:

- 1. Labour Standards Code Areas:
 - 0: Enabling accurate Assessment
 - 1: Employment is Freely Chosen
 - 1.A: Responsible Recruitment & Entitlement to Work
 - 2: Freedom of Association and Right to Collective Bargaining are Respected
 - 4: Child Labour Shall Not be Used
 - 5: Legal Wages are Paid
 - 5.A: Living Wages are Paid
 - 6: Working Hours are Not Excessive
 - 7: No Discrimination is Practiced
 - 8: Regular Employment is Provided
 - 8.A: Sub-contracting and Homeworkers are Used Responsibly
 - 9: No Harsh or Inhumane Treatment is Allowed
- 2. Health & Safety Code Area:
 - 3: Working Conditions are Safe and Hygienic
- 3. Environment Code Area:
 - 10.A: Environment 2-Pillar

Included in a 4-Pillar audit:

- 1. Labour Standards Code Areas
 - As 2-pillar
- 2. Health & Safety Code Area
 - As 2-pillar
- 3. Environment Code Area:
 - 10.A: Environment 2-Pillar
 - 10.B: Environment 4-Pillar
- 4. Business Ethics Code Area:
 - 10.C: Business Ethics



(2) Where appropriate, non-compliances or non-conformances were raised where either local law or the Base Code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

(3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.



Audit and site details

Audit details

| Sedex company reference | ZC1048936 | Auditor company name | Accordia Global Compliance Group Asia Limited |
|-------------------------|-------------------------------------------------------------------------------|----------------------|--------------------------------------------------|
| Date of audit | 2024-09-14 | Audit conducted by | Sedex member |
| Audit pillars | Labour Standards Health and safety Environment 4-Pillar Business ethics | | |

Site details

| Sedex site reference | ZS1077026 | Site name | OMKAR CORPORATION |
|----------------------|-------------------|--------------|-----------------------------------------------------------------------------------------------------------|
| Business name | Omkar Corporation | Site address | 421302 UNIT D1- 110 TO 115 & D2 - 110 TO 112, BLDG. D1, HARIHAR COMERCIAL COMPLEX,, BHIWANDI, IN |
| Site phone | 9323128856 | Site email | sales@omkarcorporation.net |



Audit parameters

| Time in and out | Day 1 |
|----------------------------------------------------|--------------------------------|
| | In 09:00 |
| | Out 16:00 |
| Audit type | Periodic |
| Was the audit announced? | Semi announced |
| Was the Sedex SAQ available for review? | Yes |
| Who signed and agreed CAPR? | Mr. Manoj Dnyanmothe / Partner |
| Any conflicting information SAQ/Pre- Audit Info | No |
| Is further information available? | No |



Audit attendance

| | Senior management | Worker representative | Union representative |
|-------------------------------------------|--------------------------------|-----------------------|----------------------|
| 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 |
| Reason for absence at the opening meeting | No union exists in the factory | Ι. | |
| Reason for absence during the audit | No union exists in the factory | ι. | |
| Reason for absence at the closing meeting | No union exists in the factory | Ι. | |



SMETA declaration

Auditor team

| SMETA declaration | | SMETA Minimum Requirements | nning the following report was co and the SMETA Auditor Manual. | |
|-----------------------------------------------------------------------------------------------------|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | 1. | Where appropriate non-complia local law and recorded as non-co and on the Sedex Platform. | ances/ non-conformances were r compliances/ non-conformances | aised against the Base Code and on both the audit report, CAPR |
| | 2. | Any non-conformance against of shared directly with the custom | customer code alone shall not be ler in question. | uploaded to Sedex, and will be |
| | | during the social audit conduct compliance with any legal regu that information be gathered a management interviews and vis audit process than is provided h guarantee that the audited site being audited against. The prov standards and this Code should standards. Companies applying applicable laws and where the that provision which affords the | ed on the above date only and do lations or industry standards. The nd considered from records revie sual observation. More informationer. The audit process is a samp prior, during or post–audit, are in visions of this Code constitute min l not be used to prevent compani this Code are expected to complo provisions of law and this Code are | w, worker interviews, on is gathered during the social ling exercise only and does not n full compliance with the Code nimum and not maximum es from exceeding these ly with national and other ddress the same subject, to apply nip of this report remains with the |
| Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size) | | Nil | | |
| Lead auditor | | Anil Tiwari | APSCA Number | 21701523 |
| Additional auditor | | Subiah Ganapathi | APSCA Number | 21704311 |
| Date of declaration | | 2024-09-14 | | |



Site representation

| Declaration | I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published. |
|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Full name | Mr. Manoj Dnyanmothe |
| Title | Partner |
| Date of declaration | 2024-09-14 |



Summary of findings

| Code area | Workplace requirement | Local law | Finding |
|---------------------------------------------|-----------------------------------------------|-----------|-----------------|
| 3. Working conditions are safe and hygienic | 3.O Implement an appropriate electrical safet | §1 | NC ZAF600660003 |

Audit reference: **ZAA600089532**

End Date: **2024-09-14**



Local law issues

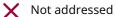
§1

According to Section 30 of Indian Electricity Rules, 1956: Service lines and apparatus on consumer's premises- (1) The supplier shall ensure that all electric supply lines, wires, fittings and apparatus belonging to him or under his control, which are on a consumer's premises, are in a safe-condition and in all respects fit for supplying energy and the supplier shall take due precautions to avoid danger arising on such premises from such supply lines, wires, fittings and apparatus (2)Service-lines placed by the supplier on the premises of a consumer which are underground or which are accessible shall be so insulated and protected by the supplier as to be secured under all ordinary conditions against electrical, mechanical, chemical or other injury to the insulation (3)The consumer shall, as far as circumstances permit, take precautions for the safe custody of the equipment on his premises belonging to the supplier (4) The consumer shall also ensure that the installation under his control is maintained in a safe condition.



Management systems

| | Policies and procedures | Resources | Communication and training | Monitoring |
|----------------------------------------------------------------------------|-------------------------|--------------|-------------------------------|--------------|
| 1. Employment is freely chosen | \bigotimes | \bigotimes | \bigotimes | \bigotimes |
| 1.A. Responsible recruitment and entitlement to work | \bigotimes | \bigotimes | \bigotimes | \bigotimes |
| 2. Freedom of association and right to collective bargaining are respected | \bigotimes | \bigotimes | \bigotimes | \bigotimes |
| 3. Working conditions are safe and hygienic | \bigotimes | \bigotimes | i | \bigwedge |
| 4. Child labour shall not be used | \bigotimes | \bigotimes | \bigotimes | \bigotimes |
| 5. Legal wages are paid | \bigotimes | \bigotimes | \bigotimes | \bigotimes |
| 6. Working hours are not excessive | \bigotimes | \bigotimes | \bigotimes | \bigotimes |
| 7. No discrimination is practiced | \bigotimes | \bigotimes | \bigotimes | \bigotimes |
| 8. Regular employment is provided | \bigotimes | \bigotimes | \bigotimes | \bigotimes |



Fundamental improvements required

Some improvements recommended i

Robust management systems



| | Policies and procedures | Resources | Communication and training | Monitoring |
|-----------------------------------------------------------|-------------------------|--------------|-------------------------------|--------------|
| 8.A. Sub-contracting and homeworkers are used responsibly | \bigotimes | \bigotimes | \bigotimes | \bigotimes |
| 9. No harsh or inhumane treatment is allowed | \bigotimes | \bigotimes | \bigotimes | \bigotimes |
| 10.A. Environment 2-Pillar | i | \bigotimes | \bigotimes | i |
| 10.C. Business ethics | \bigotimes | \bigotimes | \bigotimes | \bigotimes |

X Not addressed



i Some improvements recommended

Robust management systems



Site details

Company and site details

| Sedex company reference | ZC1048936 | |
|---------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
| Sedex site reference | ZS1077026 | |
| Company name | Omkar Corporation | |
| Business ownership type | GOODS | |
| Site name | OMKAR CORPORATION | |
| Site name in local language | | |
| GPS location | GPS address | N/A |
| | Coordinates | N/A |
| Is the worksite in a remote location, far from habitation? | No | |
| Site contact | Contact name | Mr. Manoj Dnyanmothe |
| | Job title | Partner |
| | Phone number | 9323128856 |
| | Email | sales@omkarcorporation.net |
| Applicable business and other legally required business license numbers and documents | 1.Factory license: 13340 valid till 31.12.202 2.Fire NOC: - BNC/Municipal Corporation/F 3.Building Stability Certificate: issued from 5th June 2021 and valid till 4th June 2026 4.Pollution consent - Facility obtained pollu | |

Site activities

Site function

Factory Processing/Manufacturer



Site activities

| Site activities | Primary | Manufacture of wearing apparel (clothing), except fur apparel |
|-------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| | Secondary | |
| | Other | |
| Product type | Christmas decorations, ribbons, textile items & garments/Raw material (Fabric & Yarn) – Embroidery or Printing - Cutting - Fusing - Stitching – Checking – Packing – Dispatch. | |
| Process overview | The factory is into manufacturing and expo textile items & garments. The main produc facility are procurements of Raw material (Fabric & Ya Fusing - Stitching – Checking – Packing –Di | tions processes are carried out by this (rn) – Embroidery or Printing - Cutting - |
| | Production Capacity – 18000 pieces per da | у. |
| | The main machine list of the factory is as for Machine -25, Cutting Machine -03, Embroid Checking -01, Layer Cutting Machine-02, Re Machine-02, Weight Machine-04, Compres Paper Transfer Machine – 1, Heat Slitter – 1 | dery Machine -02. Fusing Machine-02, Fabric ewinding Machine-7, Cartoon Strapping sor Machine-02, Digital Printing Machine – 1, |
| What level of mechanization best describes the work at this site? | High mechanisation / low manual Labour | |

Site scope

| Is the audited site a physically continuous area? | Yes | |
|---------------------------------------------------|----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| What is the area of audited site to its boundary? | 1580m² | |
| Building 1 | Last construction works on site | 2010 |
| | If building is shared, provide details | It's a shared building and facility has occupied first floor only. Ground belongs to other entity and having their warehouse. |
| | Number of floors | 2 |
| | Description of floor activities | Floor -1 - Ground Floor - Belongs to other entity. |
| | | Floor - 2 - First Floor - Cutting, Stitching, Checking, Packing, Finishing, Packing - production activities, toilets & Offices. |



Site scope

| Is there any difference between the site | Νο |
|-----------------------------------------------------------------------------------------|----|
| Is there any difference between the site scope of the audit and the Sedex site profile? | |
| Doos the scope of the audit subdivide any | No |
| Does the scope of the audit subdivide any building or is limited to particular | No |
| processes, products or businesses within the physical site? | |
| | |
| Is any activity conducted onsite not included within the scope of the audit? | No |
| Included within the scope of the audit? | |

Worker accommodation and transport

| Are there any site-provided worker accommodation buildings? | No |
|-------------------------------------------------------------|--------------------------------------------------|
| Does the site organise worker transport to the worksite? | Not provided |
| | No transportation provided. Not required by law. |

Work patterns

| Approximate workers on site per month (% of peak) | January | 95-100% | February | 95-100% |
|------------------------------------------------------|-----------|---------|----------|---------|
| | March | 95-100% | April | 95-100% |
| | Мау | 95-100% | June | 95-100% |
| | July | 95-100% | August | 95-100% |
| | September | 95-100% | October | 95-100% |
| | November | 95-100% | December | 95-100% |
| | | | | |

Is there any night or back shift work at the No site?

Site assessments

Does this site hold any certifications that No address labour standards, human rights, corruption or environmental impact?

Audit reference: **ZAA600089532**

Start Date: **2024-09-14**



Site assessments

| Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community? | Yes Yes, the site has been assessed for negative impacts on human rights, lands, resources, and livelihoods of indigenous peoples or the local community. No negative impacts have been identified. |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Has there been a Human Rights Impact | Yes |
| Assessment (HRIA) conducted within the | Yes, a Human Rights Impact Assessment (HRIA) was conducted at this facility on 23rd |
| last three years at this site? | August 2024. |



Worker analysis

Gender disaggregated data available

Men and women

Worker totals

| | Men | Women | Other | Total |
|-------------------|------------|------------|-------|-----------|
| Number of workers | 34 (70.8%) | 14 (29.2%) | | 48 (100%) |

Workers by type

| | Men | Women | Other | Total |
|-----------------------------------------|-----------------|------------|-------|---------------|
| Permanent workers (employees) | 34 (70.8%) | 14 (29.2%) | | 48 (100%) |
| Temporary or fixed term employees | 0 (0%) | 0 (0%) | | 0 (0%) |
| Agency or subcontracted workers | 3 (6.3%) | 1 (2.1%) | | 4 (8.3%) |
| Seasonal workers | 0 (0%) | 0 (0%) | | 0 (0%) |
| Self-employed workers | 0 (0%) | 0 (0%) | | 0 (0%) |
| Informal workers including home workers | 0 (0%) | 0 (0%) | | 0 (0%) |
| Apprentices, trainees or interns | 0 (0%) | 0 (0%) | | 0 (0%) |

* % of total workforce



Migrant workers

| | Men | Women | Other | Total |
|-------------------------------|---------------|---------------|-------|---------------|
| Domestic migrant workers | 0 (0%) | 0 (0%) | | 0 (0%) |
| International migrant workers | 0 (0%) | 0 (0%) | | 0 (0%) |
| Total migrant workers | 0 (0%) | 0 (0%) | | 0 (0%) |

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from

Not Applicable - All local workers only.

Workers by age

| | Men | Women | Other | Total |
|--------------------|---------------|---------------|-------|---------------|
| 18 - 24 years old | 2 (4.2%) | 1 (2.1%) | | 3 (6.3%) |
| 15 - 17 years old | 0 (0%) | 0 (0%) | | 0 (0%) |
| Under 15 years old | 0 (0%) | 0 (0%) | | 0 (0%) |

* % of total workforce



Workers by employee type

| | Men | Women | Other | Total |
|-----------------------------------|-----------------|---------------|-------|-------------------|
| Employees in management positions | 10 (20.8%) | 3 (6.3%) | | 13 (27.1%) |
| Supervisors or team leaders | 1 (2.1%) | 0 (0%) | | 1 (2.1%) |
| Administrative staff | 2 (4.2%) | 0 (0%) | | 2 (4.2%) |

* % of total workforce

| Is the worker analysis data relevant for peak season and current to the audit? | Yes |
|-----------------------------------------------------------------------------------------------------------|--------|
| Please list the nationalities of all workers, with the three most common nationalities listed first | Indian |

Most common nationalities as approximate % of workforce

| | Men | Women | Other | Total |
|--------|-----|-------|-------|-------|
| Indian | 71% | 29% | - | 100% |



Workers by remuneration type

| | Men | Women | Other | Total |
|----------------------------------------------------------------|---------------|---------------|-------|---------------|
| Workers paid per unit (piece rate) | 0 (0%) | 0 (0%) | | 0 (0%) |
| Workers paid based on a mix of 'piece work' and hourly rate | 0 (0%) | 0 (0%) | | 0 (0%) |
| Workers paid hourly / daily rate | 0 (0%) | 0 (0%) | | 0 (0%) |
| Salaried workers | 34 (70.8%) | 14 (29.2%) | | 48 (100%) |

* % of total workforce

Workers by payment cycle

| | Men | Women | Other | Total |
|--------------|------------|---------------|-------|-----------|
| Paid daily | 0 (0%) | 0 (0%) | | 0 (0%) |
| Paid weekly | 0 (0%) | 0 (0%) | | 0 (0%) |
| Paid monthly | 34 (70.8%) | 14 (29.2%) | | 48 (100%) |
| Other | 0 (0%) | 0 (0%) | | 0 (0%) |

* % of total workforce

If other payment cycle entered, please provide details Not Applicable



Worker interview summary

| Gender disaggregated data available | Men and women |
|-----------------------------------------------|-------------------------------------------|
| Which methods of worker engagement were used? | Group interviews Individual interviews |

Digital worker survey participants

| | Men | Women | Other | Total |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-------|-------|-------|
| Number of workers | - | - | - | - |
| Were any of the audit findings attributable to the survey? | | | | |
| Was the interview sample representative of all types of nationality and employment types of workers? | Yes | | | |
| Was the interview sample representative of the gender composition of the workforce? | Yes | | | |
| Number and size of group interviews | 1 Group of 4 workers. | | | |
| Did workers understand the purpose of the audit? | Yes | | | |
| Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers? | Yes | | | |
| Was there any indication that workers had been 'coached' in how they should respond to questions? | No | | | |
| What was the general attitude of the workers towards their workplace? | Favorable | | | |



Attitude of workers

| In which areas did workers raise significant concerns or complaints? | Other (provide details) Non compliant/Concern raised by workers. |
|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| What did the workers like the most about working at this site? | Equal opportunities Hours worked, rest days or breaks Work atmosphere (e.g. treatment by supervisors) Facilities (e.g. rest area, recreation, canteen) Training and development Job security Freedom of movement Grievance mechanisms Work environment – comfort (e.g. temperature, noise or dust levels) Pay |
| Additional comments | Workers said that they can approach to the management directly for any of the issues or suggestions. |
| Attitude of workers' committee/union representatives | Members from grievance committee looked very positive towards the management and no negative information reported. Their attitude towards factory management seemed positive. The reason they give for the same are: on time payment, good facilities, good behavior of the management and supervisors. |
| Attitude of managers | The factory management showed a positive attitude to this audit during the whole process. All documentation requested for review was provided timely. At the end of the audit all the non- compliances were accepted by the facility. The facility management showed strong commitment for taking corrective actions against the Non-Conformance. After factory tour it was noted that the management is very much committed towards implementation of health and safety requirements |

Workers interviewed by type

| | Total |
|-------------------------------------|-------|
| Permanent workers | 8 |
| Temporary or fixed-term employees | 0 |
| Agency or subcontracted workers | 2 |
| Seasonal workers | 0 |
| Other workers | 0 |
| Total number of workers interviewed | 10 |



Workers interviewed by group/individual

| | Men | Women | Other | Total |
|----------------------------------|-----|-------|-------|-------|
| Workers interviewed in groups | 2 | 2 | - | 4 |
| Workers interviewed individually | 4 | 2 | - | 6 |

Migrant workers interviewed

| | Men | Women | Other | Total |
|----------------------------------------------|-----|-------|-------|-------|
| Domestic migrant workers interviewed | 0 | 0 | - | 0 |
| International migrant workers interviewed | 0 | 0 | - | 0 |
| Total migrant workers interviewed | 0 | 0 | - | 0 |



Measuring workplace impact

Gender disaggregated data available

Men and women

Annual worker turnover (%)*

| | Men | Women | Other | Total |
|------------------------------------|------|-------|-------|-------|
| Last full quarter (90 days) | 5.0% | 4.0% | - | 4.0% |
| Last full calendar year (2023) | 5.0% | 4.0% | - | 9.0% |
| Previous full calendar year (2022) | 4.0% | 3.0% | - | 7.0% |

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

| | Men | Women | Other | Total |
|------------------------------------|------|-------|-------|-------|
| Last full quarter (90 days) | 5.0% | 3.0% | - | 8.0% |
| Last full calendar year (2023) | 4.0% | 4.0% | - | 8.0% |
| Previous full calendar year (2022) | 6.0% | 8.0% | - | 14.0% |

* Number of days lost through job absence in the year, calculated as (the 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*100

Are accidents recorded?

Yes

Facility maintaining the accident register and Dangerous occurrences register. Review of records show that no accident had happened during this year

Annual number of work related accidents and injuries (per 100 workers)*

| Men | Women | Other | Total |
|-----|-------|-------|-------|
| | | | |
| | | | |



Annual number of work related accidents and injuries (per 100 workers)*

| Last full quarter (90 days) | 0.0% | 0.0% | - | 0.0% |
|------------------------------------|------|------|---|------|
| Last full calendar year (2023) | 0.0% | 0.0% | - | 0.0% |
| Previous full calendar year (2022) | 0.0% | 0.0% | - | 0.0% |

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

| | Men | Women | Other | Total |
|------------------------------------|------|-------|-------|-------|
| Last full quarter (90 days) | 0.0% | 0.0% | - | 0.0% |
| Last full calendar year (2023) | 0.0% | 0.0% | - | 0.0% |
| Previous full calendar year (2022) | 0.0% | 0.0% | - | 0.0% |

* Calculated as (number of lost days due to work accidents and work related injuries * 100) / number of total workers.

Percentage of workers that work on average more than 48 standard hours in a given week

| | Men | Women | Other | Total |
|------------------------------------|------|-------|-------|-------|
| Last full quarter (90 days) | 0.0% | 0.0% | - | 0.0% |
| Last full calendar year (2023) | 0.0% | 0.0% | - | 0.0% |
| Previous full calendar year (2022) | 0.0% | 0.0% | - | 0.0% |

Percentage of workers that work on average more than 60 standard hours in a given week

| | Men | Women | Other | Total |
|-----------------------------|------|-------|-------|-------|
| Last full quarter (90 days) | 0.0% | 0.0% | - | 0.0% |



Percentage of workers that work on average more than 60 standard hours in a given week

| Last full calendar year (2023) | 0.0% | 0.0% | - | 0.0% |
|------------------------------------|------|------|---|------|
| Previous full calendar year (2022) | 0.0% | 0.0% | - | 0.0% |



0. Enabling accurate assessment

Summary of findings

| Code area | Workplace requirement | Local law | Finding |
|------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | No findings | | |
| Systems and evidence examined a validate this code section | to 1.List of documents provided, access log selected employees, and access permiss 2.Code of conduct policy documents, re and staff on anti-bribery and anti-coerci their understanding of this policy. 3.Sedex profile printout, site layout plar provided during the audit process. 4.Copy of the human rights policy, appr training records showing dates and per communication materials such as poste | Sions for different cords of training c on policies, and in ns, workforce data, oval document fro sonnel who receiv | parts of the facility. conducted for management aterviews with staff to confirm , and facility description om senior management, red the training, and |



0. Enabling accurate assessment

Data points

| Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment? | No |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| Did any workers selected by the auditor decline to be interviewed? | No |
| Were sufficient documents for non- employee (e.g. agency or other subcontracted) workers available for review? | No |



1. Employment is freely chosen

Management systems

| Develop and maintain relevant policies and procedures to ensure workplace requirements are met | Robust Management Systems |
|----------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Appoint a manager with sufficient seniority who is responsible for implementing procedures | Robust Management Systems |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems |
| Monitor the effectiveness of procedures to meet policy and workplace requirements | Robust Management Systems |
| Explanation for management systems grades | 1. The facility has established policies and procedures to ensure that employment is freely chosen, prohibiting any form of forced labor or coercion. These policies were developed in line with local labor laws and international standards to guarantee that all employees work voluntarily. During the audit process, it was verified that no instances of forced labor were found, and all employees confirmed they are working voluntarily. |
| | 2. Mr. Manoj Dnyanmothe, Senior Management, was appointed on 1st January 2023 as the senior management representative responsible for overseeing the implementation of the procedures to prevent forced labor. His role includes ensuring that all workers are aware of their rights and that no coercive practices are present in the facility. |
| | 3. All employees and managers receive comprehensive training on the facility's policies and procedures related to freely chosen employment. The last training session was conducted on 3rd July 2024, and it was verified during the audit that all employees understood the policies. Evidence reviewed included training attendance records and employee interviews, confirming proper adherence. |
| | 4. The effectiveness of the procedures is regularly monitored and reviewed, with the last internal review conducted on 1st July 2024. The facility uses feedback from employees and managers, along with periodic audits, to ensure that the policies remain effective and compliant with legal standards. Verified through audit observations, the monitoring system ensures continuous compliance and improvement. |
| | |

Summary of findings

| Code area | Workplace requirement | | Local law | Finding |
|-----------|-----------------------|------------|-----------|---------|
| | No | o findings | | |
| | | | | |
| | | | | |



Systems and evidence examined to validate this code section

Details:

1.Anti-Forced Labour Policy: Verified the written Anti-Forced and Bonded Labour Policy displayed in the factory and reviewed its content to ensure it complies with legal and ethical standards.

2.Worker Interviews:

Conducted interviews with a random selection of workers. The workers confirmed that they were recruited voluntarily and were aware of their right to leave the job at any time without any penalties.

3.Recruitment Documentation:

Reviewed job application forms and contracts, which clearly indicate that employment was sought voluntarily. The terms of employment align with legal requirements and no undue pressure was placed on employees.

4.Wage and Payment Records:

Examined wage records to ensure timely payment according to a regular schedule, without any withholdings or delays. No evidence of forced savings or deductions was found.

5.Document Handling Logs:

Verified logs and documentation showing that workers' personal documents are not held by the factory. Observed the secure storage option available for workers.



1. Employment is freely chosen

Data points

| If required under local law, is there a published 'modern slavery' or similar statement? | Not Applicable |
|------------------------------------------------------------------------------------------|----------------|
| Does the site utilise any workers who are prisoners? | No |
| Does the site use the labour of persons required to work under any government scheme? | No |



1.A. Responsible recruitment and entitlement to work

Management systems

| Develop and maintain relevant policies and procedures to ensure workplace requirements are met | Robust Management Systems |
|-------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Appoint a manager with sufficient seniority who is responsible for implementing procedures | Robust Management Systems |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems |
| Monitor the effectiveness of procedures to meet policy and workplace requirements | Robust Management Systems |
| Explanation for management systems grades | 1. The facility has established policies and procedures to ensure responsible recruitment practices and to verify that all employees have the legal right to work. These policies were developed in line with local labor laws and international standards to ensure fair recruitment and compliance with employment laws. During the audit process, it was verified that all employees' documents were in order, and no discrepancies were found regarding entitlement to work. |
| | 2. Mr. Manoj Dnyanmothe, Senior Management, was designated on 1st January 2023 as the senior management representative responsible for overseeing the implementation of these recruitment procedures. His duties include ensuring that all workers are recruited legally and that appropriate checks are made to verify their eligibility to work. |
| | 3. All employees and managers receive thorough training on the facility's policies and procedures related to responsible recruitment. The last training session was held on 20th August 2024, and it was verified during the audit that employees and managers were fully aware of the requirements. Training attendance records and interviews with employees were reviewed to confirm compliance. |
| | 4. The effectiveness of these procedures is regularly monitored and reviewed to ensure they are being properly followed. The last internal audit and review of recruitment practices were conducted on 1st July 2024. The facility ensures that any gaps or areas for improvement are addressed promptly. Verified through audit observations, the monitoring system effectively tracks compliance and allows for continuous improvement of recruitment practices. |
| | |

Summary of findings

| Code area | Workplace requirement | | Local law | Finding |
|-----------|-----------------------|-------------|-----------|---------|
| | | No findings | | |
| | | | | |
| | | | | |

End Date:

2024-09-14



Systems and evidence examined to validate this code section

1.Photocopies of identification documents (e.g., national IDs, passports, work permits) stored in employee personnel files, alongside employment contracts. 2.Employee records, which include identification documents, employment contracts, and on contracts is a stored and the store the store the store that the store that

and any applicable work permits.

3.Employment contracts, payroll records, employee interviews, and company-provided documents detailing working conditions, living conditions (if applicable), and other benefits.

4.HR policy documents, employee age verification records (birth certificates, national IDs), and internal audits verifying compliance with the company's policies regarding young workers. 5.Recruitment policy documents, internal hiring processes, and records of direct

6.Copies of relevant labor laws, internal HR policies, legal compliance audit reports, and personnel files confirming compliance.



1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

| Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes? | Workers are recruited, selected, and hired directly by our company |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| How do the labour providers recruit and hire workers? | N/A - Recruitment providers not used |
| Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey? | 0 |
| Are there any subcontracted workers (including dispatched labour) on site? | Yes |
| How many contractors are present and what are the names of the employer(s)? | Facility using security agency for the deployment of security guard. There were 4 security guards deployed by the agency. Name of the Agency - Mumbai Force Security Services. Address - Anand Nagar Dahisar East, Mumbai, Maharashtra, India |
| Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview? | Yes |
| Were sufficient documents for non- employee (e.g. agency or other subcontracted) workers available for review? | Yes |
| Migrant workers | |

| Do any workers migrate across international borders to work at this site? | No |
|---------------------------------------------------------------------------------------------------------------|----|
| Percentage of workers that are migrant | 0% |
| Do any workers migrate from other states, provinces or regions within the country to work at this site? | No |



Recruitment fees

| Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process? | No Facility is not using any recruitment labor provider and further no recruitment fees and costs imposed on workers. |
|-------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| Were recruitment fees or costs identified during worker interviews? | No |
| | Not Applicable - Facility is not using any recruitment labor provider and further no recruitment fees and costs imposed on workers. |



2. Freedom of association and right to collective bargaining are respected

Management systems

| Develop and maintain relevant policies and procedures to ensure workplace requirements are met | Robust Management Systems |
|----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Appoint a manager with sufficient seniority who is responsible for implementing procedures | Robust Management Systems |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems |
| Monitor the effectiveness of procedures to meet policy and workplace requirements | Robust Management Systems |
| Explanation for management systems grades | The facility has implemented policies and procedures that respect and support freedom of association and the right to collective bargaining for all workers. These policies are aligned with local labor laws and international standards, ensuring that workers can freely form or join unions and engage in collective bargaining without any interference. During my audit in September 2024, it was verified through interviews with employees and management that workers are aware of these rights and that no restrictions are imposed. Mr. Manoj Dnyanmothe, Senior Management, was appointed on 1st January 2023 as the senior management representative responsible for ensuring the effective implementation of these procedures. His role involves promoting a work environment where freedom of association is respected and collective bargaining is actively supported. |
| | 3. All employees and managers receive training on the facility's policies and procedures related to freedom of association and collective bargaining. The last training session was conducted on 20th August 2024, and verified through training records and employee interviews during the audit. This training ensures that employees understand their rights and the procedures in place. |
| | 4. The effectiveness of these procedures is regularly monitored and reviewed to ensure proper application and maintenance within the facility. The most recent review was conducted on 1st July 2024, and the audit confirmed that the monitoring system is effective in ensuring that the policies are applied consistently across the facility. The effectiveness of the committees that represent workers' interests is actively observed by management. It was verified during the audit that these committees are functioning as intended, meeting regularly, and contributing to the protection of workers' rights. Committee meeting minutes and interviews with worker representatives confirm their active participation and effectiveness. |

Summary of findings



| Code area | Workplace requirement | Local law | Finding |
|----------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | No findings | | |
| Systems and evidence examined validate this code section | to 1.Policy Review: Reviewed the factory's written policy on support for the rights of workers to join 2.Worker Interviews: Conducted interviews with employees ac confirmed they were aware of their right representative groups. There was no eviregarding their rights. 3.Works Committee and Grievance Commitees have elected or nominated records showed that regular meetings a 4.Suggestion Box: Inspected the suggestion box system an complaints submitted by workers. Verified feedback without fear of retaliation. 5.No Union: Confirmed through interviews and documents within the factory. However, the faworkers choose to do so. | unions or particip cross various depa t to join or form u dence of suppress mittee: nittee and grievar representatives fr re held to discuss ad reviewed record ed that the system ment review that | hate in worker committees. Artments, and all workers nions or other worker sion or discouragement ance committee. These om each department, and worker issues and concerns. ds of suggestions and a allows workers to provide no trade union currently |



2. Freedom of association and right to collective bargaining are respected

Data points

| Are trade unions allowed by law in the national context? | Yes |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Are there any registered trade unions in the workplace? | No |
| Are they active? | |
| Does the employer recognise the trade union? | Not Applicable |
| Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)? | Yes |
| Are the worker representatives freely elected by the workforce as a whole? | Yes |
| Does union/worker committee membership reflect the gender composition of the workforce? | Yes |
| Does the membership reflect the nationality composition of the workforce? | Yes |
| Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years? | No |



3. Working conditions are safe and hygienic

Management systems

| Develop and maintain relevant policies and procedures to ensure workplace requirements are met | Robust Management Systems |
|----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Appoint a manager with sufficient seniority who is responsible for implementing procedures | Robust Management Systems |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Some Improvements Recommended |
| Monitor the effectiveness of procedures to meet policy and workplace requirements | Fundamental Improvements Required |
| Explanation for management systems grades | 1. The facility has implemented policies and procedures to ensure a safe and healthy working environment for all employees. These policies are designed in line with local and international health and safety standards, promoting a safe workplace free from hazards. During the audit process, it was verified that safety protocols such as fire drills, emergency exits, and personal protective equipment (PPE) were in place and actively maintained. |
| | 2. Mr. Manoj Dnyanmothe, Senior Management, was appointed on 1st January 2023 as the senior management representative responsible for overseeing the implementation of the health and safety policies. His role includes ensuring that all safety procedures are followed and that the facility maintains a safe working environment for all employees. |
| | 3. A training plan is in place to ensure all employees are educated on health and safety policies and practices. The most recent Health & Safety training was conducted on 22nd July 2024, but it was noted during the audit that the facility has not yet effectively measured or reviewed the outcomes of this training. This suggests that improvements are needed to assess the effectiveness of the training and ensure that employees retain the knowledge required to maintain a safe working environment. |
| | 4. An internal monitoring system is in place to evaluate compliance with health and safety policies, and an internal audit was conducted on 1s July 2024. However, during the audit, a non-compliance related to health and safety were identified, indicating that while monitoring systems are in place, they are not entirely effective in ensuring compliance. |
| | |

Summary of findings

| Code area | Workplace requirement | Local law | Finding |
|-----------|-----------------------|-----------|---------|
| | | | |



3. Working conditions are safe and hygienic

§1 NC

NC ZAF600660003

| Systems and evidence examined to validate this code section | The factory was neat and clean and with adequate lighting arrangements and well ventilated. Emergency exits are identified, marked. The facility has formed a health and safety committee, and the last meeting was conducted on 12th August 2024. Fire evacuation drills were conducted once in 3 months, the last drills were held on 12th August 2024 (Total Present – 61 & Visitor – 00). The factory has provided adequate numbers of fire equipment like Facility 26 fire extinguishers, 06 Fire Alarm, Fire Panel – 01, Smoke Detector – 17, Emergency Light – 09, Evacuation Plan – 6. A visual fire alarm is installed in each section. To people are trained in the use of firefighting equipment. An adequate number of first aid boxes (03) with prescribed contents are kept at all sections of the factory except the assembly area. Adequate number of persons (06) was trained for first aid from St. John Ambulance Association. Accidents / injuries records are maintained. The facility has a policy on health and safety, which was found to be suitable. Safety signage was posted in various departments. The facility has appointed Mr. Brijesh Pandey – HR Manager who is responsible for H&S at work. Factory has provided 04 male and 04 female toilet facilities to their employees. The facility has a health and safety policy in place. |
|-------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|-------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|



Findings: non-compliances

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.0 Implement an appropriate electrical safety program to ensure that electrical hazards are reduced and controlled by appropriately qualified personnel.

Issue title

224 - Isolated occurrence of incorrect/damaged insulation in electricals including burnt/damaged wiring and plugs

Description

It was noted during the factory tour that open ended electrical wire used for operation in embroidery section.

Corrective and preventative actions

The facility shall ensure to cover all the loose electrical wire to avoid any electric shock to workers.

Corrective and preventative actions (carried over)

The facility shall ensure to cover all the loose electrical wire to avoid any electric shock to workers.

Local law reference

According to Section 30 of Indian Electricity Rules, 1956: Service lines and apparatus on consumer's premises- (1) The supplier shall ensure that all electric supply lines, wires, fittings and apparatus belonging to him or under his control, which are on a consumer's premises, are in a safe-condition and in all respects fit for supplying energy and the supplier shall take due precautions to avoid danger arising on such premises from such supply lines, wires, fittings and apparatus (2)Service-lines placed by the supplier on the premises of a consumer which are underground or which are accessible shall be so insulated and protected by the supplier as to be secured under all ordinary conditions against electrical, mechanical, chemical or other injury to the insulation (3)The consumer shall, as far as circumstances permit, take precautions for the safe custody of the equipment on his premises belonging to the supplier (4) The consumer shall also ensure that the installation under his control is maintained in a safe condition.

Evidence

Non-compliance Due 2024-12-10

Status Open*

Time given to resolve 60 days

Verification method Desktop audit

Area of non-compliance/nonconformance Local law Base code





NC - Loose wire evident .jpg

* PDF generated at 19:12 on 11 Oct 2024. View this finding on the Sedex platform for live updates and closure details.



3. Working conditions are safe and hygienic

Data points

| Is someone within the company responsible for health and safety? | Yes, senior manager or business owner |
|-------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|
| Do workers operate high risk or heavy machinery or vehicles as part of their jobs? | No |
| Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)? | No |
| Who organises accommodation for workers? | Workers independently arrange their own accommodation |
| Who organises worker transportation between accommodation and worksite? | Workers organise their own transport |
| Who organises worker transportation while at work? | Workers organise their own transport |
| Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law? | Yes Facility has obtained all the valid permits and inspection report as per local law. |
| Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building? | No |
| Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally? | No |
| Does the site have a structural engineer evaluation? | Yes |



4. Child labour shall not be used

Management systems

| Develop and maintain relevant policies and procedures to ensure workplace requirements are met | Robust Management Systems |
|-------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Appoint a manager with sufficient seniority who is responsible for implementing procedures | Robust Management Systems |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems |
| Monitor the effectiveness of procedures to meet policy and workplace requirements | Robust Management Systems |
| Explanation for management systems grades | The facility has implemented policies and procedures to strictly prohibit the use of child labor, ensuring full compliance with local and international laws and regulations. These policies are designed to prevent the employment of individuals below the legal working age and to protect the rights of young workers. During the audit process, it was verified that all employee records, including age verification documents, are maintained in compliance with child labor laws. Mr. Manoj Dnyanmothe, Senior Management, was appointed on 1st January 2023 as the senior management representative responsible for overseeing the implementation |
| | of these procedures. His role includes ensuring that no child labor is employed within the facility and that recruitment processes include thorough age verification. 3. All employees and managers receive comprehensive training on the facility's policie and procedures related to the prohibition of child labor. This training ensures full understanding and adherence to child labor laws. The last training session was conducted on 10th August 2024, and during the audit, it was confirmed that all staff members were aware of the legal requirements and the facility's strict stance on preventing child labor. |
| | 4. The effectiveness of these procedures is regularly monitored to ensure they are strictly followed. The facility has a monitoring system in place, which includes regular internal audits and checks. During the internal audit conducted on 1st July 2024, no instances of child labor were identified, confirming the effectiveness of the procedures. Any potential issues or gaps in compliance are promptly addressed to maintain the facility's commitment to upholding child labor laws. |

Summary of findings

| Code area | Workplace requirement | : | Local law | Finding |
|-----------|-----------------------|-------------|-----------|---------|
| | | No findings | | |
| | | | | |
| | | | | |

Audit reference: **ZAA600089532**

46



Systems and evidence examined to validate this code section

Employee Records: Reviewed a sample of employee records, including photographic identification and age verification documents, to ensure that all workers meet the legal minimum age requirement. Verified that the youngest worker is 22 years old.
 Hiring Process: Inspected the factory's hiring process to ensure that age verification is a mandatory step. All records demonstrated that the process is rigorously followed, with no instances of underage workers.
 Child Labour Policy: Reviewed the factory's written policy on child labour, which outlines the steps to be taken if child labour is identified. The policy is compliant with ILO standards and local legal requirements, and it provides clear guidance on remediation and safeguarding underage workers.

remediation and safeguarding underage workers. 4.Worker Interviews: Conducted interviews with a selection of workers, all of whom confirmed that they were above the legal working age when hired. No workers reported any knowledge or presence of child labour at the facility.



4. Child labour shall not be used

Data points

| Percentage of workers that are age 24 or younger | 6% |
|----------------------------------------------------------------------------------------|----------------|
| Enter the legal age of employment | 14 |
| Enter the age of the youngest worker identified | 23 |
| Enter the number of workers under local legal minimum age | 0 |
| Enter the number of workers under 15 years old | 0 |
| Percentage of workers that are apprentices, trainees or interns | 0% |
| Were there children present on the work floor but not working at the time of audit? | No |
| Do children live at the accommodation provided to workers? | Not Applicable |



5. Legal wages are paid

Management systems

| Develop and maintain relevant policies and procedures to ensure workplace requirements are met | Robust Management Systems |
|-------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Appoint a manager with sufficient seniority who is responsible for implementing procedures | Robust Management Systems |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems |
| Monitor the effectiveness of procedures to meet policy and workplace requirements | Robust Management Systems |
| Explanation for management systems grades | 1. The facility has established policies and procedures to ensure that wages and benefits are provided in full compliance with local laws and regulatory requirements. These policies cover minimum wage, overtime pay, allowances, and other benefits that employees are entitled to. During the audit process, it was verified that all employees are receiving their wages and benefits as per legal standards. |
| | 2. Mr. Manoj Dnyanmothe, Senior Management, was appointed on 1st January 2023 as the senior management representative responsible for overseeing the implementation of these wage and benefit procedures. His responsibilities include ensuring that all wage policies are adhered to and that any discrepancies are resolved promptly. |
| | 3. All employees and managers receive training on the facility's policies and procedures concerning wages and benefits. This training ensures that they understand their rights and the requirements for compliance. The last training session was conducted on 10th August 2024, and it was confirmed during the audit that employees and managers fully understood the policies and their entitlements under the law. |
| | 4. The effectiveness of these procedures and their implementation has been reviewed through internal audits and regular compliance checks. It has been found that the procedures are adequate, ensuring that employees receive fair and timely compensation. The internal audit conducted on 1st July 2024 confirmed that all wages and benefits are paid on time, and there were no instances of underpayment or delayed payments. |

Summary of findings

| Code area | Workplace requirement | Local law | Finding | |
|-----------|-----------------------|-----------|---------|--|
| | No findings | | | |
| | | | | |
| | | | | |



Systems and evidence examined to validate this code section

1.Verified that all sampled workers (including non-employee workers) received wages that met or exceeded the legal minimum wage for the sampled months of August

2024, January 2024, and September 2023. 2.Workers received all legally required benefits and insurances, including leave entitlements, based on records for 10 workers for the sampled months. No discrepancies were found in the entitlement allocation.

3.No wage deductions for disciplinary actions were observed. Deductions complied with national laws, and all workers received wages above the legal minimum wage. Verified wage breakdowns in pay slips for 10 sampled workers.

4.All time worked, including meetings and essential training, was compensated. No evidence of unpaid working hours or training was found during the review of payroll records.

5.All workers received written wage information in a language they understand before employment. Records showed clearly documented wage breakdowns, benefits, and leave entitlements for all sampled workers.

6.Payslips provided for each pay period were clear and detailed. Verified for 10

workers in the sampled months. 7.The facility complied with all applicable wage-related laws. Wages and deductions were verified for 10 workers for the months of August 2024, January 2024, and September 2023, and found to be in full compliance.



5. Legal wages are paid

Data points

| What is the basic wage paid to workers? | The legal minimum wage Wages meet a living wage |
|----------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers? | Only digital payments |
| How much as a percentage of their pay does a worker receive as 'payment-in- kind' benefits? | None |

Worker renumeration

Which benefits are provided to permanent Not applicable or full-time workers that are not provided to temporary or part-time workers?

Summary information

| Monthly | |
|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Monthly | |
| Max hours per day | 8.0 |
| Max hours per week | 48.0 |
| Max hours per month | 208.0 |
| Required hours per day | 8.0 |
| Required hours per week | 48.0 |
| Required hours per month | 208.0 |
| Max hours per day | 2.0 |
| Max hours per week | 12.0 |
| Max hours per month | Non applicable |
| | Monthly Max hours per day Max hours per week Max hours per month Required hours per day Required hours per week Required hours per month Max hours per day Max hours per week |



| Actual overtime hours | Max hours per day | 0.0 |
|------------------------------|---------------------|----------------|
| | Max hours per week | 0.0 |
| | Max hours per month | 0.0 |
| Minimum legal wage | Min per hour | Non applicable |
| | Min per day | 572.38 |
| | Min per week | Non applicable |
| | Min per month | 14882.0 |
| Actual minimum wage | Actual per hour | Non applicable |
| | Actual per day | 580.0 |
| | Actual per week | Non applicable |
| | Actual per month | 16000.0 |
| Minimum legal overtime wage | Min per hour | Non applicable |
| | Min per day | Non applicable |
| | Min per week | Non applicable |
| | Min per month | Non applicable |
| Actual minimum overtime wage | Actual per hour | Non applicable |
| | Actual per day | Non applicable |
| | Actual per week | Non applicable |
| | Actual per month | Non applicable |

Wage analysis

| Number of workers' records checked | 10 |
|-------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Provide the date and details of the records | 10 Samples from 1st August to 31st August 2024 10 Samples from 1st February to 28th February 2024 10 Samples from 1st September to 30th September 2024 |
| Are there different legal minimum/ legally recognised CBAs wage grades? | Yes -INR 14,882/- per month (Unskilled) -INR 15,382/- per month (semiskilled) -INR 16,082/- per month (Skilled) |



| For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs? | Above legal minimum |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|
| Indicate the breakdown of workforce per earnings | Lowest minimum wages in the sample INR 16000/ - per month for unskilled workers |
| Are there any bonus schemes used? | Yes Facility has paid bonus at the rate of 8.33% (Legal Minimum is 8.33%) of the gross wages. |
| Were accurate records shown at the first request? | Yes |
| Were any inconsistencies found? | No |



5.A. Living wages are paid

Summary of findings

| Code area | Workplace requirement | Local law | Finding |
|----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|
| | No findings | | |
| Systems and evidence examined validate this code section | to 1. As part of the audit process, a referred to as the living wage) wa are fair and sufficient to meet the calculation is based on several ke maintain a decent standard of liv healthcare, education, transporta the facility's wage structure, the f | as conducted to ensure t eir essential living requir by factors necessary for a ing. These factors includ ation, and other miscella | hat wages paid to workers ements. The basic need wage worker and their family to le the cost of food, housing, neous needs. In reviewing |
| | Legal Minimum Wage: The legal month, which exceeds the calculation of | minimum wage paid by ated basic need wage of | the facility is ₹16000 per ₹13500 per month. |
| | Living Wage Compliance: The fac calculated living wage, indicating their essential living expenses. | ility meets both the lega that workers are compe | l minimum wage and the ensated adequately to meet |
| | 2. The facility has implemented a currently earning below the living continuous monitoring of wages wage standards. Periodic wage re in living costs, ensuring all worke | g wage of ₹13500 per me to maintain compliance eviews are in place to ad | onth. The plan ensures with both legal and living just for inflation and changes |



6. Working hours are not excessive

Management systems

| Develop and maintain relevant policies and procedures to ensure workplace requirements are met | Robust Management Systems |
|----------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Appoint a manager with sufficient seniority who is responsible for implementing procedures | Robust Management Systems |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems |
| Monitor the effectiveness of procedures to meet policy and workplace requirements | Robust Management Systems |
| Explanation for management systems grades | 1. The facility has implemented policies and procedures to monitor working hours, ensuring full compliance with both legal and industry standards. These policies cover regular working hours, overtime, and rest periods to protect employees' rights and ensure a safe working environment. During the audit proces, it was verified that the facility adheres to the legal working hour limits, including the proper management of overtime. |
| | 2. Mr. Manoj Dnyanmothe, Senior Management, was appointed on 1st January 2023 as the senior management representative responsible for implementing and overseeing the procedures related to working hours. His role includes ensuring that all working hour regulations are followed and that any issues related to excessive working hours are addressed promptly. |
| | 3. All employees and managers are trained in the facility's policies and procedures related to working hours. The last training session was conducted on 20th July 2024, ensuring that both employees and managers understand the rules surrounding working hours, overtime, and rest periods. This training ensures proper adherence to policies and compliance with legal requirements. |
| | 4. The effectiveness of these procedures is regularly monitored through internal audits and time-tracking systems to ensure compliance. Any discrepancies in working hours are promptly addressed. The internal audit conducted on 1st July 2024 confirmed that the facility's procedures for monitoring working hours are effective, with no significant deviations or violations found. |
| | |

Summary of findings

| Code area | Workplace requirement | Local | law | Finding |
|-----------|-----------------------|-------|-----|---------|
| | No finding | js | | |
| | | | | |
| | | | | |



Systems and evidence examined to validate this code section

1.Working hours do not exceed legal limits or collective bargaining agreement limits. The facility operates from 09:00 am to 18:00 pm, with a standard 8-hour working day and 48-hour working week. Verified attendance records for the sampled months of August 2024, January 2024, and September 2023.

2.Workers receive all legally required rest and meal breaks, including continuous rest hours between shifts. The facility provides a lunch break from 13:00 to 13:30 and two tea breaks from 11:00 to 11:15 and 16:00 to 16:15. This was confirmed through interviews and review of the facility's work schedule.

3.Workers are provided with at least 24 hours of consecutive rest every 7-day period. The facility observes a weekly off day on Sunday. Verified through worker interviews and attendance records.

4.No worker exceeded 60 hours in a standard working week, and no exceptional circumstances (such as production peaks or emergencies) were reported during the audit period. Verified through payroll and attendance records.

5. The standard working week, excluding overtime, is 48 hours and is included in workers' contracts. The actual working hours found were 8 hours per day, 48 hours per week, and 208 hours per month. 6. No overtime was observed during the sampled months. Overtime is only used to

6.No overtime was observed during the sampled months. Overtime is only used to manage changes in demand, and there was no indication of overtime replacing regular employment. Verified through payroll and worker interviews.
7.Overtime is voluntary and can be refused without penalty. Verified through worker interviews, where employees confirmed they are not forced to work overtime.
8.While no overtime was found during the sampled months, the facility's policy ensures that overtime is compensated at a rate not less than 200% of the regular rate of pay, as confirmed by management interviews and the facility's policies.
9.The facility regularly reviews working hours for individual workers and the overall workforce to manage overtime responsibly. Verified through internal reports and records.

10.The facility complies with all applicable laws on working hours. Legal minimum wages, effective from -INR 15627/- per month (Unskilled) -INR 16132/-per month (semiskilled)-INR 16917/- per month (Skilled) for skilled workers. The facility is paying INR 15627/- per month for unskilled workers, in compliance with the legal minimum wage.



6. Working hours are not excessive

Data points

| Is the sample size the same as in the wages section? | Yes |
|----------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| Normal day overtime premium as a percentage of standard wages | 200% |
| If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations? | No, paying an overtime premium of less than 125% is not allowed under Indian law. Site has a policy to pay overtime premium not less than 200% |
| Excluding overtime, what are the regular working hours per week for workers at this site? | 48.0 |
| Including overtime, what is the average number of working hours per week for full-time workers at this site? | 48.0 |
| In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site? | 48.0 |
| Maximum number of days worked without a day off in sample | 6 |



7. No discrimination is practiced

Management systems

| Robust Management Systems |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Robust Management Systems |
| Robust Management Systems |
| Robust Management Systems |
| The facility has implemented policies and procedures to prohibit discrimination in the workplace, ensuring equal treatment for all employees regardless of gender, race, religion, age, or other protected characteristics. These policies are aligned with both legal and ethical standards, promoting a fair and inclusive work environment. During the audit proces., it was verified that no cases of discrimination were reported, and all employees confirmed fair treatment. Mr. Manoj Dnyanmothe, Senior Management, was appointed on 1st January 2023 as the senior management representative responsible for enforcing these anti- discrimination procedures. His role includes overseeing compliance with the policy and ensuring that any complaints related to discrimination are addressed promptly and effectively. All employees and managers receive training on the facility's policies and procedures related to the prohibition of discrimination. The last training session was conducted on 10th August 2024, and it was confirmed during the audit that employees and managers understand their rights and responsibilities in maintaining a discrimination-free workplace. Training records and employee interviews supported this. The effectiveness of these procedures is regularly monitored through internal audits, employee surveys, and feedback mechanisms. The internal audit conducted on 1st July 2024 found no instances of discrimination, confirming that the procedures are effectively applied and maintained. Any potential issues are addressed immediately to |
| |

Summary of findings

| Code area | Workplace requirement | | Local law | Finding |
|-----------|-----------------------|-------------|-----------|---------|
| | | No findings | | |
| | | | | |
| | | | | |

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End Date:

2024-09-14



Systems and evidence examined to validate this code section

1.Based on employee interviews and a review of personnel records, no evidence of discrimination related to race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliation was found during the hiring, compensation, promotion, or termination processes. 2.The facility has established employment policies and processes that prevent discrimination at all stages of employment, including hiring, compensation, access to training, promotion, termination, and retirement. Verified through the review of HR policies and employment records.

policies and employment records. 3.Health checks are not conducted during the recruitment process or employment unless required by law. There was no evidence of workers being unfairly excluded from employment or retained based on health conditions such as pregnancy or HIV/AIDS. This was confirmed through interviews with both management and workers. 4.Grievance mechanisms are in place and accessible to all workers, regardless of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliation. Workers confirmed during interviews that they are aware of the grievance process and feel comfortable using it. 5.The facility has implemented an equity approach in recruitment, training, development, and promotion processes. Verified through the training records and interviews with employees. Training on non-discrimination and equity was provided on 03/09/2024.

6.The facility complies with all applicable laws related to non-discrimination in the workplace. This compliance was verified through the review of legal documents, employment contracts, and personnel files. Employees interviewed confirmed that no discrimination was practiced in the facility.



7. No discrimination is practiced

Data points

| Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)? | 0% |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| Representation of women in managerial roles (ratio of women workers to women managers) | 21% |
| Representation of women in supervisory roles (ratio of women workers to women supervisors) | 0% |
| Three most common nationalities in managerial and supervisory roles | Indian - 100% |



8. Regular employment is provided

Management systems

| Develop and maintain relevant policies and procedures to ensure workplace requirements are met | Robust Management Systems |
|-------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Appoint a manager with sufficient seniority who is responsible for implementing procedures | Robust Management Systems |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems |
| Monitor the effectiveness of procedures to meet policy and workplace requirements | Robust Management Systems |
| Explanation for management systems grades | The facility has established policies and procedures to ensure that employees are provided with regular and secure employment, in compliance with legal standards. These policies are designed to guarantee job security and prevent the use of precarious employment models. During the audit process, it was verified that all employees have formal contracts, and no temporary or casual workers are employed outside of legal requirements. Mr. Manoj Dnyanmothe, Senior Management, was appointed on 1st January 2023 as the senior management representative responsible for overseeing the implementation of these regular employment procedures. His role includes ensuring that all |
| | employment practices are aligned with legal and ethical standards and that all workers have secure, regular employment. 3. All employees and managers receive training on the facility's policies and procedures related to regular employment. The last training session was held on 25th July 2024, ensuring that employees and managers understand the importance of providing stable, secure jobs in compliance with labor laws. Training attendance records and interviews conducted during the audit confirmed this. |
| | 4. The effectiveness of these procedures has been reviewed through internal audits and regular compliance checks, and they have been found to be adequate. These reviews ensure that stable and fair employment practices are maintained across the facility. The internal audit conducted on 1st July 2024 confirmed that all employees are engaged under formal, secure employment contracts, with no irregular employment practices identified. |
| | |

Summary of findings

| Code area | Workplace requirement | : | Local law | Finding |
|-----------|-----------------------|-------------|-----------|---------|
| | | No findings | | |
| | | | | |
| | | | | |



Systems and evidence examined to validate this code section

1.All workers are provided with written contracts specifying the terms and conditions of employment, meeting all legal requirements. The contracts are in a language that workers understand. Verified through the review of personal files, appointment orders, and contract documentation.

2.The facility meets its contractual and legal obligations in cases of dismissal, termination, or redundancy. Payroll records and termination notices for the sampled months of August 2024, February 2024, and September 2023 show compliance with applicable laws and procedures.

3. The employment model used by the facility is appropriate for the nature of the work and local context. All employees work under formal contracts, as verified in their personal files and payroll records.

personal files and payroll records. 4.The facility does not utilize apprenticeships, temporary, irregular, sub-contracted, or non-employment models to avoid obligations related to regular employment. There were no temporary or subcontracted workers found at the facility during the audit. Verified through interviews with management and employees.

5.In cases where temporary or apprenticeship models might be used, the facility complies with all legal conditions. However, it was noted that no apprentices or temporary workers were currently employed in the facility.

6.The facility does not restrict temporary or irregular workers (if any) from seeking regular employment. This was verified through interviews with workers and management, and no such restrictions were observed.

7. The facility demonstrates real intent to impart skills and provide regular employment if an apprenticeship program were in place. However, it was noted that no apprentices were engaged in the production process at the time of the audit.

were engaged in the production process at the time of the audit. 8.The facility complies with all applicable laws regarding regular employment. The hiring and termination practices, personal files, appointment orders, payroll records, attendance records, and interviews with production supervisors and employees confirm this compliance. There were no temporary, irregular, or home workers found in the facility.



8. Regular employment is provided

Data points

| Percentage of workers that are permanently or temporarily employed | 100.0% |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment | 8.33% |
| Percentage of workers employed as apprentices, trainees or interns | 0.0% |



8.A. Sub-contracting and homeworkers are used responsibly

Management systems

| Robust Management Systems |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Robust Management Systems |
| 1. The facility has implemented policies and procedures regarding sub-contracting and home working, although no sub-contracting or home working has been observed or engaged in by the facility at present. These policies are in place as a preventive measure to ensure that, should such practices be introduced in the future, they comply with legal and ethical standards. During the audit process, it was verified that the facility does not currently engage in these practices. |
| 2. Mr. Manoj Dnyanmothe, Senior Management, was appointed on 1st January 2023 as the senior management representative responsible for implementing and overseeing the procedures related to sub-contracting and home working. His role includes ensuring that all relevant policies are adhered to and that any future use of sub- contractors or home workers meets legal and industry standards. |
| 3. All employees and managers receive training on the facility's policies and procedures concerning sub-contracting and home working. The last training session was conducted on 20th July 2024, and it was confirmed during the audit that staff are fully aware of the facility's policies, even though these practices are not currently in use. |
| 4. The effectiveness of these procedures has been reviewed and found to be adequate during internal audits. The most recent internal audit on 1st July 2024 confirmed that, while sub-contracting and home working are not utilized, the facility is prepared to manage these activities should they be introduced, ensuring proper control and oversight. |
| |

Summary of findings

| Code area | Workplace requirement | | Local law | Finding |
|-----------|-----------------------|-------------|-----------|---------|
| | | No findings | | |
| | | | | |
| | | | | |



Systems and evidence examined to validate this code section

1. The facility does not engage in any sub-contracting or homeworking activities. No sub-contracted work was observed, and no records or authorizations were required from clients receiving the products. Verified through interactions with management and production staff.

2.As the facility does not utilize subcontractors, no records for subcontracted work are maintained. The facility's internal systems and production processes ensure that all work is performed in-house. Verified through production records and interactions with management.

3.Since there are no home workers or subcontractors employed by the facility, there was no need to implement systems for assessing the working conditions of such workers. Verified through interviews with management and review of production and personnel records.

workers. Verified through interviews with management a sub-contracting and 4.The facility complies with all applicable laws regarding sub-contracting and homeworking. However, no sub-contracting or homeworking was found to be in use during the audit. Verified through the examination of production records, interactions with management and production staff, and review of goods/vehicle movement registers.



8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or Not applicable engaged through an agent?

Gender disaggregated data available

Number of homeworkers used

| | Men | Women | Other | Total |
|---------------------------------------------------------------------------------------|---------------------------------------------------|--------------------------|-------------------------|-------|
| Number of workers | - | - | - | - |
| What processes are carried out by homeworker? | | | | |
| Are full records of homeworkers available at the site? | | | | |
| Does the supplier buy products or services from suppliers that use homeworkers? | No No, the supplier does not b homeworkers. | buy products or services | from suppliers that use | |

Sub-contracting

| Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? | No No, there are no concerns about unrecorded work or undeclared sub-contracting on site. |
|----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| Are any sub-contractors used? | No |



9. No harsh or inhumane treatment is allowed

Management systems

| Develop and maintain relevant policies and procedures to ensure workplace requirements are met | Robust Management Systems |
|----------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Appoint a manager with sufficient seniority who is responsible for implementing procedures | Robust Management Systems |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems |
| Monitor the effectiveness of procedures to meet policy and workplace requirements | Robust Management Systems |
| Explanation for management systems grades | 1. The facility has implemented policies and procedures to strictly prohibit any form of harsh or inhumane treatment, ensuring a respectful and dignified workplace for all employees. These policies align with both local labor laws and international standards, promoting a safe and supportive work environment. During the audit process, it was verified that no incidents of harsh treatment were reported, and all employees confirmed a positive work atmosphere. |
| | 2. Mr. Manoj Dnyanmothe, Senior Management, was appointed on 1st January 2023 as the senior management representative responsible for overseeing the implementation of these procedures. His role includes ensuring that the workplace remains free from any form of abuse or inhumane treatment and that employees' rights are protected. |
| | 3. All employees and managers are trained on the facility's policies and procedures related to the prohibition of harsh or inhumane treatment. The last training session was conducted on 10th August 2024, ensuring that all staff are fully aware of the policy and their responsibilities in maintaining a respectful workplace. Training records and employee interviews confirmed compliance with this requirement. |
| | 4. The effectiveness of these procedures has been reviewed through internal audits and employee feedback. The internal audit conducted on 1st July 2024 found no violations of the facility's policy against harsh treatment, indicating that the procedures are adequate and effective in maintaining a safe and respectful work environment. |
| | |

Summary of findings

| Code area | Workplace requirement | Local law | Finding |
|-----------|-----------------------|-----------|---------|
| | No findings | | |
| | | | |
| | | | |



Systems and evidence examined to validate this code section

1.From interviews with employees, there was no evidence of harsh or inhumane treatment, including gender-based violence or harassment. All workers reported being treated with respect and dignity.

2. The facility has a workplace policy prohibiting harsh or inhumane treatment, including gender-based violence and harassment. The policy has been communicated to all employees and is readily available. Reviewed the policy on prevention of harassment and abuse.

3. The facility has implemented a disciplinary policy and procedures that are fair and appropriate. These have been communicated to all workers, and employees confirmed their awareness of the policies during interviews. Reviewed the company's disciplinary policy documents.

A. The facility has measures in place to prevent and control risks of harsh or inhumane treatment, based on the identification of workplace hazards. No accommodation or worker transport is provided by the employer. Verified through management interviews and policy reviews.

5.Workers at all levels, including supervisors and managers, receive appropriate training on preventing harsh or inhumane treatment. The facility also monitors the understanding and implementation of the training. Reviewed training records and confirmed training was conducted on 12/08/2024.

6.The facility ensures that all workers, including vulnerable worker groups, have accessible information and training on the measures taken to prevent and control harsh or inhumane treatment. This was confirmed through worker interviews and review of training materials.

7.The facility does not conduct bodily searches. Any non-bodily searches (such as for theft) are conducted with respect for workers' privacy and in accordance with legal requirements. Verified through interviews with management and workers.
8.The facility has a formal grievance mechanism in place that allows workers to report concerns without fear of retaliation. The grievance process is legitimate, accessible, and transparent. Workers confirmed they were aware of this mechanism. Verified

through review of the grievance handling procedure and records from the grievance committee meeting on 12/08/2024. 9.The facility complies with all applicable laws relating to preventing harsh or

inhumane treatment. This was confirmed through the review of the company's policies, grievance handling procedures, and interviews with workers.



9. No harsh or inhumane treatment is allowed

Data points

| Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')? | Yes, there is a formal grievance process The grievance process is available to all workers |
|------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| What type of grievance mechanism(s) are available? | Facility had effective grievance mechanism in place where workers, communities & suppliers can express their grievance through Suggestion box, Hot line, Committee meetings etc. |
| Number of grievances raised in the last 12 months | 0 |
| Number of grievances resolved in the last 12 months | 0 |



10.A. Environment 2-Pillar

Management systems

| Develop and maintain relevant policies and procedures to ensure workplace requirements are met | Some Improvements Recommended |
|-------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Appoint a manager with sufficient seniority who is responsible for implementing procedures | Robust Management Systems |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems |
| Monitor the effectiveness of procedures to meet policy and workplace requirements | Some Improvements Recommended |
| Explanation for management systems grades | The facility has implemented policies and procedures for environmental management to ensure compliance with environmental regulations and standards. These policies are designed to minimize the facility's environmental impact, covering areas such as waste management, energy use, and resource conservation. During the audit process, it was observed that the facility's efforts to manage environmental risks were in line with legal requirements, though there are areas needing improvement. Mr. Manoj Dnyanmothe, Senior Management, was appointed on 1st January 2023 as |
| | the senior management representative responsible for overseeing the implementation of the facility's environmental procedures. His role includes ensuring that the facility complies with environmental laws and that corrective actions are taken when necessary to improve environmental performance. |
| | 3. All employees and managers receive training on the facility's environmental policies and procedures. The most recent environmental training was held on 10th August 2024, with a focus on raising awareness of environmental responsibilities, such as waste reduction, energy conservation, and proper disposal practices. Training records and employee interviews verified that staff understand their environmental responsibilities. |
| | 4. The effectiveness of these environmental procedures has been reviewed and found to be inadequate, indicating that improvements are needed. The internal audit conducted on 1st July 2024 revealed gaps in the facility's environmental management systems, such as incomplete waste disposal records and inconsistent energy usage tracking. The facility is recommended to strengthen its monitoring processes and take corrective actions to ensure full compliance with environmental standards. |
| | |

Summary of findings

Code area

Workplace requirement

Local law

Finding



No findings

Systems and evidence examined to validate this code section

1. The company had undertaken to comply with the local and international laws and regulations and their end client's environmental requirements through its Environmental Policy.

2. The company was found to be aware of the end client's environmental requirements and is committed to complying with them. 3.There are no hazardous operations involved in the manufacturing process of the

2. Factory has maintained air, noise, particulate matters, emissions, stake analysis certificate as required by NABL Accredited Laboratory 5. Factory had an environmental policy and communicated to all appropriate parties, including its own suppliers.



10.A. Environment 2-Pillar

Data points

| Has the site received an official notice, fine or prosecution for any non- compliances with environmental legislation, regulation, consent or permits (within the last three years)? | No |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| Does the site have any valid environmental or energy management certificates? | Not Applicable. Facility does not have such certification. |
| Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)? | No |
| Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change? | Yes Yes, the site has implemented or made plans to implement adaptive measures to protect workers from the impact of climate change. |



10.B. Environment 4-Pillar

Summary of findings

| Code area | Workplace requirement | Local law | Finding | |
|----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| No findings | | | | |
| Systems and evidence examined validate this code section | to 1.The facility has identified and monitor its operations and supply chain. System these impacts. Verified through environ conducted on 09/08/2024, and through 2.The facility has communicated its envirolevel, including commitments to improv cover managing environmental impacts Environmental Policy was reviewed and 3.The facility has established resource-u these targets. Verified through review o management plans. 4.The facility records energy use, water substance use, and effluent discharge. A matter, emissions, and stack analysis) w 2024. The facility also maintains waster or waste management records. 5.The facility monitors and mitigates its not involved in hazardous work, regular relevant reports, such as Ambient Air Qe Monitoring, were reviewed. There is no facility's operations. 6.Mrs. Mamta Biyani oversees environm Environmental impact and aspect asses | s are in place to pla | revent, mitigate, or remedy d aspect assessment ns. s, endorsed at the highest performance. The policies cholders. The facility's inicated to all employees. s a plan in place to meet tal Policy and resource material use, hazardous testing (air, noise, particulate L-approved lab on 05/04/ teviewed testing reports and versity. Although the factory is ionitoring is conducted, and h, Noise, and Stack ersity impact due to the | |

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10.B. Environment 4-Pillar

Data points

| Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks? | Yes |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| What additional specific environmental policies does the site capture? | Sustainable material sourcing Responsible use and management of water Biodiversity and eco system impact management |
| Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues? | Yes Facility has a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues. |
| Does the site have reduction targets in place to manage climate related risks? | None |
| Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))? | Yes Facility had reduction targets in place for environmental aspects e.g. water consumption reduced by using automation system (sensor system) in the water basin; energy reduced by using energy saving light, sun switch, servo motor & motion sensor |
| Has the site 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? | Yes Factory has a system to monitor the performance of sub-contracting agencies in line with the environmental expectation. |

Usage/discharge analysis

| | Last full calendar year (2023) | Previous full calendar year (2022) |
|--------------------------------------------------------------------|--------------------------------|------------------------------------|
| Total electricity consumption from non- renewable sources (kWh) | 37,560 | 22,000 |
| Total electricity consumption from renewable sources (kWh) | 0 | 0 |
| Sources of renewable energy used | None | None |
| Types of renewable energy used | Data not available | Data not available |



| Total natural gas consumption (kWh) | 0 | 0 |
|-------------------------------------------------------|----------------------|----------------------|
| Usage of other purchased fuels | 0 | 0 |
| Has the site completed any carbon footprint analysis? | No | No |
| Water sources | Local Authority | Local Authority |
| Does the site use mercury or mercury compounds? | No | No |
| Water volume used (m3) | 240 | 120 |
| Water discharged | Local sewage system. | Local sewage system. |
| Water volume discharged (m3) | 234 | 110 |
| Water volume recycled (m3) | 0 | 0 |
| Total waste produced (mt) | 0.2 | 0.1 |
| Total hazardous waste produced (mt) | 1.8 | 0.1 |
| Waste to recycling (mt) | 0 | 0 |
| Waste to landfill (mt) | 1.8 | 0.1 |
| Waste to other (mt) | 0.2 | 0.1 |
| Total product produced (mt) | 5,100 | 2,500 |



10.C. Business ethics

Management systems

| Develop and maintain relevant policies and procedures to ensure workplace requirements are met | Robust Management Systems |
|-------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Appoint a manager with sufficient seniority who is responsible for implementing procedures | Robust Management Systems |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems |
| Monitor the effectiveness of procedures to meet policy and workplace requirements | Robust Management Systems |
| Explanation for management systems grades | 1. The facility has established policies and procedures related to business ethics, ensuring that all business operations are conducted in a legal and ethical manner. These policies cover key areas such as anti-bribery, corruption prevention, and transparency in business dealings. During the audit process, it was verified that the facility maintains a high standard of ethical business practices, with clear guidelines in place. |
| | 2. Mr. Manoj Dnyanmothe, Senior Management, was appointed on 1st January 2023 as the senior management representative responsible for implementing and overseeing the facility's business ethics procedures. His role includes ensuring that ethical conduct is upheld throughout all business activities and that employees adhere to the facility's ethical standards. |
| | 3. All employees and managers receive training on the facility's business ethics policies to ensure proper understanding and compliance with ethical requirements. The last training session was held on 10th August 2024, and it was confirmed during the audit that all staff are aware of their responsibilities to uphold ethical standards in their day-to-day activities. |
| | 4. The effectiveness of these procedures has been reviewed through internal audits and employee feedback and found to be adequate, ensuring that ethical practices are maintained across the facility. The internal audit conducted on 1st July 2024 confirmed that the business ethics procedures are functioning effectively, with no reported instances of unethical behavior or violations of the facility's policies. |
| | |

Summary of findings

| Code area | Workplace requirement | | Local law | Finding |
|-----------|-----------------------|-------------|-----------|---------|
| | Ν | lo findings | | |
| | | | | |
| | | | | |



Systems and evidence examined to validate this code section

1. The facility demonstrates a clear understanding of relevant legislation relating to bribery, corruption, and unethical business practices. This was confirmed through the review of the business ethics policy, which was last updated on 1st April 2024. 2. The facility has assessed risks of bribery, corruption, and fraudulent business practices, and has implemented measures to mitigate these risks. Risk assessments are reviewed periodically, and no instances of unethical practices were reported during the audit.

3. The facility complies with fiscal legislative requirements, including 3rd party financial audits, where required. Verified through internal audit reports and financial records. 4. The facility has a business ethics policy covering bribery, corruption, and fraudulent practices. This policy has been communicated to all relevant parties, including high-risk suppliers. The policy was last updated on 07/08/2024. 5. Appropriate business ethics training was provided to workers in roles with higher

5.Appropriate business ethics training was provided to workers in roles with higher exposure to risks, such as sales, purchasing, and logistics. The most recent training session was conducted on 06/08/2024. Verified through training records.

6.The facility has a confidential and anonymous reporting mechanism for fraudulent or unethical business practices. This mechanism is accessible to all employees, and there are safeguards in place to protect reporters from reprisals. Verified through the review of the grievance and whistleblower policies.

7.The facility complies with legislative requirements regarding the collection and storage of personal data. Appropriate consents and controls are in place. Reviewed personal data handling procedures and consent forms.
8.The facility has not been subject to any fines or prosecutions for non-compliance

8.The facility has not been subject to any fines or prosecutions for non-compliance with business ethics regulations. If any issues were to arise, the facility has a corrective action plan in place to address them effectively.

9. The facility holds all necessary licenses and permissions related to the ownership and/or leasing of the land where it operates. Verified through the review of land ownership and lease agreements.



10.C. Business ethics

Data points

Has the site received an official notice, No fine or prosecution for any noncompliances with business ethics legislation, regulation, consent or permits (within the last three years)?

Provide any certified anti-bribery management systems for the site

The facility does not have a certified anti-bribery management system, but it has a policy, procedure, and training records available for review.



Attachments





Fire alarm.jpg

Stitching 2.jpg

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☑

Stitching.jpg

First Aid box.jpg

☑

☑



FIRS'

Emergency light.jpg



Finishing.jpg

Fire extinguisher.jpg \mathbf{C}

Checking.jpg



Notice board.jpg

Biometric machine.jpg N

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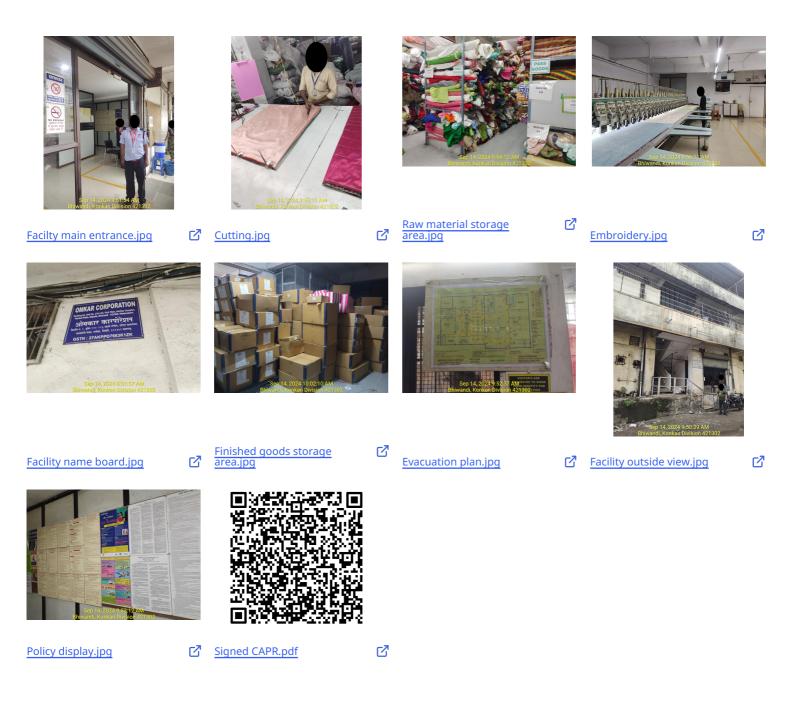
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☑ Smoke detector.jpg

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