

Sedex Members Ethical Trade Audit Report



	Audit Details								
Sedex Company Reference: (only available on Sedex				Sedex Site Reference: (only available on Sedex System)				794177	
Business name (Coname):	mpany	THE TAJ	THE TAJ STORES						
Site name:		THE TAJ	STORES						
Site address:		VILL - PALLUPURA GHOSI NEAR J.A.B SCHOOL LODHIPUR MORADABAD 244102 IN			Country:		IN		
Site contact and job	title:	Bilal Ahsan / Proprietor							
SMETA Audit Pillar	s:		Standards Safety		Health and Safety (plus Environment 2-Pillar)	y (plus 4-pillar onment		ment	Business Ethics
Date of Audit:		2023-06-0	03						
			Aud	it Com	pany Name:				
			Internation	onal Co	mpliance Grou	ıp			
Audit Conducted By									
Affiliate Audit Company	~		Purchaser				Retailer		
Brand owner			NGO				Trade Ur	nion	
Multi-stakeholder		,			Combined Audit (select all that apply)				

2023-06-03

Audit Content:

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Audit company:

Report reference:

Start Date: 2023-06-03

End Date:

SMETA Declaration

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

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

Auditor Team						
Lead Auditor:	Bhupendra Kumar	APSCA Number:	21705095			
Additional Auditors:	Kasak Pal					
Date of declaration:	2023-06-03					

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

Site Representation				
Full Name:	Bilal Ahsan			
Title:	Proprietor			
Date of declaration:	2023-06-03			

Comments:

Any exceptions to this must be recorded here (e.g. different sample size):
Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just

started last Sep 2020).
The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives

Audit company:

Report reference: ZAA600012741

Start Date: 2023-06-03 End Date: 2023-06-03

Sedexglobal.com



Summary of Findings

Issue	Are: Non-Co		Nui	mber of iss	ues	Findings
(please click on the issue title to go direct to the appropriate audit results by clause)	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
0B - Management systems and code implementation	0.B.1 0.B.1	§1 §2	2	0	0	NC - ZAF600081762 NC - ZAF600081763
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
3 - Working conditions are safe and hygienic	3.1 3.1 3.1 3.1	§3 §4 §5	4	0	0	NC - ZAF600081764 NC - ZAF600081765 NC - ZAF600081766 NC - ZAF600081767
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid			0	0	0	
6 - Working hours are not excessive			0	0	0	
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is allowed			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2-pillar			0	0	0	
10B4 - Environment 4-pillar	10.B4.4		0	1	0	Obs - ZAF600081768
10C - Business ethics 4-pillar			0	0	0	

Local Law Issues

Issue	Description
§1	In accordance with the Uttar Pradesh Factories Rules 1950, Chapter XI Supplemental, Section 118 – Display of notices, The abstract of the Act and the rules required by Section 108(1) to be displayed in every factory shall be in the prescribed Form No. 20.
§2	In accordance with the Uttar Pradesh Factories Rules 1950, Chapter IX Special provisions, Section 120 – Returns, The owner, occupier or Manager of every factory shall furnish to the Chief Inspector of Factories and any other officer or officers designated by Government the following returns namely: (i) On or before January 15, every year an annual return in duplicate in the Form No. 21: (ii) 50[On or before July 15, each year, a half-yearly return for the period January 1 to June 30 in duplicate in the Form No. 22:] Provided that in the case of a factory in which work is carried on only during a certain season or seasons of the year, the

Audit company:

Report reference: ZAA600012741

Start Date: 2023-06-03

§3	In accordance with the Indian Electricity Rules, 1956, Section – 36. Handling of electric supply lines and apparatus- (1) Before any conductor or apparatus is handled adequate precautions shall be taken, by earthing or other suitable means, to discharge electrically such conductor or apparatus, and any adjacent conductor or apparatus if there is danger there from, and to prevent any conductor or apparatus from being accidentally or inadvertently electrically charged when persons are working thereon. Every person who is working on an electric supply line or apparatus or both shall be provided with tools and devices such as
§4	In accordance with the Factories Act 1948, Section 38, Factories and workplace are to be furnished with a certificate that they are provided with means of escape in case of fire as can reasonably be required
§5	In Accordance with the Uttar Pradesh Factories Rules 1950 Chapter VI -A Provisions Relating To Hazardous processes Section 63 L. Decontamination facilities (c) a sufficient number of eye wash bottles filled with distilled water or suitable liquid, kept in boxes or cupboards conveniently placed and clearly indicated by a distinctive sign which shall be easily available at all times.

Sedex Audit Reference:

Site Details

	Site Details					
Company Name	THE TAJ STORES					
Site Name	THE TAJ STORES					
GPS location (if available)	GPS Address:		Rd. Dhanu	ores, Asmoli Madhan upura, Pallupura gla Needer, Uttar 44102		
	Coordinates:			6852052018 and 671340307		
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	1. Business Registration / License No: UPFA4000129 for employing No of workers upto 50 and HP: 500 issued on 11-27-2022 and is Valid till: 12-31-2023, 2. PAN No: ADAPA5277A, 3. Export Code no: 0588061921, 4. GST Registration No: 09ADAPA5277A1Z2, 5. Approved building plan layout no: 1131, 6. Stability certificate no: 04/I/A2013 issued on 07-17-2013 by Prakash Verma - B.E Civil and is valid for lifetime 7. DG Installation no: 20VSNOC03023210 issued on 02-09-2023 by Om Prakash for DG Sets of 250 KVA and 500 KVA, 8. Transformer approval no: 20VSNOC03023210 issued on 02-09-2023 by Om Prakash, 9. Fire NOC No: UPFS / 202264486 / MRV / MORADABAD / 968 / GD issued on 10-18-2022, 10. EPF ID: UPBLY0053938000 and ESI ID: 30000647580000506, 11. Water consent no: 62634 / UPPCB / Moradabad (UPPCBRO) CTO / water / Moradabad/2019 issued on 03-31-2020 by Amit Chandra and is Valid till: 12-31-2023 and 12. Air consent no: 63633 / UPPCB / Moradabad (UPPCBRO) CTO / air / MORADABAD / 2019 issued on 03-31-2020 by Amit Chandra and is Valid till 12-31-2023.					
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturer of Home items and the activitie grinding, polishing, plachecking, packing and	s done at th ating, buffing	e site are R	Raw material receiving,		
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The facility's physical NEAR J.A.B SCHOOL of establishment is 19 sq mt and production	L LODHIPUI 198. The tota	R and is 25 Il area of th	years old as its year		
Structure and number of buildings	Building Name:		The Taj st	ores		
	Floor	Description	า	Remark		
	Ground floor	Security ro assembly a toilets		Not shared		
	Peripheral area Parking area, DG Area, Office, cora area, packing area, warehouse area, powder coating area, plating area and ETP Area Not shared Not shared					
Visible structural integrity issues (large cracks) observed?	☐ Yes ☑ No					
CIACKS) ODSELVEU!	Please give details:					
	The site does not have	e any struct	ural integrit	y issues (large cracks)		

Audit company: Report reference: Start Date: ZAA600012741 2023-06-03

Does the site have a structural engineer evaluation?	☑ Yes □ No					
evaluation:	Please give details:					
	The site has obtained structural e obtained stability certificate no: 04 by Prakash Verma - B.E Civil	ngineer evaluation and has 4/I/A2013 issued on 07-17-2013				
Site function	☐ Agent					
	☐ Finished Product Supplier	☐ Grower				
	☐ Homeworker	□ Labour Provider				
	□ Pack house	□ Primary Producer				
	☐ Service Provider	□ Sub-contractor				
Months of peak season						
Process overview	Products manufactured at the site are Home Decor, kitchen ware, furniture and antique items. There are 8 production lines in the facility. Process at the site: Raw material - Grinding - Polishing - Plating - Buffing - Lackring - Powder coating - Checking - Packing and dispatch					
What form of worker representation is there	□ Union	☐ Worker Commitee				
on site?	☑ Other	□ None				
Please give details:	Grievance committee exists in the	e facility.				
Is there any night production work at the site?	☐ Yes ☑ No					
Are there any on site provided worker	☐ Yes ☑ No					
accommodation buildings	Please give details:					
Are there any off site provided worker accommodation buildings	☐ Yes ☑ No					
accommodation buildings	Please give details:					
Were all site provided accommodation buildings included in this audit	☐ Yes ☑ No					
	Please give details:					
	Not applicable as no accommodation has been provided by the facility.					

Audit company:
International Compliance Group

Report reference: ZAA600012741

Start Date: 2023-06-03

Audit Parameters					
Time in and time out	Day 1				
	In	09:00			
	Out	17:30			
Audit type:	FULL_IN	NITIAL			
Was the audit announced?	ANNOUNCED				
Was the Sedex SAQ available for review?	No				
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No				
Who signed and agreed CAPR	Bilal Ah	san / Prop	rietor		
Is further information available	No				

٠,	ers'	ınn	h 1
v	c_{13}	ıvı	O. 1
v	0.0		٠.

Audit attendance	Management	Worker Representatives				
	Senior management	Worker Committee representatives	Union representatives			
A: Present at the opening meeting?	Yes	No	No			
B: Present at the audit?	Yes	No	No			
C: Present at the closing meeting?	Yes	No	No			
Reason for absence at the opening meeting	Not applicable as grievance committee exists in the facility and it consists of only chairperson no representative and no Union has been formed in the facility.					
Reason for absence during the audit	Not applicable as grievance committee exists in the facility and it consists of only chairperson no representative and no Union has been formed in the facility.					
Reason for absence at the closing meeting	Not applicable as grievance chairperson no representati	Not applicable as grievance committee exists in the facility and it consists of only chairperson no representative and no Union has been formed in the facility.				

Audit company: International Compliance Group Report reference: ZAA600012741

Start Date: 2023-06-03

Worker Analysis

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

	Worker Analysis								
	Local				Migrant*		Home		
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	workers	Total	
Worker numbers – male	24	0	0	0	0	0	0	24	
Worker numbers – female	0	0	0	0	0	0	0	0	
Total	24	0	0	0	0	0	0	24	
Number of Workers interviewed – male	10	0	0	0	0	0	0	10	
Number of Workers interviewed – female	0	0	0	0	0	0	0	0	
Total – interviewed sample size	10	0	0	0	0	0	0	10	

Audit company: International Compliance Group Report reference: ZAA600012741

Start Date: 2023-06-03

	Nationalities Structure	
Nationality of Management	Indian	
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationaility 1: INDIAN	approx %: 100%
Was this list completed during peak season?	☐ Yes ☑ No	
	Please give details:	
	Not applicable as no peak seasor	n exists in the facility
Worker remuneration	Workers on piece rate:	00%
	Paid hourly:	00%
	Salaried:	100%
Payment cycle	Paid daily:	00%
	Paid weekly:	00%
	Paid monthly:	100%
	Other:	00%
	Details for other:	Not applicable

Audit company: International Compliance Group Report reference: ZAA600012741

Start Date: 2023-06-03

W	orker Interview Summary
Were workers aware of the audit?	☑ Yes □ No
Were workers aware of the code?	☑ Yes □ No
Number of group interviews:	1 Group of 4 workers
Number of individual interviews:	Male: 06 Female: 00
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	☑ Yes ☐ No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☑ Yes □ No
In general, what was the attitude of the workers towards their workplace?	☑ Favorable ☐ Non-favourable ☐ Indifferent
What was the most common worker complaint?	There were no complaints at present.
What did the workers like the most about working at this site?	Regular Payment & Regular work
Any additional comment(s) regarding interviews:	None.
Attitude of workers to hours worked:	Workers are satisfied with working hours
Is there any worker survey information available?	☐ Yes ☑ No Please give details:

Audit company: International Compliance Group Report reference: ZAA600012741

Start Date: 2023-06-03

End Date: 2023-06-03

Sedexglobal.com 13

Attitude of workers:

Workers from different work areas were selected randomly for interviews. 10 randomly selected Workers were interviewed in the absence of the management. There was freewheeling interaction with the workers. Interview centred on the elements covered in the scope of the audit issues like child labour, forced labour, health & safety, working hours, wages & benefits, disciplinary actions, discrimination. Workers confirmed that they have not seen any child labour or young worker at the site. Workers confirmed that they were not asked any deposits by the management; neither any original document was asked from them. They are free leave the Facility at the end of the shift. Overtime is voluntary and whenever done is compensated at the rate of double the normal wages for company on roll workers. Workers found to be aware about use of fire extinguisher, evacuation procedures in case of emergency, confirmed availability of first aid box, availability of the drinking water. Personal protective equipment's are provided free of cost, and they use them where required. Workers confirmed that they do not feel discriminated.

Attitude of worker's committee/union reps:

Grievance Committee is present in the facility and chairperson looked very positive towards the management and no negative information reported. His attitude towards Facility management seemed positive. The reason they give for the same are on time payment, good facilities, good behaviour of the management and supervisors.s

Attitude of managers:

Managers were co-operative during the audit. Further, they were receptive to the observations during the audit and showed commitment to improve the working conditions.

Audit company:
International Compliance Group

Report reference: ZAA600012741

Start Date: 2023-06-03

End Date: 2023-06-03

Sedexglobal.com 14

OA - Universal Rights covering UNGP [Summary of Findings]

0A: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- 0.A.1 Factory has established worker related policies and procedures, pertaining to the human rights impacts and issues.
- 0.A.2 Factory has appointed HR Manager for implementing standards concerning Human rights.
- 0.A.3. Businesses identify their stakeholders and salient issues.
- 0.A.4. It was noted that fácility has measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- 0.A.5. Factory generally has a process for managing respect of addressing any negative impacts to Facility own employees and external services such as security and janitorial.
- 0.A6. Business has a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter.

Evidence examined:

- Documented policy on human rights
- Supplier's social compliance monitoring records.
- Interaction with Management and Interview with employees
- Training provided by facility on basic Human Rights of workers.
- Employees handbook
- Grievance procedure and records
- Employees data confidentiality policy, procedure, and related record.

Any other comments:	
Nil	

Policy statement that expresses commitment to respect human rights?	☑ Yes □ No
	Please give details:
	Factory has established policies and procedures pertaining to the human rights.
Are the policies included in workers' manuals?	☑ Yes □ No
	Please give details:
	Yes, all the policies maintained in the facility are included in the worker's manuals

2023-06-03

2023-06-03

Audit company: Report reference: Start Date: End Date:

ZAA600012741

Does the business have a designated person responsible for implementing	☑ Yes □ No	
standards concerning Human Rights?	Please give details:	
	The facility has appointed HR Manager for implementing standar concerning Human Rights	rds
Does the business have a transparent system in place for confidentially reporting,	☑ Yes □ No	
and dealing with human rights impacts without fear of reprisals towards the	Please give details:	
reporter?	Business has transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter.	
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	☑ Yes □ No	
Does the business demonstrate effective data privacy procedures for workers'	☑ Yes □ No	
information, which is implemented?	Please give details:	
	All personal data is with Human Resources Department which is kept under lock & key with limited access.	i
Me	easuring Workplace Impact	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average	Last year 7.0%	
total number of workers on site over the year (annual worker turnover))	This year 3.0%	
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	1.0%	
Annual % absenteeism(Number of days lost	Last year 6.0%	
through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	This year 3.0%	ļ
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	1.0%	
Are accidents recorded?	☑ Yes □ No	
	Please give details:	
	The facility has maintained the accident register for recording accidents	

Audit company: Rep
International Compliance Group ZAA

Report reference:

Start Date: Er

End Date:

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

Audit company: International Compliance Group Report reference: ZAA600012741

Start Date: 2023-06-03

OB - Management Systems and code Implementation [Summary of Findings]

0B: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- 0.B.1 Facility has implemented and maintained system for delivering compliance to the ETI Code.
- 0.B.2 Facility has system in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.
- 0.B.2 Facility was found to have appropriate land rights.
- 0.B.2 The facility has obtained valid Factory License accordance with local law
- 0.B.3 HR Manager is responsible to ensure compliance with these code requirements.
- 0.B.4 Factory has displayed copy of ETI Code of Conduct in local language at notice board to communicate for all employees and suppliers and ETI Code of conduct training was conducted on dated 05-10-2023
- 0.B.4 During the Facility tour, documents review and management and worker's interviews, it was noted that there is ETI Code of Conduct posted in the facility. Moreover, workers are aware about this ETI Code.
- 0.B.5 The facility has communicated ETI code requirement to their suppliers.
- Facility has conducted adequate risk assessment covering all aspects of social and labour management system.
- Facility has conducted internal audit to monitor effectiveness of social management system implemented at audited site.

Evidence examined:

- Interviews with Management and workers.
- •ETI code translations, responsibilities of managers for implementation of Code.
- •Communication of ETI code.
- Personnel records.
- Employment contracting procedures.
- Documentation of Working time
- Legal Permit Factory License.
- •Risk assessment dated 04-13-2023

Any other comments:

- 01. Factory has not displayed the Law abstract.
- 02. Factory has not submitted annual returns to the chief inspector of the factories.

	Management Systems
In the last 12 months, has the site been subject to any fines/prosecutions for	□ Yes ☑ No
non-compliance to any regulations?	Please give details:
	During the audit, no evidence found that the facility has had any fine for non-compliance levied against the facility during the last 12 months.

Start Date: Audit company: Report reference: End Date: ZAA600012741 2023-06-03 2023-06-03

Do policies and/or procedures exist that reduce the risk of forced labour, child	☑ Yes □ No
labour, discrimination, harassment & abuse?	Please give details:
abuse?	The facility has its own policies and procedures on forced labour, child labour, discrimination, harassment & abuse and the policies are posted for worker's reference. The facility conducts training to the workers on legal requirements. The facility does not maintain any original documents of the employees and checks with a valid age proof document at the time of hire.
If Yes, is there evidence (an indication) of effective implementation? Please give details.	On the day of assessment, no traces of forced labour, child labour, discrimination, harassment & abuse was observed. All interviewed employees reported that they are treated with dignity and respect. The facility conducts training to all employees related to health and safety, legal requirements etc. and maintains all training records.
Have managers and workers received training in the standards for forced labour,	☑ Yes □ No
child labour, discrimination, harassment & abuse?	Please give details:
abuse :	Induction training is conducted to all employees. Periodic trainings are conducted on regular basis.
If Yes, is there evidence (an indication) that training has been effective e.g. training	☑ Yes □ No
records etc.? Please give details	Please give details:
	Training evaluation is carried out after every training. Records are maintained by Human Resources Department
Does the site have any internationally recognised system certifications e.g. ISO	☐ Yes ☑ No
9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	Please give details:
other social addits)!	No, the facility has not obtained internationally recognised system certifications.
Is there a Human Resources manager/department?	✓ Yes □ No
	HR Manager is responsible for Human Resources Department
Is there a senior person /manager responsible for implementation of the code?	☑ Yes □ No
	Please give details:
	HR Manager is responsible for implementation of the code
Is there a policy to ensure all worker information is confidential?	☑ Yes □ No
	Please give details:
	The company had established a policy on ensuring confidentiality of worker information.
Is there an effective procedure to ensure confidential information is kept confidential?	☑ Yes □ No
	Please give details:
	The company had established a policy on ensuring confidentiality of worker information.
Are risk assessments conducted to evaluate policy and procedure	☑ Yes □ No
effectiveness?	Please give details:
	Risk assessments conducted to evaluate policy and procedure effectiveness and Internal audits and Management review meetings (MRM) was conducted in the facility.

Audit company: Report reference: Start Date: End Date: ZAA600012741 2023-06-03 2023-06-03

Does the facility have a process to address issues found when conducting risk assessments, including implementation of	☑ Yes □ No
	Please give details:
controls to reduce identified risks?	The facility conducts MRM for reviewing the issues found during risk assessments and comes with preventive actions to reduce the identified risks
Does the facility have a policy/code which	☑ Yes □ No
require labour standards of its own suppliers?	Please give details:
	The facility had established a Supplier Control Plan and Procedure to ensure that their suppliers confirm to the requirements of the standard
	Land Rights
Does the site have all required land rights	☑ Yes □ No
licenses and permissions (see SMETĂ Measurement Criteria)?	Please give details:
	The land is owned by the owner of the Facility and has all required land rights license.
Does the site have systems in place to	☑ Yes □ No
conduct legal due diligence to recognize and apply national laws and practices	Please give details:
relating to land title?	Facility has a system in place to conduct legal due diligence relating to land title.
Does the site have a written policy and procedures specific to land rights?	☑ Yes □ No
procedures specific to faile rights:	Please give details:
	The facility has maintained a written policy and procedures specific to land rights and the facility has obtained all the land rights accordance with policies maintained.
Is there evidence that facility/site	☑ Yes □ No
compensated the owner/lessor for the land prior to the facility being built or expanded?	Please give details:
	Facility owner has paid for the land prior to the facility being built or expanded.
Does the facility demonstrate that alternatives to a specific land acquisition	☑ Yes □ No
were considered to avoid or minimize adverse impacts?	Please give details:
	Facility has obtained all licenses required by local law.
Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?	□ Yes ☑ No
	Please give details:
	There is no illegal appropriation of land, and the facility has

Audit company: Report reference: Start Date: End Date:

Sedexglobal.com 20



	Non-Compliance	Evidence
[Back to findings summary]		
	Non-Compliance	
Status	CLOSED	
Reference	ZAF600081762	
Clause	0B - Management Systems and code Implementation	
Issue Title	30 - No / inadequate system for management to keep up-to-date with local and national laws and regulations	
Subcategory	Site's Awareness of Code/Legal Requirements	
New or carried over?	☑ New ☐ Carried Over	
Resolved by audit	ZAA600012741	
Root cause	☐ Training ☑ System	
	☐ Costs ☐ Lack of workers	
	□ Other	
Root cause - Other		
Local law issue	In accordance with the Uttar Pradesh Factories Rules 1950, Chapter XI Supplemental, Section 118 – Display of notices, The abstract of the Act and the rules required by Section 108(1) to be displayed in every factory shall be in the prescribed Form No. 20.	
ETI code	0.B.1 - Suppliers are expected to implement and maintain systems for delivering compliance to this Code.	
Explanation to the non compliance	It was noted during the factory tour that the factory has not displayed the Law abstract	
Follow up method	☐ Follow up audit ☑ Desktop audit	
Timescale	☐ Immediate ☐ 30 days ☐ 60 days	
	□ 90 days □ 120 days □ 180 days	
	□ 365 days □ Other	
Actions	The facility will ensure to the factory display the law abstract in a common area at the earliest.	
Additional comments	Factory has improved your system, now we have displayed factory law abstract. The facility has displayed the law of abstracts.	

Audit company: International Compliance Group

Report reference: ZAA600012741

Start Date: 2023-06-03



	Non-Compliance	Evidence
[Back to findings s	summary]	
	Non-Compliance	
Status	OPEN	
Reference	ZAF600081763	
Clause	0B - Management Systems and code Implementation	
Issue Title	30 - No / inadequate system for management to keep up-to-date with local and national laws and regulations	
Subcategory	Site's Awareness of Code/Legal Requirements	
New or carried over?	☑ New ☐ Carried Over	
Root cause	☐ Training ☑ System	
	☐ Costs ☐ Lack of workers	
	□ Other	
Root cause - Other		
Local law issue	In accordance with the Uttar Pradesh Factories Rules 1950, Chapter IX Special provisions, Section 120 – Returns, The owner, occupier or Manager of every factory shall furnish to the Chief Inspector of Factories and any other officer or officers designated by Government the following returns namely: (i) On or before January 15, every year an annual return in duplicate in the Form No. 21: (ii) 50[On or before July 15, each year, a half-yearly return for the period January 1 to June 30 in duplicate in the Form No. 22:] Provided that in the case of a factory in which work is carried on only during a certain season or seasons of the year, the	
ETI code	0.B.1 - Suppliers are expected to implement and maintain systems for delivering compliance to this Code.	
Explanation to the non compliance	It was noted during the documents review that the factory has not submitted annual returns to the chief inspector of the factories.	
Follow up method	☐ Follow up audit ☑ Desktop audit	
Timescale	☐ Immediate ☐ 30 days ☐ 60 days	
	□ 90 days □ 120 days □ 180 days	
	□ 365 days □ Other	
Actions	The facility will ensure to submit the annual returns to the concerned authority as soon as possible.	

Audit company:
International Compliance Group

Audit company: International Compliance Group Report reference: ZAA600012741

Start Date: 2023-06-03

1 - Freely chosen Employment [Summary of Findings]

- 1: Compliance Requirements
- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined

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

Current Systems:

- 1.1 There was no presence of forced / bonded or prison labour at the workplace.
- 1.2 Employees are not required to lodge any deposits, identity papers with the facility before or after joining the services.
- Employees are free to leave at the end of their shift and there is no compulsion to work overtime.
- Employees are free to leave their employer after giving a reasonable notice to their employers.
- There was a formalised application procedure which states that workers must present their IDs for proof of age but that only copies must be kept in the personnel files and the original given back to the workers.
- The factory did not use prison labour.
- The above was confirmed in management and employee interview.
- HR Manager is responsible to oversee that no forced, bonded, involuntary or prison labour is employed.

Evidence examined:

- Facility forced labour Policy and Procedures.
- •Personal files with application form and bio data including employment contract. Of 10 sample workers
- •Interaction with Management and Interview with employees.
- •Resignation records Any other comments:

Nil	
Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	☐ Yes ☑ No
	Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	☐ Yes ☑ No
	Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	☐ Yes ☑ No
	Please give details:
Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ☑ No
' ,	Please give details:
	Employees are free to leave their job by giving 30 days' notice period.
If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	☐ Yes ☐ No ☑ Not Applicable
	Please give details:
Slavery Statement:	Facility does not have any part of business with UK.

Audit company: Report reference: Start Date: End Date:

Is there evidence of any restrictions on workers' freedoms to leave the site at the	□ Yes ☑ No
end of the work day?	Please give details:
	Workers are free to leave the site after their shift gets over.
Does the site understand the risks of forced / trafficked / bonded labour in its supply	☑ Yes □ No □ Not Applicable
chain	Please give details:
	Yes, the site understands the risk of forced / trafficked / bonded labour in its supply chain and has system to prevent such issues in the facility.
Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	☑ Yes □ No
and not on torough administrations.	Please give details:
	Yes, Factory is taking steps to reduce the risk of forced/trafficked labour. There is no forced or trafficked labour found in the factory.

Audit company: International Compliance Group Report reference: ZAA600012741

Start Date: 2023-06-03

End Date: 2023-06-03 Sedexglobo

2 - Freedom of Association and Right to Collective Bargaining are Respected [Summary of Findings]

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

Current Systems and Evidence Examined

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

Current Systems:

- 2.1 Employees without distinction, have the right to join any union or form trade unions of their own choosing and to bargain collectively.
- 2.2 The facility has an open attitude towards the activities of the grievance committee in the facility.
- 2.3 Chairperson is not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 No collective bargaining exists in the facility
- HR Manager is responsible to ensure that Freedom of Association and Right to Collective Bargaining are respected by the management.
- At present, there was no union / trade union in the facility.
- Factory has Grievance committee to address worker's issues.

Evidence examined:

- Facility freedom of association Policy and Procedures.
- Interaction with Management and Interview with employees
- Grievance Committee meetings records 05-17-2023

• Grievance Committee meetings records 05-	17-2023	
Any other comments:		
Nil		
What form of worker representation/union is	□ Union	□ Worker Commitee

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	☐ Union☑ Other	□ Worker Commitee□ None
Other details:	Grievance committee exists in the	facility
Is it a legal requirement to have a union?	☐ Yes ☑ No	
Is it a legal requirement to have a worker's committee?	☐ Yes ☑ No	
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	 ✓ Yes □ No Please give details: Workers can speak with facility management in the facility. 	
Is there evidence of free elections?	☐ Yes ☑ No	

2023-06-03

2023-06-03

Audit company: Report reference: Start Date: End Date:

ZAA600012741

Does the supplier provide adequate facilities to allow the Union or committee to	☐ Yes ☑ No
conduct related business?	Please give details:
	Not applicable as no Union has been formed in the facility
Name of union and union representative, if applicable:	Not applicable as no Union has been formed in the facility
Is there evidence of free elections?	☐ Yes ☐ No ☑ Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Grievance committee is present in the facility.
Is there evidence of free elections?	☐ Yes ☐ No ☑ Not Applicable
Are all workers aware of who their representatives are?	□ Yes ☑ No
representatives are:	Please give details:
	Not applicable as chairperson exist in grievance committee instead of representatives and workers are aware about him.
Were worker representatives freely elected?	☐ Yes ☑ No
Date of last election:	null
Do workers know what topics can be raised with their representatives?	☐ Yes ☑ No
Were worker representatives/union representatives interviewed?	☐ Yes ☑ No
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Grievance committee meeting is held once in 3 months. Last meeting was conducted on 05-17-2023
Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ☑ No

Audit company: International Compliance Group Report reference: ZAA600012741

Start Date: End Date:

2023-06-03

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

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

practicable, the causes of hazards inherent in the working environment.
3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined

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

Current Systems:

Audit company: International Compliance Group Report reference:

Start Date:

End Date:

Sedexglobal.com

- 3.1 The facility has provided safe and hygienic working environment for the workers employed at the facility.
- 3.2 Health and safety training conducted on 05-23-2023 and Health and Safety risk assessment conducted on
- 3.3 The facility has maintained the toilets in clean and hygienic condition.
- 3.4 No accommodation was provided by the facility.
- 3.5 The facility has appointed a senior management representative for the responsibility of Health and safety.

General requirements:

- Diesel Generator Installation No: 20VSNOC03023210 issued on 02-09-2023 by Om Prakash for DG Sets of 250 KVA and 500 KVA.
- Transformer Approval No: 20VSNOC03023210 issued on 02-09-2023 by Om Prakash.
- Air quality test report no: PCTS/PG/18904 issued on 05-23-2023 by Prestige Calibration Testing Solution
- DG Stack monitoring report no: PCTS/PG/18690 issued on 05-18-2023
 Drinking water test report no: PCTS/PG/18907 issued on 05-23-2023 by Calibration Testing Solution
- Lux monitoring test report no: PCTS/PG/18910 issued on 05-23-2023
- Noise Monitoring test report no: PCTS/PG/18914 issued on 05-25-2023 by Prestige Calibration Testing Solution.
- Facility has maintained accident register.
- · Adequate lighting and ventilation are provided in every part of the facility.
- The facility has maintained proper temperature in every part of the facility.
 The Facility management has provided male toilets 04, urinal points 04, female toilets 01 and Drinking water point-01.

Fire Safety

Provisional fire NOC no: UPFS / 202264486 / MRV / MORADABAD / 968 / GD issued on 10-18-2022.

- Firefighting training was last conducted on dated: 05-15-2023. by Rajkumar Pal.
- Firefighting drill was conducted on dated: 04-13-2023 and time taken: 01 minute 20 seconds.
- The Facility has provided Fire Extinguishers 12, Main exit 01, Secondary exits 10, Fire hydrant 12, fire alarms - 10 and Emergency light - 10.
- All the exits and emergency exits were properly marked in local language also.

Electrical Safety:

All electrical equipment was in good condition such as sockets, plugs, switches and main fuse boards.

Medical Services

- The Facility management has provided 03 First Aid Boxes in the facility.
- First-aid training was conducted on 05-17-2023 for 05 employees by St John ambulance.

Evidence examined:

- Health and safety policy
- Health and Safety manual
- Government License
- Trained first aid register Accident report register.
- Water quality test
- Interview with Health and Safety Manager
- Interview with workers
- Fire Drill reports.
- Health and safety risk assessment was reviewed.
- Training records.
- List of fire equipment's reviewed.
- First aid training

Any other comments:

- 1. No hammer was provided on 04 out of 10fire alarms.
- 2. No rubber mats were provided under the electrical panel in the facility.
- 3. Factory has not obtained Fire NOC from the Concerned authority. Further it was noted that the facility has provision Fire NOC.
- 4. Eye station was not available in the factory near the ETP & plating

Audit company: Report reference: Start Date: End Date:

Does the facility have general and occupational Health & Safety policies and	☑ Yes □ No
procedures that are fit for purpose and are	Please give details:
these communicated to workers?	Facility had established general Health & Safety, occupational Health & Safety policies and procedures that are fit for purpose, and these are communicated to workers during induction training.
Are the policies included in workers' manuals?	☑ Yes □ No
manuais?	Please give details:
	Facility has included the social compliance policies in worker's manual.
Are there any structural additions without required permits/inspections (e.g. floors	☐ Yes ☑ No
added)?	Please give details:
	The factory has obtained the layout plan as per the current setup of the facility.
Are visitors to the site informed on H&S and provided with personal protective	☑ Yes □ No
equipment?	Please give details:
	Visitors to the site informed on H&S and provide with personal protective equipment.
Is a medical room or medical facility provided for workers?(This section is to list	☐ Yes ☑ No
evidence to support system description (Documents examined & relevant	Please give details:
comments. Include renewal/expiry date where appropriate))	Not required by law but 03 first-aid boxes have been provided by the facility.
Is there a doctor or nurse on site or there is easy access to first aider/ trained medical	☑ Yes □ No
aid?	Please give details:
	5 First aid trained persons were present at the site.
Where the facility provides worker transport – is it fit for purpose, safe, maintained and	□ Yes ☑ No
operated by competent persons e.g. buses and other vehicles?	Please give details:
and other verifices:	No, transport facility was provided by the facility as it is not required by law
Is secure personal storage space provided for workers in their living space and is fit for	☐ Yes ☑ No
purpose?	Please give details:
	No, accommodation was provided by facility.
Are H&S Risk assessments are conducted (including evaluating the arrangements for	☑ Yes □ No
workers doing overtime e.g. driving after a long shift) and are there controls to reduce	Please give details:
identified risk?	Health and safety Risk assessments have been conducted including for workers doing overtime. As such organisation has policy to discourage overtime. But in case required periodic refreshment breaks are given.

Audit company: Report reference: Start Date: End Date:

Is the site meeting its legal obligations on environmental requirements including	☑ Yes □ No
required permits for use and disposal of natural resources?	Please give details:
Tradular resources?	Environmental aspect impact analysis has been conducted and all the required documents were present at the time of the audit.
Is the site meeting its customer requirements on environmental standards,	☑ Yes □ No
including the use of banned chemicals?	Please give details:
	Organisation is aware about requirements & follows the same. They do get updates from customers from time to time. Required information is also submitted to client when ever asked.

Audit company: International Compliance Group Report reference: ZAA600012741

Start Date: 2023-06-03



	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	CLOSED	
Reference	ZAF600081764	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	186 - Firefighting equipment is not sufficient to address type or severity of risk	
Subcategory	Fire Safety - Fire Fighting Equipment	
New or carried over?	☑ New ☐ Carried Over	
Resolved by audit	ZAA600012741	
Root cause	☐ Training ☑ System	
	☐ Costs ☐ Lack of workers	
	□ Other	FREALARM PIDE ALADM
Root cause - Other		sour elem day FIRE ALANN
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	DSC09211.JPG
Explanation to the non compliance	It was noted during the factory tour that no hammer was provided on 04 out of 10fire alarms.	FREALARN JUNEAU STREET
Follow up method	☐ Follow up audit ☐ Desktop audit	
Timescale	☐ Immediate ☐ 30 days ☐ 60 days	
	☐ 90 days ☐ 120 days ☐ 180 days	
	□ 365 days □ Other	
Actions	The facility will ensure to provide hammers on every fire alarm	
Additional comments	Factory has improved ous fire system, now factory has fixed hammered near by call points & Now Health & safety officer on regular monitoring related the health & safety points. The hammer have been installed beside the fire alarm call point.	

2023-06-03

	Non-Com	pliance			Evidence
[Back to findings s	ummary]				
	Non-Com	pliance		1	
Status	CLOSED	-			
Reference	ZAF600081765				
Clause	3 - Working Condition	ons are Safe ar	nd Hygienic		
Issue Title	228 - Unsafe handli rubber mats in front	ng of electrical of electricity pa	equipment e.g. no anels		
Subcategory	Electrical risk				
New or carried over?	☑ New	□ Ca	arried Over		
Resolved by audit	ZAA600012741				
Root cause	☐ Training	☑ Sy	ystem		
	□ Costs	□ La	ack of workers		
	□ Other				
Root cause - Other					
Local law issue	In accordance with the Indian Electricity Rules, 1956, Section – 36. Handling of electric supply lines and apparatus- (1) Before any conductor or apparatus is handled adequate precautions shall be taken, by earthing or other suitable means, to discharge electrically such conductor or apparatus, and any adjacent conductor or apparatus if there is danger there from, and to prevent any conductor or apparatus from being accidentally or inadvertently electrically charged when persons are working thereon. Every person who is working on an electric supply line or apparatus or both shall be provided with tools and devices such as				DSC09289.JPG
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.				
Explanation to the non compliance	It was noted during the facility tour that No rubber mats were provided under the electrical panel in the facility.				
Follow up method	☐ Follow up audit	☑ De	esktop audit		
Timescale		☑ 30 days □ 120 days	□ 60 days □ 180 days		
		□ Other			
Actions	_		he rubber mat under	1	

2023-06-03

the electrical panel.	
Additional comments Factory has improved ous system, now factory has put on rubber mat on all Electrical panel, Health & safety officer on regular on monitoring. Rubbers mats have been provided near the electric panel area.	

Audit company: International Compliance Group Report reference: ZAA600012741

Start Date: 2023-06-03



	Non-Compliance	Evidence	
[Back to findings s	summary]		
	Non-Compliance		
Status	OPEN		
Reference	ZAF600081766		
Clause	3 - Working Conditions are Safe and Hygienic		
Issue Title	172 - Fire licence, inspection, or certificates not in place as required by law		
Subcategory	Fire Safety - Licenses, Inspections & Training		
New or carried over?	✓ New ☐ Carried Over		
Root cause	☐ Training ☑ System		
	☐ Costs ☐ Lack of workers		
	□ Other		
Root cause - Other			
Local law issue	In accordance with the Factories Act 1948, Section 38, Factories and workplace are to be furnished with a certificate that they are provided with means of escape in case of fire as can reasonably be required		
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.		
Explanation to the non compliance	It was noted during the document review that the factory has not obtained Fire NOC from the Concert authority further it was noted that the facility has provision Fire NOC.		
Follow up method	☐ Follow up audit ☐ Desktop audit		
Timescale	☐ Immediate ☐ 30 days ☐ 60 days		
	□ 90 days □ 120 days □ 180 days		
	□ 365 days □ Other		
Actions	The facility will ensure to the Factory obtains fire "NOC"		

Audit company:
International Compliance Group

Report reference: ZAA600012741

Start Date: 2023-06-03



	Non-Com	pliance			Evidence
[Back to findings	summary]				
	Non-Com	pliance			
Status	CLOSED				
Reference	ZAF600081767				
Clause	3 - Working Condition	ons are Safe an	d Hygienic		
Issue Title	242 - No / inadequa	te eye wash / s nents including	hower station in chemical areas		
Subcategory	Chemicals				
New or carried over?	☑ New	□ Ca	arried Over		
Resolved by audit	ZAA600012741				
Root cause	☐ Training	☑ Sy	vstem		
	□ Costs	□ La	ck of workers		
	□ Other				
Root cause - Other					
Local law issue	In Accordance with the Uttar Pradesh Factories Rules 1950 Chapter VI -A Provisions Relating To Hazardous processes Section 63 L. Decontamination facilities (c) a sufficient number of eye wash bottles filled with distilled water or suitable liquid, kept in boxes or cupboards conveniently placed and clearly indicated by a distinctive sign which shall be easily available at all times.				
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.				
Explanation to the non compliance	It was noted during the factory tour that an eye wash station was not available in the factory near the ETP & plating area.				
Follow up method	☐ Follow up audit	☑ De	esktop audit		
Timescale	□ 90 days [☑ 30 days □ 120 days □ Other	□ 60 days □ 180 days		
Actions	-		wash station wash is P & Plating area.		
Additional comments	Factory has improve factory has installed				

Audit company:

Report reference: ZAA600012741

Start Date: End Date:

2023-06-03

nlatina	araa	\sim	raa	ıııra	\sim
plating	alea	as	160	une	u.
P			. – –	••••	•

Eye wash station has now been installed in the facility.

Audit company:
International Compliance Group

Report reference: ZAA600012741

Start Date: 2023-06-03

End Date: 2023-06-03

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

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

Current Systems and Evidence Examined

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

Current Systems:

- 4.1 The facility has established system to ensure no recruitment of child labour. Concerned personnel are trained on the same.
- 4.2 The facility complies on minimum age requirement of 14 years old by ensuring the age verification during the interview and physical age verification.
- 4.3 During the facility tour no worker below age of 18 years was found to working.

4.4 The policies and procedures conform to the provisions of the relevant ILO Standards
Evidence examined:
 Personal Files of employees Child Labour and forced labour prohibition policy. Interaction with Management and Interview with employees
Any other comments:
Nil

Legal age of employment:	14
Age of youngest worker found:	26
Are there children present on the work floor but not working at the time of audit?	☐ Yes ☑ No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	☐ Yes ☑ No
	Please give details:
	Not applicable as no young workers have been employed at the facility.

Audit company: International Compliance Group

Report reference:

Start Date:

End Date:

5 - Living Wages are Paid [Summary of Findings]

5: Compliance Requirements

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

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

concerned each time that they are paid.

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

Current Systems and Evidence Examined

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

Current Systems:

- 5.1 The facility meets the national legal standards and basic needs of the workers.
- 5.2 Workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3 No wages were deducted on the basis of disciplinary measure by the facility.
- Wages, in/out time, and attendance record of 10 employees for the month of Recent month April 2023, Random month July 2022 and random month December 2022 were available for review at the time of audit.
- Based on employee's interview, wages are paid on monthly basis on or before the 07th day of the month.
- · Based on employee's interview and record review, all the employees have received appointment letter in local language.
- Company employees are paid legal benefits such as Annual bonus and annual leaves as per law. Annual bonuses are paid once in year through bank transfer.
- Annual leave is paid along with the salary as per law.
- · Company employees are paid salary once in a month through bank transfer and wage calculation for company employees is on month basis.
- All employees including company as well as are registered under social insurance benefit i.e., Provident Fund (PF), Employees' State Insurance (ESI) and social insurance receipts were verified.
- PF and ESI records contract and principal records were reviewed of 12 months.
- Payslips provided to the workers in local language

Evidence examined:

- Wage records
- In /out time records
- Leave with wages records.
- List of holidays
- •Pay slips.
- Employer salary debit record
- PF and ESI records
- Maternity records
- Bonus Records
- •Full and final settlement
- Gratuity records
- Interaction with management and Employees

Any other comments:

Nil

Summary Information



Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: null	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 192.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 12.0 Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 388.0 Per Week: null Per Month: 10089.0	Actual Per Day: 388.0 Per Week: 0.0 Per Month: 10090.0	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 97.0 Per Week: null Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO
	Wages Analysis:		
Were accurate records shown at the first request?	☑ Yes □ No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 samples for Recent Month: April 2023 10 Samples for Random months: December 2022 10 samples for Random month: July 2022		
Are there different legal minimum wage grades? If Yes, please specify all.	☑ Yes ☐ No Minimum Wages fixed by Government of Uttar Pradesh are: Unskilled - INR 10089.00 per month, Semi-skilled – INR 11089.00 per month and Skilled – INR 12433.00 per month		
If there are different legal minimum grades, are all workers graded and paid correctly?	✓ Yes ☐ No ☐ Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	□ Below legal min□ Meet☑ Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	Wages paid by the facility are: Unskilled: INR 10090 Per month Semi-skilled: INR 12432 per month No skilled workers employed at the facility.		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found:Bonus was paid to the workers on 01-05-2022 to all the workers employed at the facility at the rate of 8.33% Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		

What deductions are required by law e.g. social insurance? Please state all types:	Deductions are required to be made for Statutory Social Security Benefits like Employee Provident Fund (EPF) and Employee's State Insurance (ESI).	
Have these deductions been made?	☑ Yes □ No	
Please list all deductions that have been made.	EPF: UPBLY0053938000 and ESI: 30000647580000506	
Please list all deductions that have not been made.	Nil	
Were appropriate records available to verify hours of work and wages?	☑ Yes □ No	
Were any inconsistencies found? (if yes describe nature)	☐ Yes ☑ No	
Do records reflect all time worked? (For	☑ Yes □ No	
instance, are workers asked to attend meetings before or after work but not paid	Please give details:	
for their time)	Yes, records reflect all time worked by the workers and paid for their time including meeting time.	
Is there a defined living wage:	☐ Yes ☑ No	
This is not normally minimum legal wage. If answered yes, please state amount and	Please give details:	
source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.		
If yes, what was the calculation method	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage	
used.	☐ Figures provided by Unions ☐ Living Wage Foundation UK	
	☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation	
	☐ Other – please give details:	
Are there periodic reviews of wages? If Yes give details (include whether there is	☑ Yes □ No	
consideration to basic needs of workers	Please give details:	
plus discretionary income).	The local government revises the minimum wage every six months which the facilities have to comply.	
Are workers paid in a timely manner in line with local law?	☑ Yes □ No	
Is there evidence that equal rates are being	☑ Yes □ No	
paid for equal work:	Please give details:	
	On the basis of interview of workers and wages record review, workers are paid equal rates for equal work	
How are workers paid:	□ Cash □ Cheque	
	☑ Bank Transfer ☐ Other	

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

- 6: Compliance Requirements
- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended
- to be not less than 125% of the regular rate of pay.
 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:
- 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined

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

Current Systems:

- 6.1The facility complies with national laws in terms of working hours.
- 6.2The working hours have been defined by the contract and do not exceed 48 hours.
- 6.2 The facility operates in general shift from 09:00 AM to 06:00 PM, lunch break: 01:00 PM to 02:00 PM and tea break: Between work.
- 6.3Overtime is voluntary in the facility and if done then is given at a premium of 200%.
- 6.4The maximum hours observed in a week were found to be 48.
- 6.5No working hours of any randomly selected sampled workers were found to exceed 60 hours per week and no exceptional circumstance exits that allows exceeding of 60 hours in a week. 6.6Weekly Holiday is given on Sunday.
- Attendance register IN/OUT time record system available in the facility for the workers and HR.
- · Manager is a responsible and also for ensuring compliance with regular and overtime hours as per law.

Evidence examined:

- In/ out time record of 10 sample workers reviewed for Recent month April 2023, Random month December 2022 and random month July 2022.
- Attendance record.
- Interaction with management and employees
- Production records (from work floors to check for discrepancies).

Anv	other	comme	ents:

Nil

Working hours' analysis	
Systems & Processes	
What timekeeping systems are used?	Biometric
Is sample size same as in wages section?	☑ Yes □ No
	Please give details:

2023-06-03

Audit company: Report reference: Start Date:

ZAA600012741

End Date:

2023-06-03

Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	☑ Yes □ No	
Are there any other types of contracts/employment agreements used?	□ Yes ☑ No	
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	□ Yes ☑ No	
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	☑ 1 in 7 days ☐ 2 in 14 days ☐ No (please explain)	
Is this allowed by local law?	☑ Yes □ No	
Maximum number of days worked without a day off (in sample):	6	
Stand	ard/Contracted Hours worked	
Were standard working hours over 48 hours	☐ Yes ☑ No	
per week found? (If yes, % of workers & frequency)	% of workers:	
	null%	
	Frequency:	
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	□ Yes ☑ No	
Overtime Hours worked		
Actual overtime hours worked in sample (State per day/week/month)	Recent Month April 2023: 00 Hours per day/ 00 Hours per week /00 Hours per month Random Month December 2022: 00 Hours per day/ 00 Hours per week /00 Hours per month Random Month July 2022: 00 Hours per day/ 00 Hours per week /00 Hours per month	
Combined hours (standard or contracted +	☐ Yes ☑ No	
overtime hours = total) over 60 found?	Please give details:	
	Not applicable as maximum hours observed were 48 hours per week	
Approximate percentage of total workers on highest overtime hours:	0.0%	
Is overtime voluntary? (Please detail evidence e.g. Wording of contract /	☑ Yes □ No □ Conflicting Information	
employment agreement / handbook /	Please give details:	
worker interviews / refusal arrangements)	Workers are never forced to do overtime in the factory as per the interview of workers and attendance records of the facility. In and out time records and production records were checked as evidence to confirm the same.	
	Overtime premium	

Audit company: Report reference: Start Date: End Date: ZAA600012741

Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	1	N/A – there is no legal requirement to OT premium	
wages)	Please give details:		
	overtime policy maintal was observed in the fa	peing paid at the rate on the facility but in the facility but in the facility due to which no discription werified in the random	no actual overtime overtime premium was
Is overtime paid at a premium?	☑ Yes □ No		
	overtime policy maintal was observed in the fa	peing paid at the rate o ained in the facility but i acility due to which no o verified in the random	no actual overtime overtime premium was
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	□ No	☐ Consolidated pay	☐ Collective Bargaining agreements
	☑ Other		
Please give details	Not applicable		
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of	☐ Overtime is voluntary	☐ Onsite Collective bargaining allows 60+ hours/week is voluntary	☐ Safeguards are in place to protect worker's health and safety
consolidated pay / CBA or Other)	☐ Site can demonstrate exceptional circumstances	Other reasons (please specify)	
Please give details	Not applicable		
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	Not applicable		
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ☑ No		
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	☑ Yes □ No		

Audit company: Report reference: Start Date: ZAA600012741 2023-06-03

End Date:

2023-06-03

7 - No Discrimination is Practiced [Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- 7.1 There was no evidence of discrimination in hiring.
- Factory employs workers based on their skills & experience.
- Workers from different religions, languages are working in the Facility.
- Interview with workers and interaction with the management confirmed that no discriminatory practices are followed in the facility.
- Based on review of wage records and employees' interview, no discrimination was noted in hiring, compensation, access to training, promotion, termination or retirement.
- Gender divisions did not exist in the facility.
- No employee was required to do the examination of the Pregnancy, hepatitis B virus and HIV.
- Anti-discrimination procedure on hiring, compensation, promotion and access to training is available during the audit.

Evidence examined:

- Facility discrimination policy
- Wage records
- Training records
- Personal files of randomly selected employees
- Interaction with management and employees

Any	other	comm	ents
-----	-------	------	------

Nil

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 100.0%		Female: 0.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	00		
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	☐ Hiring	□ Compensation	☐ Access to training
	□ Promotion	☐ Termination or retirement	No evidence of discrimination found
Please give details	No evidence found of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.		
Professional Development			
What type of training and development are available for workers?	Facility has various trainings and development programs like technical trainings, etc. is available for workers.		



SMETA Sedex Audit Reference: ZAA600012741

Version 6.1

Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	☑ Yes □ No

Audit company: International Compliance Group Report reference: ZAA600012741

Start Date: 2023-06-03

End Date: 2023-06-03

8 - Regular Employment Is Provided [Summary of Findings]

8: Compliance Requirements

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

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

- Additional Elements: Responsible Recruitment 8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.
- 8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.
- 8.5 Employment agencies must only supply workers registered with them.
- 8.6 Workers pay no recruitment fee at any stage of the recruitment process.
- 8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined

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

Current Systems:

- 8.1 Work performed in the facility is on the basis of recognised employment relationship established through national law and practice.
- 8.2 No obligation to employees under labour or social security laws and regulations arising from the regular employment relationship are being avoided.
- 8.3 The suppliers have full understanding of the entire recruitment process and are in compliance with legal requirement.
- 8.4 Effective management systems are in place to identify and monitor the hiring and management of all workers.
- 8.5 Currently no agency workers are employed at the facility.
- 8.6 Based on interaction with employees, no recruitment fee is required at any stage of the recruitment process.
- 8.7 Based on record review and employee's interview appointment letters issued to all sampled employees in a local language of the majority of the workers.
- The Facility does not engage any employee for homework.
- All workers who completed 6 months of probation period were issued with employment confirmation letter in a local language of the majority of the workers.

Evidence examined:

- Personal records of employees
- Facility recruitment Policy.
- Salary and other benefit records.
- Interaction with management and Employees.

Any other comments:

Nil

Responsible Recruitment			
All Workers			
Were all workers presented with terms of employment at the time of recruitment, did	☑ Terms & Conditions presented	☑ Underst	tood by workers
they understand them and are they same as current conditions?	☑ Same as actual conditions		

Audit company:

Report reference: ZAA600012741

Start Date:

End Date:

2023-06-03 2023-06-03

Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	☐ Yes ☑ No
	Migrant Workers
Type of work undertaken by migrant workers:	Not applicable as no migrant workers have been employed at the facility.
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in	☐ Yes ☑ No
writing by the worker and is evidence of the	Please give details:
transaction supplied by the facility to the worker?	Not applicable as no migrant workers have been employed at the facility
Is there any observation on this finding?	Not applicable as no migrant workers have been employed at the facility
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	☐ Yes ☑ No
	Non-employee workers
Recruitment Fees	
Are there any fees?	☐ Yes ☑ No
Agency Workers (if applicable) (Workers sou by the agency. Usually the agencies are paid	rced from a local agent who are not directly paid by the site, but paid by the site and the wages of the individual workers are paid by the agency.)
Number of agencies used (average):	0
Please provide the names of agencies if applicable	Not applicable as no agency workers have been employed at the facility.
Were agency workers' age / pay / hours included within the scope of this audit?	☐ Yes ☑ No
Were sufficient documents for agency workers available for review?	☐ Yes ☑ No
Is there a legal contract agreement with all	☐ Yes ☑ No
agencies?	Please give details:
	Not applicable as no agency workers have been employed at the facility.
Does the site have a system for checking	☐ Yes ☑ No
labour standards of agencies?	Please give details:
	Not applicable as no agency workers have been employed at the facility.
Contractors (Contractors in this context are	generally individuals who supply several workers to a site. Usually
	e wages of the workers are paid by the contractor. Common terms

Audit company: Report reference: Start Date: End Date:

Any contractors on site?	☐ Yes ☑ No
	Please give details:
	Not applicable as no contractor workers have been employed at the facility.
Do all contractor workers understand their terms of employment?	□ Yes ☑ No
	Please give details:
	Not applicable as no agency workers have been employed at the facility.

Audit company:
International Compliance Group

Report reference: ZAA600012741

Start Date: 2023-06-03

End Date: 2023-06-03

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

8A: Compliance Requirements

Nil

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

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

Current Systems and Evidence Examined

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

shown to support the systems. **Current Systems:** 8A.1 It was verified through document review, Facility tour, and management interaction and worker interview that Facility is not using any subcontractor or home worker. 8.2 No system was in place to manage sub-contracting, homeworking and external processing as no sub-contracting, homeworking and external processing exists in the facility. Evidence examined: Production record ·Inward and outward material movement review Interaction with management. Any other comments:

Summary of sub–contracting – if applicable	
Is there any sub-contracting at this site?	☐ Yes ☑ No
Summary of homeworking – if applicable	
Is homeworking used at this site?	☐ Yes ☑ No

Audit company: International Compliance Group Report reference:

Start Date:

End Date:

2023-06-03

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

9: Compliance Requirements

- 9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- 9.2 companies should provide access to a confidential grievance mechanism for all workers

Current Systems and Evidence Examined

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

Current Systems:

- 9.1 Through the interaction with the facility management and employees' interview, it was confirmed that there is no case of harsh, inhumane treatment or abuse of the employees.
- 9.2 Grievance Committee is present in the facility for reporting grievances and suggestion box is present for reporting grievances confidentially.

Evidence examined:

- Policy and procedure on No harassment at workplace
- Grievance committee record
- Interaction with management and employees

Any other comments:	
Nil	

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	☑ Yes □ No	
	Please give details:	
	Grievance committee and suggestion bor facility.	xes are available in the
If yes, are workers aware of these channels and have access? Please give details.	They are free to contact the chairperson of grievance committee and put suggestions and grievances in the suggestion box confidentially.	
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Grievance Committee, suggestion box ar management directly.	nd workers can contact
Which of the following groups is there a grievance mechanism in place for?	☑ Worker ☑ Co	ommunities
	☑ Suppliers ☑ Ot	ther
Please provide grievance mechanism details	Grievance committee and suggestion bor facility.	x is maintained in the
Are there any open disputes?	☐ Yes ☑ No	
	Please give details:	
Does the site encourage its business	☑ Yes □ No	
partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	Please give details:	

Audit company: Report reference: Start Date: End Date:

Is there a published and transparent disciplinary procedure?	☑ Yes □ No
alsolphilary procedure:	Please give details:
If yes, are workers aware of these the disciplinary procedure?	☑ Yes □ No
discipilitary procedure:	Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for	☐ Yes ☑ No
disciplinary purposes (see wages section)?	Please give details:

2023-06-03

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

10A: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

10A.1 All the workers working in the factory are Indian nationals. The Factory has taken copies of all relevant identification documents from all workers and maintains the same in their personal files. 10A.2 All the workers are validated by the employer.

• It was noted through review of documents, interview with the employees and interaction with the factory management that facility employs workers from nearby areas.

Evidence examined:

- Personal Records of employee
- Hiring Policy
- Interaction with the management and employees

Any other comments:

Nil

Audit company:
International Compliance Group

Report reference:

Start Date:

Date: End Date:

3-03

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

10B4: Compliance Requirements

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

10.B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc. 10.B4.3 Businesses shall be aware of their end client's environmental standards/code requirements

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

10.B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 10.B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).

10.B4.7 Businesses shall make continuous improvements in their environmental performance. 10.B4.8 Businesses shall have available for review any environmental certifications or any environmental

management systems documentation

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

10B4: Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

- 10B4.1 The facility meets the requirements of local and national laws related to environmental standards.
- 10B4.2 Facility has obtained required permit to use and disposal of resources e.g., water, waste etc
- 10B4.3 Based on management interaction, facility and their suppliers are aware the environmental requirements.
- 10B4.4 Facility has documented environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.
- 10B4.5 Facility is measuring use of natural resource like water, diesel and have target to reduce.
- 10B4.6 Facility has conducted environment impact assessment and aware of the significant environmental impact of their site and its processes.
- 10B4.7 Facility is working continuously to reduce use of natural resources to improve in their environmental performance.
- 10B4.8 Facility does not have any environment certification. However, facility have documented environmental management systems in place.
- 10B4.9 The facility has HR Manager responsible for implementation of environment management system at audited site.
- 10B4.10 The facility has not completed the SEDEX SAQ and the same has been noted in the observation.
- 1.B4.11 The site has not been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.
- Air consent no: 63633 / UPPCB / Moradabad (UPPCBRO) CTO / air / MORADABAD / 2019 issued on 03-31-2020 by Amit Chandra and is valid till 12-31-2023.
- Water consent no: 62634 / UPPCB / Moradabad (UPPCBRO) CTO / water / Moradabad / 2019 issued on 03-31-2020 by Amit Chandra and is valid till 12-31-2023.

Evidence examined:

Audit company: Report reference: Start Date: End Date:

Facility Policy on environmental compliance. Interaction with management and Employees. Environmental aspect and impact Environment monitoring record Legal and valid environment permits. Electricity Bills. Facility Tour. Water bills.	
Any other comments:	
1. Facility has not filled the SEDEX SAQ	

	Environmental Analysis
Is there a manager responsible for Environmental issues (Name and Position):	HR Manager is responsible for handling environmental issues
Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	☑ Yes □ No
	Please give details:
reduce identified fisks:	The facility has conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks.
Does the site have a recognised environmental system certification such as	☐ Yes ☑ No
ISO 14000 or equivalent?	Please give details:
	The facility has not obtained any equivalent environmental system certification.
Does the site have an Environmental policy?	☑ Yes □ No
If yes, is it publicly available?	☑ Yes □ No
If yes, does it address the key impacts from their operations and their commitment to	☑ Yes □ No
improvement?	Please give details:
	The policy covers the key environmental impacts and commitment to improve.
Does the site have a Biodiversity policy?	☑ Yes □ No
Is there any other sustainability systems present such as Chain of Custody, Forest	☐ Yes ☑ No
Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	Please give details:
Stewardship Council (MSC) etc.:	The facility does not have any of these certifications.
Have all legally required permits been shown?	☑ Yes □ No
Shown:	Please give details:
	The facility has obtained the legally required permits.
Is there a documentation process to record hazardous chemicals used in the	☑ Yes □ No □ Not Applicable
manufacturing process?	Please give details:
	The facility has maintained MSDS of the chemicals being used in the facility.

Audit company: Report reference: Start Date: End Date: ZAA600012741

Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	☑ Yes □ No			
	Please give details:			
	The facility has a system for man local legislations related to enviro	aging client's requirements and nmental issues		
Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	☑ Yes □ No			
	Please give details:			
	The facility maintains reduction talenvironmental aspects.	arget on the identified		
Facility has evidence of waste recycling and	☐ Yes ☑ No			
is monitoring volume of waste that is recycled.	Please give details:			
	No recycling process at site			
Does the facility have a system in place for	☑ Yes □ No			
accurately measuring and monitoring consumption of key utilities of water, energy	Please give details:			
and natural resources that follows recognised protocols or standards?	The facility has a system in place consumptions of key utilities such	The facility has a system in place to monitor and measure the consumptions of key utilities such as water.		
Has the facility checked that any Sub-	☐ Yes ☑ No			
Contracting agencies or business partners operating on the premises have the	Please give details:			
appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Not applicable as no sub-contract	tors are being used by the facility.		
L	Isage/Discharge analysis			
Criteria	Previous year: 2022	Current year: 2023		
Electricity Usage: Kw/hrs	3372	3022		
Renewable Energy Usage: Kw/hrs	0	0		
Gas Energy Usage: Kw/hrs	0	0		
Has site completed any carbon Footprint Analysis?	No	No		
If Yes, please state result				
Water Sources	Local water authority	Local water authority		
Water Volume Used	152	138		
Water Discharged	Sewage	Sewage		
Water Volume Discharged	50	30		
Water Volume Recycled	80	90		
Total waste produced	Carton - 120 Kg, polly - 77 kg and Cardboard - 30 Kg	Cardboard - 110 Kg, polly - 55 Kg and cardboard - 26 Kg		
Total hazardous waste produced	ETP Sludge – 29 Kg, used PPE – 12 Kg, used Oil – 19 LTR, E- wastage – 2 Kg	ETP Sludge – 27 Kg, used PPE – 12 Kg, used Oil – 10 LTR		
Waste to recycling	0	0		
	•			



Waste to landfill	0	0
Waste to other	0	0
Total Product Produced	2500 Pieces / Month	2500 Pieces / Month

Audit company: International Compliance Group

Report reference: ZAA600012741

Start Date:

2023-06-03

End Date: 2023-06-03

Observation **Evidence** [Back to findings summary] Observation Status **OPEN** Reference ZAF600081768 10B4 - Environment 4-Pillar Clause 610 - Environmental section of the Sedex SAQ not Issue Title completed General Environmental Permits, & Management Subcategory systems New or carried □ Carried Over ✓ New over? Root cause □ Training □ Lack of workers □ Costs □ Other Root cause -Other ETI code 10.B4.4 - Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers. Explanation to It was noted during the documents review and the observation interaction with the management that facility has not filled the SEDEX SAQ

Actions

The facility will ensure to fill SEDEX SAQ.

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

10C: Compliance Requirements

- 10.C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent **Business Practice.**
- 10.C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.
- 10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements
- 10.C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.
- 10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice.
- 10.C.6 Businesses should have a designated person responsible for implementing standards concerning **Business Ethics**
- 10.C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.
- 10C: Guidance for Observations
- 10.C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.
- 10.C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

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

Current Systems and Evidence Examined

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

Current Systems:

- 10C.1. The facility conducts the business ethically.
- 10C.2. The facility meets the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices
- 10C.3. Based on audit process and review of records, it was noted that the facility complies with all fiscal legislative requirements.
- 10C.4. It was noted that facility has a transparent system in place for confidentially reporting and dealing with unethical Business Ethics without fear of reprisals towards the reporter.
- 10.C.5. The facility has maintained business ethics policy in place for controlling and reporting any corrupt or unethical practices. Facility conducted their business activities without bribery, corruption, or any type of fraudulent Business Practice.
- 10.C.6. HR Manager is designated person responsible for implementing standards concerning Business Ethics 10.C.7. It was noted that the facility has provided business ethics training to the employees according to their role and responsibility and related job functions.
- 10C.8. The facility has communicated Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all its suppliers.
- 10C.9. The facility has not been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations

Evidence examined:

- Facility business ethics Policy.
- Interaction with management and Employees.
- Legal Licenses and approvals

Any other comments:

Nil

Audit company: Report reference: Start Date: End Date:

Does the facility have a Business Ethics Policy and is the policy communicated and	☑ Internal Policy
applied internally, externally or both, as appropriate?	Policy for third parties including suppliers
	Please give details:
	Facility has communicated their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.
Does the site give training to relevant	☑ Yes □ No
personnel (e.g. sales and logistics) on business ethics issues?	Please give details:
	The facility had provided training to relevant personnel on business ethics issues.
Is the policy updated on a regular (as needed) basis?	☑ Yes □ No
	Please give details:
	The facility has a system to review the Business Ethics Policy on regular basis and update if necessary.
Does the site require third parties including suppliers to complete their own business	☑ Yes □ No
ethics training	Please give details:
	The facility requires their third parties including suppliers to complete their own business ethics training.

Audit company: International Compliance Group Report reference:

Start Date:

End Date: 2023-06-03

Attachments



THE TAJ STORES - SMETA 4P ZAA600012741 - Photo Report - June 3, 2023-R.pdf

Audit company:
International Compliance Group

Report reference: ZAA600012741

Start Date: 2023-06-03

End Date: 2023-06-03





For more information visit: <a>Sedexglobal.com

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

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

Click here for Buyer (A) & Buyer/Supplier (A/B) members:

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

Click here for Supplier (B) members:

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

Click here for Auditors:

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

Audit company: International Compliance Group Report reference:

Start Date:

End Date: