




# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details			
Sedex Company Reference: (only available on Sedex System)	ZC: 292992442	Sedex Site Reference: (only available on Sedex System)	ZS: 292992740
Business name (Company name):	Moonlight Exports		
Site name:	Moonlight Exports		
Site address: (Please include full address)	Vill. Ghunghawli, Behjoi Road, Hayat Nagar, Sambhal- 244303	Country:	India
Site contact and job title:	Mohammad Shariq-Director		
Site phone:	+91 9837923161	Site e-mail:	info@moonlightexports.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:	19 <sup>th</sup> March 2022		

<b>Audit Company Name &amp; Logo:</b>   <b>TÜVRheinland®</b> Precisely Right. TUV Rheinland India Pvt. Ltd <a href="http://www.ind.tuv.com">www.ind.tuv.com</a>	<b>Report Owner (payer):</b>  <b>Moonlight Exports</b>
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact [grievance@sedex.com](mailto:grievance@sedex.com).

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

## Audit Content:

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

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

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size):

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

Lead auditor: Hariom Sharma APSCA number: RA 21705347

Lead auditor APSCA status: In Good Standing

Team auditor: None APSCA number:

Interviewers: Hariom Sharma APSCA number: RA 21705347

Report writer: Hariom Sharma

Report reviewer: H R Venkataramaiah

Date of declaration: 19<sup>th</sup> March 2022

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

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

## Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.		Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
		ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	<a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>		00	00	None Observed
0B	<a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	01	01	00	NC <ul style="list-style-type: none"> <li>ETI Training was not give to workers</li> </ul> Obs <ul style="list-style-type: none"> <li>SAQ was not filled</li> </ul>
1.	<a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None Observed
2	<a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None Observed
3	<a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	01	00	00	NC <ul style="list-style-type: none"> <li>Loose Wires were found in the production floor.</li> </ul>
4	<a href="#">Child Labour</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None Observed
5	<a href="#">Living Wages and Benefits</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None Observed
6	<a href="#">Working Hours</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None Observed
7	<a href="#">Discrimination</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None Observed

8	Regular Employment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None Observed
8A	Sub-Contracting and Homeworking		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None Observed
9	Harsh or Inhumane Treatment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None Observed
10A	Entitlement to Work		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None Observed
10B2	Environment 2-Pillar		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	02	00	00	NC <ul style="list-style-type: none"> <li>Stack Emission test for DG Set was not conducted.</li> <li>Noise monitoring test was not done.</li> </ul>
10B4	Environment 4-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None Observed
10C	Business Ethics		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None Observed

General observations and summary of the site:

#### Audit Process

This is a Initial audit was conducted by TUV Rheinland India Pvt. Ltd. There was 01 auditor, who assessed the facility's operations in 1 days. The scope of this audit was based on 2 Pillar SMETA systems.

#### Overview of opening meeting, facility management responses

Auditor entered the facility at 10:00 am on 19 March 2022 and conducted an opening meeting with facility management according to the ETI Base Code. Mohmmad Shariq- Director was present in the meeting and he assured full co-operation to this audit.

#### Site Summary :-

- The products manufactured at this site is Manufacturer and Exporter of Furniture, Home Accents products, Gifts, Games, Button, Handbag, Jewellery, Lamp & Various Type of Horn Bone Wood Brass Polisher Razin handicrafts.
- Overall responsibility for meeting the standards is taken by the Mohmmad Shariq- Director.
- There are a total 08 employees out of which are all male



- The youngest worker on site was 22 year old.
- There is no union at this factory.
- Facility has started operation since December 2020 on current location.
- All workers were interviewed; 04 were interviewed individually and 04 in one group.
- All workers said they were satisfied with their employment at the factory.
- 08 attendance records and payroll records for April 2021 (Random month), 08 attendance records and payroll records for October 2021 (Random month) and 08 attendance records and payroll records for & February 2022 (Current month) were reviewed in this audit.
- Standard hours on site 8 hours/day with 1 day off in every 7-day-period.
- Facility has 06 days a week working in one shift. Details are given below:
- General shift: 9:00 am – 5:30 pm • Lunch break : 1:00 pm –1:30 pm • Tea breaks: 3:45 pm to 4:00 pm • Weekly Holiday : Sunday
- Salary to all employees is fixed and paid once in a month on or before 7th day of next Month

#### Non-conformances:

In this audit, 01 non-compliance issues was observed in Safety and Hygienic Conditions, 01 non-compliance issues was observed in management systems and 02 non-compliance was observed in Environment 2 Pillar. Further, no non-compliance issue were noted in other sections. The details were marked in specific section of the report.

#### Positive observations:

- There is no evidence of child labour and forced labour.
- There is no evidence of any discrimination, harassment and abuse or unfair disciplinary practices.
- The facility has provided applicable legal minimum wages for all the employees

#### Observations:

01 instance of observation noted in management systems clause.

#### Good Example:

None observed

*\*Please note the table above records the total number of Non-compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.*

## Site Details

Site Details		
A: Company Name:	Moonlight Exports	
B: Site name:	Moonlight Exports	
C: GPS location: (If available)	GPS Address: Vill. Ghunghawli, Behjoi Road, Hayat Nagar, Sambhal-244303	Latitude: Longitude:
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<ul style="list-style-type: none"> <li>Factory License: - Registration Number: UPFA73001701 Dated 27/04/2019 for 50 Persons and power not exceeding 50 HP Valid till 5 years</li> <li>Fire NOC: -UPFS/2019/5091/SBL/SAMBHAL/38/CFO dated 28/03/2019 valid 02/04/2022.</li> <li>Building Stability Certificate: Plan No: GZ/282/2BP/2018 Approved by Prakash Verma (B.E.Civil)</li> <li>Pollution : Air: Ref No. 107353/UPPCB/Moradabad(LAB)/CTO/Air/BHIM NAGAR/2020 Valid for the period of 15/10/2020 to 31/07/2024</li> <li>Water: 107361/UPPCB/Moradabad(LAB)/CTO/Water/BHIM NAGAR/2020 Valid for the period of 15/10/2020 to 31/07/2024</li> </ul>	
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturer and Exporter of Furniture, Home Accents products, Gifts, Games, Button, Handbag, Jewellery, Lamp & Various Type of Horn Bone Wood Brass Polisher Razin handicrafts.	



<p>F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)</p>	<p>Moonlight Exports is located at Vill. Ghunghawli, Behjoi Road, Hayat Nagar, Sambhal-244303. It's covered area is 3000 sq. meters and its plot area is 4100 sq. meters. It was established in December 2020. Age of building is 4 years</p> <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground Floor</td> <td>Office, Warehouse, Showroom,</td> <td>Age of Building- 4 years</td> </tr> <tr> <td>First Floor</td> <td>Packing, Finishing</td> <td></td> </tr> <tr> <td>Second Floor</td> <td>Cutting, Production</td> <td></td> </tr> <tr> <td>Shed 1</td> <td>Woodwork Production</td> <td></td> </tr> <tr> <td>Shed 2</td> <td>Horn Work Production</td> <td></td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>N/A</td> </tr> </tbody> </table> <p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: No integrity issues were observed</p> <p>F3: Does the site have a structural engineer evaluation?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>F4: Please give details: Plan No: GZ/282/2BP/2018 Approved by Prakash Verma (B.E.Civil)</p>	Production Building no	Description	Remark, if any	Ground Floor	Office, Warehouse, Showroom,	Age of Building- 4 years	First Floor	Packing, Finishing		Second Floor	Cutting, Production		Shed 1	Woodwork Production		Shed 2	Horn Work Production		Is this a shared building?	No	N/A
Production Building no	Description	Remark, if any																				
Ground Floor	Office, Warehouse, Showroom,	Age of Building- 4 years																				
First Floor	Packing, Finishing																					
Second Floor	Cutting, Production																					
Shed 1	Woodwork Production																					
Shed 2	Horn Work Production																					
Is this a shared building?	No	N/A																				
<p>G: Site function:</p>	<p> <input type="checkbox"/> Agent  <input checked="" type="checkbox"/> Factory Processing/Manufacturer  <input type="checkbox"/> Finished Product Supplier  <input type="checkbox"/> Grower  <input type="checkbox"/> Homeworker  <input type="checkbox"/> Labour Provider  <input type="checkbox"/> Pack House  <input type="checkbox"/> Primary Producer  <input type="checkbox"/> Service Provider  <input type="checkbox"/> Sub-Contractor         </p>																					
<p>H: Month(s) of peak season: (if applicable)</p>	<p>Uniform Throughout the year</p>																					
<p>I: Process overview:</p>	<p>Collecting Of Raw Material( MDF, wood, Horn &amp; Bone)—</p>																					

(Include products being produced, main operations, number of production lines, main equipment used)	<p>Cutting &amp; Splitting—Pasting &amp; Making Shapes—Grinding &amp; Sanding—Filling &amp; Polishing—Fitting &amp; Finishing—Quality Check &amp; Packing—Dispatch</p> <p>Machinery Used: Leith Machine, Cutter Machine-Sander &amp; Grinder-Moulder-Surface Planner-CNC Router-Laser Machine-UV Flatbed Printer-Panal Saw- Drum Sander-Band Saw-Drum Polishing Machine</p>
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details: No Accommodation Is provided to Employees

Audit Parameters			
A: Time in and time out	Day 1 Time in: 10:00 AM Day 1 Time out: 18:30 PM	Day 2 Time in: Day 2 Time out:	Day 3 Time in: Day 3 Time out:
B: Number of auditor days used:	1 Manday		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define:		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail:      weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If No, why not , Factory was not aware.		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mohmmad Shariq- Director		
H: Is further information available (if yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	N/A		
J: Previous audit type:	N/A		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Worker Representative was present.
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	Union was not present.

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	08	00	00	00	00	00	00	08
Worker numbers – female	00	00	00	00	00	00	00	00
Total	08	00	00	00	00	00	00	08
Number of Workers interviewed – male	08	00	00	00	00	00	00	08
Number of Workers interviewed – female	00	00	00	00	00	00	00	00
Total – interviewed sample size	08	00	00	00	00	00	00	08



A: Nationality of Management	Indian	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i>	Nationalities: B1: Nationality 1: <u>Indian</u> B2: Nationality 2: _____ B3: Nationality 3: _____	Was the list completed during peak season? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If no, please describe how this may vary during peak periods: No Peak periods
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 <u>100</u> C1: approx % total workforce: Nationality 2 _____ C2: approx % total workforce: Nationality 3 _____	
D: Worker remuneration (management information)	D: _____% workers on piece rate D1: _____% hourly paid workers D2: <u>100</u> % salaried workers  Payment cycle: D3: _____% daily paid D4: _____% weekly paid D5: <u>100</u> % monthly paid D6: _____% other D7: If other, please give details	





Worker Interview Summary		
A: Were workers aware of the audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	01 group of 04 employees	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 04	D2: Female: 00
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	None	
I: What did the workers like the most about working at this site?	No work pressure, on time payment, good facilities inside the factory.	
J: Any additional comment(s) regarding interviews:	Not applicable	
K: Attitude of workers to hours worked:	Good	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:		
M: Attitude of workers: (Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk		
The factory agreed that TUV Rheinland auditor conducted confidential interviews with workers who were		

chosen freely without any influence by the factory management; 08 workers from different work floors for individual & group interviews. The workers interviews were conducted in a separate Room. The workers showed a cooperative attitude during the interview process. The effective evidences were collected by workers interview. Based on the workers interview, workers expressed their positive attitude to management and workplace. They agreed with the rules and management of the factory.

The information of interview was as below:

- For child labour issue, all interviewees confirmed that the factory checked their ID cards to verify their ages during recruitment. All interviewed workers declared their ages were over 19 years old. Factory checks the age before recruitment and maintain copies of age related documents in the workers personnel files.
- For forced labour issue, the workers confirmed no "deposit" was required and their original documents such as ID cards were kept by themselves.
- For discrimination issue, the workers' wages were paid based on their positions, outputs and abilities. All interviewees confirmed that no discrimination occurred in the factory.
- For discipline practice issues, the interviewees said they had never been warned, fined or fired if they broke the factory rules.
- For safety and health issue, the workers were satisfied with the working condition and the factory provided induction training for new workers and regular safety training to all workers. Factory does not engage any home workers.
- For working hour's issues, workers reported they worked regularly for 6 days per week, 8 hour per day, they rested on each Sunday. Factory only engages workers for overtime work when there is an urgency of shipment. Workers are receiving overtime allowance at Premium rate. They had right to refuse overtime work.
- For wages issue, the interviewed worker said they could obtain the wages periodically through Bank on or before 07th of every month. Employees confirmed that they get all benefits like Employees state insurance, maternity benefits, Earned leaves etc.
- For treatment issue, the workers confirmed no harsh or inhumane treatment occurred and the management was kind to all employees.
- For freedom of association issue, there was no trade union, but they are clear about employee representatives' election in the factory; they could also complain to their supervisors directly or wrote anonymous letter to the suggestion box. Workers Participation Committee is available in Factory and complaint boxes have been inside the factory to ventilate worker grievance.

N: Attitude of worker's committee/union reps:

*(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk*

The work's committee representatives confirmed that they were-elected from management. They confirmed that they could talk to the workers about their problems and workers brought forth their suggestions and problems if any, to the committee members. Meetings were conducted once in 3 months and the members could put forth the complaints to the management who would then solve the problem. The representatives were very positive about the management and stated that the management took prompt action to rectify any problem.

O: Attitude of managers:

*(Include attitude to audit, and audit process. Both positive and negative information should be included)*

The factory management was cooperative and demonstrated a willingness to improve all issues found during the audit.

## Audit Results by Clause

### 0A: Universal Rights covering UNGP

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

#### 0.A. Guidance for Observations

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

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

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

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

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

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

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

### Current Systems and Evidence Examined

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

**Current systems:** Factory has established the policy and procedure for the Universal rights covering UNGP.

**Evidence examined** – To support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate): Policies, procedures and Interview with management & Worker

Details: Factory has derived the policy, endorsed at the highest level, covering human rights impacts and issues, and ensures it is communicated to all appropriate parties, including its own suppliers. Facility has appointed a designated person Mohammad Shariq- Director responsible for implementing standards concerning Human rights, identified their stakeholders and salient issues and measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights and procedure for the data privacy procedures for workers' information.

Any other comments: None

A: Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility policies and procedure expresses commitment to respect human rights
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	<p>Please give details: The designated person responsible for implementing standards concerning Human rights.</p> <p>Name: Mohammad Shariq Job title: Director</p>
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please give details: Facility has a transparent system for confidentially reporting.</p>
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: If no, please give details The Grievance Mechanism meets the UNGP requirements.</p>
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details: Procedure for the data privacy procedures for workers' information, which is implemented</p>

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

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

## Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2020 _10_ %	A2: This year 2021 _9_ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	6%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2020 _9_ %	C2: This year 2021 _8.5_ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	8%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Accidental registered maintained on form 11 & Form 23, no accident happen so far.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2020 Number: 0	F2: This year: 2021 Number: 0
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2020 0	H2: This year: 2021 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months _0_ % workers	I2: 12 months _0_ % workers
J: % of workers that work on average more than 60 total hours / week in the	J1: 6 months _0_ % workers	J2: 12 months _0_ % workers

last 6 / 12 months:

### 0B: Management system and Code Implementation

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

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

### Current Systems and Evidence Examined

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

**Current systems:** Factory has established the policy and procedure and clearly defined roles and responsibilities. Factory has established the policy on social standards. ETI Code was displayed on the notice board.

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

Details: Factory has displayed the policies, procedures for the workers reference and factory obtained appropriate factory licenses and permits with respect to local and national law. Mohmmad Shariq- Director appointed as management representative to implement and monitor the compliance requirements.

Any other comments: None

### Management Systems:

A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: No such fine imposed on the site till date.
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility has established the policies and procedure with respect to social compliance.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Facility had effectively implemented the social compliance system and ensuring the same by conducting an audit in a periodic manner, necessary corrective and preventive action has



	been taken by the facility for the noncompliance raised during the audit. Further, the report of the same was maintained by the facility.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Managers and workers have received training in the standards for forced labour, child labour, discrimination, harassment & abuse
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Training is provided to all employees. Records are maintained by the facility.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details:
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Facility has dedicated HR department to take care of HR activities
H: Is there a senior person /manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Mr. Shatadal Maity- Hr & Accounts Manager is responsible for compliance with the code.
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Facility had "Data Privacy policy" to ensure all worker information is confidential.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility had a system to ensure the same whether the information was shared on a need to know basis only.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility had a system of conducting internal audit to evaluate the effectiveness of policy and procedures and update the same if required.

L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1 Please give details: Based on the interaction with the management and review of record that effective action has been taken for the risk identified during internal audit.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Facility has a policy which requires labour standards of its own suppliers
<b>Land rights</b>	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Company has the valid factory licence
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: Facility has policy and procedure in place to conduct legal due diligence.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: The factory has formed a written procedure Specific to land rights.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: The premises is owned by the factory
R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: Yes, the factory demonstrates that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts through proper legal sale deed made between the owner and the buyers.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: No illegal appropriation of land for factory building or expansion of footprint

### Non-compliance:

#### 1. Description of non-compliance:

- ☒ NC against ETI/Additional Elements  
☐ NC against customer code:

☐ NC against Local Law

Based on document review, it was noted that ETI Training was not given to workers.

#### ETI requirement:

0.B.4 Suppliers are expected to communicate this Code to all employees.

#### Recommended corrective action:

It was recommended to the facility to give ETI Training to workers.

#### Objective evidence observed:

Document Review

### Observation:

Finding: Observation ☒

Company NC ☐

**Description of observation:** Based on the documentation review and management interaction it was noted that the facility has not completed SAQ.

**ETI requirement:** 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.

**Comments:** It is recommended to the facility to complete the SAQ

#### Objective evidence observed:

Document Review

### Good Examples observed:

Description of Good Example (GE):

None observed

#### Objective evidence observed:

Not applicable

## 1: Freely Chosen Employment

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

### ETI

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

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

### Current Systems and Evidence Examined

To complete 'current systems' Auditor examines 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:** During the audit, workers against this clause raised no complaint or violations. The factory will not hold any identification papers. Workers are free to join or leave the company. The factory does not limit the workers' freedom. Workers are free to leave the work place and manage their own time while not on duty. No Prisoner workers are working.

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):** On site tour/ verification/ Worker interview / Personal Files / Appointment letter

Details: Nothing identified during audit. Factory does not keep any original documents from the workers. Workers are free to leave their employer at any time giving required notices and no restriction for movement within the facility. It has been verified during workers interview. Factory has issued appointment letter to all employees and maintained the details in personal files for all their employees with other relevant documents.

Any other comments: None

A: Is there any evidence of retention of original documents, e.g. passports/ID's	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected: N/A
B: Is there any evidence of a loan scheme in operation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected: N/A
C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected: N/A
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: N/A
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding: N/A

statement?	
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: N/A
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected:
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: Policy and procedure derived and implemented against the same.

#### Non-compliance:

##### 1. Description of non-compliance:

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

None observed

Local law and/or ETI requirement Not applicable

Recommended corrective action: Not applicable

##### Objective evidence observed:

(where relevant please add photo numbers)

Not applicable

#### Observation:

Description of observation: none observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

##### Objective evidence observed:

Not applicable

#### Good Examples observed:

Description of Good Example (GE): none observed

##### Objective evidence observed:

Not applicable

## 2: Freedom of Association and Right to Collective Bargaining are Respected

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

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

### ETI

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

### Current Systems and Evidence Examined

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

**Current systems:** Factory has the Worker committee consisting of duly elected worker representatives. The worker committee meets once in 3 months. The last meeting was conducted on 12/02/2022 Workers – 04 and Management 01, Election Conducted on 18/10/2021. Complaint/ suggestion boxes have been placed inside the factory to ventilate workers' grievances. The workers could complain to their supervisors directly or through their worker representative, although the suggestion box was available in the factory for collecting workers' appeals.

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):** Committee meeting minutes / Workers Interview / complaint Box register.

Details:

1. Workers without distinction, have the right to join any union or form trade unions of their own choosing.
2. There was no evidence of suppression of workers' rights.
3. No union exist in the factory. Hence, factory has asked to elect the worker committee and meeting to be conducted once 3 months.
4. The workers can directly approach the management. However, the Workers Committee, Grievance Handling Committee, Health & Safety Committee, meetings are conducted once in every 3 month. The workers are aware about the committee.

Any other comments: None

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

- ☐ Union (name)
- ☒ Worker Committee
- ☐ Other (specify)
- ☐ None



B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: : Factory has Grievance Handling Committee 12/02/2022 and Health & Safety Committee 12/02/2022  D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Workers representatives conduct the meeting during working hours and management provides awareness to employees to rise their concern through representatives and take part in committees	
F: Name of union and union representative, if applicable:	Not applicable	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Yes	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 18/10/2021
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: 04 Worker	
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Meetings were conducted once in 3 months and last meeting records maintained which was held on 12/02/2022 Minutes of meeting were displayed at notice board for better communication	

M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Not applicable under local law	
If <b>Yes</b> , what percentage by trade Union/worker representation	M1: ____% workers covered by Union CBA	M2: ____% workers covered by worker rep CBA
M3: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A	

### Non-compliance:

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

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

<b>Description of Good Example (GE): Not applicable</b>	<b>Objective evidence observed:</b>  None observed
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### 3: Working Conditions are Safe and Hygienic

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

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

#### ETI

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

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

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

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

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

### Current Systems and Evidence Examined

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

**Current systems:** Factory has developed the policy and procedure for the H&S and implemented the same at all levels by training and maintaining the record. In addition, done the risk assessment and incorporated the appropriate action for each department. Factory doing thermal scanning on main gate before enter in the facility and hand sensitization also done on main gate.

For Fire safety factory follow the legal requirement for the firefighting equipment's and maintaining he same periodically for its functions. Conducting periodical maintenance for all machineries as per the time line and obtain the approval from appropriate authority.

Factory has formed the health and safety committee including the workers and staffs for implementing and monitoring the H&S activities.

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):** Factory walk through / safety committee meeting minutes / minor injury records / accident records / PPE issue records / safety training records / first aid training certificates, fire safety training records / report of examination of pressure vessels.

Details:

- Emergency Mock Drill :Dated 07/01/2022 Head Count –25, Evacuation Time 1:29 Min. Unannounced
- Firefighting Training: Dated 07/01/2022 – Through Bhartiya Fire Safety , Employee –07
- List Of Firefighting Equipment: Fire Extinguishers –24, Fire Alarm –04, Hose Real – 02, Hydrant – 05, Emergency Light –06. , Sand Buckets – 04, Sprinkler-50
- First Aid Box : 04
- First Aid Trained Employee: 04 workers through St. John's Ambulance. 20/12/2019 for 3 Years

It was noted through workers interview, interaction with factory management and factory tour:

- Facility has provided 04 first aid boxes.
- Way paths were marked and provided with emergency exits and aisle marking.
- Factory has conducted fire drill regularly once in every 03 months,
- All rooms had adequate number of exits and emergency exits.
- PPE Training : 08.01.22
- Health And Safety Training : 11/01/22
- Disciplinary Training: 11.01.22
- Business Ethics Training: 11.01.22
- Human Rights Training: 10.01.22
- ETI Awareness Training: 08.01.22

Any other comments: None

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facilities has draft health and safety policy. Facilities providing training to existing along with new workers. All the policies displayed at front notice board for better communication.
B: Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Policies contain the worker manual for machine operation.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: Not applicable
D: Are visitors to the site informed on H&S and provided with personal protective equipment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: The security guard is responsible to inform H & S related information to all visitors.
E: Is a medical room or medical facility provided for workers?  If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: Not applicable Only first aids boxes and trained first aider provided.
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: Facilities does not provide doctor or nurse but they have trained first aider always present inside the factory.
G: Where the facility provides worker	<input type="checkbox"/> Yes

transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input checked="" type="checkbox"/> No G1: Please give details: Facilities does not provide transport facilities as workers are coming from nearby. Legally not required.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: Not applicable
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Risk Assessment covered the areas including all the production activities
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The facility has all the legal permits for use and disposal of natural resources.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: No banned chemical used.

### Non-compliance:

#### 1. Description of non-compliance:

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

Based on the tour of facility, it was noted that loose wires were found on the production floor.

#### Local law

According to Factories act 1948 Sec 7-A. (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory (a) the provision and maintenance of plant and systems of working in the factory that are safe and without risks to health.

#### ETI requirement

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

#### Recommended corrective action:

It was recommended to the facility to remove loose wires.

#### Objective evidence observed:

Factory Tour & NC-2 is attached

**Observation:**

**Description of observation:** Not applicable

**Local law or ETI requirement:** Not applicable

**Comments:** Not applicable

**Objective evidence observed:** Not applicable

**Good Examples observed:**

**Description of Good Example (GE):** Not applicable

**Objective evidence observed:** Not applicable



#### 4: Child Labour Shall Not Be Used

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

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

##### ETI

4.1 There shall be no new recruitment of child labour.

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

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

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

#### Current Systems and Evidence Examined

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

**Current systems:** Factory has a prohibition of child labour policy. Workers were aware that children would not be allowed to work in the facility. All regular workers files contained copies of age proof documents. Factory does not engage workers below 18 years and no child or young worker has been identified during audit. Factory checks the age before recruitment by the doctor and maintains age related documents in the workers' personnel files. It was observed that all these workers were above 19 years of age.

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):** Walk through of the factory / Review of personnel files.

Details: We checked 08 employees from the present strength and checked their files for the age proof and the issuance of appointment letter

Any other comments: Not applicable

A: Legal age of employment:	15 Years
B: Age of youngest worker found:	22 Years
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	Not applicable %
E: Are workers under 18 subject to hazardous work assignments? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details

### Non-compliance:

#### 1. Description of non-compliance:

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

None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: Not applicable

#### Objective evidence observed:

*(where relevant please add photo numbers)*

Not applicable

### Observation:

Description of observation: none observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

#### Objective evidence observed:

Not applicable

### Good Examples observed:

Description of Good Example (GE): none observed

#### Objective Evidence Observed:

Not applicable

## 5: Living Wages are Paid

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

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

### ETI

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

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

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

### Current Systems and Evidence Examined

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

**Current systems:** Factory is paying equal than the legal minimum wage as per the Minimum wage declared by government for the industry and the same applied to all workers.

Other benefits paid as per local law for EL (Elected Leave) for all employees. The factory issued wages through Bank and provided the pay slips to workers for verifying their wages.

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):** Minimum wages Notification, Wage records, ESI records, Leave with wage records of company workers.

Details: Company has provided wages record for 03 months– April 2021, October 2021 & February 2022. We verified the Time card and wage record for 08 workers and the details found meeting the legal requirements.

Any other comments:

None

### Non-compliance:

#### 1. Description of non-compliance:

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

None observed

**Local law and/or ETI requirement: Not Applicable**

**Recommended corrective action: Not Applicable**

#### Objective evidence observed:

(where relevant please add photo numbers)

No applicable

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

Good Examples observed:	
Description of Good Example (GE): none observed	<b>Objective Evidence Observed:</b> <b>not applicable</b>

## Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 8 hours per day, 48 hours per week	A1: 8 hours per day, 48 hours per week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 02 hours per day 12 hours per week 100 hours per quarter	B1: No overtime found during selected month.	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: Un skilled INR 9184/- per month Semiskilled – INR 10102.29/- per month Skilled- INR 11316.16 per month	Legal minimum: Un skilled INR 9184/- per month Semiskilled – INR 10102.29/- per month Skilled- INR 11316.16 per month	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at	Legal minimum: 200% of ordinary	D1: 200% of ordinary rate of	D2: <input type="checkbox"/> Yes

site, please state if possible per hr, day, week, and month)	rate of wages	wages.	<input checked="" type="checkbox"/> No
--	---------------	--------	--

<b>Wages analysis:</b> <a href="#">(Click here to return to Key Information)</a>		
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
A1: If <b>No</b> , why not?		
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	Company has provided wages record for 03 selected months– April 2021, October 2021 & February 2022. We verified the Time card and wage record for 08 workers and the details found meeting the legal requirements.	
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If <b>Yes</b> , please give details: Un skilled- INR 9184/- per month Semiskilled – INR 10102.29/- per month Skilled- INR 11316.16 per month
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	D1: If <b>No</b> , please give details:
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above	E1: Lowest actual wages found: Note: full time employees and please state hour / week / month etc. Un skilled INR 9184/- per month
F: Please indicate the breakdown of workforce per earnings:	F1: ____% of workforce earning under minimum wage F2: _100_ % of workforce earning minimum wage F3: ____% of workforce earning above minimum wage	
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week/month etc. Paid to all eligible employees at the rate of 8.33 %	
H: What deductions are required by law e.g. social insurance?	As per Factory Act & Minimum Wages Act 1948 of the India, factory may deduct wages for un-authorized absence, for fines, housing	

Please state all types:	facility, advance payments, loans, income tax, profession tax etc. Factory is deducting un-authorized absence, and Employee state insurance ( Health cover charges)		
I: Have these deductions been made?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	I1: Please list all deductions that <b>have</b> been made.	1. 2. Please describe: N/A
		I2: Please list all deductions that <b>have not</b> been made.	1. 2. Please describe: N/A
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Record does reflect all time worked including meetings, which are only conducted within the working hours.		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time:		
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details:		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Uttar Govt. will revise the minimum wages on the month of April and October of every year and the same will		

discretionary income).	be paid to the employees accordingly
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Based from wage records review, the facility provides the same pay for same work of similar nature
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:

## 6: Working Hours are not Excessive

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

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

### ETI

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

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

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

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

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

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

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

## Current Systems and Evidence Examined

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

**Current systems:** Facility has 06 days a week working in one shift. Details are given below -  
General shift: 09:00 am – 5:30 pm ,Lunch break : 1:00 pm – 1:30 pm, Weekly Holiday : Sunday

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):** In / Out time records & Wage Slip.

Details: Company has provided wages record for 03 months–April 2021, October 2021 & February 2022 We verified the Time card and wage record for 08 workers and the details found meeting the legal requirements. Employee's interview, the facility has trained all the employees during their induction training on Recording IN/OUT time in biometric attendance system by the employees. The time records were appropriate and meeting legal requirement.

Any other comments: Not applicable



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### Non-compliance:

#### 1. Description of non-compliance:

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

None observed

#### Local law and/or ETI requirement:

Not applicable

**Recommended corrective action:** Not applicable

#### Objective evidence observed:

(where relevant please add photo numbers)

Not applicable

### Observation:

**Description of observation:** none observed

**Local law or ETI requirement:** Not applicable

**Comments:** Not applicable

#### Objective evidence observed:

Not applicable

### Good Examples observed:

Description of Good Example (GE): none observed

#### Objective Evidence Observed:

Not applicable

### Working hours' analysis

Please include time e.g. hour/week/month

[\(Go back to Key information\)](#)

#### Systems & Processes

A. What timekeeping

Describe: The facility has implemented manual attendance to record IN/OUT

systems are used: time card etc.	time recording for all the employees.				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details				
C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:			
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:			
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:			
		N/A			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If <b>yes</b> , please detail hours, %, types of workers affected and frequency Please give details:			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:		F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <b>In accordance with Factories Act 1948, Chapter VI, Section 52 (1),</b> No adult worker shall be required or allowed to work in a factory on the first day of the week (hereinafter referred to as the said day) unless- (a) He has or will have a holiday for a whole day on one of the three days immediately before or after the said day, and (b) The manager of the factory has, before the said day or the substituted day under clause (a) whichever is earlier, - (i) Delivered a notice at the office of the Inspector of his intention to require the worker to work on the said day and of the day which is to be substituted, and (ii) Displayed a notice to that effect in the factory: Provided that no substitution shall be made which will result in any worker working for more than ten days consecutively without a holiday for a whole day.		
	Maximum number of days worked without a day off (in sample):				

	06 Days	
<b>Standard/Contracted Hours worked</b>		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency: Not Applicable
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details: Not Applicable
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: Not applicable	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	___0___%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract/employment agreement/handbook/worker interviews/refusal arrangements: Worker Interview
<b>Overtime Premiums</b>		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a 200% of <b>standard</b> wages: 200% of basic rate of pay. However, No overtime performed
N: Is overtime paid at a	<input checked="" type="checkbox"/> Yes	N1: If yes, please describe % of workers & frequency: 200 % of

premium?	<input type="checkbox"/> No	worker and monthly for 100% of the workers
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	
	N/A	
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> <b>Overtime is voluntary</b> <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)	
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:	
	N/A	
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details:	
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

## 7: No Discrimination is Practiced

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

### ETI

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

### Current Systems and Evidence Examined

To complete 'current systems' Auditorsexaminepoliciesandwrittenproceduresin conjunctionwithrelevantmanagers, 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:** Based from review of wage records and employees interview, no discrimination was noted in hiring, compensation, access to training, promotion, termination or retirement.
- Mohammad Shariq- Director is responsible for the investigation and disposal of discrimination case.
- Based from wage records review, the facility provides the same pay for employees for same work of similar nature.
- 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.
- Gender divisions did not exist in the facility;
- There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
- There was no evidence of sexual harassment.

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

Details:

- Facility Policy.
- The hiring and termination procedure, leave application records and employee handbook.
- Time in and out records, full and final settlement records and training records.
- Appointment letter with terms and conditions for 08 out 08 selected samples.
- Salary and other benefit records.
- Interaction with management and Employees

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 100% A2: Female: 00%
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	None

C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found  C1: Please give details: n/a
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Professional Development	
A: What type of training and development are available for workers?	Facility had a system of professional development of their employees & staff based on character, attendance, any disciplinary action, involvement in training program etc.

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details: n/a
--	---

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

Observation:	
<b>Description of observation:</b> None observed <b>Local law or ETI requirement: not applicable</b>	<b>Objective evidence observed:</b>

<b>Comments:</b> Not applicable	Not applicable
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Good Examples observed:	
Description of Good Example (GE): none observed	<b>Objective Evidence Observed:</b>  Not applicable

## 8: Regular Employment Is Provided

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

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

### ETI

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

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

### Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

## Current Systems and Evidence Examined

To complete 'current systems' Auditor examines 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:** Based on record review and employee's interview appointment letters issued to all 08 out of 08 employees.
- Based on interaction with the facility management, it was noted that all employees are employed on regular basis; and no casual and apprentice employees were engaged.
- Facility does not employ any migrant workers.
- Based on interaction with employees, no recruitment fees is required at any stage of the recruitment process.

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

Details:

- Facility Policy.
- Appointment letter with terms and conditions for 08 out of 08 samples.
- Salary and other benefit records.
- Interaction with management and Employees.

Any other comments: None



### Non-compliance:

#### 1. Description of non-compliance:

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

None observed

**Local law and/or ETI requirement:** Not applicable

**Recommended corrective action:** Not applicable

#### Objective evidence observed:

*(where relevant please add photo numbers)*

Not applicable

### Observation:

**Description of observation:** none observed

**Local law or ETI requirement:** Not applicable

**Comments:** Not applicable

#### Objective evidence observed:

Not applicable

### Good Examples observed:

Description of Good Example (GE): none observed

#### Objective Evidence Observed:

Not applicable

## Responsible Recruitment

### All Workers

A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?

- ☒ Terms & Conditions presented
- ☒ Understood by workers
- ☒ Same as actual conditions

A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:

B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?

- ☐ Yes
- ☒ No

B1: If yes, please describe details and specific category(ies) of workers affected:

C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details:
D: If any checked, give details:	N/A

<p align="center"><b>Migrant Workers:</b></p> <p align="center"><i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i></p>		
A: Type of work undertaken by migrant workers:	Not Applicable	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used:  B2: Total number of (outside of local country) recruitment agencies used:	
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:	C2: Observations:
D: Are Any migrant workers in skilled, technical, or management roles  <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: If yes, number and example of roles:	

## NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other  B1– If other, please give details:
C: If any checked, give details:	

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

<p>E: Does the site have a system for checking labour standards of agencies? If yes, please give details.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details:</p>
---	---

<p><b>Contractors:</b></p> <p><i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i></p>	
<p>A: Any contractors on site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>A1: If yes, how many contractors are present, please give details:</p>
<p>B: If <b>Yes</b>, how many workers supplied by contractors?</p>	
<p>C: Do all contractor workers understand their terms of employment?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please describe finding:</p>
<p>D: If <b>Yes</b>, please give evidence for contractor workers being paid per law:</p>	

### 8A: Sub-Contracting and Homeworking

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

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

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

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

*Note to auditor on homeworking:*

*Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.*

*Note to auditor on subcontracting: auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers*

### Current Systems and Evidence Examined

To complete 'current systems' Auditor 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:** Management has not using any subcontractor and Homeworker in the facility.

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

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

Process Subcontracted	Process 1	Process 2
Name of factory		
Address		

Process Subcontracted	Process 3	Process 4
Name of factory		
Address		

Process Subcontracted	Process 5	Process 6
Name of factory		
Address		

Details: Verified In ward and Outward Registers, Delivery Challans and Conformed with the factory Management.

### Non-compliance:

#### 1. Description of non-compliance: Not applicable

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

Local law and/or ETI /Additional Elements requirement: Not applicable

Recommended corrective action: Not applicable

**Objective evidence observed:**  
 (where relevant please add photo numbers)

Not applicable

### Observation:

Description of observation: Not applicable

Local law or ETI/Additional elements requirement: Not applicable

Comments: Not applicable

**Objective evidence observed:**

Not applicable

### Good Examples observed:

Description of Good Example (GE): Not applicable

**Objective Evidence Observed:**

Not applicable

### Summary of sub-contracting – if applicable

☒ Not Applicable please x

A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting

- ☐ Yes  
☐ No  
 A1: Please describe:

B: If sub-contractors are used, is there evidence this has been agreed with the main client?

- ☐ Yes  
☐ No  
 B1: If **Yes**, summarise details:

C: Number of sub-contractors/agents used:

D: Is there a site policy on sub-contracting?

- ☐ Yes  
☐ No

	D1: If <b>Yes</b> , summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	

Summary of homeworking – if applicable			
<input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If <b>Yes</b> , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?			
F: What processes are carried out by homeworkers?			
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

## 9: No Harsh or Inhumane Treatment is Allowed

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

## ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 <sup>rd</sup> party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Factory has formed the committees like, Grievance handling committee, Works committee, and provide the Suggestion/compliant box for the workers anonymous approach.
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	As per workers interview they are aware about the committee and local NGOs/trade union to rise their concerns.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion/ Compliant box.
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: Grievance meeting is conducted one in three month.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details



G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  H1: If no, please give details
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  I1: If yes, please give details

### Current Systems and Evidence Examined

To complete 'current systems' Auditorsexaminepoliciesandwrittenproceduresin conjunctionwithrelevantmanagers, 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:** Based from the interaction with the facility management and employee's interview, it is observed that no case of abuse or discipline has happened in the facility and the facility has a written disciplinary procedure that is displayed in the notice board of the facility.

- According to the documentation, the facility management had established a disciplinary procedure for employee's misbehaviour, which included oral warning, written warning and finally termination and the site, had developed a training program for all employees on the procedure. Employee interview confirmed that employees were aware of the disciplinary procedure
- As per management interview, document review and employees' interview, there was a policy on Harsh Treatment.
- There is an internal process for grievance and suggestion box has been provided, where employees can report grievances (harassment, bullying, discrimination etc.) management, without any reprisal for the employee in question, will handle any received complaint. All sampled employees were aware this system.

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

Details:

- Facility Policy
- The relevant policy on prevention of harassment and abuse
- Internal grievance procedure documentation.
- Training records
- Interaction with management and Employees

Any other comments: None

### Non-compliance:

#### 1. Description of non-compliance:

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

None Observed

**Local law & ETI requirement:** Not Applicable

#### Recommended corrective action:

Not Applicable

#### Objective evidence observed:

Not Applicable

### Observation:

**Description of observation:** Not applicable

**Local law or ETI requirement:** Not applicable

**Comments:** Not applicable

#### Objective evidence observed:

Not applicable

### Good Examples observed:

**Description of Good Example (GE):** Not applicable

#### Objective Evidence Observed:

Not applicable

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

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

### Additional Elements

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

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

### Current Systems and Evidence Examined

To complete 'current systems' Auditor examines 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:** All workers in the facility are Indians with a right to work anywhere in the country. Generally, the factory ensures that employees meet the legal age limit through physical verification (weight, height, appearance). Otherwise, verification done through Doctors & age proof verification. No immigrant workers have been engaged by the factory.

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

Factory walk through and personnel files review

Details:

No foreigner working in the facility

Any other comments: Not applicable

### Non-compliance:

#### 1. Description of non-compliance: not applicable

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

**Local law and/or ETI /Additional Elements requirement: Not Applicable**

**Recommended corrective action: Not Applicable**

#### Objective evidence observed:

(where relevant please add photo numbers)

**Not applicable**

**Observation:**

**Description of observation:** not applicable

**Local law or ETI/Additional Elements requirement:** not applicable

**Comments:** not applicable

**Objective evidence observed:**

not applicable

**Good examples observed:**

**Description of Good Example (GE):** not applicable

**Objective Evidence Observed:**

not applicable

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

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

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

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

10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.

Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

## Current Systems and Evidence Examined

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

### Current systems:

The facility has established and maintained environmental policy.

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):** Policy and record & Test Reports.

Details:

Facility Policy.

Interaction with management and Employee.

- Pollution : Air: Ref No. 107353/UPPCB/Moradabad(LAB)/CTO/Air/BHIM NAGAR/2020 Valid for the period of 15/10/2020 to 31/07/2024
- Water: 107361/UPPCB/Moradabad(LAB)/CTO/Water/BHIM NAGAR/2020 Valid for the period of 15/10/2020 to 31/07/2024
- Air Ambient Test Report: Report No: AAQ-111219-01 Dated: 25.02.2022 by Noida Testing Laboratories

Any other comments: None

## Non-compliance:

<p><b>1. Description of non-compliance:</b></p> <p><input checked="" type="checkbox"/> NC against ETI/Additional Elements <input checked="" type="checkbox"/> NC against Local Law</p> <p>Based on the review of document, it was noted that Stack Emission Test for DG Set was not conducted by the facility.</p> <p><b>Local law</b></p> <p>In accordance with Environment (Protection) Act, 1986. Section 9(1): Where the discharge of any environmental pollutant in excess of the prescribed standards occurs or is apprehended to occur due to any accident or other unforeseen act or event, the person responsible for such discharge and the person in charge of the place at which such discharge occurs or is apprehended to occur shall be bound to prevent or mitigate the environmental pollution caused as a result of such discharge and shall also forthwith- (a) intimate the fact of such occurrence; and (b) be bound if called upon to render all assistance to such authorities or agencies as may be prescribed.</p> <p><b>ETI/Additional Elements requirement:</b></p> <p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p><b>Recommended corrective action:</b></p> <p>It was recommended to the facility to conduct Stack Emission for DG Set</p>	<p><b>Objective evidence observed:</b></p> <p>Document Review</p>
<p><b>2. Description of non-compliance:</b></p> <p><input checked="" type="checkbox"/> NC against ETI/Additional Elements <input checked="" type="checkbox"/> NC against Local Law</p> <p>Based on the review of documents it was noted that Noise Monitoring Test was not conducted by the facility.</p> <p><b>Local law</b></p> <p>In accordance with Noise Pollution (Regulation and Control) Rules, 2000. Rule 4: (1) The noise levels in any area/zone shall not exceed the ambient air quality standards in respect of noise as specified in the Schedule. (2) The authority shall be responsible for the enforcement of noise pollution control measures and the due compliance of the ambient air quality standards in respect of noise.</p> <p><b>ETI/Additional Elements requirement:</b></p> <p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits</p> <p><b>Recommended corrective action:</b></p> <p>It was recommended to the facility to conduct Noise Monitoring Test.</p>	<p>Document Review</p>

Observation:	
Description of observation: None Observed	Objective evidence observed:

<b>Local law or ETI/additional elements requirement:</b> Not Applicable  <b>Comments:</b> Not Applicable	None Observed
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Good examples observed:	
Description of Good Example (GE): None Observed	<b>Objective Evidence Observed:</b>  None Observed

## Other findings

## Other Findings Outside the Scope of the Code

None Observed

## Community Benefits

(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)

None Observed

## Appendix 1

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

☒ Not Applicable please x



## Photo Form

		
Name Board	Building View	Social Policy
		
Suggestion Box	First Aid Box	Fire Fighting Equipment's
		
Emergency Assembly Area	Sand Buckets	Warehouse
		
Fire Alarm Panel	packing	Finishing

		
Fire Evacuation Plan	Eye Wash Station	Drinking Water

		
Wood Work Production	Hose Reel	Electrical Panel


Fire Hydrant

## NC


NC-2 Loose Wires were found.

## Legal Documents

Factory License	Fire NOC	Consent Order



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

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

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

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

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw\\_3d\\_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

**[Click here for Supplier \(B\) members:](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)**

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY\\_2brg\\_3d\\_3d](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)

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