

Sedex Members Ethical Trade Audit Report





Audit Details						
Sedex Company Reference: (only available on Sedex System)	ZC: 417068151		Sedex Site Re (only available System)		ZS: 41	7232404
Business name (Company name):	Alim Exports					
Site name:	Alim Exports					
Site address: (Please include full address)	Mangupura, Opp Prakash Kambhal, Delhi Road, Moradabad-24400)]	Country:		India	
Site contact and job title:	Mr Jawed Ahmad	– Pro	prietor			
Site phone:	+91-9837041819		Site e-mail:	_	alime	xports@gmail.com
SMETA Audit Pillars:	∑ Labour Standards	Safe	Health & ety (plus ironment 2- ir)	Environ 4-pillar	ment	☐ Business Ethics
Date of Audit:	8 th November 2021	8 th November 2021				

Audit Company Name & Logo:



Report Owner (payer):

(If paid for by the customer of the site please remove for Sedex upload)

Alim Exports

	Audit Conducted By							
Affiliate Audit Company		Purchaser		Retailer				
Brand owner		NGO		Trade Union				
Multi– stakeholder				Combined Audit (select all that apply)				

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact grievance@sedex.com.

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



Audit Content:

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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



SMETA Declaration

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

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

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

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

Lead auditor: Anil Tiwari APSCA number: RA 21701523

Lead auditor APSCA status: In good understanding

Team auditor: Not Required APSCA number: N/A

Interviewers: Anil Tiwari APSCA number: RA 21701523

Report writer: Anil Tiwari

Report reviewer: Jeffry Hawkins

Date of declaration: 8th November 2021

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		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)	
	e audit report, hyperlinks are retained.	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs GE		
0A	Universal Rights covering UNGP						0	0	None Observed
ОВ	Management systems and code implementation					01	0	0	It was noted during worker interview that 04 out of 10 workers were not aware of ETI code of conduct.
1.	Freely chosen Employment					0	0	0	None Observed
2	Freedom of Association					0	0	0	None Observed
3	Safety and Hygienic Conditions					03	0	0	 It was noted during factory tour that 02 out of 6 fire extinguishers located on ground floor found with low pressure level. It was noted during worker interview and documentation review that facility has not conducted the fire drill as scheduled and last drill was conducted on 29th January 2021 It was noted through factory tour that, Inspection and testing of fire extinguishers was not carried out periodically.



- Audited facility exports of all kinds of handicraft items.
- Overall responsibility for meeting the standards is taken by Mr. Mohd. Waseem-Proprietor
- There are a total of 09 employees (09 male and 00 female) at site. Out of 09 employees, on site, 08 employees (Male 08 & Female -00) are production employees and 01 employee (01 Male & 0 Female) is non-production employees. All employees are employed on company roll.
- There is no evidence of child labour. Age proof record was maintained for 08 of 08 randomly selected employees.
- The youngest worker on site was 23-year-old.
- There is no evidence of any discrimination, harassment and abuse or unfair disciplinary practices.
- There are no migrant employees employed at site.
- There is no union at audited facility.
- Worker committee was present in the facility.
- The facility is not using any sub-contractor.
- Wages of employees are fixed on monthly basis. Employees are paid on or before 07th day of every next month.
- Facility has not employed any piece rate employees.
- 100% of the employees are paid through bank transfer.

Facility is operational in one shift as per below detail –

Shift timing: 9:00 am to 18:00 pm Lunch break: 13:00 pm to 14:00 pm

Tea breaks- 11:00 am to 11:15 am and 16:00 pm to 16:15 pm

Weekly Holiday: Sunday

- A total of 08 employees were interviewed and the same numbers of records were reviewed for the months of October 2021 (till audit date), May 2021 and December 2020
- Facility has regular work throughout the year. No specific peak or lean season for the facility.
- 08 employees (08 male & 00 females) were selected for interview. Out of 08, 04 workers (04 Male & 00 Female) interviewed individually and 4 workers in one group.
- All workers said they were satisfied with their employment at the facility.
- As per employee's interaction, they were able to make suggestions to their supervisors and team leaders and sometimes they have seen these Suggestions used.
- Standard working hour's onsite were 208 hours per month.
- Legal minimum wage is INR 9184 per month for unskilled workers. Facility has paid INR 9184 per month to unskilled workers (Helpers).
- Facility has policy to pay Overtime wages at the rate of 200% of regular wage rate. No overtime observed

The closing meeting start at 17:45 pm and corrective action plan was discussed. A copy of the CAP was left to Mr Jawed Ahmad – Proprietor. Auditor

thanked for good cooperation, organization and friendly working environment and left company at 18:10 pm on 8th November 2021.

*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:	Alim Exports					
B: Site name:	Alim Exports					
C: GPS location: (If available)	GPS Address: 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	Factory license – UPFA40006680 valid till 31st December 2021 Pollution – 65986/UPPCB/Moradabad(UPPCBRO)/CTO/water/MAOTSFSNSF/2019 dated – 21st November 2019 and valid till – 31st July 2023 65983/UPPCB/Moradabad(UPPCBRO)/CTO/air/MAOTSFSNSF/2019 dated – 21st November 2019 and valid till – 31st July 2023 Import Export Code – AFHPB7862H GSTIN – 09AFHPB7862H179.					
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Exporter of all kinds of handicraft items.					
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The facility area is 3700 square meter and production area is 4578 square meters. Physical address of the factory is Mangupura, Opp Prakash Kambhal, Delhi Road, Moradabad-244001, Uttar Pradesh India The facility premises were found to be neat and clean and people working were found satisfied with the management.					
	Production Building no	Description	Remark, if any			
	Ground Floor	Office, Kora Storage, Repairing, Security Office, Checking & Packing	None			
	First Floor	Warehouse	None			
	Is this a shared building?	No	None			
	For below, please add any extra rows if appropriate. This facility is a modern structure, and basic facilities for hand wash, drinking water etc., are available. The facility is involved in exports all kind of handicrafts item. F1: Visible structural integrity issues (large cracks) observed? Yes No					

	F2: Please give details: No visible structural integrity issues observed in the factory. F3: Does the site have a structural engineer evaluation? Yes No No F4: Please give details: Factory has approved building stability certificate issued by competent and approved structural engineer.
G: Site function:	☐ Agent ☐ Factory Processing/Manufacturer ☐ Finished Product Supplier ☐ Grower ☐ Homeworker ☐ Labour Provider ☐ Pack House ☐ Primary Producer ☐ Service Provider ☐ Sub-Contractor
H: Month(s) of peak season: (if applicable)	N/A – Uniform
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	The facility is into the export of all kinds of handicraft items. The total capacity is around 10000 pieces per month (as per management). Process flow is as below: The processes at site are Office – Receipt of finished products, checking – assembly if any – final checking- packing and dispatch.
J: What form of worker representation / union is there on site?	☐ Union (name) ☑ Worker Committee ☐ Other (specify) ☐ None
K: Is there any night production work at the site?	☐ Yes ☐ No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	Yes No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	Yes No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	Yes No N1: If no, please give details Not Applicable

Audit Parameters								
A: Time in and time out	A1: Day 1 Time in: 09:20 A2: Day 1 Timeout: 18:10	A3: Day 2 Time in: A4: Day 2 Time out:	A5: Day 3 Time in: A6: Day 3 Time out:					
B: Number of auditor days used:	1 Audit-day (1 Auditor x 1 [Day)						
C: Audit type:	Full Initial Periodic Full Follow-up Partial Follow-Up Partial Other If other, please define							
D: Was the audit announced?	Announced Semi – announced: Wir	ndow detail: weeks						
E: Was the Sedex SAQ available for review?	Yes No E1: If No, why not? As per management, Facility was not aware of SAQ							
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes ☐ No If Yes , please capture detail in appropriate audit by clause							
G: Who signed and agreed CAPR (Name and job title)	Mr Jawed Ahmad – Proprietor							
H: Is further information available (If yes, please contact audit company for details)	☐ Yes ☑ No							
I: Previous audit date:	N/A							
J: Previous audit type:	N/A							
K: Were any previous audits reviewed for this audit	☐ Yes ☐ No ☐ N/A							
Audit attendance	Manageme	nt Worker Repres	entatives					

Audit attendance	Management	Worker Representativ	es
	Senior management	Worker Committee representatives	Union representatives

A: Present at the opening meeting?	⊠ Yes	□No	⊠ Yes	□No	☐ Yes	⊠ No
B: Present at the audit?	⊠ Yes	□No	⊠ Yes	□No	☐ Yes	⊠ No
C: Present at the closing meeting?	⊠ Yes	□No	⊠ Yes	□No	☐ Yes	⊠ No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Not Applico	ıble				
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	Workers have not formed any union in the facility and neither they are associated with any outside union.					



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	Total
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. Please add more nationalities as applicable to site. Add more rows if required.	Nationalities: B1: Nationality 1: India B2: Nationality 2: B3: Nationality 3:	Was the list completed during peak season? ☐ Yes ☐ No If no, please describe how this may vary during peak periods: N/A - Uniform
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 _100% 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: _100% salaried workers Payment cycle: D3:% daily paid D4:% weekly paid D5: _100% monthly paid D6:% other D7: If other, please give details	

Sedex Audit Reference: 2021 INZAA417244062 Sedex Members Ethical Trade Audit Report Version 6.1

Worker Interview Summary						
A: Were workers aware of the audit?	☐ Yes ☒ No					
B: Were workers aware of the code?	∑ Yes □ 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 workers.					
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. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	Xes No If no, please give details	s – Not Applicable				
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	⊠ Yes □ No					
G: In general, what was the attitude of the workers towards their workplace?	□ Favourable □ Non favourable □ Indifferent					
H: What was the most common worker complaint?	No complaints at preser	nt				
I: What did the workers like the most about working at this site?	Management attitude of time and availability of p					
J: Any additional comment(s) regarding interviews:	Workers said that they c management directly fo suggestions.					
K: Attitude of workers to hours worked:	Acceptable					
L. Is there any worker survey information available?						
Yes No L1: If yes, please give details:						
M: Attitude of workers: (Include their attitude to management, workplace, and the interview procincluded) Note: Do not document any information that could put workers of		nformation should be				

08 employees were selected for individual and group interviews found to be happy with the management behaviour. No negative information was raised. No negative comments were received from the workers & staff against the management.

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

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

Members from works committee looked very positive towards the management and no negative information reported. Their attitude towards factory management seemed positive. The reason they give for the same are: on time payment, good facilities, good behavior of the management and supervisors.

O: Attitude of managers:

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

The factory management showed a positive attitude to this audit during the whole process. All documentation requested for review was provided timely. At the end of the audit all the non-compliances were accepted by the facility. The facility management showed strong commitment for taking corrective actions against the Non-Conformance. After factory tour it was noted that the management is very much committed towards implementation of health and safety requirements

Audit Results by Clause

0A: Universal Rights covering UNGP

(Click here to return to summary of findings)

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- 1. Factory has established worker related policies and procedures, pertaining to the human rights impacts and issues
- 2. Factory has a designated person responsible for implementing standards concerning Human rights.
- 3. It was noted that factory has measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- 4. Factory generally has a process for managing respect of addressing any negative impacts to factory own employees and external services such as security and janitorial.

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

Details:

- Documented policy on human rights
- Supplier's social compliance monitoring records.
- Interaction with Management and Interview with employees

A: Policy statement that expresses commitment to respect human rights?	Yes No A1: Please give details: Factor policies and procedures pertorights		
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	⊠Yes □ No		
S S	Please give details: Name: Mr Jawed Ahmad Job title: Proprietor		
E: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals owards the reporter? □ No □ C1: Please give details: Suggestion/ Complaint boxes had been provide conspicuous places in the facility through which workers express their suggestion / complaints if or		ility through which	
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rightscompatible, a source of continuous learning and based on stakeholder engagement)	YesNoD1: If no, please give details		
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	∑ Yes □ No		
E1: Please give details: The plant information was found to be the business module of the c		naintained throughout	
Fi	ndings		
Finding: Observation Company NC Description of observation:		Objective evidence observed:	
Local law or ETI/Additional elements / customer spe			
Comments:			
· · · · · · · · · · · · · · · · · · ·			
Good examples observed:			
Description of Good Example (GE):		Objective Evidence Observed:	



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: 5 %	A2: This year 6 %
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 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	5%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 3 %	C2: This year 4 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	5%	
E: Are accidents recorded?	Yes No E1: Please describe: Facility maintaining the accident register and Dangerous occurrences register. Review of records show that no accident had happened during this year.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total worke rs]	F1: Last year: Number: Ni	F2: This year: Number: Ni
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	Nil	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: NIL	H2: This year: NIL
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0_% workers	I2: 12 months 0% workers
J: % of workers that work on average	J1: 6 months	J2: 12 months



more than 60 total hours / week in the last 6 / 12 months:

0% workers

0% workers

0B: Management system and Code Implementation

(Click here to return to summary of findings)

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

Current Systems and Evidence Examined

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

Current systems:

- A Social Accountability Policy has been defined by the company for delivering compliance to the ETI Code.
- Mr Jawed Ahmad Proprietor of the company had been appointed as the responsible person for the implementation of ETI code requirements.
- Facility has displayed the abstracts of different act like factories act 1948, Uttar Pradesh factories rules, payment of wages act etc.
- It was noted during worker interview that 04 out of 10 workers were not aware of ETI code of conduct.

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

Details:

- ETI training record
- ETI Policies & Procedure

Management Systems:		
A: In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	Yes No A1: Please give details: During the audit, no evidence found that the facility has had any fine for non-compliance levied against the facility during the last 12 months.	
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	∑ Yes ☐ No B1: Please give details: The facility has its own	

	policies and procedures on forced labour, child labour, discrimination, harassment & abuse and the policies are posted for workers reference. The facility conducts training to the workers on legal requirements. The facility does not maintain any original documents of the employees and checks with a valid age proof document at the time of hire.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	On the day of assessment no traces of forced labour, child labour, discrimination, harassment & abuse was observed. All interviewed employees reported that they are treated with dignity and respect. The facility conducts training to all employees related to health and safety, legal requirements etc. and maintains all training records.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	Yes No D1: Please give details: The facility conducts training to all employees on the social policies on regular basis and during the induction.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	Yes No E1: Please give details: The facility conducts training to all employees on all social policies and legal requirements on regular basis and during induction for the new employees. The interviewed employees are found to be aware of the standards of child labour, forced labour etc.
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).	Yes No F1: Please give details: The facility does not have any internationally recognised system certifications.
G: Is there a Human Resources manager/department? If Yes, please detail.	Yes No G1: Please give details: HR Manager is also in charge of the Human Resource Management of the company.
H: Is there a senior person / manager responsible for implementation of the code	Yes No H1: Please give details: Mr. Jawed Ahmad – Proprietor as the Management Representative responsible for the implementation of the code.
I: Is there a policy to ensure all worker information is confidential?	Yes No I1: Please give details: The company had



	established a policy on ensuring confidentiality of worker information.	
J: Is there an effective procedure to ensure confidential information is kept confidential?	Yes No J1: Please give details: The company had implemented a procedure on ensuring confidentiality of confidential information.	
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	Yes No K1: Please give details: Internal audits and Management review meetings (MRM) are being conducted periodically to evaluate the performance of the facility's management system as against the requirements of the standard.	
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	Yes No L1Please 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?	Yes No M1: Please give details: The facility had established a Supplier Control Plan and Procedure to ensure that their suppliers confirm to the requirements of the standard.	
Land rights		
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	Yes No N1: Please give details: Factory is available all required land right licenses and permissions	
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?	Yes No O1: Please give details: Factory has a system in place to conduct legal due diligence relating to land title	
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	Yes No P1: If yes, how does the company obtain FPIC: The facility had committed itself to confirm to the requirements of Local laws on all aspects, as per the Social compliance policy of the facility.	
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being	∑ Yes □ No	

built or expanded. Q1: Please give details: Factory owner has paid for the land prior to the facility being built or expanded X Yes R. Does the facility demonstrate that alternatives to a ПΝο specific land acquisition were considered to avoid or R1: Please give details: Factory has obtained all minimize adverse impacts? licenses required by local law. S: Is There any evidence of illegal appropriation of land Yes for facility building or expansion of footprint. \square No \$1: Please give details: There is no illegal appropriation of land and all the legal licenses for the land and buildinas. Non-compliance: Objective evidence 1. Description of non-compliance: NC against ETI/Additional Elements ☐ NC against Local Law observed: (where relevant please add ☐ NC against customer code: photo numbers) It was noted during worker interview that 04 out of 10 workers were not aware of Worker Interview ETI code of conduct. Local law and/or ETI requirement: 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. Recommended corrective action: The facility shall ensure to provide refresh training to all the workers on ETI base code of conduct for the better understanding of the requirement. Observation: Objective evidence Description of observation: observed: Local law or ETI requirement: Comments: Good Examples observed: Objective evidence Description of Good Example (GE): observed:

1: Freely Chosen Employment

(Click here to return to summary of findings)

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

- Through interview with the employees and review of document it was noted that, workers are
 recruited through a personal interview and the job application clearly indicated that each
 applicant is seeking job voluntarily.
- There is no presence of any prison labour at the workplace.
- Factory had documented policy against forced, bonded, or involuntary labour.

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

Details:

- The factory has drafted Anti Forced and bonded labour policy and also displayed in the prominent place in the factory.
- Through interview with the employees and review of document it was noted that, workers are
 recruited through a personal interview and the job application clearly indicated that each
 applicant is seeking job voluntarily.

A: Is there any evidence of retention of original documents, e.g. passports/ID's	Yes No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	Yes No B1: If yes, please give details and category of worker affected:
C: Is there any evidence of retention of wages /deposits	Yes No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	Yes No D1: Please describe finding: Employees are free to leave their job by giving one month notice



period. Yes E: If any part of the business is UK No based or registered there & has a \boxtimes Not applicable turnover over £36m, is there a published a 'modern day slavery E1: Please describe finding: statement? Yes F: Is there evidence of any No. restrictions on workers' freedoms to leave the site at the end of the F1: Please describe finding: work day? Employees are free to leave their workplace without any restriction at the end of the workday. G: Does the site understand the No ☐ No☐ Not applicable risks of forced / trafficked / bonded labour in its supply chain G1: If yes, please give details and category of workers affected: The facility had established a Supplier Control Plan and Procedure to ensure that their suppliers confirm to the requirements of the standard. \boxtimes Yes H: Is the site taking any steps taking □ No to reduce the risk of forced / trafficked labour? H1: Please describe finding: The facility had established Policy and Procedures against Forced Labour and the effectiveness of the policy and procedures are monitored through Internal Audits and Management Review Meetings. Non-compliance: 1. Description of non-compliance: Objective evidence ☐ NC against Local Law: ☐ NC against customer ☐ NC against ETI observed: (where relevant please code: add photo numbers) Local law and/or ETI requirement Recommended corrective action: 2. Description of non-compliance: ■ NC against ETI
■ NC against Local Law:
■ NC against customer code: Local law and/or ETI requirement: Recommended corrective action: Observation:



Description of observation: Local law or ETI requirement: Comments:	Objective evidence observed:	
Good Examples observed:		
Description of Good Example (GE):	Objective evidence observed:	

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

(Click here to return to summary of findings)
(Click here to return to Key Information)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- Workers without distinction, have the right to join any union or form trade unions of their own choosing and to bargain collectively.
- Factory had provided confidential suggestion box for the workers in which workers can put their suggestions and complaints without any fear.
- There was no evidence of suppression of workers' rights.
- No union exists in the factory.
- The factory has a policy of supporting and protecting freedom of association of their employees.
- A works committee, grievances committee represented by workers from all departments is functional in the factory. These representatives of committees are nominated by employees.

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

Details: Through interview with the employees and review of document it was noted that, workers
are free to raise their concerns and problems and management found to be supportive by take
necessary action where and when required.

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?	☐ Yes ☐ No

C: Is it a legal requirement to have a worker's committee?	∑ Yes □ No		
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	Yes No D1: Please give details: Suggestion boxes had been provided at conspicuous places in the facility through which workers express their suggestion / complaints if any. The suggestion boxes are opened periodically in the presence of worker committee representative. On receipt of any suggestions or complaints, actions are intended to be taken and to record the same in a register. D2: Is there evidence of free elections? Yes No		
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	Yes No E1: Please give details: Based on the employee's interview and review of records that, works committee employee representatives are free to carry out their functions like meetings with adequate facilities on periodical basis and the record of the same was maintained.		
F: Name of union and union representative, if applicable:	Not applicable. No union exists in facility.	F1: Is there evidence of free elections? Yes No N/A	
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Workers had elected representatives from among themselves and had formed worker committees.	G1: Is there evidence of free elections? Yes No N/A	
H: Are all workers aware of who their representatives are?	⊠ Yes □ No		
I: Were worker representatives freely elected?	⊠ Yes □ No	11: Date of last election: 20 th May 2021	
J: Do workers know what topics can be raised with their representatives?	⊠ Yes □ No		
K: Were worker representatives/union representatives interviewed?	Yes No If Yes , please state how many: 01		
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Works committee meeting is held once in 3 months in the factory. Records of meeting minutes reviewed and discussed the same with the workers and found effective. The date of last meeting was on 19th August 2021		



☐ Yes ☐ No M: Are any workers covered by Collective Bargaining Agreement (CBA)? If Yes, what percentage by trade M1: _____% workers covered by M2: _____% workers covered by Union/worker representation Union CBA worker rep CBA ☐ Yes ☐ No M3: If **Yes**, does the Collective Bargaining Agreement (CBA) include rates of pay? Non-compliance: 1. Description of non-compliance: Objective evidence ☐ NC against ETI □ NC against Local Law □ NC against customer observed: (where relevant please add code: photo numbers) Local law and/or ETI requirement: Recommended corrective action: 2. Description of non-compliance: □ NC against ETI
□ NC against Local Law
□ NC against customer code: Local law and/or ETI requirement: Recommended corrective action: Observation: Description of observation: Objective evidence observed: Local law or ETI requirement: Comments: Good Examples observed: Objective evidence Description of Good Example (GE): observed:

3: Working Conditions are Safe and Hygienic

(Click here to return to summary of findings)
(Click here to return to Key Information)

ETI

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined

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

Current systems:

- Factory was neat and clean and with adequate lighting arrangements and well ventilated.
- Emergency exits are identified, marked.
- Fire evacuation drills were conducted once in 3 months, last drills held on 29th September 2021 (Total Present 06 & Visitor 00)
- Evacuation plan displayed in the factory.
- Factory has provided 06 fire extinguishers (ABC Type), Fire Alarm 03, Emergency Light 02
- Visual fire alarm is installed in each section.
- 04 persons are trained on use of firefighting equipment.
- Adequate number of first aid boxes (02) with prescribed contents are kept at all sections of the factory except assemble area.
- Adequate number of persons (02) was trained for first aid from St. John Ambulance Association.
- Accidents / injuries records are maintained.
- The facility has a policy on health and safety, which was found to be suitable.
- Safety signage was posted in various departments.
- The facility has provided 24 X 7 security arrangements.
- The facility has appointed Mr Jawed Ahmad Proprietor who is responsible for H&S at work.
- Factory has provided 01 male and 01 female toilet facilities to their employees.
- It was noted during factory tour that 02 out of 6 fire extinguishers located on ground floor found with low pressure level.
- It was noted during worker interview and documentation review that facility has not conducted the fire drill as scheduled and last drill was conducted on 29th January 2021
- It was noted through factory tour that, Inspection and testing of fire extinguishers was not carried out periodically.

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

Details:

- Health and safety policy
- Health and safety committee minutes Last meeting was conducted on 21st September 2021



Training records and certificates for fire and first aid.
Fire equipment maintenance records
Fire drill records
Fire licence, Stability certificate for the building, Building approval, etc.

Any other comments: Nil

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	Yes No A1: Please give details: Health and Safety policy and procedures prepared by the management and the same is fit for purpose. Facility conducting the health and safety training periodically.
B: Are the policies included in workers' manuals?	Yes No B1: Please give details: Facility had included the social compliance policies in worker's manual.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	Yes No C1: Please give details: No change in structure
D: Are visitors to the site informed on H&S and provided with personal protective equipment	☐ Yes ☐ No D1: Please give details: Facility visitors are informed on H&S and provided with appropriate personal protective equipment.
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.	☐ Yes ☑ No E1: Please give details: Not required by Law
F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?	☐ Yes ☐ No F1: Please give details: Not required by Law, however facility has enough first aid trained persons.
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	Yes No G1: Please give details: Not required by Law
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	Yes No H1: Please give details: Not required by Law

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? J: Is the site meeting its legal obligations on environmental requirements including required 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?	☐ Yes ☐ No ☐ No ☐ Please give details: Facility had conducted risk assessment of corrective and preventive action has been the identified risks. ☐ Yes ☐ No ☐ J1: Please give details: Facility is meeting its legal obligations or requirements including required permits natural resources. ☐ Yes ☐ No K1: Please give details: Based on interaction with facility managed does not use any banned chemicals an environmental standards based on cust	een by the facility for n environmental for use and disposal of gement that the facility ad meet all the
	Non-compliance:	
1. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: It was noted during factory tour that 02 out of 6 fire extinguishers located on ground floor found with low pressure level.		Objective evidence observed: (where relevant please add photo numbers) Factory tour
Local law and/or ETI requirement 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.		
In accordance with Factory Act 1948, Chapter IV 34. SCHEDULE Fire protection Rule (7) (k)All extinguishers shall be thoroughly cleaned and re-charged Immediately after discharge. Sufficient refill material shall be always kept readily available for this purpose.		
Recommended corrective action: The facility shall ensure to refill the identified fire extinguisher and monitor the same on periodic basis.		
2. Description of non–compliance: ☑ NC against ETI ☑ NC against Local Law ☐ NC against customer code:		Documenation Review and Worker Interview
It was noted during worker interview and documentation review that facility has not conducted the fire drill as scheduled and last drill was conducted on 29th January 2021		

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

Local law and/or ETI requirement:



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.	
in accordance with Factory Act 1948, Chapter 4 Section 68. Fire protection12) Personnel in charge of equipment and for fire fighting, fire drills etc(a) The first-aid and other fire fighting equipment to be provided as required in sub-rules (10) and (11) shall be in charge of a trained responsible person. (b) Sufficient number of persons shall be trained in the proper handling of fire fighting equipment as referred to in clause (a) and their use agianst the types of fire of which they are intended to ensure that adequate number of persons are avilable for fire fighting by means of first-aid fire fighting equipment and others. Such persons shall be provided with clothing and equipment including helmets, belts and boots, preferably gumboots. Wherever vehicles with towing attachment are to be rpovided as required in clause (d) of sub-rule (11) sufficient number of persons shall be trained in driving these vehicles to ensure that trained persons are available for driving them whenever the need arises. ©Fire fighting drills shall be held at often as necessary and at least once in every period of 3 months.	
Recommended corrective action: The facility shall ensure to conduct fire drill once in period of every three months.	
3. Description of non-compliance: ☐ NC against ETI ☐ NC against customer code:	
It was noted through factory tour that, Inspection and testing of fire extinguishers was not carried out periodically.	Factory tour
Local law and/or ETI requirement: 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.	
In accordance with Factory Act 1948, Chapter IV 34. SCHEDULE Fire protection Rule(7)(I)All first-aid fire fighting equipment shall be subjected to routine maintenance, inspection and testing to be carried out by properly trained persons. Periodicity of the routine maintenance, inspection and test shall conform to the relevant Indian Standards.	
Recommended corrective action: The facility shall ensure to conduct periodic inspection and testing of fire extinguisher	

Observation:	
Description of observation:	Objective evidence observed:
Local law or ETI requirement:	

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Recommended corrective action:			
Good Examples observed:			
Description of Good Example (GE):	Objective Evidence Observed:		

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

Current systems:

- The establishment has posted "No child labour" board at the main gate.
- All workers have been interviewed and each individual worker stated that they are above 18 years
 of age.
- Top management has been interviewed and said that they verify the age of worker before hiring them and keep a valid age proof of each employee.
- There is no evidence of child labour employment was found at the time of audit.

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

Details:

Auditor has seen the child labour policy which factory has displayed at main notice board and outside of the factory. For ensuring no child labour in the factory, factory has maintained age proof in all personal files in form of school leaving certificated, Voter ID cards, Aadhar Cards or dental age proof and auditor has verified **08** personal files.

A: Legal age of employment:	Above 15 years
B: Age of youngest worker found:	23 Years completed
C: Are there children present on the work floor but not working at the time of audit?	☐ Yes ☑ No
D: % of under 18's at this site (of total workers)	0%
E: Are workers under 18 subject to hazardous work assignments?	☐ Yes ⊠ No



(Go to clause 3 – Health and Safety) E1: If yes, give details			
Non-compliance.			
Non–compliance:			
Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)		
Local law and/or ETI requirement:			
Recommended corrective action:			
2. Description of non–compliance: NC against ETI NC against Local Law NC against customer code:			
Local law and/or ETI requirement:			
Recommended corrective action:			
Observation:			
Description of observation:	Objective evidence observed:		
Local law or ETI requirement:	observed.		
Comments:			
Good Examples observed:			
Description of Good Example (GE):	Objective Evidence Observed:		



5: Living Wages are Paid

(Click here to return to summary of findings)
(Click here to return to Key information)

ETI

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Current Systems and Evidence Examined

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

Current systems:

- 1. Based from review of wage records, the facility has paid the applicable minimum wages to all the employees.
- 2. Based from employee's interview, wages are fixed on daily rated, calculated and paid on monthly basis on or before 7th of respective month.
- 3. Based from employee's interview, wage slips are provided to all the employees and employees are aware of their wage calculations.
- 4. Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules.
- 5. Based on employee's interview and record review all the employees are received appointment letter with written and understandable information about their employment conditions in respect to wages.

Remark- Currently, Provident Fund (PF) is not applicable to this factory as the factory strength is less than 20 workers. As & Deplicable subjected to factory employ 20 & Deplicable subjected to factory employ 20 & Deplicable subjected to ensure

to pay PF benefits to all workers immediately as per legal norms.

- Currently, ESI is not applicable to this factory as the factory strength is less than 10 workers. As & the ESI is applicable subjected to factory employ 10 & persons, factory need to ensure to pay ESI benefits to all workers immediately as per legal norms.

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

Details:

Auditor has verified 3 months i.e., October 2021, May 2021 and December 2020 records of Wages records, Time records, Leave records, Wages slip, muster roll and social benefits records such as Provident Fund and Welfare contribution of each employee.

Any other comments: Nil

Non-compliance:



B: Overtime hours:

1. Description of non-compliance: NC against ETI NC against Local Law code:	□ NC against custo	mer	observ (where	ive evidence ed: relevant please oto numbers)
Local law and/or ETI requirement:				
Recommended corrective action:				
2. Description of non–compliance: NC against ETI NC against Local Law code:	□ NC against custo	mer		
Local law and/or ETI requirement:				
Recommended corrective action:				
Observation:				
Description of observation:				ive evidence
Local law or ETI requirement:			observ	ea:
Comments:				
Good Examples observed:				
Description of Good Example (GE):			Object Observ	ive Evidence red:
Summary Information				
Criteria	Local Law (Please state legal requirement)	Actual of Site (Record results ago	d site ainst the	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: 48 hours / Week	A1: 48 hours /	Week	A2: ☐ Yes ☑ No

Legal maximum:

B2:

B1: No overtime

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(Maximum legal and actual overtime hours, please state if possible per day, week, and month)	02 hour per day / 12 hours per week	found in sampled months	☐ Yes ☑ 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: Minimum wages fixed by the UP- Government w.e.f 01.10.2021INR 9184 per month (Unskilled) -INR 10201.29 per month (Semi Skilled) -INR 11316.16 per month (Skilled)	C1: C1: -INR 9184 per month (Unskilled) -INR 10202 per month (Semi Skilled) -INR 11314 per month (Skilled)W.E.F 01.10.2021	C2: ☐ Yes ☑ No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 200% of normal rate of wages	D1: 200% of normal rate of wages	D2: ☐ Yes ☑ No

Wages analysis: (Click here to return to Key Information)				
A: Were accurate records shown at the first request?	⊠ Yes □ No			
A1: If No , why not?	Not Applicable			
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)	08 samples from October 2021 08 samples from May 2021 08 samples from December 2020			
C: Are there different legal minimum wage grades? If Yes , please specify all.	⊠ Yes □ No	C1: If Yes , please give details: -INR 9184 per month (Unskilled) -INR 10201.29 per month (Semi Skilled) -INR 11316.16 per month (Skilled)		
D: If there are different legal minimum grades, are all workers graded and paid correctly?	Yes No N/A	D1: If No , 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?	Below legal min Meet Above	E1: Lowest actual wages found: Note: full time employees and please state hour / week / month etcINR 9184 per month (Unskilled) -INR 10202 per month (Semi Skilled) -INR 11314 per month (Skilled)		
F: Please indicate the breakdown of	F1:% of workforce earning under minimum wage			

workforce per earnings:	F2:% of workforce earning minimum wage F3: 100 % 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. Facility has paid bonus at the rate of 8.33% (Legal Minimum is 8.33%) of the gross wages.			
H: What deductions are required by law e.g. social insurance? Please state all types:	Deductions are required to be made for Statutory Social Security Benefits viz., Currently, Provident Fund (PF) is not applicable to this factory as the factory strength is less than 20 workers. As & Description workers are persons, factory need to factory employ 20 & Description of the persons, factory need to ensure to pay PF benefits to all workers immediately as per legal norms. - Currently, ESI is not applicable to this factory as the factory strength is less than 10 workers. As & Description of the persons, factory need to ensure to pay ESI benefits to all workers immediately as per legal norms.			
I: Have these deductions been made?	☐ Yes ☐ No	I1: Please list all deductions that have been made. I2: Please list all deductions that have not been made.		1. N/A 2. N/A Please describe:
				1. 2. Please describe:
J: Were appropriate records available to verify hours of work and wages?	Yes No Manual attendance Record system was found to be maintained for recording the In and Out timings of all employees. Wage register was found to be maintained for all employees to record attendance, based on Manual In / OUT time system. Wages slips had been issued to all employees towards acknowledgement of receipt of wages.			
K: Were any inconsistencies found? (if yes describe nature)	☐ Yes ⊠ No	K1: Type Poor record keeping Isolated incident Repeated occurrence:		ed incident
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)	 ∑ Yes ☐ No L1: Please give details: Facility had implemented Manual recording system to record the in/out time recording and all time worked by the employees are recorded. 			



M: Is there a defined living wage: 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.	Yes No M1: Please specify amount/time: Facility did not define any living wages. At present facility is following the applicable minimum wages as notified by the State government.
M2: If yes, what was the calculation method used.	□ ISEAL/Anker Benchmarks □ Asia Floor Wage □ Figures provided by Unions. □ Living Wage Foundation UK □ Fair Wear Wage Ladder □ 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 discretionary income).	Yes No N1: Please give details: The local government revises the minimum wage every six months which the facilities must comply
O: Are workers paid in a timely manner in line with local law?	∑ Yes □ No
P: Is there evidence that equal rates are being paid for equal work:	Yes No P1: Please give details: Review of appointment orders, time records, wage registers and wage slips show that equal rate of wages are being paid for equal work done by employees.
Q: How are workers paid:	☐ Cash ☐ Cheque ☑ Bank Transfer ☐ 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)

FTI

- 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 <u>all</u> of the following are met:
 - this is allowed by national law;
 - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
 - appropriate safeguards are taken to protect the workers' health and safety; and
 - The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined

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

Current systems:

Factory has Manual system to record the attendance of the workers. Through employees' interview and factory policy it was noted that overtime is voluntary. The overtime wage rate is 200% of the regular wage rate. As per the reviewed records, the regular working hours and overtime working hours followed the legal and client requirement.

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

Details:

- Payrolls (for sampled months of October 2021, May 2021 and December 2020)
- Time IN / OUT records (for sampled months of October 2021, May 2021 and December 2020)
- Production records (from work floors to check for discrepancies)
- Leave records
- Muster roll



Any other comments:				
Non-compliance:				
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)			
Local law and/or ETI requirement:				
Recommended corrective action:				
2. Description of non-compliance: NC against ETI NC against Local Law NC against customer code:				
Local law and/or ETI requirement:				
Recommended corrective action:				
Observation:				
Description of observation:	Objective evidence			
Local law or ETI requirement:	observed:			
Comments:				
Good Examples observed:				
Description of Good Example (GE):	Objective Evidence Observed:			



Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe: Manua	l Attendan	ce Record System		
B: Is sample size same as in wages section?	Yes No B1: If no, please g	give details			
C: Are standard/contracted working hours defined in all contracts/employment agreements?	⊠ Yes □ No	workers d	o NOT have stand /employment agr	ils including % and v lard hours defined in eements.	
D: Are there any other types of	☐ Yes ☑ No	D1: If YES,	please complete	as appropriate:	
contracts/employment agreements used?		0 hrs	Part time	☐ Variable hrs	Other
		If "Other", Please define:			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	☐ Yes ☑ No	E1: If yes , and frequ Please giv	iency	rs, %, types of worke	ers affected
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: 1 in 7 days 2 in 14 days No If 'No', please explain:	F3: Is this o	allowed by local lo	3M.Š	
	Maximum numbe	er of days w	orked without a d	lay off (in sample):	
	06 Days				

Standard/Contracted Hours worked				
G: Were standard	☐ Yes ⊠ No	G1: If yes, % of workers & frequency:		
working hours over 48 hours per week found?	⊠ NO			
H: Any local waivers/local law or permissions which	☐ Yes ⊠ No	H1: If yes, please give details:		
allow averaging/annualised	MINO			
hours for this site?				
Overtime Hours worked				
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours:	No overtime found in sampled months		
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	☐ Yes ☑ No			
K: Approximate percentage of total workers on highest overtime hours:	0%			
L: Is overtime voluntary?	Yes No Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Overtime is voluntary and the employees can refuse the overtime.		
Overtime Premiums				
M: Are the correct legal overtime premiums paid?	Yes No N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of standard wages: As per policy factory has paid the overtime at 200% of the ordinary rate of wages. However, as per provided time records no overtime were performed by any of the employee.		
N: Is overtime paid at a premium?	∑ Yes □ No	N1: If yes, please describe % of workers & frequency: As per policy factory has paid the overtime at 200% of the ordinary rate of wages. However, as per provided time records no overtime were performed by any of the employee.		

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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	□ No □ Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) □ Collective Bargaining agreements □ Other	
where relevant.	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	
	Not Applicable - No overtime work during the sampled months. However If engaged any Overtime work, Facility paying 200% of normal rate of wages.	
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the	Overtime is voluntary Onsite Collective bargaining allows 60+ hours/week Safeguards are in place to protect worker's health and safety Site can demonstrate exceptional circumstances Other reasons (please specify)	
boxes where relevant.	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:	
	No overtime work during the sampled months. However If engaged any Overtime work, Facility paying 200% of normal rate of wages.	
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	Yes 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.	Yes No The facility had established an Urgent Business Needs Policy under which overtime can be engaged on special occasions of Urgent Business Needs. The overtime hours that might be engaged had also been declared as voluntary. Facility ensures that the overtime hours are within the legal limit.	

7: No Discrimination is Practiced

(Click here to return to summary of findings)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

• The facility had displayed Anti-discrimination policy on the notice board and well explained to all employees.

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

Details:

• It was noted from interview with the employees and review of records that employees are not discriminated in hiring, compensation, promotion and termination based on race, caste, national origin, religion, age, disability, gender, marital status and sexual orientation.

Any other comments: Nil

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:	#: No such skilled or technical roles had been engaged
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?:	Hiring Compensation Access to training Promotion Termination or retirement No evidence of discrimination found C1: Please give details: No evidence of discrimination was found

Professional	Deve	lopment
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A: What type of training and development are available for workers?	All employees had been provided with p Health & Safety and ETI requirements	periodical trainings on	
B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	∑ Yes □ No		
	If no, please give details:		
	Non–compliance:		
Description of non–compliance: NC against ETI	ocal Law NC against customer	Objective evidence observed: (where relevant please add photo numbers)	
Local law and/or ETI requirement:			
Recommended corrective action:			
2. Description of non-compliance: NC against ETI NC against Local Law NC against customer code:			
Local law and/or ETI requirement:			
Recommended corrective action:			
Observation:			
Description of observation:		Objective evidence	
Local law or ETI requirement:		observed:	
Comments:			

Good Examples observed:		
Description of Good Example (GE):	Objective Evidence Observed:	

8: Regular Employment Is Provided

(Click here to return to summary of findings)
(Click here to return to Key Information)

ETI

- 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour–only contracting, sub–contracting, or home–working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed–term contracts of employment.

Additional Elements: Responsible Recruitment

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

Current Systems and Evidence Examined

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

Current systems:

- The company had undertaken to ensure that all employees perform their work on the basis of an employment contract.
- The recruitment policy and procedure of the company on this regard was available and had been communicated to the employees.
- It was noted that there is no temporary workers had been employed in the company.
- It was also noted that home workers or apprentices are also not being engaged in the production

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

Details:

- The hiring and termination practices
- Personal files
- Appointment order.
- Payroll records.
- Time Cards
- Interaction with the production supervisors and interview of employees.

Any other comments: Nil



Non-compliance: 1. Description of non-compliance: Objective evidence □ NC against ETI
□ NC against Local Law
□ NC against customer observed: (where relevant please code: add photo numbers) Local law and/or ETI requirement: Recommended corrective action: 2. Description of non-compliance: □ NC against ETI
□ NC against Local Law
□ NC against customer code: Local law and/or ETI requirement: Recommended corrective action: Observation: Description of observation: Objective evidence observed: Local law or ETI requirement: Comments: Good Examples observed: Description of Good Example (GE): **Objective Evidence** Observed: **Responsible Recruitment All Workers** A: Were all workers presented with ☐ Terms & Conditions presented ☐ Understood by workers terms of employment at the time of recruitment, did they Same as actual conditions understand them and are they same as current 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:	Recruitment / hiring fees Service fees Application costs Recommendation fees Placement fees Administrative, overhead or processing fees Skills tests Certifications Medical screenings Passports/ID's Work / resident permits Birth certificates Police clearance fees Any transportation and lodging costs after employment offer Any transport costs between work place and home Any relocation costs after commencement of employment New hire training / orientation fees Medical exam fees Deposit bonds or other deposits Any other non-monetary assets Other – C1: If other, please give details:
D: If any checked, give details:	Not Applicable

Migrant Workers: 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 A: Type of work undertaken by migrant Not applicable [Migrant workers had not been engaged workers: B: Please give details about recruitment B1: Total number of (in country recruitment agencies) used: Not agencies for migrant workers: applicable [Migrant workers had not been engaged B2: Total number of (outside of local country) recruitment agencies used: Not applicable [Migrant workers had not been engaged ☐ Yes ☐ No C: Are migrant workers' voluntary C2: Observations: Not applicable [Migrant deductions (such as for remittances) workers had not been engaged confirmed in writing by the worker and C1: Please describe is evidence of the transaction supplied finding: by the facility to the worker?



Migrant Workers (this should include all	s, number and example of roles: licable [Migrant workers had not been engaged
--	--

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	Yes
	⊠ No
B: If yes, check all that apply:	Recruitment / hiring fees Service fees Application costs Recommendation fees Placement fees Administrative, overhead or processing fees Skills tests Certifications Medical screenings Passports/ID's Work / resident permits Birth certificates Police clearance fees Any transportation and lodging costs after employment offer Any transport costs between work place and home Any relocation costs after commencement of employment
	New hire training / orientation fees Medical exam fees Deposit bonds or other deposits Any other non-monetary assets Other
	B1– If other, please give details: Not Applicable
C: If any checked, give details:	Not Applicable

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: Not Applicable - Agencies are not being used	
B: Were agency workers' age / pay	Yes	



П No / hours included within the scope of this audit? Not Applicable C: Were sufficient documents for Yes ☐ No agency workers available for review? Not Applicable Yes No D: Is there a legal contract / agreement with all agencies? D1: Please give details: Not Applicable E: Does the site have a system for Yes □ No checking labour standards of agencies? E1: Please give details: Not Applicable If yes, please give details.

Contractors: 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,		
A: Any contractors on site?	Yes No A1: If yes, how many contractors are present, please give details:	
B: If Yes , how many workers supplied by contractors?	Not Applicable	
C: Do all contractor workers understand their terms of employment?	Yes No C1: Please describe finding: No contract employees in this facility	
D: If Yes , please give evidence for contractor workers being paid per law:	Not Applicable	

8A: Sub-Contracting and Homeworking

(Click here to return to summary of findings) (Click here to return to Key Information)

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

• Facility is not using any sub-contractor and home workers.

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

	phologe pelow poves	
Process-1	Process -2	
Process 3	Process 4	
Process 5	Process 6	
	Process 3	Process - 2 Process 3 Process 4

Details:

- Production records
- Interactions with Management
- Interactions with Production Staff
- Goods/ Vehicle movement registers

Any other comment - Nil

Non-compliance:



Description of non–compliance: NC against ETI/Additional Elemen NC against customer code:	ts NC against Local Law	Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI /Additional Elen	nents requirement:	
Recommended corrective action:		
2. Description of non–compliance: NC against ETI/Additional Elemen NC against customer code:	ts NC against Local Law	
Local law and/or ETI requirement:		
Recommended corrective action:		
	Observation:	
Description of observation:		Objective evidence
Local law or ETI/Additional elements requirement:		observed:
Comments:		
	Cood Evamples absorved:	
	Good Examples observed:	1
Description of Good Example (GE):		Objective Evidence Observed:
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	Yes	



Пио there evidence this has been agreed with the main client? B1: If Yes, summarise details: C: Number of subcontractors/agents used: ☐ Yes D: Is there a site policy on sub-П No contracting? D1: If Yes, 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 \boxtimes Not Applicable please x A: If homeworking is being used, is □Yes П№ there evidence this has been agreed with the main client? A1: If Yes, summarise details: B: Number of homeworkers B2: Female: Total: B1: Male: ☐ Directly C1: If through agents, number of C: Are homeworkers employed direct or through agents? ☐ Through Agents agents: D: Is there a site policy on ☐ Yes П № homeworking? 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 Yes □ № homeworkers? G1: Please give details: H: Are full records of homeworkers ☐ Yes available at the site? ☐ 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 rd party?	Yes No A1: Please give details: Facility has an open door policy. Facility has displayed the contact details of inspector of factories, and other government authorities. So workers can communicate if there anything required.
B: If Yes , are workers aware of these channels and have access? Please give details.	Yes. Contact details of public authorities (Police, Fire Station, hospital, Labor department etc), have been displayed.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Workers can communicate if there anything required through mail, phone or directly.
D: Which of the following groups is there a grievance mechanism in place for?	☐ Workers ☐ Communities ☐ Suppliers ☐ Other D1: Please give details: Facility had effective grievance mechanism in place where workers, communities & suppliers can express their grievance through Suggestion box, Hot line, Committee meetings etc.
E: Are there any open disputes?	Yes 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)	X Yes No No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	Yes No G1: If no, please explain



H: If yes, are workers aware of these the disciplinary procedure?	Yes No H1: If no, please give details	
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	Yes No II: If yes, please give details	
Current Systems and Evidence Examined To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.		
Current systems: From interview with the employees, there was no evidence of harsh or inhumane treatment of employees. All workers are treated with respect and dignity. The company's disciplinary policies had been explained to all employees and all employees were well aware about their rights of grievance redress procedure		
Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):		
Details:		
 Policy on prevention of harassment and abuse Grievance handling procedure documentation. 		
Any other comments: Nil		
	Non–compliance:	
Description of non-compliance: NC against ETI	al Law 🔲 NC against customer	Objective evidence observed:

Non-compliance:			
Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)		
Local law and/or ETI requirement:			
Recommended corrective action:			
2. Description of non-compliance: NC against ETI NC against Local Law NC against customer code:			

Local law and/or ETI requirement: Recommended corrective action:			
Observation:			
Description of observation: Local law or ETI requirement:	Objective evidence observed:		
Comments:			
Good Examples observed:			
Description of Good Example (GE):	Objective Evidence Observed:		

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

(Click here to return to NC-table)

Additional Elements

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.
10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined

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

Current systems:

- The company has established a recruitment policy and related procedures to ensure that only workers with a legal right are employed.
- Company had not employed any foreign nationals.

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

Details:

- Personal files of 08 employees were reviewed.
- Recruitment Policy and Procedures

Any other comments: Nil

Non–compliance:		
1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code: NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)	
Local law and/or ETI /Additional Elements requirement:		
Recommended corrective action:		
2. Description of non–compliance: NC against ETI/Additional Elements NC against customer code: Local law and/or ETI/Additional Elements requirement:		
Recommended corrective action:		

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Observation:		
Description of observation:	Objective evidence observed:	
Local law or ETI/Additional Elements requirement:		
Comments:		
Good examples observed:		
Description of Good Example (GE):	Objective Evidence Observed:	

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

(Click here to return to summary of findings)

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The company had undertaken to comply with the local and international laws and regulations and their end client's environmental requirements through its Environmental Policy.
- The company was found to be aware of the end client's environmental requirements and is committed to comply with the same.
- There are no hazardous operations involved in the manufacturing process of the company.
- Factory has maintained air, noise, particulate matters, emissions, stake analysis certificate as required by NABL Accredited Laboratory.
- Factory had an environmental policy and communicated to all appropriate parties, including its own suppliers.

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

Details:

- On site observation
- Environmental Policy
- Ambient Air Quality, Illumination, Noise and Stack Monitoring Reports.
- Waste disposal records

Any other comments: Nil

Non-compliance:

Description of non-compliance: NC against ETI/Additional Elements NC against Local Law	Objective evidence observed: (where relevant please add photo numbers)		
Local law and/or ETI/Additional Elements requirement:			
Recommended corrective action:			
2. Description of non-compliance: NC against ETI/Additional Elements NC against Local Law			
Local law and/or ETI/Additional Elements requirement:			
Recommended corrective action:			
Observations			
Observation:			
Description of observation:	Objective evidence observed:		
Local law or ETI/additional elements requirement:	observed:		
Comments:			
<u>'</u>			
Good examples observed:			
Description of Good Example (GE):	Objective Evidence Observed:		



Other findings

Other Findings Outside the Scope of the Code

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

None

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

NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection

Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.

protection.	
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
 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. 	
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation
0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.0.2 Suppliers shall appoint a senior member of management who shall be responsible for	

compliance with the Code. 0.3 Suppliers are expected to communicate this Code to all employees. 0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain. ETI 1. Forced Labour ETI 1. Forced Labour 1.1 There is no forced, bonded or involuntary prison 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. ETI 2. Freedom of association and the right to ETI 2. Freedom of association and the right to collective bargaining are respected collective bargaining are respected 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. ETI 3. Working conditions are safe and hygienic ETI 3. Working conditions are safe and hygienic 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.	
ETI 4. Child labour shall not be used	ETI 4. Child labour shall not be used
 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. 	
ETI 5. Living wages are paid	ETI 5. Living wages are paid
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.	
ETI 6. Working Hours are not excessive	ETI 6. Working Hours are not excessive
 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. ETI 7. No discrimination is practised ETI 7. No discrimination is practised 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. ETI 8. Regular employment is provided ETI 8. Regular employment is provided 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. 8A: Sub-Contracting and Homeworking 8A: Sub-Contracting and Homeworking 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. ETI 9. No harsh or inhumane treatment is allowed ETI 9. No harsh or inhumane treatment is allowed 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 10. Other Issue areas: 10A: Entitlement to Work and **Immigration 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. 10. Other issue areas 10B2: Environment 2-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.

SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
Environment Section	Environment Section
B.4. Compliance Requirements 10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards. 10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc. 10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements 10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers. 10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details). 10B4.7 Businesses shall make continuous improvements in their environmental performance. 10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation 10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance. B4. Guidance for Observations 10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor. 10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.	
Business Practices Section	

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers. 10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented.



Photo Form







Facility outside view

Facility main entrance

Facility Name board







Checking & Packing







Fire Extinguisher

Fire Alarm

Emergency Light







Emergency Assembly Area

Policy Display

PPE Instruction and Emergency Number







First Aid Box

Suggestion Box

Drinking water







Finished Goods Storage area



02 out of 6 fire extinguishers located on ground floor found with low pressure level.





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

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