

Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details						
Sedex Company Reference: (only available on Sedex System)	ZC1032140		Sedex Site Re (only available o	eference: n Sedex System)	ZS424	17745
Business name (Company name):	MECTECH KNITFAB	S PVT L	IMITED			
Site name:	MECTECH KNITFABS	S PVT L	.TD (KHANDSA	N)		
Site address:	PLOT NO 748, PACE CITY II, SECTOR 37. GURGAON 122001 IN		Country:		IN	
Site contact and job title:	Mr. Sanjeet Kumar \	/adav /	HR Manager			
Site phone:	NA Site e-mail:			sanje co.in	et.yadav@mectech.	
SMETA Audit Pillars:	Labour Standards		Health and Safety (plus Environment 2-Pillar)	Enviror 4-pillar		Business Ethics
Date of Audit:	2023-09-18					

Audit Company Name:
Intertek India

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

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Audit Content:

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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



SMETA Declaration

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

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

Auditor Team						
Lead Auditor:	Deep Tiwari	APSCA Number:	21700591			
Additional Auditors:	Sumit Yadav		32200763			
Date of declaration:	2023-09-18	-				

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

Site Representation			
Full Name:	Mr. Sanjeet Kumar Yadav		
Title:	HR Manager		
Date of declaration:	2023-09-18		
Comments:			

Any exceptions to this must be recorded here (e.g. different sample size): Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020). The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed

upon with the factory representatives

None



Summary of Findings

Issue	Area of Non-Conformity		Number of issues		sues	Findings
(please click on the issue title to go direct to the appropriate audit results by clause)	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
<u>OB - Management systems and code</u> implementation			0	0	0	
<u>1 - Freely chosen employment</u>			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.1 3.3	§1 §2 §3	5	0	0	NC - ZAF600168363 NC - ZAF600168364 NC - ZAF600168365 NC - ZAF600200524 NC - ZAF600200526
4 - Child labour shall not be used	4.4	§ 4	1	0	0	NC - ZAF600200525
5 - Living wages are paid			0	0	0	
<u>6 - Working hours are not excessive</u>			0	0	0	
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
<u>9 - No harsh or inhumane treatment is</u> <u>allowed</u>			0	0	0	
<u> 10A - Entitlement to work and immigration</u>			0	0	0	
10B2 - Environment 2-pillar			0	0	0	
<u> 10B4 - Environment 4-pillar</u>			0	0	0	
<u>10C - Business ethics 4-pillar</u>			0	0	0	

Local Law Issues

Issue	Description
§1	In accordance with Punjab Factory Rules 1952 as applicable to Haryana, Rule 67-K[Framed U/S 41-B & 112 of the Act] Disclosure of information to workers (g) personal protective equipment required to be used by workers employed in hazardous process or dangerous operations.



§ 2	According to Section 30 of Indian Electricity Rules, 1956:Service lines and apparatus on consumer's premises- (1) The supplier shall ensure that all electric supply lines, wires, fittings and apparatus belonging to him or under his control, which are on a consumer's premises, are in a safe-condition and in all respects fit for supplying energy and the supplier shall take due precautions to avoid danger arising on such premises from such supply lines, wires, fittings and apparatus. (2)Service-lines placed by the supplier on the premises of a consumer which are underground or which are accessible shall be so insulated and protected by the supplier as to be secured under all ordinary conditions against electrical, mechanical, chemical or other injury to the insulation. (3)The consumer shall, as far as circumstances permit, take precautions for the safe custody of the equipment on his premises belonging to the supplier. (4) The consumer shall also ensure that the installation under his control is maintained
	in a safe condition.
§ 3	In accordance with the Factories Act 1948, Section 38 (1) In every factory, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and to provide and maintain (a) safe means of escape for all persons in the event of a fire, and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory all the workers are familiar with the means of escape in case of fire and have been adequately trained in the routine to be followed in such cases.
§ 4	In accordance with Maternity Benefit (Amendment)Act. 2017, In the principal Act, after section 11, the following section shall be inserted, namely: ''11A. (1) Every establishment having fifty or more employees shall have the facility of créche within such distance as may be prescribed, either separately or along with common facilities.

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Site Details

Site Details					
Company Name	MECTECH KNITFABS PVT LIMITED				
Site Name	MECTECH KNITFABS	PVT LTD (KHANDSA)			
GPS location	GPS Address:	28.433648			
(if available)	Coordinates:	Longitud	e-76.996964		
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Factory License Reg No.GGN-ONLINE-GGN-M-78 Valid till 31/12/2025 for employee not more than 450 and 134 HP.				
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturers of rea Women).	dymade knitted garn	nents (Mens, Kids and		
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	MECTECH KNITFABS PVT LTD is located in PLOT NO 748, PACE CITY II, SECTOR 37., Gurugram, Haryana-122050, India The total land area occupied was approx. 2100 sq. meters and 3716.12 sq. meters is covered area including all floors. The facility had operated in the existing location since April 2015. A total of 363 employees were currently working in the facility, which includes 342 workers and 17 management employees and 04 are hired from security agency. All workers were hired by the facility directly. The employees worked for 6 days a week in one shift. The normal working hours were from 09:30 to 18:00 with half hours staggered lunchtime from 13:00 to 13:30 and 13:30 to 14:00 Employees' wages were calculated on hourly rate and paid on or before 7th of each month. There were 01 production building with Basement+Ground+First and Terrace Floor in it.				
Structure and number of buildings	Building Name:	Building	No-1		
	Floor Description Remark		Remark		
	Basement	Cutting,Fabric store ,relaxation area,Trims and accessories store,Cad room ,Electrical maintenance room ,Scrap room.	None		
	Ground	Office,Finishing,pac king ,Laboratory,Warehc use			
	First	Sewing,sampling	None		
	Periphery	Guard room ,Assembly area,Diesel generator,Chemical store ,Diesel store,washing ETP,Meter room ,Transformer	None		



Visible structural integrity issues (large	🗆 Yes 🗵 No			
cracks) observed?	Please give details:			
	None Observed.			
Does the site have a structural engineer evaluation?	🖂 Yes 🗆 No			
	Please give details:			
	Facility has obtained stability certificate dated on 16/2015 by structural engineer Er. R.K.Singh (BE CIVIL).			
Site function	□ Agent			
	Finished Product Supplier Grower			
	Homeworker Labour Provider			
	□ Pack house □ Primary Producer			
	□ Service Provider □ Sub-contractor			
Months of peak season	Select a month to Select a month			
Process overview	Facility is involved in Manufacturing and exporting of readymade garments. Production process was as follows: Receiving Raw Material – Fabric Checking - Cutting – Washing- Fusing -Sewing - Finishing – Ironing-Packing – Dispatch. Process such as Printing and Computer embroidery are done from Sub-contractors. The main equipment and machines used by the factory are Single needle machine, Single Needle machine UBT, Overlock Machine, Flat lock machine plain, Band knife machine , Fusing machine ,150000 Pcs/Month			
What form of worker representation is there on site?	□ Union ☑ Worker Commitee			
	☑ Other			
Please give details:	Facility has formed legally required workers committee to resolve workers grievance and have also formed grievance committee, Health & safety and ICC committee which was found as per the legal requirements.			
Is there any night production work at the site?	🗆 Yes 🗵 No			
Are there any on site provided worker accommodation buildings	 □ Yes ☑ No Please give details: 			
Are there any off site provided worker	□ Yes ☑ No			
Are there any off site provided worker accommodation buildings	Please give details:			
Were all site provided accommodation buildings included in this audit	□ Yes 🗵 No			
	Please give details:			
	Not Applicable			

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Audit Parameters			
Time in and time out	Day 1		
	In	09:45	
	Out	18:30	
Audit type:	PERIODIC		
Was the audit announced?	SEMI_ANNOUNCED		
Was the Sedex SAQ available for review?	Yes		
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No		
Who signed and agreed CAPR	Mr. Sanjeet Kumar Yadav / HR Manager		ar Yadav / HR Manager
Is further information available	No		

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Audit attendance	Management	Worker Representatives		
	Senior management	Worker Committee representatives	Union representatives	
A: Present at the opening meeting?	Yes	No	No	
B: Present at the audit?	Yes	No	No	
C: Present at the closing meeting?	Yes	No	No	
Reason for absence at the opening meeting	Worker representatives were busy with the production process. No union exist, not legally required.			
Reason for absence during the audit	Worker representatives were busy with production process. No union exist, not legally required.			
Reason for absence at the closing meeting	Worker representatives were busy with the production process. No union exist, not legally required.			





Worker Analysis

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

Worker Analysis								
	Local		Migrant*			Home		
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	workers	Total
Worker numbers – male	61	0	282	0	0	0	0	343
Worker numbers – female	3	0	17	0	0	0	0	20
Total	64	0	299	0	0	0	0	363
Number of Workers interviewed – male	0	0	20	0	0	0	0	20
Number of Workers interviewed – female	0	0	5	0	0	0	0	5
Total – interviewed sample size	0	0	25	0	0	0	0	25





Nationalities Structure			
Nationality of Management	Indian		
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationaility 1: INDIAN	approx %: 100%	
Was this list completed during peak season?	□ Yes ☑ NoPlease give details:		
	It may vary to an extent till legal maximum 450 employees on an	lly approved limit of employing y working day.	
Worker remuneration	Workers on piece rate:	0%	
	Paid hourly:	0%	
	Salaried:	100%	
Payment cycle	Paid daily:	0%	
	Paid weekly:	0%	
	Paid monthly:	100%	
	Other:	0%	
	Details for other:	Not Applicable	





Worker Interview Summary			
Were workers aware of the audit?	🗆 Yes 🗵 No		
Were workers aware of the code?	🗹 Yes 🗆 No		
Number of group interviews:	4 groups of 5		
Number of individual interviews:	Male: 6 Female: 0		
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	 ✓ Yes □ No Please give details: 		
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☑ Yes □ No		
In general, what was the attitude of the workers towards their workplace?	☑ Favorable		
What was the most common worker complaint?	Employees did not report any complaints.		
What did the workers like the most about working at this site?	Good working environment with no restrictions and timely payment.		
Any additional comment(s) regarding interviews:	None		
Attitude of workers to hours worked:	No negative comments came from the workers.		
Is there any worker survey information available?	 □ Yes ☑ No Please give details: 		





Attitude of workers:

26 workers (21 Male and 5 Female) were selected for interview. They were interviewed as 01 group of 05 employees and remain 06 workers were interviewed individually. The workers were assured of confidentiality and all of them spoke freely of their views for the facility. All employees said that they were satisfied with their employment practice and current wages structure. They reported freedom to leave after proper notice period. They had good relationships with their supervisors who treated them with respect. They were able to make suggestions to their supervisors and team leaders and sometimes they have seen these suggestions used. They can complain directly to their supervisors and also felt free to give their general concerns to their grievance representative who would take it to the management.

Attitude of worker' s committee/union reps:

There was no union at site. Facility has formed workers committee and grievance committee to resolve workers grievance. During interaction with the workers representatives, it was noted that there was no restriction from the management, and they were allowed to do their works committee related task independently in required manner. There was no discrimination reported at the time of interaction with the workers representatives.

Attitude of managers:

The facility management showed a positive attitude to this audit during the whole process. All documentation requested for review was provided. Locked areas encountered during the audit were unlocked timely. At the end of the audit, all the non-compliance was accepted by the facility. No negative information reported.





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

0A: Compliance Requirements

0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers. 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights

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

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

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

0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems. Current Systems: 1) Mr. Sanjeet Kumar Yadav (HR Manager)- is responsible for implementing standards concerning Human rights. 2) Facility has identified their stakeholders and salient issues. 3) Facility has measured direct, in-direct and potential impacts on stack holder's human rights. Further remedial action was found in place. 4) Facility does have transparent system in place for confidential reporting and dealing with human rights impacts without fear of reprisal towards the reporter. 5) No discrimination related to human rights observed regardless of gender, nationality, place of residency, sex, ethnicity, religion, colour or and other categorization and all are treated equally. 6) No Slavery, forced labour and human trafficking observed. All employees are of Indian nationality. 7) Employees are free to quit if they are not willing to work. 8) The facility has policy on "Human Right" which is duly endorsed by Management and management répresentative is responsible for implementation. **Evidence examined:** Documented policy on human rights.

Supplier's social compliance monitoring records. Interaction with Management and Interview with employees

Any other comments:

None

Policy statement that expresses commitment to respect human rights?	🗹 Yes 🗆 No
	Please give details:
	Facility has documented human right policy which expresses commitment to respect human rights.
Are the policies included in workers' manuals?	🗹 Yes 🗆 No
	Please give details:
	Policies included in workers' manuals

Audit company:	Report reference:	Start Date:	End Date:	
Intertek India	ZAA600025935	2023-09-18	2023-09-18	





	Acciden	nts recorded was maintained by facility and no accidents	
	Please g	give details:	
Are accidents recorded?	⊡ Yes	□ No	
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)	5.0%		
[(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)		0.070	
Annual % absenteeism(Number of days lost through job absence in the year /	Last yea This yea		
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	5.0%		
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))	Last yea This yea	ar 9.0%	
Ме	asuring W	Norkplace Impact	
	Factory employe confider	has formed a Data privacy policy which ensures all rees, supplier and customer information remains ntial.	
data privacy procedures for workers' information, which is implemented?		give details:	
Does the business demonstrate effective	☑ Yes	□ No	
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	☑ Yes	□ No	
system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?		give details: does have a transparent system in place for data or ntially reporting and dealing with human rights impacts t fear of reprisals towards the reporter.	
Does the business have a transparent			
standards concerning Human Rights?	Please give details: Mr. Sanjeet Kumar Yadav (HR Manager)		
Does the business have a designated person responsible for implementing	✓ Yes □ No		

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





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

OB: Compliance Requirements

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code. 0.B.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.

0.B.3 Suppliers are expected to communicate this Code to all employees. 0.B.4 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with. 0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

Current Systems and Evidence Examined

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

Current Systems:

Mr. Sanjeet Kumar Yadav (HR Manager) is responsible for ensuring compliance with these code requirements.

1. Based on interaction with the factory management, it was understood that factory management has developed a management system for implementing & maintaining social compliance code.

2. Facility managers are aware of the compliance requirements and have adequate knowledge of the legal requirements.

3. Facility was having certified standing orders No .DSO/37115 (Date -29/9/2014) as required by law.

4. Facility has obtained building layout plan No -1194/02, dated 11/03/2016
5. Facility has obtained the building stability certificate dated (Date -16/2015)
6. Facility has obtained Factory License Reg No.GGN-ONLINE-GGN-M-78 Valid till 31/12/2025.
7. Employees were found aware of the Ethical Trade Initiative (ETI) code requirements.
8. Facility has communicated FT code FT code FT.

8. Facility has communicated ETI code requirement to their suppliers. 9. Facility have conducted internal audit to monitor effectiveness of social management system

implemented at audited site dated (12/04/2023). 10. Facility has system in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.

11. Facility was found to have appropriate land rights and have drafted a land right policy.

Evidence examined:

Facility Policy and Procedures on systems implemented.

Facility has written policy and procedures specific to land rights.

All statutory licenses including factory License and building plan approvals with stability certificate. Factory license of facility is valid till December 31, 2025. Building Stability certificate obtained from competent person on 16/2015.

Approved layout plan of facility on 11/03/2016.

Facility conducts internal audits on social management system periodically. Last internal audit was conducted on 12/04/2023.

Facility conducts risks assessment periodically. Last assessment was conducted on 28/07/2023. ETI Training to employees on 21/08/2023.

Any other comments:

None

Management Systems		
In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	□ Yes ☑ No Please give details:	
	No such fine imposed on the site till date	





🗹 Yes 🗆 No
Please give details:
The facility has established the policies and procedure with respect to social compliance.
Facility had effectively implemented the social compliance system
and ensuring the same by conducting an audit in a periodic manner, necessary corrective and preventive action has been taken by the facility for the noncompliance raised during the audit.
Further the report of the same was maintained by the facility.
☑ Yes □ No
Please give details:
All the employees have undergone an induction training were the
social compliance policies and procedures were explained.
🗹 Yes 🗆 No
Please give details:
Based on interaction with the employees, the training provided found effective.
🗆 Yes 🗵 No
Please give details:
No such Certifications obtained.
Ves 🗆 No
Facility has defined HR Departments which monitor and control all
HR related activities
☑ Yes □ No
Please give details:
Mr. Sanjeet Kumar Yadav (HR Manager)is responsible for compliance with the code.
🗹 Yes 🗆 No
Please give details:
Facility had "Data Privacy policy" to ensure all worker information is confidential.
🗹 Yes 🗆 No
Please give details:
Facility had a system to ensure the same whether the information was shared on a need -to-know basis only.



Are risk assessments conducted to	🗹 Yes 🗆 No
evaluate policy and procedure effectiveness?	Please give details:
	Facility has system to conduct risk assessment (28/07/2023) to evaluate the effectiveness of policy and procedures and update the same if required.
Does the facility have a process to address issues found when conducting	🗹 Yes 🗆 No
risk assessments, including implementation of controls to reduce	Please give details:
identified risks?	Based on the interaction with the management and review of record that effective action has been taken for the risk identified during internal audit.
Does the facility have a policy/code which require labour standards of its own	🗹 Yes 🗆 No
suppliers?	Please give details:
	Facility has established policy covering labour standards of its own suppliers.
	Land Rights
Does the site have all required land rights	☑ Yes □ No
licenses and permissions (see SMETA Measurement Criteria)?	Please give details:
	Facility had obtained "Business License" and "Approved
	Plant Layout" from the concerned authority which is found valid.
Does the site have systems in place to conduct legal due diligence to recognize	🗹 Yes 🗆 No
and apply national laws and practices relating to land title?	Please give details:
	Facility has systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.
Does the site have a written policy and procedures specific to land rights?	☑ Yes □ No
procedures specific to faild rights:	Please give details:
	Facility has HR & compliance department internally to check this
	requirement.
Is there evidence that facility/site compensated the owner/lessor for the	☑ Yes □ No
land prior to the facility being built or expanded?	Please give details:
	Facility is having rented premises & obtained all legal permissions from the landlord.
Does the facility demonstrate that alternatives to a specific land acquisition	☑ Yes □ No
were considered to avoid or minimize adverse impacts?	Please give details:
	Facility is having rented premises & obtained all legal permissions. from the landlord. Facility has written policy to check all legal aspects before taking any land.

: End Date: 8 2023-09-18





Is there any evidence of illegal appropriation of land for facility building	🗆 Yes 🗵 No
or expansion of footprint?	Please give details:
	All the areas of factory were legal according to the interview and document review.







1 - Freely chosen Employment [Summary of Findings]

1: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

1) Mr. Sanjeet Kumar Yadav (HR Manager) is responsible for overseeing that no forced, bonded, involuntary, or prison labor is employed.

2) There was no presence of forced/bonded or prison labor at the workplace.

3) Employees are not required to lodge any deposits, or identity papers with the facility before or after joining the services.

4) All interviewed employees reported that there are no such illegal deposits to be deposited to the facility for recruitment and they are free to resign from the facility after serving a specified notice period of 01 month.

5) Employees are free to leave at the end of their shift and there is no compulsion to work overtime.

Evidence examined:

Facility Policy on no forced, bonded or involuntary prison labor and Procedures. Personal files with application form and bio data including employment contract. Interaction with Management and Interview with employees

Any other comments:

None

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



Is there evidence of any restrictions on workers' freedoms to leave the site at	□ Yes ☑ No		
the end of the work day?	Please give details:		
	Employees are free to leave their workplace without any restriction at the end of the work day.		
Does the site understand the risks of forced / trafficked / bonded labour in its	🗹 Yes 🗆 No 🗆 Not Applicable		
supply chain	Please give details:		
	Facility understands the risks of forced / trafficked / bonded labour in its supply chain.		
Is the site taking any steps taking to reduce the risk of forced / trafficked	🗹 Yes 🗆 No		
labour?	Please give details:		
	Facility has policy not to employ forced / trafficked labour.		
	Facility has implemented system like grievance committee and		
	suggestion box as grievance handling mechanism to identify and resolve issues related to forced/trafficked labour. Further, employees can		
	reach directly to management without any restriction to discuss their grievances		





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

2: Compliance Requirements

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Current Systems and Evidence Examined

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

Current Systems:

1. There is no union at the site

 There is workers committee at the site, worker representatives were elected by employees.
 Based on employee' s interview, employees can approach top management directly to report their grievances and necessary corrective action is taken by the management. 4. Facility has formed a Workers Committee for which meetings conducted once in three months and

Grievance committee for which meetings is conducted meetings once in every three months and the minutes of meetings are recorded for verification and future reference.

 Based on employee' s interview, the facility does not restrict employees from organizing trade unions and has an open-minded approach towards the activities of trade unions and their organizational activities.
 Based on the employee' s interview and interaction with facility management, works committee employee representatives are not discriminated, and they are free to carry out their functions like meetings on a periodical basis.

Evidence examined:

- 1. Social compliance system program and procedure
- 2. Suggestion box complain feedback
- 3. Meeting minutes
- Works Committee Minutes dated 26/07/2023 and 27/05/2023.
- 5. Grievance committee Minutes dated 24/08/2023 and 23/06/2023.
- 6. Employee interview and management interview

7. Employee handbook and employment contracts were reviewed. They both stated that employees are free to form trade unions. Nobody will be treated differently whether they are members of the union.

Any other comments:

None

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	□ Union☑ Other	Worker CommiteeNone	
Other details:	Grievance Committee, ICC Committee, and Health & Safety Committee		
Is it a legal requirement to have a union?	🗆 Yes 🗹 No		
Is it a legal requirement to have a worker's committee?	🗹 Yes 🗆 No		

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Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	 ✓ Yes □ No Please give details: Facility has provided suggestion box, where employees are free to express their problems / suggestions / complaints for any grievances. While interviewing, all employees reported that they are free to approach the management for any problem. 		
Is there evidence of free elections?	☑ Yes □ No		
Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	 ✓ Yes □ No 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.		
Name of union and union responses to the			
Name of union and union representative, if applicable:	Not applicable. No union exited in facility.		
Is there evidence of free elections?	🗆 Yes 🗆 No 🖂 Not Applicable		
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Workers committee and Grievance Committee is present in the facility.		
Is there evidence of free elections?	🗹 Yes 🗆 No 🗆 Not Applicable		
Are all workers aware of who their representatives are?	 ✓ Yes □ No Please give details: Based on workers interview it was noted that all workers are 		
	aware about the workers representative.		
Were worker representatives freely elected?	🗹 Yes 🗆 No		
Date of last election:	2021-10-20		
Do workers know what topics can be raised with their representatives?	☑ Yes □ No		
Were worker representatives/union representatives interviewed?	🗹 Yes 🗆 No		
If Yes, please state how many:	1.0		
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Based on the audit process and review of records, it was noted that the workers committee was effective. As per employees' interview and interaction with workers representatives it was noted that the issue reported during committee meeting was taken seriously and effective actions are taken to resolve the issue. Last works committee meeting conducted on 26-07-2023.		
Are any workers covered by Collective Bargaining Agreement (CBA)?	□ Yes 🗵 No		

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

3: Compliance Requirements

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided. 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

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

Current Systems and Evidence Examined

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

Current Systems:





1. General Health and Safety management

- Mr. Sanjeet Kumar Yadav (HR Manager) is responsible for the Health and safety aspects of the site. - Drinking water was freely available in the facility and test certificates were up-to-date, Drinking water points were maintained in hygienic conditions.

Points were maintained in hygienic conditions.
Sufficient number of toilets were available at all times for workers, cleanliness and hygiene maintained in the toilet provision located in periphery.
Ventilation, temperature and lighting were adequate in all section of the facility.
Housekeeping was found in good condition throughout the facility.
Construction of the building was found safe.
Facility has formed health and safety committee to resolve safety issues at site.
Adequate Personal Protective Equipment's (PPE's) were provided to the employees working in production area however facility tour it was noted that 08 out 08 employees working in cutting section, basement were not using face mask while performing their task. basement were not using face mask while performing their task

2. Fire Safety

-There were at least 2 exits from each work area from the building.

-Facility has installed 51 fire extinguishers and 09 hydrant & 09 hose reels covering all section/floor of the site.

Fire extinguishers and hydrant & hose pipes were found in maintained condition. -Facility has installed 16 Fire alarm call points which were found in operational condition. -Facility has installed 36 smoke detectors.

-Facility has installed 132 emergency lights and 06 UPS connected lights at site. -Facility has installed 16 fire sirens and 03 hooters at site.

-Facility has installed 02 drinking water points at site. -Facility has installed 10 first-aid boxes at site. -Facility has installed 92 sprinklers at site

-Evacuation maps were posted in all section/floor of the facility.

-Fire drills were organized and recorded and it was conducted on monthly basis.

-Facility has marked illuminated exit sign on all around the exits for employee' s reference.
-Facility has obtained Fire-NOC from local authorized body as required.
-Fire safety training is provided to sufficient number of employees by competent person.
-Evacuation Aisles were found marked in all required areas with directional arrows leading towards exit however 01 out of 03 escape route were found blocked at ground floor with finished goods cartons , where 6-7 employee were working on the day of audit. 2) 01 out of 02 escape route was found obstructed by hanging of garments at periphery section

3. Machine & Electrical safety
- All machines and electrical equipment's were found maintained in good condition.
- Safety sign was posted near machines/equipment's for employee's reference.
- Facility has provided adequate safety guard on all required plant and machines.

- During facility tour that facility has not provided rubber mat at 02 electrical panel at first floor.

Chemical safety

- Facility does use chemicals in the production process which were found stored with proper labelling and secondary containment.

- Chemical and Diesel containers were found to have hazard and identification labels.

- Material Safety Data Sheet (MSDS) in local language was found posted nearby chemical and diesel storage

 area for employee' s reference.
 Adequate Personal Protective Equipment' s (PPE' s) were used by the employees handling chemical and diesel however during facility tour found 01 ETP operator working at the ETP section was found without gloves However, facility had provided the required masks to all the employees. - Occupational health check-up was conducted for employees handling chemicals and diesel. -PPE' s and chemical handling trainings were provided to the employees as required.

Evidence examined:





Health and Safety Policy.

Fire NOC of facility building obtained on 03 Feburary, 2023, which is valid till for 3 years
Industrial accident records – Updated and no accident occurred in last one year.

First aid training was provided to 11 employees having certificates as required and that training was done dated on 10.09.2023 from ST. John Ambulance (India) for the validity of 3 years.
Drinking Water Test conducted on August 05, 2023.
Fire Drill conducted once in every two months. Last drill was conducted on August 19, 2023 and prior this dated on luly 17, 2023.

this dated on July 17, 2023.

Firefighting equipment inspection conducted on monthly basis.
Fire training was provided to all employees dated on 19 August 2023 .
Personal Protective Equipment (PPE's) training and chemical handling training provided on August 18, 2023.

• Diesel Generator 1X160 KVA periodic inspections conducted on July 07, 2023 with the validity of 1 year only.

• Transformer 1X160 KVA periodic inspection conducted on on July 07, 2023 with the validity of 1 year only.

Compressor periodic inspection conducted dated on August 01, 2023.

Meeting for Health & Safety committee was last conducted on July 26, 2023.

• Medical Examination of employees such as Electrician, Housekeeping and Chemical Handler total 16 was conducted dated on May 05, 2023

Interaction with management and Interview with employees.

Any other comments:

None

Does the facility have general and	☑ Yes □ No		
occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	Please give details:		
are these communicated to workers:	Facility has established general Health & Safety, occupational Health & Safety policies and procedures that are fit for purpose and these are communicated to workers through training and notice board.		
Are the policies included in workers' manuals?	🗹 Yes 🗆 No		
	Please give details:		
	Facility has included the social compliance policies in worker's manual.		
Are there any structural additions without required permits/inspections (e.g. floors	🗹 Yes 🗆 No		
added)?	Please give details:		
	Facility has obtained approved plant layout as per the current setup.		
Are visitors to the site informed on H&S and provided with personal protective	🗹 Yes 🗆 No		
equipment?	Please give details:		
	Visitors are provided health and safety guidelines before giving access to the facility. Personal protective equipment's (PPE's) are provided to the visitors as per requirement.		





 Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate)) Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid? Yes ☑ No Please give details: Facility does not requires the same as its not a legal requirement. however there were adequate first aid kits in each production area and they were well stocked. Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid? Yes ☑ No Please give details:
renewal/expiry date where appropriate))requirement. however there were adequate first aid kits in each production area and they were well stocked.Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?Image: Stock and they were well stocked.Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?Image: Stock and they were well stocked.
is easy access to first aider/ trained medical aid? Please give details:
There were 11 first aiders, and they had been trained at a local
hospital. These first aiders were identified by St. John Ambulance
Associates and all applicable employees are covered under Employee State Insurance.
Where the facility provides worker transport is it fit for purpose safe
transport – is it fit for purpose, safe, maintained and operated by competent preserve a subsect of the subsection of th
persons e.g. buses and other vehicles? Transport facility is not provided to the employees. Further, it is not a legal requirement.
Is secure personal storage space provided □ Yes ☑ No for workers in their living space and is fit
for purpose? Please give details:
Not applicable.
Are H&S Risk assessments are conducted (including ovaluating the arrangements
(including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls
after a long shift) and are there controls to reduce identified risk? Facility has conducted risk assessment to take appropriate corrective and preventive action for the identified risks.
Is the site meeting its legal obligations on environmental requirements including
required permits for use and disposal of natural resources?
Facility is meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources.
Is the site meeting its customer requirements on environmental
standards, including the use of banned chemicals?
Facility does not use any banned chemicals. Facility does meet all
the environmental standards based on customer requirement.

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	Evidence
:	
ins) are	
	un anno seconda da da da
ers	P T T
table for food	Corrected -All Broken Urinal Pipe was repaired and changed.JPG
ound vgienic as d broken.	
t	
iys	
ays	
vorker's e, photos ity has ere kept	
it	v has

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	Non-Com	pliance		Evidence
[Back to findings	summary]			
	Non-Com	pliance		
Status	CLOSED			
Reference	ZAF600168364			
Clause	3 - Working Condit	ions are Safe a	nd Hygienic	
Issue Title	242 - No / inadequ hazardous enviror	ate eye wash / s ments includir	shower station in ng chemical areas	
Subcategory	Chemicals			
New or carried over?	🗆 New	⊡ Ca	arried Over	
Raised by audit	ZAA421264547			
Resolved by audit	ZAA600025935			
Root cause	🗆 Training	🗆 Sy	rstem	
	🗆 Costs	🗆 La	ck of workers	
	🗹 Other			
Root cause - Other	N/A			P 23
ETI code	be provided, beari knowledge of the i hazards. Adequate accidents and inju associated with, o	ng in mind the ndustry and of steps shall be ry to health aris r occurring in th far as is reasona	any specific taken to prevent sing out of, ne course of work, ably practicable, the	<u>Corrected -Eye wash</u> <u>station at chemical stor</u> <u>section was found with</u> <u>adequate water</u> <u>pressure.JPG</u>
Explanation to the non compliance	It was noted durin installed eye wash in periphery but so water pressure.	station at che	ur that facility has mical storage area ved with too low	
Follow up method	🗆 Follow up audi	t 🖸 De	esktop audit	
Timescale	□Immediate	⊠ 30 days	□60 days	
	□90 days	□ 120 days	□180 days	
	□ 365 days	□Other		
Actions	N/A			
Additional comments	appropriate, photo	area in peripher o attached for v	ry, now pressure is	

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	Non-Compliance	Evidence
[Back to findings	<u>summary]</u>	
	Non-Compliance	
Status	OPEN	
Reference	ZAF600168365	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate	
Subcategory	Personal Protective Equipment/Clothing	
New or carried over?	□ New ☑ Carried Over	
Raised by audit	ZAA421264547	
Root cause	Training System	
	□ Costs □ Lack of workers	
	Other	
Root cause - Other		08 out 08 employees
Local law issue	In accordance with Punjab Factory Rules 1952 as applicable to Haryana, Rule 67-K[Framed U/S 41-B & 112 of the Act] Disclosure of information to workers (g) personal protective equipment required to be used by workers employed in hazardous process or dangerous operations.	working in cutting section, basement were not using face mask.JPG
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	01 ETP operator working was found without gloves.JPG
Explanation to the non compliance	Based on the facility tour it was noted that 08 out 08 employees working in cutting section, basement were not using face mask while performing their task and 01 ETP operator working at the ETP section was found without gloves However, facility had provided the required masks to all the employees.	<u>Levener e</u>
Follow up method	Follow up audit Desktop audit	1
Timescale	□Immediate ☑ 30 days □ 60 days	
	□ 90 days □ 120 days □ 180 days	
	□ 365 days □ Other	
Actions	It is recommended the facility to provide more effective training to all concern employees on use of personnel protective equipment.	

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	Non-Comp	liance	Evidenc	e
[Back to findings	summary]			
	Non-Comp	liance		
Status	OPEN			
Reference	ZAF600200524			
Clause	3 - Working Conditio	ns are Safe and Hygienic		
Issue Title	228 - Unsafe handlin rubber mats in front	g of electrical equipment e.g. no of electricity panels		
Subcategory	Electrical risk			
New or carried over?	🖸 New	Carried Over		
Root cause	🗆 Training	System		
	🗆 Costs	Lack of workers		
	🗆 Other			
Root cause - Other				
Local law issue	According to Section 1956:Service lines ar premises- (1) The su electric supply lines, belonging to him or consumer's premis all respects fit for su shall take due preca such premises from and apparatus. (2)Se supplier on the prem underground or which insulated and protect secured under all or electrical, mechanic insulation. (3)The co circumstances perm custody of the equip to the supplier. (4) T that the installation in a safe condition.	Rubber mat not under 02 electric at first floor	cal panel	
ETI code	be provided, bearing knowledge of the inc hazards. Adequate s accidents and injury associated with, or c by minimising, so far	enic working environment shall in mind the prevailing dustry and of any specific teps shall be taken to prevent to health arising out of, occurring in the course of work, as is reasonably practicable, the herent in the working		
Explanation to the non compliance	It was noted during f provided rubber mat floor.	acility tour that facility has not t at 02 electrical panel at first		
Follow up method	□ Follow up audit	Desktop audit		

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Timescale	□ Immediate	⊠ 30 days	□60 days	
	□90 days	□ 120 days	□180 days	
	□ 365 days	□Other		
Actions	It is recommende provide rubber m handling.	ed that facility sha at at all electrical	ll ensure to panels for safe	





	Non-Compliance	Evidence
[Back to findings	<u>summary]</u>	
	Non-Compliance	
Status	OPEN	
Reference	ZAF600200526	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	207 - Isolated occurrence of blocked fire exits	
Subcategory	Fire Safety - Fire exits	
New or carried over?	☑ New □ Carried Over	
Root cause	🗆 Training 🛛 System	
	Costs Lack of workers	× A
	🗆 Other	
Root cause - Other		
Local law issue	In accordance with the Factories Act 1948, Section 38 (1) In every factory, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and to provide and maintain (a) safe means of escape for all persons in the event of a fire, and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory all the workers are familiar with the means of escape in case of fire and have been adequately trained in the routine to be followed in such cases.	Escape route was found obstructed by hanging or garments at periphery sectionJPG
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	Escape route found blocked at ground floor with finished goods cartonsJPG
Explanation to the non compliance	Based from tour of the facility, it was noted that :- 1) 01 out of 03 escape route were found blocked at ground floor with finished goods cartons, where 6-7 employee were working on the day of audit. 2) 01 out of 02 escape route was found obstructed by hanging of garments at periphery section.	
Follow up method	🗆 Follow up audit 🛛 🗹 Desktop audit	
Timescale	□Immediate ⊡ 30 days □ 60 days	
	□ 90 days □ 120 days □ 180 days	
	□ 365 days □ Other	
Actions	It is recommended to facility to ensure that all escape route free from blockage during working hours.	

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

4: Compliance Requirements

4.1 There shall be no new recruitment of child labour.

4.1 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:

1) Mr. Sanjeet Kumar Yadav (HR Manager) is responsible for ensuring that no child is employed at the site. 2) Based on interaction with the factory management, all employees are hired by the Human Resource Department only.

3) Based on a review of hiring policy documents, the employee' s ID for age proof such as Voter ID, Aadhar Card, PAN Card, and School Certificate was checked by the HR department prior to hiring. The employees without valid ID certificates are not being hired.

4) Based on the policy review, the minimum hiring age of the facility is above 20 years old.
5) Based on employees' interview, any suspect of child labor can be reported to facility management.
6) Based on the employee interviews, review of facility' s Anti Child Labor & Hiring Policy and age proof documents, the facility has complied with ILO Standards for Child Labor

7) During tour of the facility that it was noted that no Childcare facility (Creche) provided. However, facility has hired 363 employees on the day of audit.

Evidence examined:

Child Labor and Child Labor Remediation Policy. Age Proof records of 26 of 26 selected samples. Interaction with Management and Interview with employees

Any other comments:

None

Legal age of employment:	14
Age of youngest worker found:	20
Are there children present on the work floor but not working at the time of audit?	🗆 Yes 🗵 No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	 □ Yes ☑ No Please give details: Not Applicable



	Non-Co	mpliance		Evidence
[Back to findings	summary]			
	Non-Co	mpliance		
Status	OPEN			
Reference	ZAF600200525			
Clause	4 - Child Labour	Shall Not Be Used	ł	
Issue Title	397 - Childcare fa alignment with l	acilities are not p egal requirement	rovided in s	
Subcategory	Child care & edu	cation		
New or carried over?	🗹 New	🗆 Ca	rried Over	
Root cause	🗆 Training	⊡ Sy	stem	
	Costs	🗆 La	ck of workers	
	🗆 Other			
Root cause - Other				
Local law issue	In accordance w (Amendment)Ac section 11, the for namely: '11A. or more employe within such dista separately or alo	t. 2017, In the pri bllowing section s (1) Every establis ees shall have the ance as may be pl	ncipal Act, after shall be inserted, shment having fifty facility of créche rescribed, either	
ETI code	4.4 - These polici the provisions of	es and procedure the relevant ILO	es shall conform to Standards.	
Explanation to the non compliance	It was noted dur Childcare facility has hired 363 em	ing tour of the fac (Creche) provide ployees on the d	ed. However, facility	/
Follow up method	🗆 Follow up aud	dit ⊡ De	sktop audit	
Timescale	□ Immediate	⊠ 30 days	□60 days	
	□90 days	□120 days	□180 days	
	□ 365 days	□Other		
Actions	It is recommend facility (Creche)	ed to the facility t as per legal requi	to provide Childcare rement.	2

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5 - Living Wages are Paid [Summary of Findings]

5: Compliance Requirements

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

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) Mr. Sanjeet Kumar Yadav (HR Manager) is responsible for ensuring that all employees are paid legal minimum wages with all legal benefits on time as per law.

2) Based on the employee' s interview, wages are fixed on a monthly wage and paid once a month.
3) All employees are paid on a monthly basis through bank transfer by the 7th of every month in the past 12 months.

4) Based on employee's interview, it was noted that pay slip is provided to all employees regularly as per law.

5) Based on wage record review, all eligible employees are covered under social security benefit of Provident Fund (PF) and Employee State Insurance (ESI). Payment receipts for the same were found remitted on time as legally required.

6) Facility has extended Leave with Wage benefits to the employees. Leave with wage were found calculated accurately during full and final payment of left employees.

7) Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules.

8) 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.
9) Through document review and facility tour, no inconsistency was found between production records and provided attendance records.

10) As per the review of records, overtime hours were paid at 200% of the ordinary rate of wages. 11) The employees are paid the bonus at the rate of 8.33% of applicable minimum wages amount as per the legal requirement.

12) Leaves were provided to all eligible employees and leave records found maintained.

Evidence examined:

Facility Policy on Wages and Benefits. Wage record, Pay slip and Time records for 1- selected samples for 03 months i.e., August 2023 – Most Recent paid month, March 2023 – Random month and September 2022 – Random month. Provident Fund (PF) remittance receipts. Employee State Insurance (ESI) receipts. Leave with wage records (Form No: 15). Full and final Settlement paid records. List of National and Festival Holidays (Form 1A). Interaction with management and Employees. Local legal minimum wage documents. Leave with wage records (Form No: 15) and Leave encashment records. The employees are paid bonus on 15/10/2022 at the rate of 8.33% of applicable minimum wages amount as per the legal requirement. Any other comments: None





Summary Information					
Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?		
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	NO		
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal MaximumActualNOPer Day: 2.0Per Day: 2.0Per Week: 4.0Per Week: 12.0Per Week: 4.0Per Month: 16.0				
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 405.11 Per Week: null Per Month: 10532.84	Actual Per Day: 410.07 Per Week: 0.0 Per Month: 10662.0	NO		
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 102.51 Per Week: 205.03 Per Month: 820.0	NO		
Wages Analysis:					
Were accurate records shown at the first request?	t 🗹 Yes 🗆 No				
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	26 sampled employees from August 2023 (Recent Month) 26 sampled employees from March 2023 (Random Month) 26 sampled employees from September 2022 (Random Month)				
Are there different legal minimum wage grades? If Yes, please specify all.	✓ Yes □ No Unskilled INR 10532.84 per month Semi-skilled A INR 11059.44 per month Semi-Skilled- B INR 11612.4 per month Skilled A INR 12193.03 per month Skilled B INR 12802.69 per month Highly skilled INR 13442.82 per month				
If there are different legal minimum grades, are all workers graded and paid correctly?	 ✓ Yes □ No □ Not Applicable Please give details: 				
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	 □ Below legal min □ Meet ☑ Above 				
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	10662 INR-Helper				
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage				

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Bonus Scheme found: Please specify details:	Bonus Scheme found:Facility is paying bonus to its employees once in year @ 8.33% of its total salary. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	Employees Provident Fund and Employees State Insurance & Labour welfare fund.		
Have these deductions been made?	🗹 Yes 🗆 No		
Please list all deductions that have been made.	Employees Provident Fund, Employee State Insurance & Labor Welfare fund. PF at the rate of 12% of basic earn wage and ESI at the rate of 0.75% of gross wage, LWF at the rate of 0.20% of wage		
Please list all deductions that have not been made.	Not Applicable		
Were appropriate records available to verify hours of work and wages?	🗹 Yes 🗆 No		
Were any inconsistencies found? (if yes describe nature)	□ Yes 🗹 No		
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	✓ Yes □ NoPlease give details:		
paid for their time)	Based on audit process, it was noted that all required meeting/training are conducted during working hours for which employees are paid. Employees do not attend any meeting/training for which they will not be paid.		
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	□ Yes ☑ No Please give details:		
If yes, what was the calculation method used.	 ISEAL/Anker Benchmarks Figures provided by Unions Fair Wear Wage Ladder Other – please give details: Asia Floor Wage Living Wage Foundation UK Asia Floor Wage Fair Wage Foundation 		
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 Please give details: The local government revises the minimum wage once in every six months which the facilities have to comply. 		
Are workers paid in a timely manner in line with local law?	☑ Yes □ No		
Is there evidence that equal rates are being paid for equal work:	 Yes D No Please give details: From the review of available records, it was noted that equal pay is given for same nature of work. 		





How are workers paid:	🗆 Cash	🗆 Cheque
	Bank Transfer	□ Other





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

6: Compliance Requirements

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

1. Mr. Sanjeet Kumar Yadav (HR Manager) is responsible for ensuring compliance with regular and overtime hours as per law.

2. Facility has implemented biometric attendance recording system to record IN/OUT time of all employees.

3. Facility record the attendance through biometric system and operates 06 days in a week with 01 shift as per

below details -

Working Days: 06 (Monday to Saturday) General Shift – 09:30 am to 06:00 pm

Lunch Break – 13:00 pm to 14:00 pm

Weekly off: Sunday 4. "IN/OUT" time time record was maintained for all 26 of 26 randomly selected employees.

5. During audit process and review of records, working hours, weekly rest was found to be in compliance with the legal requirements.

6. Facility has no compulsion on overtime work. It is purely voluntary.

- Based on review of time records, the working hours could be summarized as follows:
 For August 2023 (recent month), the maximum working hours per week was 48 hours
 For March 2023 (random month) the maximum working hours per week was 48 hours.

• For September 2022 (random month) the maximum working hours per week was 48 hours.

Evidence examined:

Facility Policy: Working Hour & Overtime Policy. In/Out time records for 26 selected samples for 03 months i.e., August 2023 – Most Recent paid month, March 2023 - Peak month and September 2022 - Random month. Production records (from work floors to check for discrepancies). Management Interaction

Any other comments:

None

Working hours' analysis

Systems & Processes

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What timekeeping systems are used?	Facility has implemented biometric attendance recording systemFinger reading for all the employees.			
Is sample size same as in wages section?	🗹 Yes 🗆 No			
	Please give details:			
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	☑ Yes □ No			
Are there any other types of contracts/employment agreements used?	🗆 Yes 🗹 No			
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	□ Yes 🗹 No			
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day- period?	☑ 1 in 7 days			
Is this allowed by local law?	🗹 Yes 🗆 No			
Maximum number of days worked without a day off (in sample):	6			
Standard/Contracted Hours worked				
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	 □ Yes ☑ No % of workers: null% Frequency: 			
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	□ Yes 🗹 No			
	Overtime Hours worked			
Actual overtime hours worked in sample (State per day/week/month)	August 2023 – 2 hour per day, 4 hours per week and 16 hours in a month. March 2023 – 2 hour per day, 4 hours per week and 16 hours in a month. September 2022 – 2 hours per day, 4 hours per week and 8 hours in a month.			
Combined hours (standard or contracted + overtime hours = total) over 60 found?	 □ Yes ☑ No Please give details: combined hours regular + overtime found below 60 Hours 			
Approximate percentage of total workers on highest overtime hours:	42.0%			



Is overtime voluntary? (Please detail evidence e.g. Wording of contract /	Yes D No D Conflicting Information			
employment agreement / handbook / worker interviews / refusal arrangements)	Please give details:			
worker interviews / refusat an angements/	As per policy, overtime will be performed voluntarily.			
	Overtime premium			
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	✓ Yes □ No □ N/A – there is no legal requirement to OT premium			
	Please give details:			
	As per policy facility will pay the 200 % of normal wages.			
Is overtime paid at a premium?	🗹 Yes 🗆 No			
	As per policy facility will pay the 200 % of normal wages. No overtime found during sample months.			
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	□ No □ Consolidated □ Collective pay Bargaining agreements ☑ Other			
Please give details	Not applicable			
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any	 □ Overtime is voluntary □ Onsite Collective □ Safeguards are in bargaining allows place to protect 60+ hours/week worker's health is voluntary and safety 			
checked boxes above e.g. detail of consolidated pay / CBA or Other)	 □ Site can □ Other reasons demonstrate (please specify) exceptional circumstances 			
Please give details	Not Applicable			
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	Not Applicable.			
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	□ Yes ☑ No			
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	☑ Yes □ No			





7 - No Discrimination is Practiced [Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

1) Based on the review of wage records and employee interviews, no discrimination was noted in hiring,

compensation, access to training, promotion, termination, or retirement. 2) Mr. Sanjeet Kumar Yadav (HR Manager) is responsible for the investigation and disposal of discrimination cases.

3) Based on the wage records review, the facility provides the same pay for male/female employees for the same work of a similar nature.

4) No employee was required to do the examination of the Pregnancy, hepatitis B virus, and HIV.

5) Anti-discrimination procedure on hiring, compensation, promotion and access to training is available during the audit.

6) Gender divisions did not exist in the facility; both female and male employees were distributed in all

types of work. 7) There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.

8) Facility having Grievance committee & Internal complain committee, quarterly meeting conducted on regular basis. Minutes of meeting found recorded.

9) There was no evidence of sexual harassment.

Evidence examined:

• Facility Policy on No Discrimination.

The hiring and termination procedure, leave application records and employee handbook.

- Time in and out records, full and final settlement records and training records.
- Appointment letter with terms and conditions for 26 out 26 selected samples.
- Salary and other benefit records.
- Interaction with management and Employees.

Any other comments:

None

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 18.0%	6	Female: 82.0%		
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	0				
Is there any evidence of discrimination based on race, caste, national origin,	□ Hiring	□ Compensation	Access to training		
based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	Promotion	Termination or retirement	☑ No evidence of discrimination found		
Please give details	Not Applicable				
Р	Professional Development				

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What type of training and development are available for workers?	Facility had a system of professional development of their employees & staff based on character, attendance, any disciplinary action, involvement in training program etc.
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	





8 - Regular Employment Is Provided [Summary of Findings]

8: Compliance Requirements

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

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

8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation. 8.5 Employment agencies must only supply workers registered with them.

8.6 Worker's 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:

1) Mr. Sanjeet Kumar Yadav (HR Manager) is responsible for ensuring compliance with these code requirements.

2) Employment contracts (appointment letters) were available and maintained for 26 of 26 selected employees. Terms and conditions of employment were clearly defined in the appointment letter issued to the employees.

3) Facility does not follow and believe in the fixed term employment.

4) Facility understands recruitment process. All recruitment processes were monitored by facility

management only.

5) Facility does not employ any migrant workers.

6) Based on interaction with employees, no recruitment fee is required at any stage of the recruitment.

7) Photo identification card is issued to all the employees

Evidence examined:

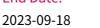
Facility Policy on Regular Employment. Appointment letter with terms and conditions for 26 of 26 selected samples. Salary and other benefit records. Agreements with contractor details. Interaction with management and Employees.

Any other comments:

None

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

Start Date: End Date: 2023-09-18





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





Any contractors on site?	☑ Yes □ No
	Please give details:
	Facility form with 03 contractors for different production process including security service.
If Yes, how many workers supplied by contractors?	299
Do all contractor workers understand their terms of employment?	🗹 Yes 🗆 No
	Please give details:
	All contract workers were well aware with and understand the terms of employments.
If Yes, please give evidence for contractor workers being paid per law	As per the received wage record it was confirmed, facility is remitting the same legal wage to contract workers as on roll.





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

8A: Compliance Requirements

8.A.1 There should be no sub-contracting unless previously agreed with the main client. 8.A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.

Current Systems and Evidence Examined

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

Current Systems:

The facility has three sub-contractor for part of the production process.

Evidence examined:

- Sub-contracting policy.Interaction with management.
- Production process and related records.

Any other comments:

None

Summary of sub-contracting – if applicable				
Is there any sub-contracting at this site?				
Process subcontracted				
Process Subcontracted		Printing		
Name of factory		Sahana Fashion Pvt ltd		
Address		Plot No -486,Pacecity-II,Sector - 37,Gururgram,Harayana		
Process subcontracted				
Process Subcontracted		Printing		
Name of factory		M&R Print Solutions		
Address		Plot No -482,Pace city -II,Sector- 37,Gururgram,Haryana		
Process subcontracted				
Process Subcontracted		Computer Embroidery		
Name of factory		Ram Hans Embroidery Pvt ltd		
Address		Plot No-362, Phase-VI, Sector-37, Gurugram, Harayana		
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			
	Please give details:			
	Auditor made a simple calculation to compare capacity with workers' workload in order to identify possible unrecorded work.			





If sub-contractors are used, is there evidence this has been agreed with the main client? (If yes, please provide details)	✓ Yes □ No Not Applicable	
Number of sub-contractors/agents used:	3	
Is there a site policy on sub-contracting?	☑ Yes □ No Facility ha related policy of sub-contracting and reviewed.	
What checks are in place to ensure no child labour is being used and work is safe?	Facility does the internal audit of sub-contractor on regular basis.	
Summary of homeworking – if applicable		
Is homeworking used at this site?	🗆 Yes 🗵 No	





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

9: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

1) Mr. Sanjeet Kumar Yadav (HR Manager) is responsible to ensure no harsh or inhumane treatment is practiced in the facility.

2) There is no evidence of harsh or inhumane treatment of employees.

3) All employees are treated with respect and dignity.

4) Facility's disciplinary policies are explained to all employees and all employees were well aware of their rights.

5) No evidence of physical abuse, sexual or any other harassment / verbal abuse is observed/reported. 5) No evidence of physical abuse, sexual of any other hardssment, versus abused of the facility.
 6) Facility has a written disciplinary procedure that is displayed on the notice board of the facility.
 6) Facility has a written disciplinary procedure that is displayed on the notice board of the facility.

7) Facility has engaged an advocate as an external member for Internal Complaints Committee, Arora - Advocate" and an NGO - Saraswati Foundation.

Evidence examined:

Facility Policy on No Harsh or Inhumane Treatment.
Meeting for Internal Complaints Committee was last conducted on September 15, 2023.

• POSH annual return submitted dated on January 19, 2023.

Interaction with management and Employees.

Any other comments:

None

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	 ✓ Yes □ No Please give details: Suggestion box and Works com Internal complain committee. F with an external member Mr.Aa Saraswati Foundation. 	acility has made an agreement
If yes, are workers aware of these channels and have access? Please give details.	Workers are familiar with these channels. The workers could express their own feeling through suggestion box and committees. Further, workers can approach the management directly for any grievance. Last meeting of ICC committee done on 15/09/2023.	
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism,comment box etc. Please give details.	Suggestion box.	
Which of the following groups is there a grievance mechanism in place for?	WorkerSuppliers	CommunitiesOther





Please provide grievance mechanism details	Facility has effective grievance mechanism in place where workers can express their grievance through committees and Suggestion box.
Are there any open disputes?	 □ Yes ☑ No Please give details:
Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	 ✓ Yes □ No Please give details:
Is there a published and transparent disciplinary procedure?	✓ Yes □ NoPlease give details:
If yes, are workers aware of these the disciplinary procedure?	✓ Yes □ NoPlease give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	 □ Yes ☑ No Please give details:





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

10A: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

1) Mr. Sanjeet Kumar Yadav (HR Manager) is responsible to ensure compliance with this code. 2) Facility has not employed any foreign employees.

3) Facility has not employed any agency labor.
4) Facility has employed 03 contractors at the site.

5) Facility has maintained personnel files for all sampled 26 employees with photocopies of documentation showing that they have local citizenship and do not need any special permission to work in India.

Evidence examined:

Recruitment policies. Interaction with management and employees. Employee handbook. Personal data files (26 personnel files were checked for proof of identity documentation)

Any other comments:

None





10B2 - Environment 2-Pillar [Summary of Findings]

10B2: Compliance Requirements

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

including having necessary permits. 10.B2.2 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:

1. The facility has established and maintained environmental policy & Mr. Sanjeet Kumar Yadav (HR Manager) is appointed to main Environment related activities.

2. The facility had obtained the environmental impact assessment report, environmental impact approval and environmental protection acceptance check.

3. The facility obtained Consent to Operate under The Air Act and The Water Act; valid upto -01/04/21 to31/03/2026.

4. The facility carried out air emission test of diesel generator on 05 August 2023 with certified lab-United Envirolab and the result was compliant.

5. The facility carried out ambient air quality test on 05 August 2023 with certified lab-United Envirolab and the result was compliant.

6. The facility carried out noise monitoring test on on 05 August 2023 with certified lab-United Envirolab and the result was compliant.

7. Waste agreement with GEPIL dated 18 March 2019 valid till 5 years.

8. The facility disposed the Hazardous waste with Manifest # 1407055518

9. The facility-maintained waste inventory.

10. The facility-maintained records of natural resource consumption.

Evidence examined:

- Facility Policy on environmental compliance.
 Consents to Operate Pollution under the Air Act and the Water Act.
- Air ambient quality test report.
- Noise test report.
- Diesel generator stack emission test report.
- Agreement with authorized hazardous waste collector (valid till 5 years from 18-03-2019).
- Hazardous waste disposal record.
- Natural resource (diesel, electricity, water, wood) consumption record.
 Interaction with management and Employees.

Any other comments:

None





Sedex Members Ethical Trade Audit Report Version 6.1

Attachments



Report reference: ZAA600025935

Start Date:End2023-09-18202







Start Date:End2023-09-18202







Report reference: ZAA600025935

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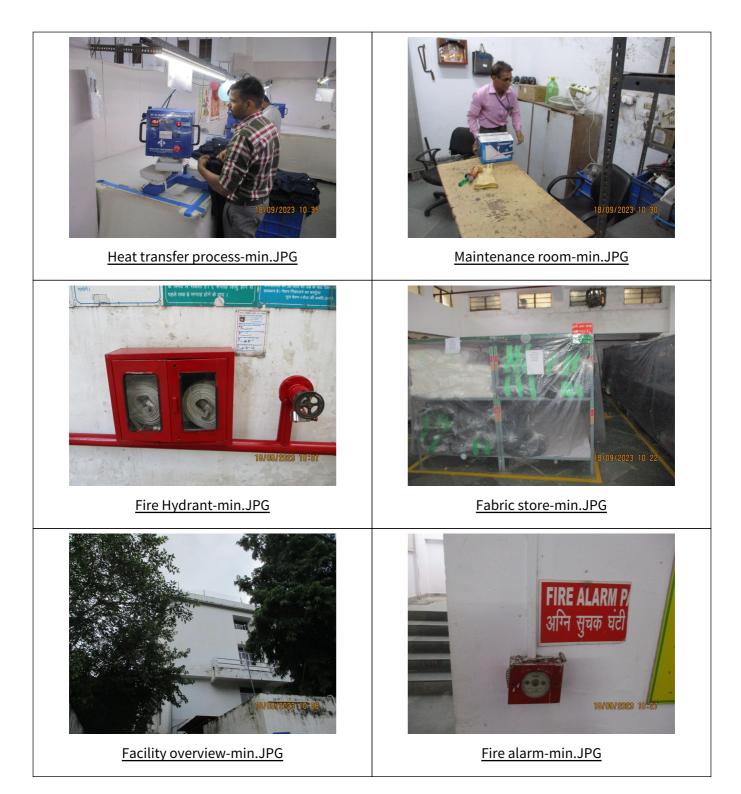
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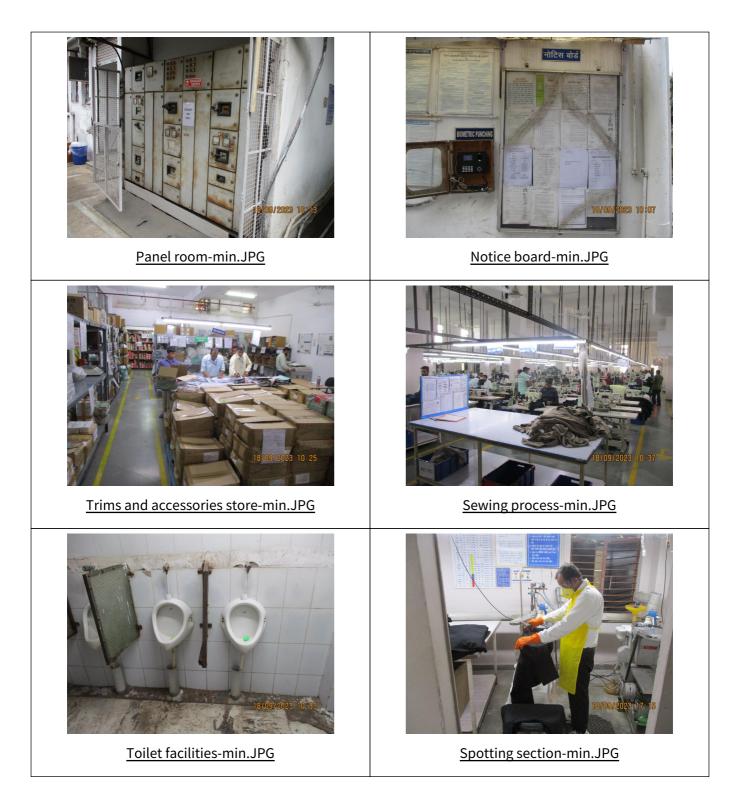
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Your feedback on your experience of the SMETA audit you have observed is extremely valuable. It will help to make improvements to future versions.

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 Report reference:
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