




# Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 1076766	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 1018830
Business name (Company name):	Delta Manufacturing Limited		
Site name:	Delta Manufacturing Limited		
Site address: <i>(Please include full address)</i>	101-103, MIDC, Satpur, 422 007 Nashik, Maharashtra, INDIA	Country:	India
Site contact and job title:	Mr. Rajesh Joshi – Management Representative		
Site phone:	+91 9921082821	Site e-mail:	rajesh@arrowtextiles.com;
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	31-08-2020 to 02-09-2020		

<b>Audit Company Name &amp; Logo:</b>  	<b>Report Owner (payer):</b> Delta Manufacturing Limited
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

## Audit Content:

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

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

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

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

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

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

Lead auditor: Mr. Sameer Edsikar APSCA number: 21702835  
Lead auditor APSCA status: Registered Auditor / In Good Standing  
Team auditor: Nil APSCA number: NA  
Interviewers: Mr. Sameer Edsikar APSCA number: 21702835

Report writer: Mr. Sameer Edsikar

Report reviewer: Mr. Syed Alamdar – Shiraz.

Date of declaration: 02-09-2020

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

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

## Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A <a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>		0	0	None Observed.
0B <a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None Observed.
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None Observed.
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None Observed.
3. <a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	04	0	0	<p>NC 01 It was noted through site tour that emergency Pathway marked in RM Store found unclear and faded</p> <p>NC 02 It was noted through facility tour that, 01 out of 02 fire exits door Woven tape department found opening inward.</p> <p>NC 03 It was noted through facility tour that, Facility has not installed Handrail to staircase of printing department.</p> <p>NC 04 It was noted through facility tour that, Facility has not provided eye wash station in finishing department</p>

4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None Observed.
5	<u>Living Wages and Benefits</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	01	0	0	NC 01 – It was noted through document review and workers interview that facility has provided payslips to all selected workers for selected months but not in their understandable local language.
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
10B4	<u>Environment 4-Pillar</u>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	01	0	0	NC 01 It was noted through review of records that facility has obtained MSPCB consent order but not updated with requirements of Wastewater monitoring, Noise Level Monitoring, Ambient Air Monitoring, and sludge disposal
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

General observations and summary of the site:

Delta Manufacturing Ltd., a Nashik based textile industry of Mody group, basically engaged in the manufacturing business of Narrow Woven Fabrics i.e woven tapes, Narrow Woven Labels and Fabric Printed Labels, over the last three decades. As one of the major players in the textile Industry, situated in INDIA, Formerly known as Arrow Textiles Ltd., has received authorized nominations from renowned brands in India namely H&M, C&A, Lux, Rupa, Amul Macho, Amul Gold, Jockey, VIP etc.

The Factory was established in 1983.

Total 4 shift running in this unit.

1<sup>st</sup> shift – 07.00 AM to 3.00 PM

2<sup>nd</sup> shift – 03.00 PM to 12.00 PM

3<sup>rd</sup> shift – 12.00 PM to 07.00 AM

General Shift – 10.00 AM to 06.00 PM

All workers and staff having one weekly off in weak (Variable)

A total of 328 Employees, 54 Managers & Staff, 216 On roll Workers,52 Contract Workers and 04 Guards, are currently working in the facility.

Male – 327

Female – 01

It was observed from workers interview and management interaction, workers are quite happy to work in this facility.

Total 26 workers interviewed at the time of Audit.

Total 06 Non-compliances (NC) observed during Audit.

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

## Site Details

Site Details		
A: Company Name:	Delta Manufacturing Limited	
B: Site name:	Delta Manufacturing Limited	
C: GPS location: (If available)	GPS Address: 101-103, MIDC, Satpur, 422 007, Nashik, Maharashtra, INDIA	Latitude: 20.000877 Longitude: 73.723366
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Facility has obtained all applicable and other legally required license.</p> <p>Factory License – License no – 14741 Date of Issue 14-02-19 Validity – 31-12-2020 Issued by Govt. Of MH Authorised for 500 workers and 2000 HP</p> <p>GST Copy – No- 27AAACG5018K1ZN Dated 04-05-2020</p> <p>IEC Copy – No- 0388089245 Dated 01-04-18</p> <p>Building Stability Certificate 1F/17 Dated 24-02-17 Valid for 5 year Issued Narayan L Panjabi Dated 15-06-16 Valid for 5 year Issued by Jayant Bhinge</p> <p>Approved Factory Lay out plan – 3315/15 Dated 10-04-15</p> <p>PF Registration No – MH/23583</p> <p>ESIC Registration No- 33400063870000199</p> <p>PCB Consent order No-SRO-NASHIK/CONSENT/1712001052 Date of Issue-27-12-17 Valid up to-31-12-19 Consent to operate under section 26 of the water act 1974 and under section 21 of the Air act 1981 Issued by MPCB Applied renewal 23-10-19</p>	



	<p>Fire NOC – No – MIDC/FIRE/2803/2014 Dated 07-11-14 Verified Form B of July 19 to Dec 19 Submitted for Jan 20 to Jun20</p>															
<p>E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc</p>	<p>Manufacturer and supplier of Woven Tapes. Printed Labels, and Woven Labels</p>															
<p>F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)</p>	<p>Delta Manufacturing Ltd., a Nashik based textile industry of Mody group, basically engaged in the manufacturing business of Narrow Woven Fabrics i.e woven tapes, Narrow Woven Labels and Fabric Printed Labels, over the last three decades. As one of the major players in the textile Industry, situated in INDIA, Arrow Textiles Ltd., has received authorized nominations from renowned brands in India namely H&amp;M, C&amp;A, Lux, Rupa, Amul Macho, Amul Gold, Jockey, VIP etc.</p> <p>The Factory was established in 1983.</p> <p>Total 4 shift running in this unit. 1<sup>st</sup> shift – 07.00 AM to 3.00 PM 2<sup>nd</sup> shift – 03.00 PM to 12.00 PM 3<sup>rd</sup> shift – 12.00 PM to 07.00 AM General Shift – 10.00 AM to 06.00 PM</p> <p>All workers and staff having one weekly off in weak (Variable)</p> <p>A total of 328 Employees, 54 Managers &amp; Staff, 216 On roll Workers,52 Contract Workers and 04 Guards, are currently working in the facility.</p> <p>Male – 327 Female – 01</p> <table border="1" data-bbox="657 1541 1484 1939"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Peripheral</td> <td>Main Gate, Security Cabin, ETP Plant. Pump house, Assembly area</td> <td>Well Maintained</td> </tr> <tr> <td>Building No 1</td> <td>Weaving Process</td> <td>Well Maintained</td> </tr> <tr> <td>Building No 2</td> <td>Weaving and Printing process</td> <td>Well Maintained</td> </tr> <tr> <td>Is this a shared building?</td> <td>NA</td> <td>NA</td> </tr> </tbody> </table>	Production Building no	Description	Remark, if any	Peripheral	Main Gate, Security Cabin, ETP Plant. Pump house, Assembly area	Well Maintained	Building No 1	Weaving Process	Well Maintained	Building No 2	Weaving and Printing process	Well Maintained	Is this a shared building?	NA	NA
Production Building no	Description	Remark, if any														
Peripheral	Main Gate, Security Cabin, ETP Plant. Pump house, Assembly area	Well Maintained														
Building No 1	Weaving Process	Well Maintained														
Building No 2	Weaving and Printing process	Well Maintained														
Is this a shared building?	NA	NA														

	<p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F2: Please give details:          No any notable cracks found as on the day of Audit.</p> <p>F3: Does the site have a structural engineer evaluation?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>F4: Please give details:          Building Stability Certificate          1F/17 Dated 24-02-17          Valid for 5 year          Issued Narayan L Panjabi          Dated 15-06-16          Valid for 5 year          Issued by Jayant Bhinge</p> <p>Approved Factory Lay out plan –          3315/15 Dated 10-04-15</p>
<p>G: Site function:</p>	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
<p>H: Month(s) of peak season: (if applicable)</p>	<p>No Peak season</p>
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>Raw Material receipt ( Yarn) – Unloading in storage area – Issued to Weaving ( 50 Elastic Looms, 22 Airjet Looms) – Issued to printing ( 20 Flexo Printing) – Cut and Fold – Packing and Despatch.</p>
<p>J: What form of worker representation / union is there on site?</p>	<input checked="" type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None

K: Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No N1: If no, please give details

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 10.00 HRS A2: Day 1 Time out: 18.00 HRS	A3: Day 2 Time in: 10.00 HRS A4: Day 2 Time out: 18.00 HRS	A5: Day 3 Time in: 10.00 Hrs A6: Day 3 Time out: 14.00 HRS
B: Number of auditor days used:	2.5 Days used by one Auditor		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other  If other, please define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail:    weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Rajesh Joshi – Management Representative		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	This is initial inspection		
J: Previous audit type:	NA		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives
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	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	Workers committee not applicable here as Trade union is available in the facility		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>			

## 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 workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	216	00	52	00	00	00	00	268
Worker numbers – female	00	00	00	00	00	00	00	00
Total	216	00	52	00	00	00	00	268
Number of Workers interviewed – male	20	00	06	00	00	00	00	26
Number of Workers interviewed – female	00	00	00	00	00	00	00	00
Total – interviewed sample size	20	00	06	00	00	00	00	26



A: Nationality of Management	Indian	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: __100%__</p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p>	<p>Was the list completed during peak season?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: No peak season</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 __100%__</p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: _____% workers on piece rate</p> <p>D1: _____% hourly paid workers</p> <p>D2: __100__% salaried workers</p> <p>Payment cycle:</p> <p>D3: _____% daily paid</p> <p>D4: _____% weekly paid</p> <p>D5: __100__% monthly paid</p> <p>D6: _____% other</p> <p>D7: If other, please give details</p>	



<b>Worker Interview Summary</b>		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	4 group of 5 workers = 20	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 06	D2: Female: 00
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	Workers Don't have any complaints, all interviewed workers have positive attitude to management and company.	
I: What did the workers like the most about working at this site?	Pay structure & Timely payment. Good management relation. Treatment is given like family members	
J: Any additional comment(s) regarding interviews:	Most workers are enjoyed working at this company, they felt they had to do work assigned to them only, and multitasking is not done with them and good relationship with management.	
K: Attitude of workers to hours worked:	Positive	
L. Is there any worker survey information available?		



Yes

No

L1: If yes, please give details:

**M: Attitude of workers:**

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

All 26 interviewed employees were satisfied with the management and facility environment and no negative. Information was reported during interview on the day of audit.  
 All workers were assured about the confidentiality and they spoke freely on their views of the factory.  
 All interviewed employees confirmed that they are comfortable in their workplace and they are free to express their concerns directly to the management.  
 They have system to make suggestions to their supervisors, managers and team leaders with help of suggestion box.

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

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

In this factory Trade union is present, Union Member Mr. Yuvraj Dighe interviewed during audit process and he was present in opening meeting also.  
 All workers are Union Members, and at every three year revision of CBA takes place.  
 Verified last agreement w.e.f. 01-01-19  
 It was noticed from workers interviews, workers are happy to work in this factory as the working culture is good and factory care for them.

**O: Attitude of managers:**

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

Auditor entered to the factory at 9:45 AM, first meet with Mr. Rajesh Joshi, Audit started with an opening meeting.  
 Scope, Criteria & Standard explained with the auditee. Role and responsibility of Auditor explained. List of documents required to review the documents explained to the management. Group and individual workers interviews requirement communicated with management. Permission to take photographs also taken.  
 Attitude of staff are found positive, all documents are readily available for Auditor.  
 Facility has conducted internal Audit to check department wise compliance before Main Audit.  
 Internal Audit Record dated 16-07-2020 Auditor name – Rajesh Joshi.

Opening meeting attended by following key persons of company -  
 Mr. Rajesh Joshi – Management Representative  
 Mr. Swapnil Aher - EHS  
 Mr. SH Shinde – Production Manager  
 Mr. Yuvraj Dighe– Union Member

Mr. Chetan Tare Accompanied auditor for facility tour has accompanied Auditor for document review and answered all the questions related to the workers employments, procedures & process at the facility.

At the end of audit closing meeting was conducted with below mentioned auditee's -  
 Mr. Rajesh Joshi – Management Representative  
 Mr. Swapnil Aher - EHS  
 Mr. SH Shinde – Production Manager  
 Mr. Yuvraj Dighe– Union Member



## Audit Results by Clause

### 0A: Universal Rights covering UNGP

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

#### 0.A. Guidance for Observations

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

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

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

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

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

1. Facility has policy and procedure for Human rights.
2. They have communicated their policies to the suppliers and buyers.
3. Also they have Business code of conduct policy and procedure.
4. Mr. Rajesh Joshi – Management representative is the person responsible.
5. Facility has their all policies and procedure available for employees and public on their Intranet.
6. Facility has assessed business impact on human rights within any of their stakeholders.  
Verified the Doc- Risk assessment on policies and procedures.  
Doc Name: Human Resources Policies, Procedures and Forms W.e.f 01-03-2020 revision 1

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

Details:

Company policy and procedure  
Revision 1 Dated 01-03-2020

Any other comments: Nil

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      A1: Please give details:                      Doc Name: Human Resources Policies, Procedures and Forms W.e.f 01-03-2020 revision 1</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      Please give details:                      Name:                      Job title: HR Manager</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      C1: Please give details:                      Facility has a suggestion box system available to the workers.                      For Suppliers and communities, Whistle blower policy is displayed, and misconduct reporting method is available in company website.</p>
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      D1: If no, please give details                      Facility has grievance handling committee.</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      E1: Please give details:                      Doc Name: Human Resources Policies, Procedures and Forms W.e.f 01-03-2020 revision 1</p>

**Findings**

<p>Finding: Observation <input type="checkbox"/>                      Company NC <input type="checkbox"/></p> <p>Description of observation: Nil</p> <p>Local law or ETI/Additional elements / customer specific requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>
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<p><b>Good examples observed:</b></p>	
<p>Description of Good Example (GE): Nil</p>	<p>Objective Evidence Observed:</p>

## Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2018-19 _3_ %	A2: This year 2019-20 _4.4_ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	2%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2018-19 _2_ %	C2: This year 2019-20 _2.8_ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	4%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Verified accident record for 2019-20 Form no 30	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2017-18 Number: 00	F2: This year: 2017-18 Number: 00
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	00	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2017-18 00	H2: This year: 2018-19\00
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months __00__% workers	I2: 12 months __00__% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months __00__% workers	J2: 12 months __00__% workers
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**0B: Management system and Code Implementation**  
[\(Click here to return to summary of findings\)](#)

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

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

**Current systems:**

1. Facility has trained workers and managers on ETI code - Name of training : Social awareness Training given on 12-01-2020 by Mr. Rahesh Joshi
2. Facility holds Code of conduct documents i.e. Code of ethics & Business Conduct in both English and local language displayed in facility premises.
3. Mr. Rajesh Joshi – Management Representative is responsible person for implementing of all the social compliances activities in the facility.
4. Facility has communicated ETI code of conduct to the suppliers verified the evidence of same. Verified mail communication.
5. ETI code of conduct has been displayed in the facility premises in local language.

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

Details:

1. Doc. Name - ETI Code of Conduct policy
2. Factory License
3. Interaction with Management and workers

Any other comments: Nil

**Management Systems:**

<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  A1: Please give details:  Verified from all legal documents and other permits that facility not been subject to any fines/prosecutions for non-compliance to any regulations.</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  B1: Please give details:  Facility has conduct risk assessment on policy and procedures.  Verified the risk assessment of forced labour, child labour &amp; discrimination.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Social awareness Training given on 12-01-2020 by Mr. Rahesh Joshi</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  D1: Please give details:  Social awareness Training given on 12-01-2020 by Mr. Rahesh Joshi</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  E1: Please give details:  Social awareness Training given on 12-01-2020 by Mr. Rahesh Joshi</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  F1: Please give details:</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  G1: Please give details:  HR Responsibility –HR and Admin manager</p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  H1: Please give details:  Mr. Rajesh Joshi – Management representative is the person responsible for implementation of the code.</p>



<p>I: Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      I1: Please give details:                      Yes, facility has data privacy policy and it covers workers information also.</p>
<p>J: Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      J1: Please give details:                      Workers information related to job is kept confidential in custody of HR manager office.</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      K1: Please give details:                      Facility has done risk assessment to evaluate policy and procedure effectiveness.                      Verified the Doc- Risk assessment on policies and procedure.</p>
<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      L1 Please give details:                      Facility has done risk assessment to evaluate policy and procedure effectiveness.                      Verified the Doc- Risk assessment on policies and procedure.</p>
<p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      M1: Please give details:                      Facility has communicated the ETI &amp; code of conduct policy to the suppliers are requested them to follow the same.                      Verified mail communication dated 26-06-20</p>
<p><b>Land rights</b></p>	
<p>N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      N1: Please give details:                      Verified possession letter of plot no 101,102,103                      Also verified submitted property tax challans for year 2018-2019</p>
<p>O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      O1: Please give details:                      Facility has a system in place to conduct legal due diligence.</p>

	HR and Admin Manager is the person responsible for legal due diligence.
<p>P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>P1: If yes, how does the company obtain FPIC: Facility has FPIC policy. Due diligence was conducted by local government authority.</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Q1: Please give details: Facility has paid property revenue tax for year 2018-19 Verified submitted bills</p>
<p>R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>R1: Please give details: <b>This Land comes under MIDC</b>, This land is not coming under land acquisition act.</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>S1: Please give details: There is no any illegal appropriation of land; Facility is legal owner of the land. Verified possession letter of plot no 101,102,103 Also verified submitted property tax challans for year 2018-2019</p>

**Non-compliance:**

<p><b>1. Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI/Additional Elements      <input type="checkbox"/> NC against Local Law</p> <p><input type="checkbox"/> NC against customer code: <b>Nil</b></p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i></p>
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Observation:	
<p><b>Description of observation: Nil</b></p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

Good Examples observed:	
<p>Description of Good Example (GE): Nil</p>	<p><b>Objective evidence observed:</b></p>

**1: Freely Chosen Employment**

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

**ETI**

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

Based upon interaction with employees, management and review of records-

1. Employees are recruited through a personal interview. Employees are not required to lodge any deposits or identity papers with the facility before or after joining the services.
2. The facility does not require monetary deposit or deposition of employee's original ID card such as a condition of employment.
3. Employees are free to leave at the end of their shift and there are no overtime hours done in the facility.
4. The facility does not restrict the employee's freedom of movement.

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

Company Social Policies & HR Manual.  
 Interaction with Management and Interview with employees  
 Policy and Procedure Manual - Doc Name - Human Resources Policies, Procedures and Forms W.e.f 01-03-2020 revision 1

Any other comments: Nil

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  A1: If yes, please give details and category of workers affected:</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  B1: If yes, please give details and category of worker affected:</p>

<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  C1: If yes, please give details and category of worker affected:</p>
<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  D1: Please describe finding:  As per interaction with workers there is no any restrictions on workers freedom to terminate employment.</p>
<p>E: If any part of the business is UK based or registered there &amp; has a turnover over £36m, is there a published a 'modern day slavery statement'?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No  <input checked="" type="checkbox"/> Not applicable  E1: Please describe finding:</p>
<p>F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  F1: Please describe finding:  As per interaction with workers and time record there is no restrictions to leave site at the end of the work day</p>
<p>G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Not applicable  G1: If yes, please give details and category of workers affected:  Facility has conducted risk assessment of forced labour.  They have found risk in workers supplier by agency.   Facility has strict policy on supplier engagement.</p>
<p>H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  H1: Please describe finding:  Facility has conducted risk assessment of forced labour.  They have found risk in workers supplier by agency.   Facility has strict policy on supplier engagement.</p>

**Non-compliance:**

<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law:    <input type="checkbox"/> NC against customer code: <b>Nil</b></p> <p><b>Local law and/or ETI requirement</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p>
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Observation:	
<p><b>Description of observation:</b> Nil</p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

Good Examples observed:	
<p>Description of Good Example (GE): Nil</p>	<p><b>Objective evidence observed:</b></p>

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

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

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

Based upon the review of company policies, interaction with facility management and employees and tour of the facility, it was noted that:

- Facility encourages and respects all employees' rights to join union freely.
- Facility recognizes and encourages the right to freedom of association and collective bargaining under the law provision.
- The facility does not restrict employees on organizing trade unions and has an open approach to get associated with trade unions and their organizational activities without management interference.
- Trade union is available in the facility, and all workers are members of union.
- Name of Trade union – Arrow Textile limited workers union
- Registration no – NSK/N-740
- At every three year revision of agreement took place, verified last agreement effective from 01-01-19.
- Health and safety committee -27-05-2020
- Grievance Redressal Committee - 01-02-2020
- Suggestion box will open every after 30 Days.
- Facility has posted suggestion box at accessible location where employees can share their concerns anonymously.
- There was no evidence of suppression of employees' rights.

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

Details:

Facility Policy and Procedures  
Suggestion Box.

Grievance Committee meeting Minutes  
 Trade union details  
 Interaction with Management and Interview with employees.

Any other comments: Nil

<p>A: What form of worker representation/union is there on site?</p>	<p><input checked="" type="checkbox"/> Union (name)  <input type="checkbox"/> Worker Committee  <input type="checkbox"/> Other (specify)  <input type="checkbox"/> None</p> <p>Name of union – Arrow Textile Limited Workers union.</p>	
<p>B: Is it a legal requirement to have a union?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>	
<p>C: Is it a legal requirement to have a worker's committee?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>There is legal requirement to form workers committee, but as trade union is present and all workers covers in union, facility has not formed workers committee.</p>	
<p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&amp;S, sexual harassment)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>D1: Please give details:                  Grievance Redressal Committee                  Suggestion box</p> <p>D2: Is there evidence of free elections?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>E1: Please give details:                  Facility allows committee workers to do the meetings when required.                  Generally, the frequency of meeting is once in 3 month</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>Name of union – Arrow Textile Limited Workers union.</p>	<p>F1: Is there evidence of free elections?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>



G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	NA	G1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	List of workers representative of union has been displayed on notice board.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 01-01-19
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: 02	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	Trade union is found effective, verified from their minutes of meetings and last collective bargaining agreement effective from 01-01-19.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If <b>Yes</b> , what percentage by trade Union/worker representation	M1: <u>100</u> % workers covered by Union CBA	M2: <u>100</u> % workers covered by worker rep CBA
M3: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

<b>Non-compliance:</b>	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI    <input type="checkbox"/> NC against Local Law    <input type="checkbox"/> NC against customer code: <b>Nil</b></p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p>

Observation:	
<p><b>Description of observation:</b> Nil</p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>
Good Examples observed:	
<p><b>Description of Good Example (GE):</b> Nil</p>	<p><b>Objective evidence observed:</b></p>

**3: Working Conditions are Safe and Hygienic**

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

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. Mr. Swapnil Aher – EHS Manager is responsible to ensure a healthy and safe work environment in the facility.
2. The facility has established General health and safety policy, Procedure.
  - a. Emergency Preparedness plan: Doc Name -Management of incidents and Emergences. No - SOP -00 revision 01 Dated 01-03-20
  - b. Health and safety committee: recent committee meeting held on - Latest MOM – 27-05-2020
  - c. HIRA - F/MR/09A Dated 05-02-2020
3. Facility has provided following safety equipment's and other facility.

- Fire Extinguisher - 56
- Hydrant system- 01
- Pump - 04
- Hose box - 11
- Hose reel - 04
- Alarm System -01
- MCP – 37
- Hooter – 28
- Smoke Detector- 58
- Sprinkler - 300
- Assembly Point - 01
- First aid box- 05
- Drinking water spot - 02
- Toilet -06
- Emergency lights- 45
- Emergency Exit- 13

Sand Bucket - 11  
 Eye Washer- 01  
 Suggestion Box- 04  
 Lunch Area – 003

4. Facility has provided clean and potable drinking water (02 drinking water point) to their entire Employees. Latest test was conducted by ENPRO Lab Report No: 117/DW/01 Dated 13-11-19

5. Examination of below instruments are carried out by Om techno Service (Competent person)

Instrument	Report No.	Date of issue	Due Date
Air Compressor	Form No 13	25-02-2020	24-08-2020
Goods Lift	Form No 11	01-09-19	29-08-2020

6. SOP for Safe Handling of machineries, Chemicals are available and implemented:

SOP Code	SOP For	Date
SOP/00	Sop for Production Process	01-03-2020
SOP/00	Sop for Hazard Analysis	01-03-2020
SOP/00	Sop for Site Security	01-03-2020
SOP/00	Management incident and emergency	01-03-2020

7. Facility has provided appropriate and relevant personal protective equipment like (Nose Mask, Hand Gloves , Metal Gloves, Gum Boots)at free of cost to the employee, PPE's issue record verified for the month of June 2020.

8. Facility conducted PPE use training to all workers - Dated 15-03-2020 Conducted by Mr. Swapnil Aher

9. It is evident through document review facility has conducted mock drills training on quarterly Basis.

Dated-05-03-2020

Conducted by Mr. Swapnil Aher

Evacuation Time – 3 Min

No of Head - 155

Department – Whole Factory

Shift – General and First

10. It is evident through document review facility has arranged external agency to provide firefighting training. It was conducted

Dated-29-02-2020

Given by Mr. Swapnil Aher (Safety officer)

Verified competent certificate

11. Verified from the workers interview and document review; Facility has conducted first aid training:

Date – 11-09-19

Given by Red Cross

Total 26 Workers

12. Risk assessment of activities and incident are carried out  
 F/MR/09A Dated 05-02-2020

- 13. Facility conducted Occupational checkup of total employee once in year.  
Conducted by Dr. Shinde's Occupational Health and safety
- 14. Facility has tie up with nearest hospital (300 Mtr from factory) for any emergency.
- 15. Facility maintained accident register to record site accident.  
Verified Accident register as per ESIC act and factory act form no 30 and 15

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

Details:  
 Factory Plan Layout  
 EHS Policy  
 Accident records  
 Firefighting, Mock drill, First Aid Training record.  
 Drinking Water Test report.  
 Instruments Examination test report.  
 Risk Assessment.  
 List of Facility  
 Interaction with Management and Interview with employees.

Any other comments: Nil

<p>A: Does the facility have general and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No          A1: Please give details:          Verified policy and procedure          Human Resources Policies, Procedures and Forms W.e.f 01-03-2020 revision 1</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No          B1: Please give details:          All employees receive polices at the time of induction and it is available in the employees personal file.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No          C1: Please give details:</p>

	<p>Verified with plan layout and site visit, there is no any additional structures are added in the premises. Facility have valid building stability certificate.</p>
<p>D: Are visitors to the site informed on H&amp;S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  D1: Please give details:  Facility has safety guideline and visitor policy for visitor.</p>
<p>E: Is a medical room or medical facility provided for workers?   If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  E1: Please give details:   Medical room is not applicable here as workers strengths is below 500.  But facility has adequate first aid boxes (05) in place.  Also, facility has tie up with nearest hospital in case of emergency</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  F1: Please give details:  Doctor/Nurse not applicable here as workers strength is below 500.  But facility has total 26 trained first Aider.  Training given by Red Cross on dated – 11-09-19</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  G1: Please give details:  Transport facility not provided by facility.</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  H1: Please give details:  Workers are not provided with accommodation.</p>
<p>I: Are H&amp;S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  I1: Please give details:  Verified H&amp;S risk assessment   Doc Name – F/MR/09A Dated 05-02-2020</p>
<p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  J1: Please give details:  Facility has obtained all applicable and other legally required license.   Factory License –  License no – 14741  Date of Issue 14-02-19  Validity – 31-12-2020  Issued by Govt. Of MH</p>

	<p>Authorised for 500 workers and 2000 HP</p> <p>GST Copy – No- 27AAACG5018K1ZN Dated 04-05-2020</p> <p>IEC Copy – No- 0388089245 Dated 01-04-18</p> <p>Building Stability Certificate 1F/17 Dated 24-02-17 Valid for 5 year Issued Narayan L Panjabi Dated 15-06-16 Valid for 5 year Issued by Jayant Bhinge</p> <p>Approved Factory Lay out plan – 3315/15 Dated 10-04-15</p> <p>PF Registration No – MH/23583</p> <p>ESIC Registration No- 33400063870000199</p> <p>PCB Consent order No-SRO-NASHIK/CONSENT/1712001052 Date of Issue-27-12-17 Valid up to-31-12-19 Consent to operate under section 26 of the water act 1974 and under section 21 of the Air act 1981 Issued by MPCB Applied renewal 23-10-19</p> <p>Fire NOC – No – MIDC/FIRE/2803/2014 Dated 07-11-14 Verified Form B of July 19 to Dec 19 Submitted for Jan 20 to Jun20</p>
<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Verified with document review and Audit observation that facility uses GOTS approved chemicals only.</p>

**Non-compliance:**

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

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

It was noted through site tour that emergency Pathway marked in RM Store found unclear and faded.

**Local law and/or ETI requirement**

According to Section 38 (1 & 2) of The Factories Act, 1948, Every factory shall provide and maintain 1) a) safe means of escape for all person in the event of 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.

**Recommended corrective action:**

It is recommended to the facility to mark clearly identified emergency pathway in production floor

**2. Description of non-compliance:**

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

It was noted through facility tour that, 01 out of 02 fire exits door Woven tape Department found opening inward.

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

According to Section 38 (1a) of the Factories Act, 1948, every factory shall provide and maintain safe means of escape for all persons in the event of a fire

**Recommended corrective action:**

It is recommended to facility to maintain fire exits properly and it must be opening outward.

**3. Description of non-compliance:**

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

It was noted through facility tour that, Facility has not installed Handrail to staircase of printing department.

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

According to Section 38 (1a) of the Factories Act, 1948, every factory shall provide and maintain safe means of escape for all persons in the event of a fire

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

**Photographic Evidence**

Photographic Evidence

Photographic Evidence



<p><b>Recommended corrective action:</b> It is recommended to facility to maintain staircase properly with hand rail.</p> <p><b>4 . Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI      <input checked="" type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p>It was noted through facility tour that, Facility has not provided eye wash station in finishing department</p> <p><b>Local law and/or ETI requirement:</b> According to 87 of The Factories Act, 1948.</p> <p><b>Recommended corrective action:</b> It is recommended to facility to install eye wash station in Finishing Department</p>	Site observation
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Observation:	
<p><b>Description of observation:</b></p> <p><b>Local law or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b></p>

Good Examples observed:	
<p>Description of Good Example (GE):</p>	<p><b>Objective Evidence Observed:</b></p>

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

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

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- 1. Facility has displayed Child Labor policy which states that "No Child labor allowed in the factory".
- 2. Facility has established Child labor policy.
- 3. Based on the review of age proof records, physical appearance of employees during walk through and Interviews with employees, there was no evidence of child labor or young labor observed / reported.
- 4. Facility has maintained valid age proof documents in the form of Voter Id Card, Pan Card & Aadhar Card.
- 5. The age of youngest worker found in the facility is 20 years.

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

Details:

- 1. Child labour policy
- 2. HR policy
- 3. Employees Personnel Files (Age proof records – Voter Id Card, Pan Card & Aadhar Card)

Any other comments: Nil

A: Legal age of employment:	Above 14 Years
B: Age of youngest worker found:	20 Years

C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Nil  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>

Observation:	
<b>Description of observation:</b> Nil  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

Good Examples observed:	
<b>Description of Good Example (GE):</b> Nil	<b>Objective Evidence Observed:</b>

**5: Living Wages are Paid**

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

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

**ETI**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

It was noted from review of wage records and interaction with employees and management that:

1. All eligible employees are covered under Provident Fund & ESIC.
2. No fines / illegal deductions are made from the wages of the employees as disciplinary measures.
3. All employees are paid on or before 7<sup>th</sup> day of every month.
4. All employees are provided with clear, written and understandable pay slip in local language.
5. All employees are paid more than the minimum wage act applicable for them.

Verified Maharashtra 01-07-20 to 31-12-20 Zone - 1

Skilled – 12532 Rs/ Month

Unskilled- 11332 Rs/Month

Semi-skilled-11832 Rs/Month

6. Facility has paying 8.33 % of total salary as bonus to the workers. Verified the Bonus payment record.

7. Facility has also extended Leave with benefits to all applicable employees as per the legal requirement. PL - 22, CL – 11, SL – 06 Paid Holiday - 07

8. Verified from the attendance and salary record of Dec-19 & June and July - 20 it was found that , workers are being paid by accurate wages and on time

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

Details:

26 employees were interviewed, and the same numbers of records were reviewed for the month of Aug-2019, June and July 2020

List of National and Festival Holidays.

Leave with wage records.

Interaction with management and Employees.

Bonus Records  
PF and ESIC Latest remitted challans

Any other comments: Nil

<b>Non-compliance:</b>	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI      <input checked="" type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:                      It was noted through document review and workers interview that facility has provided payslips to all selected workers for selected months but not in their understandable local language.</p> <p><b>Local law and/or ETI requirement:</b>                      According to Rule 26 (2) of The Minimum Wages Central Rules, 1950</p> <p><b>Recommended corrective action:</b>                      It is recommended to facility to provide payslip in local language.</p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)</p> <p><b>Verified with document review and workers interview</b></p>

<b>Observation:</b>	
<p><b>Description of observation:</b> Nil</p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

<b>Good Examples observed:</b>	
<p><b>Description of Good Example (GE):</b> Nil</p>	<p><b>Objective Evidence Observed:</b></p>

### Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 48 Hrs /Week	A1: 48 Hrs / Week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 12 Hrs / Week	B1: OT not performed in selected months	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: Skilled – 12532 Rs/ Month Unskilled- 11332 Rs/Month Semi-skilled- 11832 Rs/Month	C1: Highest Salary – 43109 Rs/Month  Lowest salary – 12000 Rs/Mont	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 200% of basic wages.	D1: OT not performed	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<b>Wages analysis:</b> <a href="#">(Click here to return to Key Information)</a>	
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A1: If <b>No</b> , why not?	
B: Sample Size Checked <i>(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)</i>	26 Samples from Aug 2019 - Random Month 26 Samples from June 2020 – Random Month 26 Samples from July 2020- Current Month
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  C1: If <b>Yes</b> , please give details:

<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>D1: If <b>No</b>, please give details:</p>	
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i></p> <p>12000 Rs/Month</p>	
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: ___% of workforce earning under minimum wage          F2: ___% of workforce earning minimum wage          F3: _100_% of workforce earning above minimum wage</p>		
<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found:  <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i></p> <p>8.33% yearly of Earned wages</p>		
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>PF @ 12% from basic salary.          ESIC @ 0.75 from gross salary.          PT @ applicable slab          Union Fee – Rs 100 Once in year</p>		
<p>I: Have these deductions been made?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Please list all deductions that <b>have</b> been made.</p>	<p>Please describe:</p> <ol style="list-style-type: none"> <li>PF @ 12% from basic salary.</li> <li>ESIC @ 0.75 from gross salary.</li> <li>PT @ applicable slab</li> <li>Union Fee – Rs 100 Once in year</li> </ol>
		<p>I2: Please list all deductions that <b>have not</b> been made.</p>	<p>1. Nil          2.          Please describe:</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type</p> <input type="checkbox"/> Poor record keeping	

	<input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details:
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info:          Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time:
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details:
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Annual wages records have been reviewed. Once every six month dearness allowance from state government have been revised. Also once in 3 years Union agreement also have been revised.
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No All Employees are getting paid by 7 <sup>th</sup> day of each month.
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: It was noticed from the workers interview and pay roll records, it was confirmed that equal rates are being paid for equal work.
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:



**6: Working Hours are not Excessive**

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

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

**ETI**

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

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

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

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

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

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

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

**Current Systems and Evidence Examined**

To complete 'current systems' 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:**

Based from the In/Out time records, interaction with the employees and management, over time is not practiced in this unit.

Total 4 shift running in this unit.

1<sup>st</sup> shift – 07.00 AM to 3.00 PM

2<sup>nd</sup> shift – 03.00 PM to 12.00 PM

3<sup>rd</sup> shift – 12.00 PM to 07.00 AM

General Shift – 10.00 AM to 06.00 PM

All workers and staff having one weekly off in weak (Variable)

Facility maintains biometric attendance recording system for all employees.

Working hours analysis as follows based on available records:

For Dec 2019 (Random Month) Maximum working hours per week were 188 hours/Month

For June 2020 (Random Month) Maximum working hours per week were 166 hours/Month

For July 2020 (Current Month) Maximum working hours per week were 180 hours/months

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

Details:

Review of In/out time records from Dec 2019 , June 2020 & July 2020

Working Hours policy

Any other comments: Nil

**Non-compliance:**

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

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

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

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

**Recommended corrective action:**

**Observation:**

**Description of observation:** Nil

**Objective evidence observed:**

**Local law or ETI requirement:**

<b>Comments:</b>	
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Good Examples observed:	
Description of Good Example (GE): Nil	Objective Evidence Observed:

Working hours' analysis					
Please include time e.g. hour/week/month <i>(Go back to Key information)</i>					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe:  Biometric Entry				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details				
C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:			
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:			
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:			

<p>E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>E1: If <b>yes</b>, please detail hours, %, types of workers affected and frequency Please give details:</p>
<p>F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?</p>	<p>F2: Please select all applicable:  <input checked="" type="checkbox"/> 1 in 7 days  <input type="checkbox"/> 2 in 14 days  <input type="checkbox"/> No                  If 'No', please explain:</p>	<p>F3: Is this allowed by local law?  <input type="checkbox"/> Yes  <input type="checkbox"/> No</p>
	<p>Maximum number of days worked without a day off (in sample):</p>	
	<p>06 Days</p>	
<p><b>Standard/Contracted Hours worked</b></p>		
<p>G: Were standard working hours over 48 hours per week found?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>G1: If yes, % of workers &amp; frequency:</p>
<p>H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>H1: If yes, please give details:</p>
<p><b>Overtime Hours worked</b></p>		
<p>I: Actual overtime hours worked in sample (State per day/week/month)</p>	<p>Highest OT hours: OT not performed in selected months.</p>	
<p>J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p>K: Approximate percentage of total workers on highest overtime hours:</p>	<p>__0__%</p>	

<p>L: Is overtime voluntary?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	<p>L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:</p>
<p><b>Overtime Premiums</b></p>		
<p>M: Are the correct legal overtime premiums paid?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	<p>M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages:</p>
<p>N: Is overtime paid at a premium?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>N1: If yes, please describe % of workers &amp; frequency:</p>
<p>O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p>	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	
	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>	
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<input type="checkbox"/> <b>Overtime is voluntary</b> <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)	
	<p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p>	
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Q1: If yes, please give details:</p>	

<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
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**7: No Discrimination is Practiced**

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

It was evident from review of wage records and employees' interview that,

1. Facility does not discriminate its employees in terms of hiring, compensation, access to training, promotion, termination or retirement based on caste, national origin, religion, age, disability, gender, marital status, Sexual orientation, union membership or political affiliation or any others thereof which could lead to discrimination.
2. It was noted from wage records review; the facility provides the same pay for employees performing work of similar nature.
3. Verified committee meeting records of Grievance committee - 01-02-2020

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

Details:

- Social policy and Procedure Manual (Ethical Policy)
- Salary records.
- Interaction with management and Employees.
- Committee record

Any other comments: Nil

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: <u>99</u> % A2: Female <u>1</u> %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	0

<p>C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:</p>	<p> <input type="checkbox"/> Hiring  <input type="checkbox"/> Compensation  <input type="checkbox"/> Access to training  <input type="checkbox"/> Promotion  <input type="checkbox"/> Termination or retirement  <input type="checkbox"/> No evidence of discrimination found         </p> <p>C1: Please give details:</p>
---	--

Professional Development	
<p>A: What type of training and development are available for workers?</p>	<p>Yearly skill development programs are conducted for the workers.</p> <p>Dated 28-01-2020</p>

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

Non-compliance:	
<p><b>1. Description of non-compliance:</b></p> <p> <input type="checkbox"/> NC against ETI                <input type="checkbox"/> NC against Local Law                <input type="checkbox"/> NC against customer code: <b>Nil</b> </p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p>

Observation:	
<p><b>Description of observation: Nil</b></p> <p><b>Local law or ETI requirement:</b></p>	<p><b>Objective evidence observed:</b></p>



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<b>Comments:</b>	
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<b>Good Examples observed:</b>	
Description of Good Example (GE): Nil	<b>Objective Evidence Observed:</b>

**8: Regular Employment Is Provided**

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

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

**ETI**

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

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

**Additional Elements: Responsible Recruitment**

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

Facility engaged company pay roll workers as well as using workers supplied by contractors (Labour Providers)

Employer registration certificate no – 1820600710013523 Dated 11-01-18

Number of contractors 01

Name of Contractor BS Enterprises

License No 1620600110013914 Valid Up to 31-12-19 (Applied for renewal)

For Workers -100

Also verified work order for contractor.

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

Details:

Verified during site tour and Confirmed during workers interview  
 Confirmed from management interaction  
 Contractor RC & Agreement

Any other comments: Nil

**Non-compliance:**

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

NC against ETI       NC against Local Law       NC against customer  
 code: **Nil**

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

**Recommended corrective action:**

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

**Observation:**

**Description of observation:** Nil

**Local law or ETI requirement:**

**Comments:**

**Objective evidence observed:**

**Good Examples observed:**

Description of Good Example (GE): Nil

**Objective Evidence Observed:**

**Responsible Recruitment**

All Workers

<p>A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?</p>	<p><input checked="" type="checkbox"/> Terms &amp; Conditions presented  <input checked="" type="checkbox"/> Understood by workers  <input checked="" type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:</p>
<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>B1: If yes, please describe details and specific category(ies) of workers affected:</p>
<p>C: If yes, check all that apply:</p>	<p><input type="checkbox"/> Recruitment / hiring fees  <input type="checkbox"/> Service fees  <input type="checkbox"/> Application costs  <input type="checkbox"/> Recommendation fees  <input type="checkbox"/> Placement fees  <input type="checkbox"/> Administrative, overhead or processing fees  <input type="checkbox"/> Skills tests  <input type="checkbox"/> Certifications  <input type="checkbox"/> Medical screenings  <input type="checkbox"/> Passports/ID's  <input type="checkbox"/> Work / resident permits  <input type="checkbox"/> Birth certificates  <input type="checkbox"/> Police clearance fees  <input type="checkbox"/> Any transportation and lodging costs after employment offer  <input type="checkbox"/> Any transport costs between work place and home  <input type="checkbox"/> Any relocation costs after commencement of employment  <input type="checkbox"/> New hire training / orientation fees  <input type="checkbox"/> Medical exam fees  <input type="checkbox"/> Deposit bonds or other deposits  <input type="checkbox"/> Any other non-monetary assets  <input type="checkbox"/> Other –</p> <p>C1: If other, please give details:</p>
<p>D: If any checked, give details:</p>	

<p><b>Migrant Workers:</b></p> <p><i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i></p>			
<p>A: Type of work undertaken by migrant workers:</p>	<p>NA</p>		
<p>B: Please give details about recruitment agencies for migrant workers:</p>	<p>B1: Total number of (in country recruitment agencies) used:  B2: Total number of (outside of local country) recruitment agencies used:</p>		
<p>C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and</p>	<table border="1" style="width: 100%;"> <tr> <td data-bbox="627 1901 932 2027"> <p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p> </td> <td data-bbox="932 1901 1500 2027"> <p>C2: Observations:</p> </td> </tr> </table>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>	<p>C2: Observations:</p>
<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>	<p>C2: Observations:</p>		

is evidence of the transaction supplied by the facility to the worker?	C1: Please describe finding:	
<p>D: Are Any migrant workers in skilled, technical, or management roles</p> <p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: If yes, number and example of roles:</p>	

**NON-EMPLOYEE WORKERS**

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

**Agency Workers (if applicable)**  
*(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)*

A: Number of agencies used (average):	A1: Names if available: NA
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No  E1: Please give details:

<b>Contractors:</b>	
<i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If yes, how many contractors are present, please give details:  Verified contractor details RC No – 1820600710013523 Dated 11-01-18 Valid up to 31-12-19 Name of Contractor BS Enterprises License No 16206001 10013914 Valid Up to 31-12-19 For Workers -100 Applied for renewal
B: If <b>Yes</b> , how many workers supplied by contractors?	55
C: Do all contractor workers understand their terms of employment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:

D: If **Yes**, please give evidence for contractor workers being paid per law:

Verified from salary slip of month Dec 19, June 20 and Jul 20.  
contractor workers being paid per law

**8A: Sub-Contracting and Homeworking**

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

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

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

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

*Note to auditor on homeworking:*

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

**Na, facility not doing any core activity as sub-contracting.**

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

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

<i>Process Subcontracted</i>	<i>Process 1</i>	<i>Process 2</i>
<i>Name of factory</i>		
<i>Address</i>		

<i>Process Subcontracted</i>	<i>Process 3</i>	<i>Process 4</i>
<i>Name of factory</i>		
<i>Address</i>		

<i>Process Subcontracted</i>	<i>Process 5</i>	<i>Process 6</i>
<i>Name of factory</i>		
<i>Address</i>		

Details:

**Non-compliance:**



<p><b>1. Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI/Additional Elements      <input type="checkbox"/> NC against Local Law</p> <p><input type="checkbox"/> NC against customer code: <b>NA</b></p> <p><b>Local law and/or ETI /Additional Elements requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i></p>
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Observation:	
<p><b>Description of observation: NA</b></p> <p><b>Local law or ETI/Additional elements requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

Good Examples observed:	
<p>Description of Good Example (GE): NA</p>	<p><b>Objective Evidence Observed:</b></p>

Summary of sub-contracting – if applicable	
<input checked="" type="checkbox"/> Not Applicable please x	
<p>A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe:</p>
<p>B: If sub-contractors are used, is there evidence this has been agreed with the main client?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No B1: If <b>Yes</b>, summarise details:</p>
<p>C: Number of sub-contractors/agents used:</p>	
<p>D: Is there a site policy on sub-contracting?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

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

<b>Summary of homeworking – if applicable</b> <input checked="" type="checkbox"/> Not Applicable please x
--

A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If <b>Yes</b> , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?			
F: What processes are carried out by homeworkers?			
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

**9: No Harsh or Inhumane Treatment is Allowed**  
[\(Click here to return to summary of findings\)](#)

**ETI**

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&amp;S or any other grievances to a 3<sup>rd</sup> party?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  A1: Please give details:                  A suggestion box is placed in the facility also grievance Redressal committee is available in the facility.</p>
<p>B: If <b>Yes</b>, are workers aware of these channels and have access? Please give details.</p>	<p>Yes, Workers are aware of these channels.                  Suggestion boxes and various committees are available in the facility.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Suggestion box, Whistle blowing mechanism policy.</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers  <input checked="" type="checkbox"/> Communities  <input checked="" type="checkbox"/> Suppliers  <input type="checkbox"/> Other                    D1: Please give details:                    There is suggestion box and grievance Redressal committee available for workers.                    Whistle blower policy and mechanism in place for suppliers and communities.</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                    E1: If yes, please give details</p>
<p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                    F1: If no, please give details</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                    G1: If no, please explain</p>

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

**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 evidence of harsh or inhumane treatment of employees.
2. All employees are treated with respect and dignity.
3. Facility's disciplinary policies are explained to all employees and all employees are well aware about their rights.
4. No evidence of physical abuse, sexual or any other harassment / verbal abuse is observed / reported.
5. Facility has formed Anti Sexual Harassment committee to discuss and resolve the issues.

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

Details:  
 Disciplinary policies.  
 Committee Meeting records.

Any other comments: Nil

**Non-compliance:**

<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer  code: <b>Nil</b></p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p>
--	--

Observation:	
<p><b>Description of observation:</b> Nil</p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

Good Examples observed:	
<p>Description of Good Example (GE): Nil</p>	<p><b>Objective Evidence Observed:</b></p>

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

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

**Additional Elements**

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. Facility has not employed migrant employees.
2. Verified from the facility policy manual and recruitment & Selection policy, they are aware about the statutory legal requirement of employee engagement.
3. Facility has maintained employment contracts, wages and working hour's records, age proofs, legal mandatory Benefits and social insurance records for all employees employed through labor contractor.
4. Based from the review of personal files of all employees, it was noted that all of them are holding the legal rights To work.

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

Details:

Recruitment policies/ Procedure.

Any other comments: Nil

**Non-compliance:**

<p><b>1. Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI/Additional Elements      <input type="checkbox"/> NC against Local Law</p> <p><input type="checkbox"/> NC against customer code: <b>Nil</b></p> <p><b>Local law and/or ETI /Additional Elements requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i></p>
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Observation:	
<p><b>Description of observation: Nil</b></p> <p><b>Local law or ETI/Additional Elements requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

Good examples observed:	
<p>Description of Good Example (GE): Nil</p>	<p><b>Objective Evidence Observed:</b></p>

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

Na as this is 4 Pillar Audit.

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

Details:

Any other comments:

**Non-compliance:**

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

NC against ETI/Additional Elements

NC against Local Law

NA

**Local law and/or ETI/Additional Elements requirement:**

**Recommended corrective action:**

**Objective evidence observed:**

(where relevant please add photo numbers)



Observation:	
<b>Description of observation: NA</b>  <b>Local law or ETI/additional elements requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

Good examples observed:	
<b>Description of Good Example (GE): NA</b>	<b>Objective Evidence Observed:</b>

**10. Other issue areas 10B4: Environment 4–Pillar**

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

To be completed for a 4–Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar

**B.4. Compliance Requirements**

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

10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.

10B4.3 Businesses shall be aware of their end client’s environmental standards/code requirements

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

10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.

10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details).

10B4.7 Businesses shall make continuous improvements in their environmental performance.

10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation

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

**B4. Guidance for Observations**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. Facility has environmental policy displayed in the factory premises.
2. Person responsible for EMS – Mr. Rajesh Joshi
3. Facility has obtained all legal license and permissions

Factory License –  
 License no – 14741  
 Date of Issue 14-02-19  
 Validity – 31-12-2020  
 Issued by Govt. Of MH  
 Authorised for 500 workers and 2000 HP

GST Copy –

No- 27AAACG5018K1ZN Dated 04-05-2020

IEC Copy –

No- 0388089245 Dated 01-04-18

Building Stability Certificate

1F/17 Dated 24-02-17

Valid for 5 year

Issued Narayan L Panjabi

Dated 15-06-16

Valid for 5 year

Issued by Jayant Bhinge

Approved Factory Lay out plan –

3315/15 Dated 10-04-15

PF Registration

No – MH/23583

ESIC Registration

No- 33400063870000199

PCB Consent order

No-SRO-NASHIK/CONSENT/1712001052

Date of Issue-27-12-17

Valid up to-31-12-19

Consent to operate under section 26 of the water act 1974 and under section 21 of the Air act 1981

Issued by MPCB

Applied renewal 23-10-19

Fire NOC –

No – MIDC/FIRE/2803/2014 Dated 07-11-14

Verified Form B of July 19 to Dec 19

Submitted for Jan 20 to Jun20

4. Facility maintain the records of Energy, water and other utility consumption

	2018-2019	2019-2020
Energy	2911789 KWH	3244764 KWH
Water	258 M3	264

5. Environmental impact assessment record - Document Name - F/MR/09B Dated 05-02-2020

6. Facility has monitored ambient air, noise, Verified the test reports

Noise Level test report - No - 109/WN/01 Dated 06-05-19 Conducted Tech 1 Lab

Ambient Air test report - No-T1/19-20/191/AA/01 Dated 05-01-2020 Conducted by Tech1 lab

7. They have fully efficient Small ETP plant having capacity 500 Ltr per Day with Collection Tank- Reaction cum settler tank – Sand + charcoal Filter ,After treatment wastewater used for Gardening

8. Facility has monitored wastewater parameter, verified test report.

No- 200/WW/1 Dated 30-01-2020

Conducted by Tech 1 Lab

9. Facility has sludge disposal membership with MEPL

No –CAA274 Dated 01-08-16

Verified latest disposal record  
 Manifest No – Form No 10 – 44037 Dated 27-12-18  
 Qty – 400.75 Kgs  
 Disposed to MEPL

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

Details:

Policy record  
 Legal Documents  
 Environmental test reports  
 Energy and water consumption records  
 Environmental Aspect and Impact.  
 Environmental monitoring test reports  
 Waste disposal records

Any other comments: Nil

**Non-compliance:**

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

NC against ETI/Additional Elements       NC against Local  
 NC against customer code:

It was noted through review of records that facility has obtained MSPCB consent order but not updated with requirements of Wastewater monitoring, Noise Level Monitoring, Ambient Air Monitoring, and sludge disposal

**Local law and/or ETI/Additional Elements requirement:**

10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.

**Recommended corrective action:**

**Objective evidence observed:**

*(where relevant please add photo numbers)*

Verified with site visit and document review

<p>It is suggested that facility must be amend in their consent order with requirement of wastewater flow, Wastewater monitoring, sludge disposal and other environmental requirements</p>	
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Observation:	
<p><b>Description of observation:</b> Nil</p> <p><b>Local law or ETI/Additional elements requirements:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

Good examples observed:	
<p>Description of Good Example (GE): Nil</p>	<p><b>Objective Evidence Observed:</b></p>

<b>Environmental Analysis</b> <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Mr. Rajesh Joshi is the person responsible for environmental issues.
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Verified Environment Aspect and Impact Doc Name - F/MR/09B Dated 05-02-2020
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details:
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? Environmental policy displayed on notice board.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Environmental performance board displayed at main gate.
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details:
H: Have all legally required permits been shown? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details:  Facility has obtained all applicable legal documents. Factory License – License no – 14741 Date of Issue 14-02-19 Validity – 31-12-2020 Issued by Govt. Of MH Authorised for 500 workers and 2000 HP  GST Copy – No- 27AAACG5018K1ZN Dated 04-05-2020  IEC Copy – No- 0388089245 Dated 01-04-18

	<p>Building Stability Certificate 1F/17 Dated 24-02-17 Valid for 5 year Issued Narayan L Panjabi Dated 15-06-16 Valid for 5 year Issued by Jayant Bhinge</p> <p>Approved Factory Lay out plan – 3315/15 Dated 10-04-15</p> <p>PF Registration No – MH/23583</p> <p>ESIC Registration No- 33400063870000199</p> <p>PCB Consent order No-SRO-NASHIK/CONSENT/1712001052 Date of Issue-27-12-17 Valid up to-31-12-19 Consent to operate under section 26 of the water act 1974 and under section 21 of the Air act 1981 Issued by MPCB Applied renewal 23-10-19</p> <p>Fire NOC – No – MIDC/FIRE/2803/2014 Dated 07-11-14 Verified Form B of July 19 to Dec 19 Submitted for Jan 20 to Jun20</p>
<p>I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details:  Facility uses only GOTS Approved chemicals.</p>
<p>J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details:</p>
<p>K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details:</p>
<p>L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: Please give details:</p>
<p>M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Facility maintain the records of Energy , water and</p>

resources that follows recognised protocols or standards?	other utility consumption. <table border="1" data-bbox="906 286 1481 421"> <tr> <td></td> <td>2018-2019</td> <td>2019-2020</td> </tr> <tr> <td>Energy</td> <td>2911789 KWH</td> <td>3244764 KWH</td> </tr> <tr> <td>Water</td> <td>258 M3</td> <td>264 M3</td> </tr> </table>			2018-2019	2019-2020	Energy	2911789 KWH	3244764 KWH	Water	258 M3	264 M3
	2018-2019	2019-2020									
Energy	2911789 KWH	3244764 KWH									
Water	258 M3	264 M3									
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input type="checkbox"/> Yes <input type="checkbox"/> No NI: Please give details:  No any subcontractor involved here.										
<b>Usage/Discharge analysis</b>											
Criteria	Previous year: Please state period: 2018-2019	Current Year: Please state period: 2019 -2020									
Electricity Usage: <i>Kw/hrs</i>	3244764 KWH	2911789 KWH									
Renewable Energy Usage: <i>Kw/hrs</i>	Nil	Nil									
Gas Usage: <i>Kw/hrs</i>	Nil	Nil									
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No									
If <b>Yes</b> , please state result	NA	NA									
Water Sources: Please list all sources e.g. lake, river, and local water authority.	<ul style="list-style-type: none"> <li>• MIDC</li> <li>•</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• MIDC</li> <li>•</li> <li>•</li> </ul>									
Water Volume Used: <i>(m<sup>3</sup>)</i>	258 M3	264 M3									
Water Discharged: Please list all receiving waters/recipients.	<ul style="list-style-type: none"> <li>• Used for gardening</li> <li>•</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Used for gardening</li> <li>•</li> <li>•</li> </ul>									
Water Volume Discharged: <i>(m<sup>3</sup>)</i>	Nil	Nil									
Water Volume Recycled: <i>(m<sup>3</sup>)</i>	Nil	Nil									
Total waste Produced <i>(please state units)</i>	68111 Kgs	75727 Kgs									
Total hazardous waste Produced: <i>(please state units)</i>	418 Kgs	600 Kgs									



Waste to Recycling: <i>(please state units)</i>	Nil	Nil
Waste to Landfill: <i>(please state units)</i>	Nil	Nil
Waste to other: <i>(please give details and state units)</i>	Nil	Nil
Total Product Produced <i>(please state units)</i>	601311221 PCs	540035155 PCS

**10C: Business Ethics – 4-Pillar Audit**

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

To be completed for a 4-Pillar SMETA Audit

**10C. Compliance Requirements**

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

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

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

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

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

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

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

**10C. Guidance for Observations**

10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.

10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. Mr. Rajesh Joshi– Management representative is the person responsible for policies authorization.
2. There are no issues with current local legislation. However, It was noted from the interaction with the facility management, the Facility has communicated business code of conduct to all employees through internal trainings.
3. Training has been given to the managers and supervisors for Ethical business practises on 12/06/2020.

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

Details:

Based on interaction with facility management.

Verified Document Policy on code of conduct & ethics Dated 01-03-220

Any other comments: Nil

**Non-compliance:**

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

NC against ETI/Additional Elements

NC against Local

NC against customer code: **Nil**

**Objective evidence observed:**

*(where relevant please add photo numbers)*

**Local law and/or ETI/Additional Elements requirement:**

**Recommended corrective action:**

**Observation**

**Description of observation:** Nil

**Objective evidence observed:**

**Local law or ETI/Additional elements requirement:**

**Comments:**

**Good examples observed:**

Description of Good Example (GE): Nil

**Objective Evidence Observed:**

<p>A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy  <input type="checkbox"/> Policy for third parties including suppliers</p> <p>A1: Please give details:</p> <p>Verified the policies on Ethical business behaviour</p>
<p>B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>B1: Please give details:</p> <p>Facility has trained workers and managers on dated 21/06/2020.</p>
<p>C: Is the policy updated on a regular (as needed) basis?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>C1: Please give details:</p> <p>Please give details: policy is not yet updated.</p>
<p>D: Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>D1: Please give details:</p>

Other findings

Other Findings Outside the Scope of the Code
Nil

Community Benefits <i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
Nil

## Appendix 1

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










Not Applicable please x

## Photo Form

<p>#01 Company Name Board</p>	<p>#02 Building Overview</p>	<p>#03 Trade Union Board</p>
<p>#04 Security Cabin</p>	<p># 05 Biometric System</p>	<p>#06 Emergency contacts</p>
<p>#07 Notice Board</p>	<p>#08 Transformer room</p>	<p>#09 Pump House</p>

<p>#10 Compressor Room</p>	<p>#11 Hydrant Point and Hose box</p>	<p>#12 Fire Buckets</p>
<p>#13 Assembly Points</p>	<p>#14 Speed Limit Board</p>	<p>#15 Parking Area</p>
<p>#16 Drinking Water Spot</p>	<p>#17 Hose Reel</p>	<p>#18 Exit Door</p>



		
<p># 19 Fire Extinguisher</p>	<p># 20 Rodent Box</p>	<p># 21 Fire Detectors</p>
		
<p># 22 Evacuation Plan</p>	<p># 23 Lunchroom</p>	<p>#24 Toilet facility</p>
		
<p># 25 Eye Wash Station</p>	<p># 26 Evacuation pathway</p>	<p># 27 Suggestion Box</p>

<p># 28 Wastewater treatment facility</p>	<p># 29 Production floor</p>	<p>#30 Production Floor</p>

<p>#31 Exit Door Opening inward</p>	<p>#32 Staircase without hand rail</p>	<p>#33 unclear and faded Floor Marking</p>



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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.

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

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

**[Click here for Supplier \(B\) members:](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)**

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\\_2brg\\_3d\\_3d](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

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