

Sedex Members Ethical Trade Audit Report





Audit Details						
Sedex Company Reference: (only available on Sedex System)			Sedex Site Re (only available System)		ZS: 420	0446791
Business name (Company name):	Vallabh Yarns Pvt Lt	Vallabh Yarns Pvt Ltd				
Site name:	Vallabh Yarns Pvt Ltd					
Site address: (Please include full address)	1256 Indra Colony Rahon Road, Ludhiana – 141007, Punjab		Country:		India	
Site contact and job title:	Mr. Vinay Jain – Dire	ector				
Site phone:	+91-9878631102		Site e-mail:	Jain.vibu		ibudh@gmail.com
SMETA Audit Pillars:	□ Labour Standards	Health & Safety (plus Environment 2-Pillar)		Environn 4-pillar	nent	Business Ethics
Date of Audit:	15 th September 2022					

Audit Company Name & Logo:



Report Owner (payer):

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

Vallabh Yarns Pvt Ltd

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

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

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



Audit Content:

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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



SMETA Declaration

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

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

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

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

Lead auditor: Megha Arya APSCA number: RA 21705264

Lead auditor APSCA status: In good understanding

Team auditor: Not Required APSCA number: N/A

Interviewers: Megha Arya APSCA number: RA 21705264

Report writer: Megha Arya

Report reviewer: Edgar Ibarra APSCA number: 21701564

Date of declaration: 15th September 2022

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

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



Summary of Findings

to the	Issue use click on the issue title to go direct e appropriate audit results by clause) o auditor, please ensure that when issuing	(Only conformit	check box v by, and only	n–Conformity when there is c in the box/es v ty can be foun	non- vhere the		Record the number of issues by line*: NC Obs GE		Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
	e audit report, hyperlinks are retained.	ETI Base Code	Local Law	Additional Elements	Customer Code	NC			
0A	Universal Rights covering UNGP						0	0	None Observed
OB	Management systems and code implementation					0	0	0	None Observed
1.	Freely chosen Employment					0	0	0	None Observed
2	Freedom of Association					0	0	0	None Observed
3	Safety and Hygienic Conditions					04	0	0	 It was noted during factory tour that open ended wire used in security guard room and tubular section. It was noted during factory tour that needle guards were missing on 10% of sewing machines. It was noted during Factory tour that workers were not wearing ear plugs in Knitting section. It was noted during factory tour that packed cartons stacked at unsafe height in warehouse section on ground floor.
4	Child Labour					0	0	0	None Observed

5	Living Wages and Benefits					0	0	0	None Observed
6	Working Hours					0	0	0	None Observed
7	<u>Discrimination</u>					0	0	0	None Observed
8	Regular Employment					0	0	0	None Observed
8A	Sub-Contracting and Homeworking					0	0	0	None Observed
9	Harsh or Inhumane Treatment					0	0	0	None Observed
10A	Entitlement to Work					0	0	0	None Observed
10B2	Environment 2-Pillar					0	0	0	None Observed
10B4	Environment 4–Pillar					N/A	N/A	N/A	Not Applicable
10C	Business Ethics					N/A	N/A	N/A	Not Applicable
General observations and summary of the site:									
Audit	Audit Process								

This Full initial announced audit was conducted by Accordia Global Compliance Group. There was 01 auditor, who assessed the facility's operations. The scope of this audit was based on 01 audit-day (01 Auditor in one day) 2 Pillar SMETA systems.

Overview of opening & closing meeting, facility management responses.

Auditor entered the facility at 09.30 am and conducted an opening meeting with facility management according to the ETI Base Code. Mr. Vinay Jain -Director was present in the meeting, and he assured full co-operation to this audit.

Site Summary: -

- Audited facility is exporter & manufacturer of Knitted fabric and readymade garments.
- Overall responsibility for meeting the standards is taken by Mr. Vinay Jain Director.



- There is a total of 46 employees [Males- 41 and Female- 05] at site. Out of 46 employees, on site, 37 employees [Male- 34 and Female- 03] are production employees and 09 employees [Male-07 and Female-02] are non-production employees. On day of audit, a total of 40 employees (Male –37 and Female 03) were present.
- There is no evidence of child labour. Age proof record was maintained for 10 of 10 randomly selected employees.
- The youngest worker on site was 20 years old.
- There is no evidence of any discrimination, harassment and abuse or unfair disciplinary practices.
- There are no migrant employees employed at site.
- There is no union at audited facility.
- Worker committee was present in the facility.
- The facility is using Sub-Contractor like Embroidery, and printing.
- Wages of employees are fixed on monthly basis. Employees are paid on or before 07th day of every next month.
- Facility has not employed any piece rate employees.
- 100% of the employees are paid through bank transfer as well as through cheque.

Facility is operational in one shift as per below detail –

Shift timing: 09:00 am to 18:00 pm Lunch break: 13:00 pm to 13:30 pm

Tea Break: 10:00 am to 10:15 am and 15:00 pm to 15:15 pm

Weekly Holiday: Sunday

- A total of 10 employees were interviewed and the 10 samples of wages records were reviewed for the months of August 2022, January 2022, and September 2021.
- 10 employees (08 male and 02 female) were selected for interview. They were interviewed as 1 group of 4 employees and the remaining 6 workers were interviewed individually.
- All workers said they were satisfied with their employment at the facility.
- As per employee's interaction, they were able to make suggestions to their supervisors and team leaders and sometimes they have seen these. Suggestions used.
- Standard working hour's onsite were 48 hours/week & 8 hours/day.
- Legal minimum wage is INR 9192.72 per month for unskilled workers. Facility has paid INR 9200 per month to unskilled workers (Helpers).
- Facility has policy to pay Overtime wages at the rate of 200% of regular wage rate. No overtime observed.

Findings:

04 non-compliances were found in the areas of "Safety and Hygienic Conditions". For other areas, no violations were noted.

The closing meeting start at 17:45 pm and corrective action plan was discussed. A copy of the CAP was left to Mr. Vinay Jain – Director. Auditor thanked for good cooperation, organization and friendly working environment and left company at 18:00 pm on 15th September 2022.

*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:	Vallabh Yarns Pvt Ltc	Vallabh Yarns Pvt Ltd				
B: Site name:	Vallabh Yarns Pvt Ltc	Vallabh Yarns Pvt Ltd				
C: GPS location: (If available)	GPS Address: N/A Longitude: N/A Longitude: N/A					
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	 Factory License – LDH0FL3993 dated 23rd November 2021 and Valid till 31st December 2023. Fire NOC – 1211-56285-Fire/39902 valid for one year. Pollution – Facility falls under white category and there is no need to obtain pollution consent as per the notification issued by Punjab pollution control board. E.S.I Code – 26000283540000199. P.F Code – LD/LDH/0019438000. GSTIN-03AAACV5322K1ZJ. 					
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturer and exporter of all kinds of Knitted fabric and readymade garments.					
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The facility area is 27477 sq. ft.and production area is 1256 Indra Colony Rahon Road, Ludhiana – 141007, Punjab, India The facility premises were found to be neat and clean and people working were found satisfied with the management.					
	Production Building no	Description	on	Remark, if any		
	Basement	Surplus warehous	se	None		
	Ground floor	Fabric sto Knitting, to and Offic	ubular	None		
	First Floor	Stitching, Finishing, Warehous	Packing,	None		
	Is this a shared building?	No		None		
	For below, please add any extra rows if appropriate. This facility is a modern structure, and basic facilities for howash, drinking water etc., are available. The facility is involved in manufacturing and exports all kinkingted fabric and readymade garments.					
	F1: Visible structural i Yes No	ntegrity issue	es (large o	cracks) observed?		

	F2: Please give details:
	F3: Does the site have a structural engineer evaluation? Yes No
	F4: Please give details: Facility has building stability certificate issued by approved competent structural engineer Mr. Sukhjinder SIngh (B.E. Civil)
G: Site function:	Agent Factory Processing/Manufacturer Finished Product Supplier Grower Homeworker Labour Provider Pack House Primary Producer Service Provider Sub-Contractor
H: Month(s) of peak season: (if applicable)	N/A - Uniform
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	The facility is into the manufacturing and export of all kinds of Knitted fabric and readymade garments. The total capacity is around 35000 pieces per month and fabric 125 tons per month (as per management). Process flow is as below: The processes at site are raw material (Fabric) Raw material (Yarn) – Knitting - Cutting – Stitching – Finishing – Ironing – Checking - Packing & Dispatch. Equipment used in production process – Knitted machine- 48, Stitching Machine – 32, Over Lock – 08, Folding – 04, Kaj Machine- 01. Button Machine – 01, Cutting Machine – 01, Pressing – 06, Gen-set – 1 (1 x 250 KVA)
J: What form of worker representation / union is there on site?	☐ Union (name) ☑ Worker Committee ☐ Other (specify) ☐ None
K: Is there any night production work at the site?	☐ Yes ☑ No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	Yes No L1: If yes, approx. % of workers in on site accommodation

M: Are there any off site provided worker accommodation buildings	Yes No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	Yes No N1: If no, please give details Not Applicable



Audit Parameters							
A: Time in and time out	A1: Day 1 Tim A2: Day 1 Tim			2 Time in: 2 Time out:		Day 3 Time in: Day 3 Time out:	
B: Number of auditor days used:	1 Audit-day (1 Auditor x 1	Day)				
C: Audit type:	Partial Fol	Periodic Full Follow-up Partial Follow-Up Partial Other					
D: Was the audit announced?	Announce Semi – an Unannour	nounced: Wir	ndow det	ail: weeks			
E: Was the Sedex SAQ available for review?	Yes No E1: If No, why not? As per management, Facility was not aware of SAQ.						
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes ☐ No If Yes , please capture detail in appropriate audit by clause						
G: Who signed and agreed CAPR (Name and job title)	Mr. Vinay Jai	n – Director					
H: Is further information available (If yes, please contact audit company for details)	☐ Yes ☑ No						
I: Previous audit date:	N/A						
J: Previous audit type:	N/A						
K: Were any previous audits reviewed for this audit	☐ Yes ☐ No ☐ N/A						
Audit attendance		Manageme	ent	Worker Represe	entativ	'es	
		Senior manageme	ent	Worker Commit		Union representatives	

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



Worker Analysis

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

Worker Analysis								
		Local			Migrant*		Total	
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	Total
Worker numbers – Male	34	00	00	00	00	00	00	34
Worker numbers – female	03	00	00	00	00	00	00	03
Total	37	00	00	00	00	00	00	37
Number of Workers interviewed – male	08	00	00	00	00	00	00	08
Number of Workers interviewed – female	02	00	00	00	00	00	00	02
Total – interviewed sample size	10	00	00	00	00	00	00	10



A: Nationality of Management	Indian	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. Please add more nationalities as applicable to site. Add more rows if required.	Nationalities: B1: Nationality 1: India B2: Nationality 2: B3: Nationality 3:	Was the list completed during peak season? ☐ Yes ☐ No If no, please describe how this may vary during peak periods: N/A - Uniform
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 _100% C1: approx % total workforce: Nationality 2 C2: approx % total workforce: Nationality 3	
D: Worker remuneration (management information)	D:% workers on piece rate D1:% hourly paid workers D2: _100% salaried workers Payment cycle: D3:% daily paid D4:% weekly paid D5: _100% monthly paid D6:% other D7: If other, please give details	

Worker Interview Summary						
A: Were workers aware of the audit?						
B: Were workers aware of the code?	⊠ Yes □ No					
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	01 Group of 04 workers.					
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 04	D2: Female: 02				
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	by If no, please give details – Not Applicable					
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	Yes ☐ No					
G: In general, what was the attitude of the workers towards their workplace?	☐ Favourable☐ Non-favourable☐ Indifferent					
H: What was the most common worker complaint?	No complaints at present					
I: What did the workers like the most about working at this site?	Management attitude of time and availability of p					
J: Any additional comment(s) regarding interviews:	Workers said that they can approach to the management directly for any of the issues or suggestions.					
K: Attitude of workers to hours worked:	Acceptable					
L. Is there any worker survey information available?						
Yes No L1: If yes, please give details:						
M: Attitude of workers: (Include their attitude to management, workplace, and the interview proceincluded) Note: Do not document any information that could put workers a		nformation should be				



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

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

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

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

O: Attitude of managers:

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

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

Audit Results by Clause

0A: Universal Rights covering UNGP

(Click here to return to summary of findings)

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

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

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

Details:

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

Any other comments: Nil



A: Policy statement that expresses commitment to respect human rights? B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	Yes No A1: Please give details: Factor policies and procedures pertorights Yes No Please give details: Name: Mr Vibudh Jain Job title: Manager	="			
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?	 ∑Yes ☐ No C1: Please give details: Suggestion/ Complaint boxes had been provided at conspicuous places in the facility through which workers express their suggestion / complaints if any. 				
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rightscompatible, a source of continuous learning and based on stakeholder engagement)	Yes No D1: If no, please give details				
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	a				
F	indings				
Finding: Observation Description of observation: Local law or ETI/Additional elements / customer spec		Objective evidence observed:			
Comments.					
Good exa	mples observed:				
Description of Good Example (GE):		Objective Evidence Observed:			





Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 5%	A2: This year 6%
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	5%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 3%	C2: This year 4%
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	5%	
E: Are accidents recorded?	Yes No E1: Please describe: Facility maintaining the accident register and Dangerous occurrences register. Review of records show that no accident had happened during this year.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total worke rs]	F1: Last year: Number: Ni	F2: This year: Number: Ni
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	Nil	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: NIL	H2: This year: NIL
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0_% workers	I2: 12 months 0_% workers
J: % of workers that work on average	J1: 6 months	J2: 12 months

more than 60 total hours / week in the last 6 / 12 months:	0% workers	0% workers

0B: Management system and Code Implementation

(Click here to return to summary of findings)

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

Current Systems and Evidence Examined

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

Current systems:

- A Social Accountability Policy has been defined by the company for delivering compliance to the ETI Code.
- Mr. Vinay Jain Director of the company had been appointed as the responsible person for the implementation of ETI code requirements.
- Facility has conducted the ETI base code of conduct training on 30th July 2022.
- Facility has displayed ETI base code of conduct in the factory for worker awareness.
- Facility has displayed all the factories legal abstracts, like ESI, EPF, Minimum wages etc.

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

Details:

- ETI training record
- ETI Policies & Procedure

Any other comments: Nil

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



harassment & abuse?	B1: Please give details: The facility has its own policies and procedures on forced labour, child labour, discrimination, harassment & abuse, and the policies are posted for worker's reference. The facility conducts training to the workers on legal requirements. The facility does not maintain any original documents of the employees and checks with a valid age proof document at the time of hire.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	On the day of assessment, no traces of forced labour, child labour, discrimination, harassment & abuse was observed. All interviewed employees reported that they are treated with dignity and respect. The facility conducts training to all employees related to health and safety, legal requirements etc. and maintains all training records.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	Yes No D1: Please give details: The facility conducts training to all employees on the social policies on regular basis and during the induction.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	Yes No E1: Please give details: The facility conducts training to all employees on all social policies and legal requirements on regular basis and during induction for the new employees. The interviewed employees are found to be aware of the standards of child labour, forced labour etc.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	Yes No F1: Please give details: The facility does not have any internationally recognised system certifications.
G: Is there a Human Resources manager/department? If Yes, please detail.	 ∑ Yes ☐ No G1: Please give details: HR Manager is also in charge of the Human Resource Management of the company.
H: Is there a senior person / manager responsible for implementation of the code	 ∑ Yes ☐ No H1: Please give details: Mr. Vinay Jain – Director as the Management Representative responsible for the implementation of the code.
I: Is there a policy to ensure all worker information is confidential?	Yes No No



	I1: Please give details: The company had established a policy on ensuring confidentiality of worker information.	
J: Is there an effective procedure to ensure confidential information is kept confidential?	 ∑ Yes ☐ No J1: Please give details: The company had implemented a procedure on ensuring confidentiality of confidential information. 	
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	Yes No K1: Please give details: Internal audits and Management review meetings (MRM) are being conducted periodically to evaluate the performance of the facility's management system as against the requirements of the standard.	
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	Yes No L1Please give details: Based on the interaction with the management and review of record that effective action has been taken for the risk identified during internal audit.	
M: Does the facility have a policy/code which require labour standards of its own suppliers?	Yes No M1: Please give details: The facility had established a Supplier Control Plan and Procedure to ensure that their suppliers confirm to the requirements of the standard.	
Land rights		
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	Yes No N1: Please give details: Factory is available all required land right licenses and permissions	
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	Yes No O1: Please give details: Factory has a system in place to conduct legal due diligence relating to land title	
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior, and informed consent, (FPIC) even if national/local law does not require it	 ∑ Yes ☐ No P1: If yes, how does the company obtain FPIC: The facility had committed itself to confirm to the requirements of Local laws on all aspects, as per the social compliance policy of the facility. 	
Q: Is there evidence that facility / site compensated		

Description of Good Example (GE):		Objective evidence observed:	
Good Examples observed:			
Comments:			
Local law or ETI requirement:			
Description of observation:		Objective evidence observed:	
Observation:			
Local law and/or ETI requirement: Recommended corrective action:			
Description of non-compliance: NC against ETI/Additional Elements NC against customer code: NC against customer code:		Objective evidence observed: (where relevant please add photo numbers)	
Non-comp	Non-compliance:		
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint. Yes No S1: Please give details: The appropriation of land and for the land and buildings.		d all the legal licenses	
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts? Yes No R1: Please give details: For incompact in the property of the			
the owner/lessor for the land prior to the facility being built or expanded.	No Q1: Please give details: For the land prior to the for expanded		

1: Freely Chosen Employment

(Click here to return to summary of findings)

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

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

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

Details:

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

Any other comments: Nil

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

Comments:

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

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Good Examples observed:	
Description of Good Example (GE):	Objective evidence observed:

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

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

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

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

Any other comments: Nil

A: What form of worker representation/union is there on site?	☐ Union (name) ☑ Worker Committee ☐ Other (specify) ☐ None
B: Is it a legal requirement to have a union?	☐ Yes ☑ No

C: Is it a legal requirement to have a worker's committee?	Yes No No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	 Yes No D1: Please give details: Suggestion boxes had been provided at conspicuous places in the facility through which workers express their suggestion / complaints if any. The suggestion boxes are opened periodically in the presence of worker committee representative. On receipt of any suggestions or complaints, actions are intended to be taken and to record the same in a register. D2: Is there evidence of free elections? Yes 	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	 No Yes No E1: Please give details: Based on the employee's interview and review of records that, works committee employee representatives are free to carry out their functions like meetings with adequate facilities on periodical basis and the record of the same was maintained. 	
F: Name of union and union representative, if applicable:	Not applicable. No union exists in facility.	F1: Is there evidence of free elections? Yes No N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Workers had elected representatives from among themselves and had formed worker committees.	G1: Is there evidence of free elections? Yes No N/A
H: Are all workers aware of who their representatives are?	⊠ Yes □ No	
I: Were worker representatives freely elected?	⊠ Yes □ No	11: Date of last election: 3 rd May 2021
J: Do workers know what topics can be raised with their representatives?	⊠ Yes □ No	
K: Were worker representatives/union representatives interviewed?	∑ Yes □ No If Yes , please state how many: 02	
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Works committee meeting is held once in 3 months in the factory. Records of meeting minutes reviewed and discussed the same with the workers and found effective. The date of last meeting was on 6 th August 2022.	



☐ Yes ⊠ No			
M1:% workers covered by Union CBA	M2:% workers covered by worker rep CBA		
s, does the Collective ng Agreement (CBA) rates of pay?			
Non-compliance:			
cal Law NC against customer	Objective evidence observed: (where relevant please add photo numbers)		
Local law and/or ETI requirement:			
Recommended corrective action: 2. Description of non-compliance: NC against ETI NC against Local Law NC against customer code:			
Local law and/or ETI requirement:			
Recommended corrective action:			
Observation:			
	Objective evidence		
	observed:		
Good Examples observed:			
	Objective evidence observed:		
	M1:% workers covered by Union CBA Yes No Non-compliance: cal Law NC against customer cal Law NC against customer Observation:		

3: Working Conditions are Safe and Hygienic

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- Factory was neat and clean and with adequate lighting arrangements and well ventilated.
- Emergency exits are identified, marked.
- Fire evacuation drills were conducted once in 3 months, last drills held on 8th July 2022.
- Fire evacuation plans are displayed in English language and in the local language at all sections of the factory.
- Factory has provided 35- fire extinguishers, 04- Fire Alarm, 03- Emergency Light, Hydrant -03, hose reel -03.
- Visual fire alarm is installed in each section.
- 08 persons are trained on use of firefighting equipment.
- Adequate number of first aid boxes (04) with prescribed contents are kept at all sections of the factory except assemble area.
- Adequate number of persons (07) was trained for first aid from St. John Ambulance Association.
- Accidents / injuries records are maintained.
- The facility has a policy on health and safety, which was found to be suitable.
- Safety signage was posted in various departments.
- The facility has provided 24 X 7 security arrangements.
- The facility has appointed Mr. Vinay Jain Director who is responsible for H&S at work.
- Factory has provided 04 male and 01 female toilet facilities to their employees.
- It was noted during factory tour that open ended wire used in security guard room and tubular section.
- It was noted during factory tour that needle guards were missing on 10% sewing machines.
- It was noted during Factory tour that workers not wearing ear plug in Knitting section.
- It was noted during factory tour that packed cartons stacked at unsafe height in warehouse section on ground floor.

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

Details:

Health and safety policy

- Health and safety committee minutes Last meeting was done on 9th July 2022.
- Training records and certificates for fire and first aid.
- Fire equipment maintenance records
- Fire drill records
- Fire licence, Stability certificate for the building, Building approval, etc.

Any other comments: NIL

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

I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk? J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources? K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	☐ Yes ☐ No ☐ No ☐ Please give details: Facility had conducted risk assessment of corrective and preventive action has been the identified risks. ☐ Yes ☐ No ☐ J1: Please give details: Facility is meeting its legal obligations or requirements including required permits natural resources. ☐ Yes ☐ No K1: Please give details: Based on interaction with facility managed does not use any banned chemicals and environmental standards based on cust	een by the facility for n environmental for use and disposal of gement that the facility ad meet all the		
Non-compliance:				
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: It was noted during factory tour that open ended wire used in security guard room and tubular section. Local law and/or ETI requirement 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. According to Factories act 1948 Sec 7-A. (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety, and welfare of all workers while they are at work in the factory (a) the provision and maintenance of plant and systems of working in the factory that are safe and without risks to health. Recommended corrective action: The facility shall ensure to cover all loose wire to avoid any fire or electrical		Objective evidence observed: (where relevant please add photo numbers) 1.Factory tour Ref NC Photo-1		
related hazard. 2. Description of non-compliance: NC against ETI NC against Lo It was noted during factory tour that need sewing machines. Local law and/or ETI requirement 3.1 A safe and hygienic working environm		2.Factory tour Ref NC Photo-2		

the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of,



associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. In accordance with the Factories Act 1948, Section 26 (1) All machinery driven by power and installed in any factory (a) every set screw, bolt, or key on any revolving shall, spindle, wheel or pinion shall be so sunk, encased, or otherwise effectively guarded as to prevent danger. Recommended corrective action: The facility shall ensure to install needle guards on all the sewing machines to avoid any injury. 3. Description of non-compliance: NC against ETI NC against Local Law □ NC against customer code: 3.Factory tour It was noted during Factory tour that workers wear not wearing ear plugs in Ref.NC Photo-3 Knitting section. Local law and/or ETI requirement 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. "In accordance with factory act 1948 section 7A(1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall includea) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, b) The arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handing, storage and transport of articles and substances, c) The provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work." Recommended corrective action: The facility shall ensure to provide required PPEs to all the workers and trained them on the purpose of wearing the same. 4. Description of non-compliance: NC against ETI NC against Local Law □ NC against customer code: It was noted during factory tour that packed cartons stacked at unsafe height in 4.Factory Tour warehouse section on ground floor. Ref NC Photo-4 Local law and/or ETI requirement 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of,

associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

According to Rule 73 of the Model Rules of the Factories Act 1948, No materials or equipment shall be stacked or stored in such a manner as to cause risk of bodily injury.

Recommended corrective action:

The facility shall ensure to reduce the height of material stacked as per legal requirement.

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

4: Child Labour Shall Not Be Used

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

FTI

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

Current Systems and Evidence Examined

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

Current systems:

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

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

Details:

Auditor has seen the child labour policy which factory has displayed at main notice board and outside of the factory. For ensuring no child labour in the factory, factory has maintained age proof in all personal files in form of school leaving certificated, Voter ID cards, Aadhar Cards or dental age proof and auditor has verified 10 personal files.

A: Legal age of employment:	Above 15 years
B: Age of youngest worker found:	20 Years completed
C: Are there children present on the work floor but not working at the time of audit?	☐ Yes ☑ No
D: % of under 18's at this site (of total workers)	0%
E: Are workers under 18 subject to hazardous work assignments?	☐ Yes ☑ No



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

5: Living Wages are Paid

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

FTI

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

Current Systems and Evidence Examined

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

Current systems:

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

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

Details:

Auditor has verified 3 months i.e., August 2022, January 2022 and September 2021 records of Wages records, Time records, Leave records, Wages slip, muster roll and social benefits records such as Provident Fund and Welfare contribution of each employee.

A		K 131
Any otner	comments:	INII

Non–compliance:	
☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)

Local law and/or ETI requirement: Recommended corrective action:				
2. Description of non–compliance: NC against ETI NC against Local Law [code:	NC against custo	mer		
Local law and/or ETI requirement:				
Recommended corrective action:				
Observation:				
Description of observation:			Object observ	ive evidence ed:
Local law or ETI requirement:				
Comments:				
Good Examples observed:				
Description of Good Example (GE):			Object Observ	ive Evidence ed:
Summary Information				
Criteria	Local Law (Please state legal requirement)	Actual (Site (Record results ago	ed site ainst the	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 48 hours / Week	A1: 48 hours /	' Week	A2: ☐ Yes ☑ No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 02 hour per day / 12 hours per week	B1: No ov found in sampled months	ertime	B2: ☐ Yes ☑ No

C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: Minimum wages fixed by the Punjab Government w.e.f 01.09.2020 -INR 9192.72 per month (Unskilled) -INR 9972.72 per month (Semiskilled) -INR 10869.72 per month (Skilled)	C1: -INR 9200 per month (Unskilled) -INR 10000 per month (Semiskilled) -INR 12400 per month (Skilled). W.E.F 01.09.2020	C2: Yes No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum:200% of normal rate of wages	D1: 200% of normal rate of wages	D2: ☐ Yes ☑ No

Wages analysis: (Click here to return to Key Information)				
A: Were accurate records shown at the first request?	∑ Yes □ No			
A1: If No , why not?	Not Applicable			
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 samples from August 2022 10 samples from January 2022 10 samples from September 2021			
C: Are there different legal minimum wage grades? If Yes , please specify all.	⊠ Yes □ No	C1: If Yes , please give details: -INR 9192.72 per month (Unskilled) -INR 9972.72 per month (Semiskilled) -INR 10869.72 per month (Skilled)		
D: If there are different legal minimum grades, are all workers graded and paid correctly?	∑ Yes □ No □ N/A	D1: If No , please give details:		
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	☐ Below legal min ☐ Meet ☑ Above	E1: Lowest actual wages found: Note: full time employees and please state hour / week / month etcINR 9200 per month (Unskilled) -INR 10000 per month (Semiskilled) -INR 12400per month (Skilled).		
F: Please indicate the breakdown of workforce per earnings:	F1:% of workforce earning under minimum wage F2:% of workforce earning minimum wage F3: 100 % of workforce earning above minimum wage			



G: Bonus Scheme found: Please specify details:	Bonus Scheme found: Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week/month etc. Facility has paid bonus at the rate of 8.33% (Legal Minimum is 8.33%) of the gross wages.			
H: What deductions are required by law e.g. social insurance? Please state all types:	Deductions are required to be made for Statutory Social Security Benefits viz., Employee's State Insurance. EPF			
I: Have these deductions been made?	⊠ Yes □ No	I1: Please list all deductions that have been made.	1. ESI 2. EPF	
		I2: Please list all deductions that have not been made.	Please describe: 1. NIL 2. Please describe:	
J: Were appropriate records available to verify hours of work and wages?	for recordi register wo attendance	ng the In and Out timin as found to be maintail e, based on biometric issued to all employee	stem was found to be maintained ngs of all employees. Wage ned for all employees to record in / OUT time system. Wages slips as towards acknowledgement of	
K: Were any inconsistencies found? (if yes describe nature)	☐ Yes		ed incident	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	Facility had		tric recording system to record the e worked by the employees are	
M: Is there a defined living wage: This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	Facility did following the			
M2: If yes, what was the calculation method used.	Asia Floo	□ISEAL/Anker Benchmarks □Asia Floor Wage □Figures provided by Unions □Living Wage Foundation UK		

	Fair Wear Wage Ladder Fairtrade Foundation Other – please give details:
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	 ∑ Yes ☐ No N1: Please give details: The local government revises the minimum wage every six months which the facilities must comply
O: Are workers paid in a timely manner in line with local law?	∑ Yes □ No
P: Is there evidence that equal rates are being paid for equal work:	Yes No P1: Please give details: Review of appointment orders, time records, wage registers and wage slips show that equal rate of wages are being paid for equal work done by employees.
Q: How are workers paid:	☐ Cash ☐ Cheque ☐ Bank Transfer ☐ Other Q1: If other, please explain:

6: Working Hours are not Excessive

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

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

Current Systems and Evidence Examined

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

Current systems:

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

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

Details:

- Payrolls (for sampled months of August 2022, January 2022, and September 2021)
- Time IN / OUT records (for sampled months of August 2022, January 2022, and September 2021)
- Production records (from work floors to check for discrepancies)
- Leave records.
- Muster roll

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

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe: Biometric Attendance Record System				
B: Is sample size same as in wages section?	∑ Yes ☐ No B1: If no, please give details				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	∑ Yes □ No	workers d		ils including % and v lard hours defined in eements.	
D: Are there any other types of	☐ Yes ☑ No	D1: If YES,	please complete	as appropriate:	
contracts/employment agreements used?		0 hrs	Part time	Variable hrs	Other
		If "Other"	, Please define:		
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	☐ Yes ☑ No	and frequ		rs, %, types of worke	ers affected
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: 1 in 7 days 2 in 14 days No If 'No', please explain:	F3: Is this o	allowed by local lo	\$wc	

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	Maximum number of days worked without a day off (in sample):		
	06 Days		
Standard/Contracted Ho	urs worked		
G: Were standard working hours over 48 hours per week found?	☐ Yes ☑ No	G1: If yes, % of workers & frequency:	
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	☐ Yes ☑ No	H1: If yes, please give details:	
Overtime Hours worked			
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours:	No overtime found in sampled months.	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	☐ Yes ☑ No		
K: Approximate percentage of total workers on highest overtime hours:	0%		
L: Is overtime voluntary?		L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Overtime is voluntary and the employees can refuse the overtime.	
Overtime Premiums			
M: Are the correct legal overtime premiums paid?	Yes No N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of standard wages: As per policy factory has paid the overtime at 200% of the ordinary rate of wages. However, as per provided time records no overtime were performed by any of the employee.	
N: Is overtime paid at a premium?	⊠ Yes □ No	N1: If yes, please describe % of workers & frequency: As per policy factory has paid the overtime at 200% of the ordinary rate of wages. However, as per provided time records no	

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		overtime were performed by any of the employee.
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes	no/low overtime pre	pay (May be standard wages above minimum legal wage, with emium) gaining agreements
where relevant.	O1: Please explain CBA or Other	n any checked boxes above e.g. detail of consolidated pay /
		No overtime work during the sampled months. However If ertime work, Facility paying 200% of normal rate of wages.
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	Safeguards are	untary ive bargaining allows 60+ hours/week e in place to protect worker's health and safety enstrate exceptional circumstances (please specify)
boxes where relevant.	P1: Please explair CBA or other:	any checked boxes above e.g. detail of consolidated pay /
		during the sampled months. However If engaged any acility paying 200% of normal rate of wages.
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	Yes No Q1: If yes, please	give details:
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	overtime can be overtime hours the	stablished an Urgent Business Needs Policy under which engaged on special occasions of Urgent Business Needs. The at might be engaged had also been declared as voluntary. at the overtime hours are within the legal limit.

7: No Discrimination is Practiced

(Click here to return to summary of findings)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

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

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

Details:

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

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: _90_ % A2: Female_10_ %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	#: No such skilled or technical roles had been engaged
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	Hiring Compensation Access to training Promotion Termination or retirement No evidence of discrimination found. C1: Please give details: No evidence of discrimination was found.

Professiona	l Developmeni	ŀ
-------------	---------------	---

A: What type of training and development are available for workers?	All employees had been provided with periodical trainings on Health & Safety and ETI requirements
B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	∑ Yes □ No
	If no, please give details:

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

ve evidence ed:
ru.
•

	•
Good Examples observe	d:
Description of Good Example (GE):	Objective Evidence Observed:

8: Regular Employment Is Provided

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

ETI

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

Additional Elements: Responsible Recruitment

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

Current Systems and Evidence Examined

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

Current systems:

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

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

Details:

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



Non–compliance:		
1. Description of non–compliance: NC against ETI NC aga code:	inst Local Law 🔲 NC against customer	Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI requirement:		
Recommended corrective action:		
2. Description of non-compliance: NC against ETI NC aga code:	inst Local Law NC against customer	
Local law and/or ETI requirement:		
Recommended corrective action:		
	Observation:	
Description of observation:		Objective evidence observed:
Local law or ETI requirement:		
Comments:		
Good Examples observed:		
Description of Good Example (GE):	· · · · · · · · · · · · · · · · · · ·	Objective Evidence
		Observed:
Responsible Recruitment		
All Workers		
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they	☐ Terms & Conditions presented☐ Understood by workers☐ Same as actual conditions	
same as current conditions?	A1: If any are unchecked, please describe fir	nding and specific



	category (ies) of workers affected:		
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	Yes No B1: If yes, please describe details and specific category (ies) of workers affected:		
C: If yes, check all that apply:	Recruitment / hiring fees Service fees Application costs Recommendation fees Placement fees Administrative, overhead or processing fees Skills tests Certifications Medical screenings Passports/ID's Work / resident permits Birth certificates Police clearance fees Any transportation and lodging costs after employment offer Any transport costs between work place and home Any relocation costs after commencement of employment New hire training / orientation fees Medical exam fees Deposit bonds or other deposits Any other non-monetary assets Other – C1: If other, please give details:		
D: If any checked, give details: Not Applicable			
Migrant Workers: The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity			
A: Type of work undertaken by migr workers:	ant Not applicable		
B: Please give details about recruitm agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: Not applicable		

B2: Total number of (outside of local country) recruitment agencies used: Not applicable C: Are migrant workers' voluntary ☐ Yes C2: Observations: Not applicable □No deductions (such as for remittances) confirmed in writing by the worker and C1: Please describe is evidence of the transaction supplied finding: by the facility to the worker? ☐ Yes D: Are Any migrant workers in skilled, No

technical, or management roles	D1: If yes, number and example of roles:
Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)	Not applicable [Migrant workers had not been engaged

NON-EMPLOYEE WORKERS

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

Agency Workers (if applicable) (workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)		
A: Number of agencies used (average):	A1: Names if available: Not Applicable - Agencies are not being used	
B: Were agency workers' age / pay / hours included within the scope of this audit?	Yes No Not Applicable	

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

Contractors: Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,		
A: Any contractors on site?	Yes No A1: If yes, how many contractors are present, please give details:	
B: If Yes , how many workers supplied by contractors?	Not Applicable	
C: Do all contractor workers understand their terms of employment?	Yes No C1: Please describe finding: No contract employees in this facility	
D: If Yes , please give evidence for contractor workers being paid per law:	Not Applicable	

8A: Sub-Contracting and Homeworking

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

Based on the interaction with the facility management and production records, it is noted that the facility does not engage any home workers. It was noted that factory subcontract the Printing & washing operation at below sub contracted sites depending upon the client's requirements & order volume capacity. As per factory management, this sub-contractor is already disclosed to their main clients.

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

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

	Process Subcontracted	Washing	Printing
	Name of factory	Boss Fabrics	Ultra-Printing
	Address	BXXX939,n Sherpur Road,	38 new Anand puri, kali
Address	Ludhiana	Sadak , shiv puri, Ludhiana	

Details:

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

Any other comment - Nil

Non-compliance:



1. Description of non-compliance: NC against ETI/Additional Elemen NC against customer code:	nts NC against Local Law	Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI /Additional Eler	ments requirement:	
Recommended corrective action:		
2. Description of non-compliance: NC against ETI/Additional Elemen NC against customer code:	nts NC against Local Law	
Local law and/or ETI requirement:		
Recommended corrective action:		
	Observation:	
Description of observation:		Objective evidence
Local law or ETI/Additional elements	requirement:	observed:
Comments:		
Comments.		
	Good Examples observed:	
Description of Good Example (GE):		Objective Evidence Observed:
Summary of sub-contracting - if applicable Not Applicable please x		
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	 ∑ Yes ☐ No Please describe: No such requirement. Facility has sufficient management.	anpower.
B: If sub–contractors are used, is	⊠ Yes	

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there evidence this has been agreed with the main client?	No If Yes , summarise details: As per Factory management interview, this sub-unit is previously agreed & disclosed to their main customers.
C: Number of sub- contractors/agents used:	02
D: Is there a site policy on sub- contracting?	Yes No If Yes , summarise details: Subcontractors are required to be ethically compliant with applicable labour regulations and are periodically monitored for risk assessment
E: What checks are in place to ensure no child labour is being used and work is safe?	Factory visit sub-contracting units on regular basis to ensure no child labour is being used and work is safe.

Summary of homeworking - if applicable

Not Applicable please x



9: No Harsh or Inhumane Treatment is Allowed (Click here to return to summary of findings)

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	Yes No A1: Please give details: Facility has an open-door policy. Facility has displayed the contact details of inspector of factories, and other government authorities. So workers can communicate if there is anything required.
B: If Yes , are workers aware of these channels and have access? Please give details.	Yes. Contact details of public authorities (Police, Fire Station, hospital, Labor department etc), have been displayed.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Workers can communicate if there is anything required through mail, phone or directly.
D: Which of the following groups is there a grievance mechanism in place for?	 ✓ Workers ✓ Communities ✓ Suppliers ✓ Other D1: Please give details: Facility had effective grievance mechanism in place where workers, communities & suppliers can express their grievance through Suggestion box, Hot line, Committee meetings etc.
E: Are there any open disputes?	☐ Yes ☐ No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	
G: Is there a published and transparent disciplinary procedure?	

H: If yes, are workers aware of these the disciplinary procedure?	∑ Yes □ No
	H1: If no, please give details
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages	☐ Yes ☑ No
section)?	11: If yes, please give details

Current Systems and Evidence Examined

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

Current systems:

- From interview with the employees, there was no evidence of harsh or inhumane treatment of employees.
- All workers are treated with respect and dignity.
- The company's disciplinary policies had been explained to all employees and all employees were well aware about their rights of grievance redress procedure.

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

Details:

- Policy on prevention of harassment and abuse
- Grievance handling procedure documentation.

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

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

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

(Click here to return to NC-table)

Additional Elements

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

Current Systems and Evidence Examined

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

Current systems:

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

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

Details:

- Personal files of 10 employees were reviewed.
- Recruitment Policy and Procedures

	Non-compliance:	
1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code:	□ NC against Local Law	Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI /Additional Elements re	quirement:	
Recommended corrective action:		
Γ		
Observation:		

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

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

(Click here to return to summary of findings)

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The company had undertaken to comply with the local and international laws and regulations and their end client's environmental requirements through its Environmental Policy.
- The company was found to be aware of the end client's environmental requirements and is committed to comply with the same.
- There are no hazardous operations involved in the manufacturing process of the company.
- Facility falls under white category as per the notification from Punjab pollution control board.

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

Details:

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

Non-compliance:		
Description of non-compliance: NC against ETI/Additional Elements	□ NC against Local Law	Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI/Additional Elements rec		
Recommended corrective action:		

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

Other findings

None

Community Benefits

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

None



Appendix 1

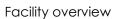
Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective 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







Facility main entrance



Facility Name Board







Stitching



Pressing



Checking & Packing



Knitting Area



Evacuation Plan









Emergency Light

Fire Alarm

Hydrant





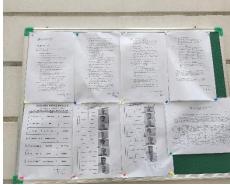


Fire Extinguisher

First Aid Box

Finished Goods Storage







Raw material storage Area

Notice Board

Policy Display

Non-Compliance Photo





NC Photo-1- Open ended wire used in security guard room and tubular section.



NC Photo-2- Needle guards were missing on 10% sewing machines.



NC Photo-3- Workers not wearing ear plug in Knitting section.



NC Photo-4- Packed cartons stacked at unsafe height in warehouse section on ground floor.





For more information visit: <u>Sedexglobal.com</u>

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

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

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

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

Click here for Supplier (B) members:

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

Click here for Auditors:

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