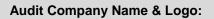


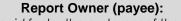
# Sedex Members Ethical Trade Audit Report





	Audit Details										
Sedex Company Reference: (only available on Sedex System)	ZC: 1060381Sedex Site Reference: (only available on Sedex System)ZS: 1053212										
Business name (Company name):	TM Fashions Limited										
Site name:	TM Fashions Limited										
Site address: (Please include full address)	Hazi Ismail Chowdhury Bhaban (1st floor), Jobeda Tower, Chandona, Gazipur Sadar, Gazipur.					Bangladesh					
Site contact and job title:	Mr. Rahel Sardar Dip	SU − I	Deputy Gene	ral Manage	r (Admin	, HR & Compliance)					
Site phone:	+88 02-9261158 Cell no: +8801730996876		Site e-mail:		dipu@	⊉tmdbd.com					
SMETA Audit Type:	⊠ Labour Standards	X H Safe	Health & ety	Environ	ment	Business Ethics					
Date of Audit:	4 <sup>th</sup> and 5 <sup>th</sup> August 2018										





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



**TM Fashions Limited** 

SGS Bangladesh Limited

	Audit Conducted By										
Commercial		Purchaser		Retailer							
Brand owner		NGO		Trade Union							
Multi– stakeholder			Combined Audit (	select all that appl	у)						



# 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 6.0 April 2017 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): None

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

Lead auditor: Nasim Banu

Team auditor: Md. Mostafizur Rahman Shah, Md. Kamruzzaman Sarker and Md. Syeed Hassan (Observer).

Interviewers: Nasim Banu, Md. Mostafizur Rahman Shah & Md. Kamruzzaman Sarker.

Report writer: Md. Syeed Hassan

Report reviewer: Ananya Mallick

# Date of declaration: 9th August 2018.

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 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.



# Non-Compliance Table

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing	(Only conformit	check box v by, and only	<b>n–Conformity</b> when there is a in the box/es w ty can be foun	non– vhere the		d the nu ues by li		NC Findings Only (note to auditor, summarise in as few words as possible NC's only)
the audit report, hyperlinks are retained.	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	

0A	Universal Rights covering UNGP					None observed.
ОВ	Management systems and code implementation					None observed.
1.	Freely chosen Employment					None observed.
2	Freedom of Association					None observed.
3	<u>Safety and Hygienic Conditions</u>			7		<ol> <li>NC:         <ol> <li>Workers were not using PPE.</li> <li>Insufficient machine safety.</li> <li>Aisle found partially blockage condition.</li> <li>Fire pump room and Jhute boiler room were not included in approved floor lay out plan.</li> <li>Minor injury not recorded properly.</li> <li>No certificate for Jhute Boiler.</li> <li>Fire license was expired.</li> </ol> </li> </ol>
4	<u>Child Labour</u>					None observed



5	Living Wages and Benefits							1	<b>GE-1:</b> Factory management provides monthly attendance bonus BDT. 250 for Asst. Operator and BDT. 400 for operator, Q.I. & Iron man.	
6	Working Hours								None observed.	
7	Discrimination								None observed.	
8	Regular Employment								None observed.	
8A	<u>Sub–Contracting and</u> <u>Homeworking</u>								None observed.	
9	Harsh or Inhumane Treatment								None observed.	
10A	Entitlement to Work								None observed.	
10B2	Environment 2-Pillar								None observed.	
10B4	Environment 4–Pillar								Not applicable	
10C	Business Ethics								Not applicable	
Gener	ral observations and summary of t	he site:		•			•			
2. Faci worke	<ol> <li>The factory produces woven (Bottom) garments. In total 2700 employees work at the site including 350 non-production employees.</li> <li>Facility does not engage any forced or bonded labour. Factory does not keep any original documents from the workers, noted by the interviewed workers. Workers are free to leave their employer at any time giving required notices.</li> </ol>									
	tory treats their workers with respe ment and abuse is practised.	ct and dign	iity; no cc	prporal punishm	nent, threa	ats of viol	ence o	r other t	orms of physical, mental, sexual, verbal	



4. Facility did not discriminate between workers in any manner while selection, pay, promotion and termination. Nothing identified by the documents verification and also nothing reported by the interviewed workers regarding discrimination. The payment and overtime record did not show any discriminatory incidents.

5. Through plant tour, workers interview and documents review, physical verification/appearance of workers; no evidence of the use of child labour was observed. Factory checks the age before recruitment by the doctor and maintains age related documents in the workers' personnel files.

6. First aid facility and toilet facilities have been found as per legal requirement. First aider's were well known about the first aid issues and fire fighters are well known about the operation of all fire fighting equipments and regular training is provided to them regarding this.

7. Standard working hours found 48 hours in the factory. Through employees' interview it was noted that they were aware about voluntary overtime policy. As per the company policy all overtime will be compensated at a premium rate (200%).

8. All workers were provided with pay slips for each pay period which is in easily understandable language to all workers.

9. No trade union has been formed by the workers of the factory. Workers are free to join or form the trade, no restriction has been imposed to the workers from the management. Nothing identified through policy verification. Moreover, factory has formed a Participation Committee (PC) as parallel means. The factory has provided suggestion & complaint box in the toilet area through which workers can give their suggestion / complaints if any.

10. All workers are getting ID card during their recruitment. Factory maintains service books for all workers. All the workers are receiving contract letter. It was verified through document review, factory tour, management interview and employee interview that no Home-working was used by this factory.

11. The factory established anti-harsh or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Through the factory management and workers' interview, it was noted that no physical abuse or discipline happened in the factory. Factory has installed complaint box in workers toilet area. No complaint records found regarding physical abuse or harassment.

12. First aid facility and toilet facilities have been found as per legal requirement. First aider's were well known about the first aid issues and fire fighters are well known about the operation of all fire fighting equipments and regular training is provided to them regarding this.

13. Factory has waste management policy regarding solid as well as hard waste.

14. Factory surrounding environment found acceptable.



\*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 Det	ails						
A: Company Name:	TM Fashions Limited	TM Fashions Limited						
B: Site name:	TM Fashions Limited							
C: Applicable business and other legally required licence numbers and documents for example, business license no, liability insurance, any other required government inspections	<ul> <li><u>Trade License No:</u> 69, issued by Gazipur City corporation and valid till 30<sup>th</sup> June 2019.</li> <li><u>Factory license no:</u> 14897/ Gazipur, issued by Department of Inspector of Factories and Institutes, Gazipur and valid till 30<sup>th</sup> June 2019.</li> <li><u>Fire License No:</u> DD/Dhaka/ 22368/2010, issued by Bangladesh Fire Service &amp; Civil Defence Authority which was valid till 30<sup>th</sup> June, 2018.</li> </ul>							
D: Products/Activities at site, for example, garment manufacture, electricals, toys, grower	Garments Manufacturer (woven Bottom)							
E: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	Facility has one 6 storied building and 05 sheds. Description of the building is as follows. The facility Established on 18 <sup>th</sup> May 2010 (As per Incorporation) and started operation on Oct 2010. Details floor descriptions are given below:							
	Factory Building # 1	Description (6 storied)	Remark, if any					
	Ground floor	Bonded Warehouse, Child care, Security Post, Fire control room, Sample section, Office.	NA					
	1 <sup>st</sup> floor	Finishing Section, Iron section, Packing section, Accessories store, Office.	NA					
	2 <sup>nd</sup> floor	Sewing section, Medical centre, Sub store, Maintenance room, Inspection room.	NA					
	3 <sup>rd</sup> floor	Sewing section, Sub store, Maintenance room, Inspection room.	NA					
	4 <sup>th</sup> floor	NA						
	5 <sup>th</sup> floor	Sewing section, Cutting section, Inspection room.	NA					
	Is this a shared building?	No	N/A					
		m, compressor room and gene	erator room.					



	<ul> <li>Shed-2: Canteen- Dining room, and Boiler room.</li> <li>Shed-3: Wastage room.</li> <li>Shed-4: Jhute Boiler (Under renovation).</li> <li>Shed-5: Fire pump room.</li> </ul>
	Total production capacity is 4, 50,000 pieces per month. Currently 2700 employees are working in the facility. Out of 2700 employees; 810 (30%) are male and 1890 (70%) are female. In general, the employees work for 6 days in a week (Saturday to Thursday) and Friday is weekly holiday for all sections. Regular working hour is 8.00 am to 5.00 pm including 1 hour lunch break from 12:30 pm to 1:30 pm, 1:00 pm to 2:00 pm and 1:30 pm to 2:30 pm. Facility is paying monthly salary through bank transfer (100% of Management) and cash (100% of workers) to the employees. The facility's wage period is 1st – 30th /31st of the month within 07 working days.
	For below, please add any extra rows if appropriate.
	Visible structural integrity issues (large cracks) observed and without structural engineer evaluation
	Yes
	No Details: This audit has been undertaken by a qualified social auditor and not a structural engineer. As such SGS can only report on any evidence of structural defects or maintenance requirements based on external reports undertaken by local authorities or other licensed bodies. Equally SGS cannot accept any liability for subsequent failures not noted or reported as a result of their visual checks. The rating above is based on the auditor's opinion of general maintenance and cosmetic soundness of the building based on purely visual checks.
F: Site function:	Agent Factory Processing/Manufacturer Finished Product Supplier Grower Home worker Labour Provider Pack House Primary Producer Service Provider Sub-Contractor
G: Month(s) of peak season: (if applicable)	April to May and August to January.
H: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Product: Woven Bottoms Process: Sample $\rightarrow$ Cutting $\rightarrow$ Sewing $\rightarrow$ Finishing $\rightarrow$ Packing. Line: 17 sewing line



	<b>Equipment:</b> Number of total machine found 1200. The machines are Plain sewing machine, Sewing machine-2 needle, Sewing machine -3 needle, Sewing machine – 4 needle, Over lock machine, feed of the arm, Chain stitch, Vertical stitch, Cutter machine, Iron machine, Metal detector, Single needle machine (auto), double needle (chain stitch) machine, over lock machine, flat lock machine, button Stitch, Kansai machines, Fusing machines, Iron Table, Bartack machines, button-hole machines, Eyelet hole, Loop making, Snap Button, Plastic Staple, Velcro cutting machine, Thread sucker, Lay Cutting, BAS, Grinding, Heat seal, Air compressor, Generator, Boiler etc.etc.
I: What form of worker representation / union is there on site?	□ Union (name) ⊠ Worker Committee □ Other (specify) □ None
J: Is there any night production work at the site?	☐ Yes ⊠ No
K: Are there any on site provided worker accommodation buildings e.g. dormitories	<ul> <li>Yes</li> <li>No</li> <li>If yes approx. % of workers in on site accommodation : NA</li> <li>Factory does not provide any living accommodation for the workers as all workers live in nearby areas and there is no legal requirement as well.</li> </ul>
L: Are there any off site provided worker accommodation buildings	<ul> <li>Yes</li> <li>No</li> <li>If Yes approx. % of workers : NA,</li> <li>Factory does not provide any living accommodation for the workers as all workers live in nearby areas and there is no legal requirement as well.</li> </ul>
M: Were the site provided accommodation buildings included in this audit	<ul> <li>Yes</li> <li>No</li> <li>If No, please give details NA,</li> <li>Factory does not provide any living accommodation for the workers as all workers live in nearby areas and there is no legal requirement as well.</li> </ul>

Audit Parameters											
A: Time in and time out	Day 1 Time in: 9:15 am Day 1 Time out: 04:30 pm	Day 2 Time in: 08:45 am Day 2 Time out: 04:30 pm	Day 3 Time in: NA Day 3 Time out: NA								
B: Number of Auditor Days Used:	5 Auditor used in 2 days (3 Auditors used in 1 <sup>st</sup> day and 2 Auditors used in 2 <sup>nd</sup> day)										
C: Audit type:	<ul> <li>☐ Full Initial</li> <li>➢ Periodic</li> <li>☐ Full Follow–up</li> <li>☐ Partial Follow–Up</li> <li>☐ Partial Other – Define</li> </ul>										



D: Was the audit announced?	<ul> <li>☐ Announced</li> <li>⊠ Semi – announced: Window detail: 02 weeks</li> <li>☐ Unannounced</li> </ul>
E: Was the Sedex SAQ available for review?	∑ Yes □ No If No, why not-NA
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<ul> <li>☐ Yes</li> <li>☑ No</li> <li>If Yes, please capture detail in appropriate audit by clause-NA.</li> </ul>
G: Who signed and agreed CAPR (Name and job title)	Mr. Rahel Sardar Dipu – Deputy General Manager (Admin, HR & Compliance)
H: Is further information available (if Y please contact audit company for details)	☐ Yes ⊠ No
I: Previous audit date:	21st & 22nd August 2017
J: Previous audit type:	Periodic audit (2 pillar)
K: Was any previous audit reviewed	Tes No
during this audit	□ N/A

Audit attendance	Manageme	nt	Worker Representatives				
	Senior management		Worker Committee representatives		Union representat	ives	
A: Present at the opening meeting?	🛛 Yes	🗌 No	🛛 Yes	🗌 No	Yes	🛛 No	
B: Present at the audit?	🛛 Yes	🗌 No	🛛 Yes	🗌 No	Yes	🛛 No	
C: Present at the closing meeting?	🛛 Yes	🗌 No	🛛 Yes	🗌 No	☐ Yes	🛛 No	
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Not applicable						
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	freedom o establishme formed, th Committee establishme	f associe nt where e worke shall run nt conce direct vo	e is no obligation and c there is no tra ers 'represen activities rela erned and wo te of workers (	collective ade unio Itatives ated to w orkers rep	bargaining n, until a trad to the Par vorkers' intere presentative s	. For an le union is ticipation ests in the should be	



# **Worker Analysis**

11 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 and where they do not intend to remain permanently or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity

	Worker Analysis									
	Le	ocal			Migrant*			Total		
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers			
Worker numbers – Male	810 (including management)	0	0	0	0	0	0	810 (including management)		
Worker numbers – female	1890 (including management)	0	0	0	0	0	0	1890 (including management)		
Total	2700 employees (including management)	0	0	0	0	0	0	2700 employees (including management)		
			•			•	•			
Number of Workers interviewed – male	20	0	0	0	0	0	0	20		
Number of Workers interviewed – female	42	0	0	0	0	0	0	42		
Total – interviewed sample size	62	0	0	0	0	0	0	62		

A: Nationality of Management	Bangladeshi	
B: Majority nationality of workers	Main countries: Bangladesh Country 1: Bangladesh Country 2:Nil Country 3:Nil	n. approx 100 % total workforce. approx 0% total workforce approx 0% total workforce



C: Worker remuneration (management information)	0% workers on piece rate 0% hourly paid workers 100 % salaried workers
	Payment cycle: 0 % daily paid 0 % weekly paid 100 % monthly paid. 0 % other – please give details

## Worker Interview Summary

Worker Interview Summary		
A: Were workers aware of the audit?	Yes	
B: Were workers aware of the code?	Yes	
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)	40 employees in 8 groups (5 in each group)	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	Male: 05	Female: 17
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	Yes No If N, please	give details-NA
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?	Favource Non-fav	vourable
H: What was the most common worker complaint?	No issue wo	as identified during worker interview.
te? getting festival bonu		nt, Good H&S training and Factory
J: Any additional comment(s) regarding interviews:	Nil	



K: Attitude of workers to hours worked:	Comfortable		
L. Is there any worker survey information available?			
☐ Yes ⊠ No If Yes, please give details:			
M: Attitude of workers: (Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk			
The auditors selected workers randomly from different section, religion and gender for interview. The workers were fearless and active during the interview process. They were satisfied with their wages, payment system and work place environment. Individual and group interview were conducted in a private place without the presence of any representative from the management.			
Total 62 employees selected for interview. Among them 22 employees were selected for individual interview and total 40 employees in 8 groups of 5 were selected for the group interview, all the interviewees were favourable with 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			
Workers committee representatives were comfortable with management, workplace and interview process. During opening meeting committee representatives were present and auditors clearly explained them about the audit, audit process, necessity of audit and audit criteria in local language. In the period of interview with workers committee representatives discussed their feelings to the auditors without any hesitation and confusion.			
O: Attitude of managers: (Include attitude to audit, and audit process. Both positive and negative information should be included)			
Management of the factory was positive and supportive during the whole audit Mr. Rahel Sardar Dipu – Deputy General Manager (Admin, HR & Compliance) was the key person of the compliance team and he was responsible for compliance with the Code, legal requirements, development of policies and its implementation, monitoring & control. In this backdrop, management had comprehensive knowledge, as assumed, about audit requirements and scope; e.g. ETI base code, local laws etc. The factory management was found to be cooperative throughout the audit.			



# Audit Results by Clause

# 0A: Universal Rights covering UNGP

(Click here to return to NC-table)

# 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. The factory implements and maintains systems for delivering compliance to this Code.

2. Mr. Rahel Sardar Dipu – Deputy General Manager (Admin, HR & Compliance) is responsible for compliance with the Code.

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

Details:

1. Facility Management Interview.

2. Document review (Policy record review and training register review).

3. Workers Interview.

Any other comments: Nil.

A: Policy statement that expresses commitment to respect human rights?	∑ Yes □ No
	Please give details: Factory has policy which authorized at the highest level human rights impacts and issues, and ensures it is communicated to all workers.



B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	Yes No Please give details: Name: Mr. Rahel Sardar Dipu – Deputy General Manager (Admin, HR & Compliance).
C: Does the businesses have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	Yes No Please give details: The factory management has provided complaint box in worker's toilet area. Through the complaint box workers can raise their suggestion and complaints. Workers can also approach the management directly for any grievances which confirmed the interviewed workers.
D: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	Yes No Please give details: All employee information and personnel files are kept locked away in the human resources department and only viewed by the HR manager and his team.

Findings		
Finding: Observation       Company NC         Description of observation: None Observed	<b>Objective evidence observed:</b> Not applicable	
Local law or ETI/Additional elements / customer specific requirement: Not applicable		
Comments: Not applicable		

Good examples observed:	
Description of Good Example (GE): Nil	<b>Objective Evidence</b> <b>Observed:</b> Not applicable



# **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)	Last year: 5 %	This year: 3%
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	3 %	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year / 2] * number available workdays in the year	Last year: 2017 6 %	This year: 2018 4 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month	Last year: 2017 3 %	This year: 2018 5 %
E: Are accidents recorded?	<ul> <li>Yes</li> <li>No</li> <li>Please describe:</li> <li>It was noted through plant tour and first aider interview that factory has no system for tracking minor injury occurred in the production floor to take corrective/ preventive action by analyzing root cause to avoid re occurrence.</li> </ul>	
F: Annual Number of work related accidents and injuries per 100 workers: [Number of work related accidents and injuries * 100) / Number of total workers]	Last year: 2017 Number: 1.74%	This year: 2018 Number: 1.21%
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [Number of work related accidents and injuries * 100) / Number of total workers]	0.45%	0.35%
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]	Last year: 2017 0.22%	This year: 2018 0%
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	6 months: 0 % workers	12 months: 0 % workers





last 6 / 12 months:	J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:6 months: 0% 0 % workers12 months: 0% 0 % workers
---------------------	--

## 0: Management systems and Code Implementation

## 0B: Management system and Code Implementation (click here to return to NC Table)

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code. 0.B.2 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with 0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.

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

0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

## Current Systems and Evidence Examined

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

## **Current systems:**

1. The factory communicates their code of conduct through training program and notice board regularly including company's own COC.

2. Mr. Rahel Sardar Dipu – Deputy General Manager (Admin, HR & Compliance) is responsible for compliance with the Code.

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

Details:

1. Document review (Policy record review and training register review).

2. Facility Management Interview.

3. Workers Interview.

4. Plant tour

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?	<ul> <li>Yes</li> <li>No</li> <li>Please describe:</li> <li>There is no fines / prosecutions from employees has been identified through document reviewed and confirmed workers during the interview.</li> </ul>



B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	Yes No Please describe: There is effective policy and procedures found to reduce the risk of forced labour, child labour, discrimination and harassment & abuse.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Factory has communicated policy and procedures on risk of forced labour, child labour, discrimination and harassment & abuse with the workers through training program and also posted those policies in the notice board. No complaint found from interviewed workers too.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	Yes No Please describe: Managers and workers have received training on the standards for forced labour, child labour, discrimination, harassment & abuse
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	Yes No Please describe: Managers and workers have received training on the standards for forced labour, child labour, discrimination, harassment & abuse and factory preserved training records as evidence. During interview workers were found aware about the policies and procedures.
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 Please describe: NA
G: Is there a Human Resources manager/department? If Yes, please detail.	Yes No Please describe: Facility has an independent Human Resources Department and Mr. Rahel Sardar Dipu – Deputy General Manager (Admin, HR & Compliance) is responsible for this department.
H: Is there a senior person /manager responsible for implementation of the Code	Yes No Please describe: Facility has a senior person and Mr. Rahel Sardar Dipu – Deputy General Manager (Admin, HR & Compliance) is put into action of the Code.
I: Is there a policy to ensure all worker information is confidential	Yes No Please describe: Factory has the policy to ensure all worker information confidential.





J: Is there an effective procedure to ensure confidential information is kept confidential	Yes No Please describe: There is effective policy and procedures found to ensure confidential information is kept confidential.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	Yes No Details: Facility management assesses risk periodically and includes all machineries and process in it.
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 Details: During document review and management interview it was noted that facility has assessed the risk of all individual section as well as machine related risk.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	Yes No Details: Facility management communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	Yes No Details: The facility have valid land agreement with the owner, Khatian no S.A 670, 432, R.S- 617, 534No 578, Deed of total land (floor space) or 19,500 sqf. The deed will be valid 1st September 2013 to December 2023.
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 Details: Facility have system in place to conduct legal due diligence to recognize and apply national laws and practices 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 If yes, how does the company obtain FPIC: NA.
Q: Is there evidence that facility site compensated the owner/lessor for the land prior to the facility being built or expanded. Please give details.	☐ Yes ☐ No Details: Not Applicable.



R. Does the Facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts Please give details.	☐ Yes ☐ No Details: Not Applicable.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	☐ Yes ⊠ No Details: Not Applicable.

Non-compliance:		
<b>1. Description of non-compliance:</b> NC against ETI/Additional Elements         NC against customer code	<b>Objective evidence</b> <b>observed:</b> (where relevant please add photo numbers)	
None Observed		
Local law and/or ETI requirement: Not applicable		
Recommended corrective action: Not applicable		

Observation:		
Description of observation: Nil	Objective evidence observed:	
Local law or ETI requirement: Not applicable	Not applicable	
Comments: Not applicable		

Good Examples observed:		
e evidence : cable		
:		

# 1: Freely Chosen Employment

(Click here to return to NC-table)

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:

Written policy and procedure are in place to ensure employment is freely chosen. The policy includes the following clause:

1. The factory does not hold main copy of any legal document of the workers during recruitment. The factory maintains only copies of all hiring documents such application, date of birth certificates, school certificates etc.

2. The workers are free to leave the work place If workers want to leave their job, they are free to do so, as long as they are fulfilled their obligations agreed under their appointment letter/agreement.

3. The facility has displayed overtime policy stating that over time work is voluntary.

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

Details:

1. Facility Management Interview

2. Document review (Recruitment policy, working hour policy, workers' personal file, copy of national ID, date of birth certificates, school certificates, security guard's job description etc.)

3. Workers Interview

Any other comments: NA

A: Is there any evidence of retention of original documents, e.g. passports/ID's	☐ Yes ⊠ No If Yes please give details and category of workers affected
B: Is there any evidence of a loan scheme in operation	☐ Yes ⊠ No If yes please give details and category of worker affected
C: Is there Any evidence of retention of wages /deposits	☐ Yes ⊠ No If yes please give details and category of worker affected
D: Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ⊠ No Please describe finding: Nil
E: If any part of the business is UK based / registered & turnover is 36m+ there is a requirement to publish a 'modern day slavery statement. F: Is there a modern day slavery statement published	☐ Yes ☐ No Please describe finding: Nil ⊠ Not applicable



G: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day	☐ Yes ⊠ No Please describe finding: Nil
H: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<ul> <li>Yes</li> <li>No</li> <li>If yes please give details and category of workers affected:</li> <li>Not applicable</li> </ul>
I: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	Yes No Please describe finding: Facility has a policy against force labour which maintained by them.

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

Observation:	
Description of observation: Nil	Objective evidence observed:
Local law or ETI requirement: Not applicable	
Comments: Not applicable	Not applicable

Good Examples observed:	
Description of Good Example (GE): Not applicable	Objective evidence observed:



Not applicable

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

#### 2: Freedom of Association and Right to Collective Bargaining are Respected (Click here to return to NC-table) (Click here to return to Key Information)

<u>CK here to return to Key Information,</u>

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:

- 1. Workers can raise their concerns through workers' representatives, telephone, complaint box, meeting and their team leader or above.
- 2. There is Participation Committee (PC) as parallel means for trade union. Last election was held on 10th May, 2018.
- 3. Verified and confirmed through records review and interview process that the facility does not discriminate any of the workers such as workers representatives also.
- 4. Factory has a policy where is no restriction imposed to the workers formation of trade union.

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

Details:

- 1. Facility management interview.
- 2. Worker interview.
- 3. Complaint box register (Suggestions from the complaint box and actions taken).
- 4. Participation Committee formation record review and PC meeting records review.
- 5. Grievance handling policy & procedure

Any other comments: Nil

<ul> <li>Union (name)</li> <li>Worker Committee (Participation Committee)</li> <li>Other (specify)</li> <li>None</li> </ul>



B: Is it a legal requirement to have a union?	☐ Yes ⊠ No NA, as there is no trade union in the factory.	
C: Is it a legal requirement to have a worker's committee?	⊠ Yes □ No	
	In Bangladesh there is no obligation to join trade union and freedom of association and collective bargaining. For an establishment where there is no trade union, until a trade union is formed, the workers 'representatives to the Participation Committee shall run activities related to workers' interests in the establishment concerned and workers representative should be elected by direct vote of workers (amendment 22nd of July 2013, Labor Law 2006)	
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 Describe: The factory management has provided complaint box in the toilet area through which workers can raise their suggestions / complaints. Workers can also approach the management directly for any grievances which confirmed the interviewed workers.	
	Is there evidence of free elections? Yes No Not applicable	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	Yes No Details: Participation committee elected by the workers. Participation committee (PC) meeting held on regular basis. Last PC meeting held on 5 <sup>th</sup> July 2018. PC meeting minutes recorded and action taken.	
F: Name of union and union representative, if applicable:	NA; This is a non- unionized factory.	Is there evidence of free elections?
G: If no union what is parallel means of consultation with workers e.g. worker committees?	Participation Committee (PC) has formed as a parallel means.	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	Date of last election: Last election was held on 10 <sup>th</sup> May, 2018.
J: Do workers know what topics can be raised with their representatives?	X Yes 🗌 No	



K: Were worker representatives/union representatives interviewed	Yes No If <b>Yes</b> , please state how many: Two Tanzila Begum- Vice President (PC) Mr. Julmat Ali - Member (PC)	
L: State any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	As per interview with the Participation Committee members & document review it was noted that the meeting is held regularly. Last meeting held on 05/07/18. Topics of last meeting are as follows: 1. Inspired workers to increase production. 2. Resolve the worker's grievance. 3. Ensure worker participation in different training. 4. Discuss about ACCORD report. 5. Non-functional sound system on 5 <sup>th</sup> floor.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)	🗌 Yes 🖾 No	
N: If <b>Yes</b> what percentage by trade Union/worker representation	0% workers covered by Union CBA	0% workers covered by worker rep CBA
O: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay	☐ Yes ☐ No Not Applicable	

Non-compliance:	
1. Description of non-compliance:         NC against ETI/Additional Elements         NC against customer code         None Observed	Objective evidence observed: (where relevant please add photo numbers) Not applicable
Local law and/or ETI requirement: Not applicable	
Recommended corrective action: Not applicable	

Observation:	
Description of observation: Nil	Objective evidence observed:
Local law or ETI requirement: Not applicable	Not applicable
Comments: Not applicable	



Good Examples observed:	
Description of Good Example (GE): Not applicable	Objective evidence observed:
	Not applicable

## 3: Working Conditions are Safe and Hygienic

(Click here to return to NC-table)

(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:

Through factory tour, it was noted that:

- 1. Facility maintained a comfortable temperature throughout work floors.
- 2. The facility posted the evacuation plans on work floors, which indicated escape routes and the location of the fire extinguishers.
- 3. Exit signs were found illuminated and emergency lights were installed with IPS back up.
- 4. Sufficient first aid kits stocked are provided in workshops. Total no. of first aid box 22 & first aider was found -44 persons.
- 5. Workers receive regular and recorded health & safety training. Last Health & Safety training was provided on 07/07/2018 to 26 participants.
- 6. Fire fighting training provided as per law. Last fire fighting training provided on 19/07/2018 to 23 participants.
- 7. First aid, PPE training provides regularly. Last first aid & PPE training provided on 10/07/2018 & 02/08/2018 to 26 participants.
- 8. Medical and child care facility available in the factory.
- 9. Workers toilet segregated male and female, adequate number as per law, wash facility provided. Total no. of male toilets -61 and female toilets -68.
- 10. The facility has done maintenance of the machines on regular monthly basis confirmed through the documents reviewed. All switches in the electrical control panels have been labelled.
- 11. Factory has regular fire equipment maintenance system.



12. Factory assigned responsible person to look after the health and safety issues.

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

Details:

- 1. Plant tour.
- 2. Document review (Training record review, daily machine maintenance register, electrical installation checking register, injury register, fire drill register, fire equipments checking register).
- 3. Facility management interview.
- 4. Worker interview.

Any other comments: Nil.

	⊠ Yes
A: Does the facility have general Health & Safety and occupational Health & Safety policies and procedures that are	No
fit for purpose and are these communicated to workers?	Details: There is an open channel for all at the facility which anybody can report to management about any act properly or corruptly and health & safety issues. Facility has communicated this procedure through orientation training confirmed from worker interview. Last Orientation training held on 26/07/2018 to 178 participants.
B: Are the policies included in worker's	⊠ Yes
manual?	No
	Details: Policies are included in the workers' handbook.
C: Are there any structural additions	Yes
without required permits/inspections (e.g. floors added)?	No
(e.g. noors added)?	Details: No additional structure done without permits.
D: Are visitors to the site informed on	⊠ Yes
H&S and provided with personal protective equipment	No
	Details: Visitors are provided PPE if required and informed on H&S.
E: Is a medical room or medical facility	⊠ Yes
provided for workers?	No
If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	Details: 1. Factory has medical facility available with fulltime Doctor & Nurse (Dr. Apurba Lal Barai, & Nurse Ms. Snigdha Ray) 2. Medical room was fully equipped.





F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid	Yes No Details: Sufficient first aid kits stocked are provided in workshops. Total no. of first aid box –22 & first aider was found - 44 persons.
G: Where facility provides worker transport - it is fit for purpose, safe and maintained and operated by competent persons e.g. buses and other vehicles	Yes No N/A Details: Transport is not provided to the workers and there is no legal requirement.
H: Secure personal storage space is provided for workers in their living space and is fit for purpose	Yes No N/A Details: Dormitory is not provided to the workers and there is no legal requirement.
I: H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and there are controls to reduce identified risk	Yes No Details: Facility conduct risk assessment on regular basis. Management has assigned Ms. Masuma Akter and Jesmin Sultana (Welfare officer) to conduct all the section's risk assessment periodically to identify potential risk so that the risks can be reduced.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources	Yes No Please describe: Production process is cut to pack. So no hazardous waste is produced in the facility. Fabric wastes are disposed through a licensed vendor.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals	Yes No Please describe Facility does not use any banned chemicals.

## Non-compliance:



1. Issue title: Workers were not using PPE.	Objective evidence observed:
Description of non-compliance:         NC against ETI       NC against Local Law         NC against ETI       NC against Local Law         NC against ETI       NC against Local Law	(where relevant please add photo numbers)
<ul> <li>It was noted through plant tour that <ul> <li>a. Around 20% over lock machine operators were not using face mask while working at sewing section on 2<sup>nd</sup> and 3<sup>rd</sup> floor of the factory building.</li> <li>b. 05 out of 20 workers of pressing section working in front of exhaust fan without using face mask on 1<sup>st</sup> and 4<sup>th</sup> floor of the factory building.</li> <li>c. No rubber mat found in snap button machine area where sharp tool found in floor which can cause the foot injury at finishing section 1<sup>st</sup> and 2<sup>nd</sup> floor.</li> </ul> </li> </ul>	1. Plant tour- (NC Picture no. 1, 2 & 3)
Local law and/or ETI requirement:	
In accordance section 78 (a-1) of Bangladesh Labour (amendment) Law, 2013 and ETI Base Code 3.1: "In an applicable case, an employer shall not engage any workers in work without providing and ensuring use of personal safety equipment, and in doing	
so, a record book shall be maintained as designated by the owner"	
<b><u>ETI Base Code 3.1:</u></b> "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."	
<b>Recommended corrective action:</b> It is recommended that factory management should ensure the use of appropriate PPE at all required areas.	
<b>Action By:</b> Mr. Rahel Sardar Dipu – Deputy General Manager (Admin, HR & Compliance)	
Time frame: 30 Days.	
2. Issue title: Insufficient machine safety	
Description of non-compliance:	2. Plant tour: (NC Picture no. 4 & 5)
<ul> <li>It was noted through plant tour that-</li> <li>d. Around 20% needle guard of sewing machines found displaced condition at sewing section on 2nd and 3rd floor of the factory building.</li> <li>e. Around 10% of eye safety guard of overlock machine found displaced condition at sewing section on 2nd and 3rd floor of the factory building.</li> </ul>	
Local law and/or ETI requirement: In accordance with Bangladesh Labour Law 2006, section 63(1) D (3).	



"In every establishment, the following shall be securely fenced by the safeguards of substantial construction which shall be kept in position while the part of machinery required to be fenced are in mention or in use, namely unless they are in such position or of such construction as to be as safe to every person employed in the establishment as they would be if they were securely fenced; every dangerous part of any machinery.	
<b><u>ETI Base Code 3.1:</u></b> "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."	
<b>Recommended corrective action:</b> It is recommended that facility management should provide effective training to the workers to ensure machine guard in place.	
<b>Action By:</b> Mr. Rahel Sardar Dipu – Deputy General Manager (Admin, HR & Compliance)	
Time frame: 30 Days.	
3. Issue title: Aisle found partially blockage condition.	
Description of non-compliance:         NC against ETI         NC against ETI         NC against Local Law         NC against customer         code	3. Plant tour (NC Picture no. )
During plant tour, it was noted that randomly checked 02 out of 06 aisles was found partially blocked by semi-finished goods at sewing section at $3^{rd}$ floor and $2^{nd}$ floor of the factory building.	
Local law and/or ETI requirement: In accordance with Bangladesh Labor Law 2006, Section 62 (6) A free passage-way giving access to each means of escape in case of fire shall be maintained for the use of all workers in every room of the establishment" ETI Base Code 3.1: "A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific	
hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment."	
<b>Recommended corrective action:</b> It is recommended that factory management should keep free all passages from blockage for safe evacuation.	
Action By: Mr. Rahel Sardar Dipu – Deputy General Manager (Admin, HR & Compliance)	
Time frame: 60 Days.	
	4



<b>4. Issue title:</b> Fire pump room and Jhute boiler room were not included in approved floor lay out plan.	4. Plant tour, Document review and management interview.
Description of non-compliance:         NC against ETI       NC against Local Law         NC against ETI       NC against Local Law	
It was noted through document review and management interview that fire pump room and Jute boiler room (constructed in March 2018) were not included in approved floor lay out pan which obtained from Chief Inspector of Labour Department. However, Facility management has applied to the respective department dated on July 15, 2018 and grant is awaited.	
Local law and/or ETI requirement:	
Bangladesh Labour Rules, 2015, Section-353 (4): Without written permission of the inspector general, no change in any approved layout plan may be brought.	
<b><u>ETI Base Code 3.1:</u></b> "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."	
<b>Recommended corrective action:</b> It is recommended that the factory management should obtain the updated approved floor lay out pan with inclusion of fire pump room and Jhute boiler room.	
Action By: Mr. Rahel Sardar Dipu – Deputy General Manager (Admin, HR & Compliance)	
Time frame: 60 Days	
5. Issue title: Minor injury not recorded properly.	5. Document review,
Description of non-compliance:	Plant tour and worker interview.
It was noted through plant tour and first aider interview that factory has no system for tracking minor injury occurred in the production floor to take corrective/ preventive action by analysing root cause to avoid re occurrence.	
Local law and/or ETI requirement:	
In accordance with Bangladesh Labour Rules, 2015, rule 73 (1):	
Authority of every institute shall preserve the record of each accident or mishap in the Register in accordance with Form-28. The authority would also accurately record the steps taken by the institute in relevant Register.	
Recommended corrective action:	



It is recommended that factory management should keep record for all kinds of injuries.	
<b>Action By:</b> Mr. Rahel Sardar Dipu – Deputy General Manager (Admin, HR & Compliance)	
Time frame: 30 Days.	
6. Issue title: No certificate for Jhute Boiler.	
Description of non–compliance:	6. Document review.
□ NC against ETI □ NC against Local Law □ NC against customer code	
Based on plant tour and management interview it was noted that factory did not obtain the certificate for recently installed Jhute boiler (capacity 01 ton) as required by the law which Is currently operating in trial basis. However, factory management has applied for the certificate to concern authority on July 25, 2018 and grant is awaited.	
Local law and/or ETI requirement:	
In accordance with The Boilers Act, 1923, Section 6: Save as otherwise expressly provided in this Act, no owner of a boiler shall use	
the boiler or permit it to be used—	
a. Unless it has been registered in accordance with the provisions of this Act. b. Unless a certificate or provisional order authorizing the use of the boiler is for the time being in force under this Act.	
It was noted that the boiler of the factory was not registered. It is recommended that the factory should register the boiler as per law.	
Recommended corrective action:	
It is recommended that factory management should obtain the required certificate from concern authority at earliest.	
<b>Action By:</b> Mr. Rahel Sardar Dipu – Deputy General Manager (Admin, HR & Compliance).	
Time frame: 60 Days.	
7 Jesua titla: Eira licansa was avairad	
7. Issue title: Fire license was expired.	7. Document review.
Description of non-compliance:	
Based on document review and management interview it was noted that fire license was expired on 1st July 2018. However, facility management has applied	
for renewal on 4th July 2018 and grant is awaited.	
Local law and/or ETI requirement:	



In accordance with Fire Prevention and Extinction Act, 2003 of section 4 (12): The license could be renewed in every year subject to paying the fixed fees if the Director General not remarks otherwise.	
<b>Recommended corrective action:</b> It is recommended that facility should collect the renewed fire license form the concern authority at earliest.	
<b>Action By:</b> Mr. Rahel Sardar Dipu – Deputy General Manager (Admin, HR & Compliance)	
Time frame: 30 Days.	

Observation:	
Description of observation: Nil	Objective evidence observed:
Local law or ETI requirement: Not applicable	
Comments: Not applicable	Not applicable

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed:
	Not applicable

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

## 4: Child Labour Shall Not Be Used

(Click here to return to NC-table) (Click here to return to Key Information)

#### ETI

4.1 There shall be no new recruitment of child labour.

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

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

#### **Current Systems and Evidence Examined**

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

## Current systems:

The factory establishes a policy that which discourages the employment of child labour and no child labour found in the factory during the audit. Factory has strong recruitment process to verify the workers age. 62



sampled workers' personal files were provided for review. In addition, every worker's file includes a biodata sheet, a recent photo, age proof records (copy of birth registration certification, national ID card). Moreover, if there is any doubt regarding any one's age factory's registered doctor certifies his/her age.

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

Details:

- 1. Policy review
- 2. Document review
- 3. Management interview
- 4. Worker interview
- 5. Factory tour

Any other comments: Nil.

A: Legal age of employment	Legal minimum: 14 years (With some restriction)
B: Age of youngest worker found:	20 years
C: Children present on workfloor but not working at time of audit	☐ Yes ⊠ No
D: % of under 18's at this site (of total workers)	0 % Not Applicable
E: Workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	Yes No If Y give details: Not Applicable

Non-compliance:			
<b>1. Description of non-compliance:</b> NC against ETI/Additional Elements         NC against customer code	<b>Objective evidence</b> <b>observed:</b> (where relevant please add photo numbers)		
None Observed	Not applicable		
Local law and/or ETI requirement: Not applicable			
Recommended corrective action: Not applicable			

Observation:		
Description of observation: Nil	Objective evidence observed:	
Local law or ETI requirement: Not applicable	Not applicable	
Comments: Not applicable		



Good Examples observed:	
Description of Good Example (GE): Not applicable	Objective evidence observed:
	Not applicable



## 5: Living Wages are Paid

(Click here to return to NC-table) (Click here to return to Key information)

ETI

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

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

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

### Current Systems and Evidence Examined

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

## Current systems:

The factory management provides appointment letter to all workers during recruitment mentioning their salary structure, employment conditions, working hours etc. The workers are enjoying benefits such as group insurance, casual leave, sick leave and maternity leave facility as per law. Wages are paid within 7 working days of the next month. There is no illegal deduction from employees has been identified through document reviewed and confirmed workers during the interview. Facility management provides through bank transfer (100% management) and Cash (Workers 100%). Moreover, facility provides pay slip to all workers at each month.

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

Details:

- 1. Document review (wage sheet review, worker's personal file, bonus payment sheet review, maternity register review, wage & benefit policy etc)
- 2. Worker interview
- 3. Management interview

Any other comments: Nil

Non-compliance:			
<b>1. Description of non-compliance:</b> NC against ETI       NC against Local Law:         NC against ETI       NC against Local Law:         NC against ETI       NC against Local Law:	<b>Objective evidence</b> <b>observed:</b> (where relevant please add photo numbers)		
None Observed	Not Applicable		
Local law and/or ETI requirement Not applicable			
Recommended corrective action: Not applicable			



Observation:		
Description of observation: None Observed	Objective evidence observed:	
Local law or ETI requirement: Not applicable	Not applicable	
Comments: Not applicable		

Good Examples observed:		
Description of Good Example (GE): 1. Factory management provides monthly attendance bonus BDT. 250 for Asst.	Objective evidence observed:	
Operator and BDT. 400 for operator, Q.I. & Iron man.	Documents review (salary sheet), management and worker interview.	

## Summary Information

Criteria	<b>Local Law</b> (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 8 hours per day and 48 hours per week.	8 hours/ day 48 hours/ week	☐ Yes ☐ No NA
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 2 hours per day and 12 hours per week. However, an adult worker may work for more than 8 (eight) hours in a day or 48 (forty-eight) hours in a week, provided that the total hours of work of an adult worker shall not exceed 60 (sixty) hours in any week and on the average 56 (fifty-six) hours per week in any year. Exception for 6 months: Government has exempted section 100 and 102 of the Bangladesh Labour Law-2006 publishing a Gazette notification in August 2011 as per section 324 Bangladesh Labour Law-2006 for 06 months relaxing daily overtime hours. In	Maximum 2 hours/ day and 12 hours per week	☐ Yes ☐ No NA



	accordance with the Clause/Condition No. – 3 of this notification, no worker shall work more than 04 hours of overtime in any day without his/her consent. <u>Exception for 06 months:</u> This exemption has been extended several times in last few years and latest extension was on April 05, 2018 and it will be in effect from April 17, 2018 to October 18, 2018.		
D: 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: <u>For Garments Section:</u> BDT. 5300 per month (Basic BDT 3000, House rent 40% of the Basic which is BDT.1200, Medical allowance BDT. 250, Conveyance allowance. BDT.200, Food Allowance BDT.650.) For Grade 7 (Assistant operator).	BDT 5300/ month	☐ Yes ☐ No NA
E: 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 the basic wage rate per hour.	200% of the basic wage rate per hour	☐ Yes ☐ No NA

## Wages analysis:

Wages analysis: (Click here to return to Key Information)					
A: Were accurate records shown at the first request?	∑ Yes □ No				
B: If <b>No</b> , why not?	Not Applicat	ble			
C: 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)	62 attendan month)	ce records and payroll records from June 2018 (Current month) ice records and payroll records from February 2018 (Off peak ce records and payroll records from October 2017 (Peak month)			
D: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	Yes No	If Yes, please give details:The Government has announced the new pay structure whichwas implemented from 1st December, 2013 for the workers ofthe Garments Industries. The Gazette Notification has beenpublished on 5th December, 2013. There are two separate paystructures; for the garment workers (Schedule A) 1. For theworkers (Schedule A):GradeMonthly basic wageMedical allowanceConveyance allowanceFood subsidyGross monthly wage			



	Г <u>г</u>		1	1	1	1	1
			the basic				
	Grade 1	Tk.850	00 Tk.3400	Tk.250	Tk.200	Tk.650	Tk. 13000
	Grade 2	Tk. 7000	Tk. 2800	Tk.250	Tk.200	Tk.650	Tk. 10900
	Grade 3	Tk. 4075	Tk. 1630	Tk.250	Tk.200	Tk.650	Tk. 6805
	Grade 4	Tk. 3800	Tk. 1520	Tk.250	Tk.200	Tk.650	Tk. 6420
	Grade 5	Tk. 3530	Tk. 1412	Tk.250	Tk.200	Tk.650	Tk. 6042
	Grade 6	Tk. 3270	Tk. 1308	Tk.250	Tk.200	Tk.650	Tk. 5678
	Grade 7	Tk. 3000	Tk. 1200	Tk.250	Tk.200	Tk.650	Tk. 5300
	Apprentice	Tk. 2200	Tk. 880	Tk.250	Tk.200	Tk.650	Tk. 4180
E: If there are different legal minimum grades, are all workers graded and paid correctly?	⊠ Yes □ No □ N/A		lf <b>No</b> , plea:	se give d	letails:		
F: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	Lowest Wages found: Note: full time employees and please state hour / week / month etc.		force				
	□ Below legal min_0_% of workforce earning under min 43.19% of workforce earning min wage 56.80% of workforce earning above min○ Meet ○ Above		-				
G: Bonus (amount specify)	Bonus Scheme found: Note: full time employees and please state hour / week / month etc. 1. Factory management provides attendance bonus BDT. 250 for Asst. Operator and BDT. 400 for operator, Q.I. & Iron man per month.						
H: What deductions are required by law e.g. social insurance? Please state all types:	As per section 125 of the Bangladesh Labour Law, 2006, factory may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc. However, factory is deducting only for un-authorized absence and revenue stamp.						
I: Have these deductions been made? Please list all deductions that have/have not been made.	☐ Yes ⊠ No If No, please describe						
	In this facility, is deducting only for un-authorized absence, advance payment and revenue stamp as per local labor law. Factory does not deduct for fines, housing facility, loans, income tax, provident fund, etc law.						



J: Were appropriate records available to verify hours of work and wages?	∑ Yes □ No
K: Were any inconsistencies found? (if yes describe nature)	Yes       Poor record keeping         No       Isolated incident         Repeated occurrence:
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	Yes No Details: Facility uses electronic time keeping system. All working time has been reflected in the time record (including overtime).
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.	<ul> <li>Yes</li> <li>No</li> <li>Factory did not define living wages as it is not required by law.</li> <li>However, factory is providing the minimum wage as Minimum</li> <li>Wages Gazette for Readymade Garments Sector published on</li> <li>December 5, 2013".</li> </ul>
If yes, what was the calculation method used.	ISEAL/Anker Benchmarks         Asia Floor Wage         Figures provided by Unions         Living Wage Foundation UK         Fair Wear Wage Ladder         Fair trade Foundation         Other – please give details: Not Applicable.
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 Details: Factory management does annual review when local wage rates are examined.
O: Are workers paid in a timely manner in line with local law?	Yes No All workers are paid within 7 working day of the month.
P: Is there evidence that equal rates are being paid for equal work:	Yes No Details: Through factory policy review, payroll records review and employees' interview, it is confirmed that equal rates are being paid for equal work.
Q: How are workers paid:	Cash (Workers) Cheque Bank Transfer (Management) Other If other explain:



week.

## 6: Working Hours are not Excessive:

6: Working Hours are not Excessive (Click here to return to NC-table) (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 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay. 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below. 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met: - this is allowed by national law; - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; - appropriate safeguards are taken to protect the workers' health and safety; and The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

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

## **Current Systems and Evidence Examined**

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

## **Current systems:**

Through working hour policy review it was noted that facility has implemented working hour as per law. Facility has maintained working hour related document accurately. No inconsistency identified during document review.

1. Factory has general duty from 8.00am to 5:00 pm for all sections including one hour meal break.

- 2. Standard working hours found 48 hours in the facility with 2 hours OT work.
- 3. Through employees' interview it was noted that they were aware about voluntary overtime policy.
- 4. As per the company policy all overtime will be compensated at a premium rate (200%).
- 5. Facility ensured one day off for every 7 days period, facility weekly holiday is Friday.
- 6. Casual leave, sick leave, festival leave and annual leave were provided as per local Law.

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

Details:



- 1. Employee interview
- 2. Payroll records
- 3. Job card records
- 4. Production records
- 5. Working hour and Overtime hours Policies & procedures etc.
- 6. Management interview

Any other comments: Nil

bjective evidence bserved: vhere relevant please dd photo numbers)
ot applicable
bs vhe dd

Observation:		
Description of observation: Nil	Objective evidence observed:	
Local law or ETI requirement: Not applicable	Not applicable	
Comments: Not applicable		

Good Examples observed:		
Description of Good Example (GE): Not applicable	Objective evidence observed:	
	Not applicable	

## Working hours' analysis

	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: Electronic time keeping system for all sections.



Yes No If N, please give details				
∑ Yes □ No	type of wor	kers do NOT h	ave standard	hours
☐ Yes ⊠ No	If YES, please complete as appropriate:			
	0 hrs	Part time	Variable hrs	Other
	If "Other", F	Please define:	NA	
☐ Yes ⊠ No	If Y please %detail hours, % and types of workers &affected and frequency Details: NA			
Please select all applicable: 1 in 7 days 2 in 14 days No If 'No', please explain: Nil		Is this allowed Yes No	d by local law	Ş
Maximum number of days worked without a day off (in sample):				
6 days				
Standard/Contracted Hours worked				
☐ Yes ⊠ No	If yes, % of workers & frequency			
	NA			
☐ Yes If YES, please give details ☐ No Government has exempted section 100 and 102 o the Banaladesh Labour Law-2006 publishing of				
	No   If N, please give details     Yes   No     Yes   No     Yes   No     Please select all applicable:   1 in 7 days   2 in 14 days   No   If 'No', please explain: Nil     Maximum number of days w   6 days     Hours worked     Yes	If N, please give details   If NO, please fixe of word defined in orderined in	No If No, please give details   Yes If NO, please give details   No If NO, please give details   Yes If YES, please complete a   No If YES, please complete a   No If "Other", Please define:   If "Other", Please define: If "Other", Please define:   Yes If Y please %detail hours, %   No &affected and frequency   Details: NA Is this allowed   Yes If No, please explain: Nil   Maximum number of days No   Hours worked Yes, % of workers & frequency   Adays No   If yes, % of workers & frequency   No If YES, please give details	In No       If NO, please give details         If Yes       If NO, please give details including % a type of workers do NOT have standard defined in contracts/employment agre Details         If Yes       If YES, please complete as appropriate         No       If YES, please complete as appropriate         If "Other", Please define: NA       If "Other", Please define: NA         If "Other", Please define: NA       If Y please % detail hours, % and types of % affected and frequency         No       If Y please % detail hours, % and types of % affected and frequency         Details: NA       Yes         In 7 days       Is this allowed by local law         No       Yes         If Yold as explain: Nil       Is this allowed by local law         Maximum number of days worked without a day off (in sample):       6 days         Hours worked       If yes, % of workers & frequency         NA       If Yes         Yes       If Yes, please give details



averaging/annualise d hours for this site?		Gazette notification in August 2011 as per section 324 Bangladesh Labour Law-2006 for 06 months relaxing daily overtime hours. In accordance with the Clause/Condition No. – 3 of this notification, no worker shall work more than 04 hours of overtime in any day without his/her consent. Exception for 06 months: This exemption has been extended several times in last few years and latest extension was on April 05, 2018 and it will be in effect
Overtime Hours work	ed	from April 17, 2018 to October 18, 2018.
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours:	27 hours in the month of June 2018 (Current month) 44 hours in the month of February 2018 (Off peak month)
J: Combined hours (standard/contracte d plus= total) 60 found?	⊠ Yes □ No	52 hours in the month of October 2017 (Peak month)
K: Approximate percentage of total workers on highest overtime hours	1.61%	
L: Is overtime voluntary?	Yes No Conflicting Information	Please detail evidence e.g. Wording of contract/employment agreement/handbook/worker interviews/refusal arrangements: Overtime work was found voluntary confirmed through worker interview, contract letter & employment agreement papers review
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	Yes No N/A – there is no legal requirement to OT premium	Please give details of normal day overtime premium as a % of <u>standard</u> wages: 200% of basic wage
N: Is overtime paid at a premium?	∑ Yes □ No	If yes, please describe % of workers & frequency: 200% of basic wage



O: ETI Code requires a prevailing standard to give greatest worker protection. If a site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant. Multi select is possible.	No       Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium)         Collective Bargaining agreements       Other         Please explain any checked boxes above e.g. detail of consolidated pay CBA or Other         Not Applicable
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. Multi select is possible.	Overtime is voluntary   Onsite Collective bargaining allows 60+ hours/week   Safeguards are in place to protect worker's health and safety   Site can demonstrate exceptional circumstances   Other reasons (please specify)   Please explain any checked boxes above Not applicable
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 If yes, please describe:
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	☐ Yes ☐ No Not applicable



## 7: No Discrimination is practiced

## 7: No Discrimination is Practiced

(Click here to return to NC-table)

#### 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:

- 1. There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement.
- 2. The factory provides the same pay to male/female employees.
- 3. No complain or records found for pregnancy test.
- 4. There is no restriction formation of trade union in the factory.

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

Details:

- 1. Management interview
- 2. Worker interview
- 3. Local and national law
- 4. Personal files
- 5. Compensation records
- 6. Termination & retirement records
- 7. Training records
- 8. Complain register

Any other comments: Nil

A: Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 90% 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	Number of workers: Nil
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?:	<ul> <li>Hiring</li> <li>Compensation</li> <li>access to training</li> <li>promotion</li> <li>termination or retirement</li> <li>NA</li> </ul>



Not applicable

Professional Development			
A: What type of training and development are available for workers?	<ul> <li>Please give details</li> <li>1. Workers receive regular and training. Last Health &amp; Safety 07/07/2018.</li> <li>2. Fire fighting training provided on training provided on 19/07/20 First aid, PPE training provided on 10/07</li> </ul>	training was provided on as per law. Last fire fighting 18. regularly. Last first aid &	
B: Are HR decisions on e.g. promotion, training, compensation based on objective, transparent criteria? If no, please give details: NA			
Non-compliance:			
<ul> <li><b>1. Description of non-compliance:</b></li> <li>NC against ETI/Additional Elements</li> <li>NC against customer code</li> <li>None Observed</li> </ul>	🗌 NC against Local Law	<b>Objective evidence</b> <b>observed:</b> (where relevant please add photo numbers)	
Local law and (or ETI requirement. Not applicable		Not applicable	
Recommended corrective action: Not applicable			
Observation:			
Description of observation: Nil		Objective evidence observed:	
Local law or ETI requirement: Not applic	Local law or ETI requirement: Not applicable		

Comments: Not applicable

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed:
	Not applicable



## 8: Regular Employment Is Provided

(Click here to return to NC-table)

(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:

- 1. All workers are getting ID card during their recruitment.
- 2. Factory maintains service books for all workers.
- 3. There is home working on the site.
- 4. All workers are getting contract letter.

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

## Details:

- 1. Management interview
- 2. Worker interview
- 3. Local and national law
- 4. Workers' personal files and service books
- 5. Policies and procedures
- 6. Wage sheets

Any other comments: Nil

Non-compliance:



<b>1. Description of non-compliance:</b> NC against ETI/Additional Elements         NC against customer code	<b>Objective evidence</b> <b>observed:</b> (where relevant please add photo numbers)
None Observed	Not applicable
Local law and/or ETI requirement: Not applicable	
Recommended corrective action: Not applicable	

Observation:		
Description of observation: Nil	Objective evidence observed:	
Local law or ETI requirement: Not applicable	Natapplicable	
Comments: Not applicable	Not applicable	

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed:
	Not applicable

## **Responsible Recruitment**

All Workers		
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<ul> <li>Terms &amp; Conditions presented</li> <li>Understood by workers</li> <li>Same as actual conditions</li> <li>If any are unchecked, please describe finding and specific category(ies) of workers affected:</li> </ul>	
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	☐ Yes ⊠ No 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 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         Not Applicable
C: If any checked, give details:	Nil

<b>Migrant Workers:</b> 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 and where they do not intend to remain permanently or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity		
A: Type of work undertaken by migrant workers:	NA; No migrant worke	rs employed by the factory.
B: Migrant worker recruitment	Total number of (outsid used	untry recruitment agencies) used: de of local country) recruitment agencies rs employed by the factory.
C: Migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and evidence of transaction is supplied by the facility to the worker.	Yes No Please describe finding: NA; No migrant workers employed by the factory.	Observations
D: Are Any migrant workers in skilled, technical, or management roles Migrant Workers (this should include all migrant workers including permanent	Yes No If Yes number and exa NA; No migrant worke	Imple of roles rs employed by the factory.



workers, temporary and/or seasonal	
workers)	

## **NON-EMPLOYEE WORKERS**

Recruitment Fees:	
A: Are there any fees	Yes 🛛 Yo
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 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
C: If any checked, give details:	Nil

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	Nil	
(average):	And names if available:	
B: Were agency workers'	☐ Yes	
age/pay/hours included within	☐ No	
scope of this audit	NA	
C: Were sufficient documents for agency workers available for review?	☐ Yes ☐ No NA	



D: Is there a legal contract / agreement with all agencies?	Yes No
	Details NA
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	Yes No Please describe: NA

<b>Contractors:</b> 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?	<ul> <li>☐ Yes</li> <li>☑ No</li> <li>Please describe finding: If Y, how many contractors are present</li> </ul>	
B: If Yes, how many workers supplied by contractors	Not Applicable	
C: Do all contractor workers understand their terms of employment?	☐ Yes ☐ No Please describe finding: Not Applicable	
D: If <b>Yes</b> , please give evidence for contractor workers being paid per law:	Not Applicable	



## 8A: Sub-Contracting and Homeworking:

## 8A: Sub-Contracting and Homeworking

<u>(Click here to return to NC-table)</u>

(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:

It was verified through document review, factory tour, management interview and employee interview that the facility only has subcontracting processes of Printing, embroidery and washing.

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

1.Management interview

2.Worker interview

3. Production capacity plan

4.Goods in/out register

5. Production process of the factory

6.Policies and procedures

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

Process Su	bcontracted	Washing	
Name of f	actory	Unique Washing Ltd.	
Address		KB Bazar, Boro Bari, Gazipur, Bangladesh.	

Process Subcontracted	Embroide	ery & Pi	rinting			
Name of factory	ASHA Em	broide	ry & Printing	Ltd.		
Address	House#	132,	Road#05,	Abdullahpur,	Utttara,	Dhaka,
Address	Banglade	əsh.				

Process Subcontracted	Printing
Name of factory	KS. Design Ltd.
Address	138/A, Hafiz Uddin Bapari road, Station road, Tongi, Gazipur, Bangladesh.

### Details: Nil

Non-compliance:



<b>1. Description of non-compliance:</b> NC against ETI/Additional Elements         NC against customer code	<b>Objective evidence</b> <b>observed:</b> (where relevant please add photo numbers)
None Observed	Not applicable
Local law and/or ETI requirement: Not applicable	
Recommended corrective action: Not applicable	

Good Examples observed:		
Description of Good Example (GE): Not applicable	Objective evidence observed:	
	Not applicable	
Observation:		
Description of observation: Nil	Objective evidence observed:	
Local law or ETI requirement: Not applicable		
Comments: Not applicable	Not applicable	

Summary of sub-contracting – if applicable	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work hours or undeclared sub- contracting	Yes No Please describe: Auditors made calculation and no hidden work hour was found. Facility has subcontracting for printing and embroidery only, not for main production processes.
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	Yes No If <b>Yes</b> , summarise details: Subcontractors are used only if the main client agrees.



C: Number of sub- contractors/agents used	3
D: Is there a site policy on sub- contracting?	Yes No If <b>Yes</b> , summarise details: Facility has a policy on subcontracting.
E: What checks are in place to ensure no child labour is being used and work is safe?	Facility has internal checking system to ensure that there is no child labour used in the facilities.

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



## 9: No Harsh or Inhumane Treatment is allowed

## 9: No Harsh or Inhumane Treatment is Allowed

(Click here to return to NC-table)

ETI

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

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 <sup>rd</sup> party?	Yes No Please describe: There is an open channel for all at the facility which anybody can report to management about any act properly or corruptly, or to accept or give a bribe or gift and health & safety issues.
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	Facility has communicated this procedure through orientation training confirmed from worker interview.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Factory has installed complaint box in workers toilet area. No complaint records found regarding physical abuse or harassment.
D: Is there a grievance mechanism is place for:	<ul> <li>Workers</li> <li>Communities</li> <li>Suppliers</li> <li>Other</li> <li>Details: Workers are aware of the grievance mechanism available in the facility for them.</li> </ul>
E: Are there any open disputes?	☐ Yes ☑ No If yes, please give details: NA
F: Does grievance mechanism meet with UNGP requirement of e.g. (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)?	∑ Yes ☐ No If no, please give details: NA
G: Does the site \ encourage its business partners (e.g., suppliers) provide individuals and communities with access to effective grievance mechanisms (e.g., help lines or whistle blowing mechanism	∑ Yes ☐ No If No Please give details: NA



H: Is there a published and transparent disciplinary procedure	∑ Yes □ No If No please explain: NA
I: If yes, are workers aware of these the disciplinary procedure	∑ Yes □ No If no please give details: NA
J: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)	Yes No If Yes please give details: Facility only deducts unauthorized absent as per local law.

#### 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 factory established anti-harsh or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Through the factory management and workers' interview, it was noted that no physical abuse or discipline happened in the factory. Factory install complain box in workers toilet area. No complain records found regarding physical abuse or harassment.

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

Details:

- 1.Policy review
- 2. Document review
- 3.Management interview
- 4. Worker interview
- 5. Factory tour

Any other comments: Nil



Non-compliance:	
1. Description of non-compliance:         NC against ETI/Additional Elements         NC against customer code         None Observed	<b>Objective evidence</b> <b>observed:</b> (where relevant please add photo numbers)
Local law and/or ETI requirement: Not applicable	Not applicable
Recommended corrective action: Not applicable	

Observation:	
Description of observation: Nil	Objective evidence observed:
Local law or ETI requirement: Not applicable	
Comments: Not applicable	Not applicable

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed:
	Not applicable



## 10 A: Entitlement to Work and Immigration

## 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:

Only workers with a legal right to work shall be employed or used by the factory. There are no agency staffs, employment agencies and immigration workers in the factory.

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

Details:

- 1. Management interview
- 2. Worker interview
- 3. Employment records
- 4. Appointment letter
- 5. Personal files

Any other comments: Nil

Non-compliance:		
<b>1. Description of non-compliance:</b> NC against ETI/Additional Elements         NC against ETI/Additional Elements         NC against customer code: None Observed	<b>Objective evidence</b> <b>observed:</b> (where relevant please add photo numbers)	
Local law and/or ETI requirement: Not applicable	Not applicable	
Recommended corrective action: Not applicable		

Observation:	
Description of observation: Nil	Objective evidence observed:
Local law or ETI requirement: Not applicable	Not applicable



Comments: Not applicable	
--------------------------	--

Good Examples observed:	
Description of Good Example (GE): Nil	Objective evidence observed:
	Not applicable

Audit Company: SGS Bangladesh Limited Report reference: 4336786 Date: 4th and 5th August 2018 Sedexglobal.com



## 10 B Environment 2-pillar

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

<u>(Click here to return to NC-table)</u>

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:

1. Factory has waste management policy regarding solid as well as hard waste.

2. Factory surrounding environment found acceptable.

3. Facility appointed Mr. Rahel Sardar Dipu – Deputy General Manager (Admin, HR & Compliance) to looking after Environmental issue.

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

Details:

1. Document review

2. Factory tour

3. Management interview

Any other comments: Nil

Non-compliance:	
<b>1. Description of non-compliance:</b> NC against ETI/Additional Elements         NC against customer code	<b>Objective evidence</b> <b>observed:</b> (where relevant please add photo numbers)
None Observed	Not applicable
Local law and/or ETI requirement: Not applicable	
Recommended corrective action: Not applicable	

Observation:



Description of observation: Nil	Objective evidence observed:
Local law or ETI requirement: Not applicable	Not applicable
Comments: Not applicable	

Good Examples observed:	
Description of Good Example (GE): Nil	Objective evidence observed:
	Not applicable

## Other Findings Outside the Scope of the Code

None Observed

### **Community Benefits**

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

None Observed

## Appendix 1

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

 $\boxtimes$  Not Applicable please x

<b>NOTE:</b> The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.	Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable. Not Applicable.
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
0.A. Guidance for Observations	Not Applicable.



<ul> <li>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.</li> <li>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</li> <li>0.A.3 Businesses shall identify their stakeholders and salient issues.</li> <li>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</li> <li>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.</li> <li>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.</li> </ul>	
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation
<ul> <li>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</li> <li>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</li> <li>0.3 Suppliers are expected to communicate this Code to all employees.</li> <li>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</li> </ul>	Not Applicable.
ETI 1. Forced Labour	ETI 1. Forced Labour
<ul> <li>1.1 There is no forced, bonded or involuntary prison labour.</li> <li>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.</li> </ul>	Not Applicable.
ETI 2. Freedom of association and the right to collective bargaining are respected	ETI 2. Freedom of association and the right to collective bargaining are respected
<ul><li>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</li><li>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</li></ul>	Not Applicable.



<ul> <li>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</li> <li>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.</li> </ul>	
ETI 3. Working conditions are safe and hygienic	ETI 3. Working conditions are safe and hygienic
<ul> <li>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.</li> <li>3.2 Workers shall receive regular and recorded Health &amp; Safety training, and such training shall be repeated for new or reassigned workers.</li> <li>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</li> <li>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</li> <li>3.5 The company observing the code shall assign responsibility for Health &amp; Safety to a senior management representative.</li> </ul>	Not Applicable.
ETI 4. Child labour shall not be used	ETI 4. Child labour shall not be used
<ul> <li>4.1 There shall be no new recruitment of child labour.</li> <li>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.</li> <li>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</li> <li>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</li> </ul>	Not Applicable.
ETI 5. Living wages are paid	ETI 5. Living wages are paid
5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.	Not Applicable.



<ul> <li>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.</li> <li>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.</li> </ul>	
ETI 6. Working Hours are not excessive	ETI 6. Working Hours are not excessive
6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.	Not Applicable.
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.	
<ul> <li>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: <ul> <li>this is allowed by national law;</li> <li>this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;</li> <li>appropriate safeguards are taken to protect the workers' health and safety; and</li> <li>The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.</li> </ul> </li> </ul>	



6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.	
ETI 7. No discrimination is practised	ETI 7. No discrimination is practised
7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.	Not Applicable.
ETI 8. Regular employment is provided	ETI 8. Regular employment is provided
8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice. 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.	Not Applicable.
Additional Elements: Responsible Recruitment 8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements. 8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation. 8.5 Employment agencies must only supply workers registered with them. 8.6 Workers pay no recruitment fee at any stage of the recruitment process. 8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.	
8A: Sub–Contracting and Homeworking	8A: Sub–Contracting and Homeworking
8A.1 There should be no sub-contracting unless previously agreed with the main client.	Not Applicable.



8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.	
ETI 9. No harsh or inhumane treatment is allowed	ETI 9. No harsh or inhumane treatment is allowed
<ul> <li>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.</li> <li>Additional elements:</li> <li>9.2 companies should provide access to a confidential grievance mechanism for all workers</li> </ul>	Not Applicable.
10. Other Issue areas: 10A: Entitlement to Work and Immigration	Not Applicable.
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.	Not Applicable.
10. Other issue areas 10B2: Environment 2–Pillar	Not Applicable.
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.	Not Applicable.

SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
Environment Section	Environment Section
<ul> <li>B.4. Compliance Requirements</li> <li>10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.</li> <li>10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.</li> <li>10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements</li> <li>10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.</li> </ul>	Not Applicable.



<ul> <li>10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.</li> <li>10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).</li> <li>10B4.7 Businesses shall make continuous improvements in their environmental performance.</li> <li>10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation</li> <li>10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.</li> <li><b>B4. Guidance for Observations</b></li> <li>10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.</li> <li>10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</li> </ul>	
Business Practices Section	
<ul> <li>10C. Compliance Requirements</li> <li>10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.</li> <li>10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.</li> <li>10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.</li> <li>10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.</li> <li>10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,</li> <li>10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics</li> <li>10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.</li> <li>10C. Guidance for Observations</li> </ul>	Not Applicable.



should communicate their Business overing bribery, corruption, or any ulent Business Practice to all ties, including its own suppliers. site recently been subject to (or fines/prosecutions for non- Business Ethics regulations. If so is that sustainable corrective actions emented.
--

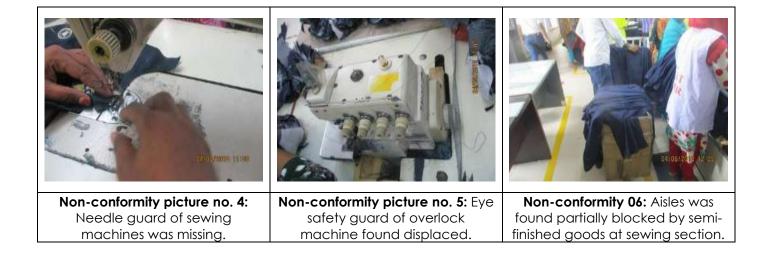
## Photo Form: Best practice:

Void	Void	Void
Nil	Nil	Nil

## Non-Compliance Photo:



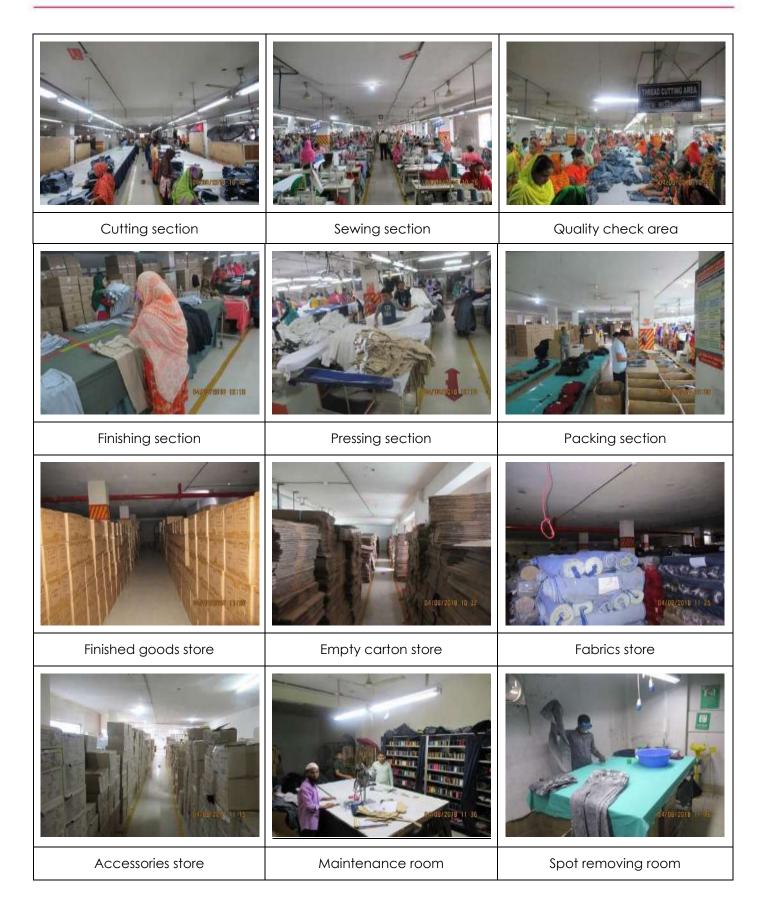




## General facility tour photos:



















## .....End of Photo.....





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=riPsbE0PQ52ehCo3Inq5Iw\_3d\_3d

Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\_2brg\_3d\_3