

Sedex Members Ethical Trade Audit Report





Audit Details							
Sedex Company Reference: (only available on Sedex System)	ZC:40523840	00	Sedex Site Refe (only available of System)		ZS:405245	749	
Business name (Company name):	Day Apparels Ltd						
Site name:	Day Apparels Ltd						
Site address: (Please include full address)	MH Tower,2 Gazipur Sac Gazipur	•	Country:		Banglade	esh	
Site contact and job title:	Khurshid Alc	ım-Manage	er-HR & Complic	ınce			
Site phone:	+880186936	11869361802 Site e-mail: <u>khursh</u>			khurshid@	daygroupbd.com	
SMETA Audit Pillars:	∑ Labour Standards		Health & Safety (plus Environment 2-Pillar)		onment 4-	■ Business Ethics	
Date of Audit:	10-12 Decer	10-12 December 2022					

Audit Company Name & Logo:	Report Owner (payer):
International Associates Limited	(If paid for by the customer of the site please remove for Sedex upload)
INTERNATIONAL ASSOCIATES®	Day Apparels Ltd

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

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

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



Audit Content:

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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



SMETA Declaration

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

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

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

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

Lead auditor: Mohammad Mosabberul Hasan APSCA number: RA 21704188

Lead auditor APSCA status: In Good Standing

Team auditor: AKM Naziullah APSCA number: ASCA 21705663

Interviewers: Mohammad Mosabberul Hasana and AKM Naziullah

Report writer: Mohammad Mosabberul Hasana

Report reviewer: Ms Karen Griffin

Date of declaration: 12 December 2022

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

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

Summary of Findings

to the	Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing		check box y, and only	f Non-Conformity box when there is a non- bonly in the box/es where the bormity can be found)			d the nu ues by l		Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
	e audit report, hyperlinks are retained.	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Universal Rights covering UNGP						0	0	None Observed
ОВ	Management systems and code implementation					0	0	0	None Observed
1.	Freely chosen Employment					0	0	0	None Observed
2	Freedom of Association					0	0	0	None Observed
3	Safety and Hygienic Conditions					07	0	0	 Around 10 workers were partially blocked by goods in sewing section at 3rd floor of production building. Facility has 02 diesel generators with capacity 510 KW but did not have permit from the concern authority. However, facility had applied on 01 November 2021, however not yet received the permit. Around 35% workers were not using PPE (face mask) in cutting, sewing, and finishing sections.

4. Facility did not have proper machine maintenance schedule for regular maintenance. 5. Garments, fabric and cartons were stored near 01 out of 04 stairwells. 6. Facility had canteen for the workers but during the audit canteen was not nooperational. 7. MSDS was not updated for spot lifter-833 in the spot lifting room Child Labour 0 0 4 None Observed 5 Living Wages and Benefits 0 0 01 GE 1. Attendance bonus BDT. 500 for the Operators and BDT. 300 for Asst. Operators who make no absent in entire month. **Working Hours** 0 0 0 None Observed 6 0 0 Discrimination 0 None Observed Regular Employment 0 0 0 8 None Observed **8**A Sub-Contracting and 0 0 0 None Observed Homeworkina Harsh or Inhumane Treatment 0 0 0 None Observed 0 Entitlement to Work 0 0 10A None Observed **Environment 2-Pillar** NA Not Applicable 10B2 NA NA 0 Environment 4-Pillar 0 0 None Observed 10B4



10C	<u>Business Ethics</u>					0	0	0	None Observed
Gener	General observations and summary of the site:								

Site Summary:

This 4-Pillar SMETA Full Audit was performed by International Associates Limited. The audit was 4.5 days and 02 auditors in 2.25 days assessed the facility against the ETI Base Code, Customer Code and local legislation on sampling basis. The site was incorporated in 1995, was shifted new location and updated address from previous location Chottogram 2nd February 2016 since factory is operated existing location from1st January 2016 and produced Woven Garments (Top & Bottom) Item. Audit scope was from December 2021 to November 2022 and Wages & Working time records were reviewed for 03 sample months, November 2022 (current month), July 2022 (random month) and February 2022 (random month). As per SEDEX Minimum Requirement, 52 workers records were reviewed and conducted group and individual interview accordingly. Workers interviewed were including both male and female.

The business is owned by Md. Anwar Hossain Patowary –Managing Director and registered in Bangladesh as Limited Company under Companies Act-1994. It consists of 3 buildings and 01 sheds. No dormitory is provided by the factory as all the workers are local and live in nearby areas. There were several non-compliances found in the audit, however overall, all workers were favourable towards the company. They enjoyed the work and stated it was a friendly environment.

- No child labour was identified during the audit. The youngest employee in the factory was 18 years 07 Months 06 days old.
- No forced labour, discrimination and harsh or inhumane treatment were identified during the audit.
- Adequate number of clean, gender wise segregated toilets was available for use by the workers.
- First aid kits were available at each workshop and 25 trained first aiders were available at factory.
- There were adequate number of fire-fighting equipment at each floor. During the audit, 210 fire extinguishers, 26 hose were available.
- Fire drill conducted on a regular basis last fire drill was on 29/09/2022.
- Fire exits were adequately marked in all areas.
- No trade union was established in the factory and it is not mandatory by law. However, they have elected participation committee.
- Worker representative Ms. Sumi Akter- PC vice president present during the audit.
- The facility has provided suggestion box in the facility through which workers can give their suggestion/ complaints if any. Employees are also free to approach the management directly for any grievances,
- Both male and female employees were engaged in management and supervision positions.
- No sub-contractor was used by the factory.
- The factory paid at least the legal minimum wage to all employees. The local legal minimum wage was BDT 8,000 per month as per Minimum Wage Gazette-2019 which was effective from January 24, 2019.
- The overtime wage was paid appropriately to employees. Employees were paid with 200% of basic wage for overtime hours.



• The normal working time in the factory was arranged from 8:00 am to 5:00 pm and lunch break in 01.00 pm to 2.00 pm. If there was overtime, it was normally arranged from 5:00 pm to 7:00 pm. There are three shifts for Security Section, shift-1: 6:00 am to 2:00 pm, Shift-2: 2:00 pm to 10:00 pm and Shift-3: 10:00 pm to 06:00 am.

During the audit, Seven non-compliances were raised under Safety and Hygienic Conditions sections. No other non-conformances were identified. One Good Examples were identified under Living Wages and Benefits section. The details were marked in specific section of the report.

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



Site Details

Site Details				
Day Apparels Ltd				
Day Apparels Ltd				
			e: 23.9813294 de: 90.3813821	
Trade License No: kha 0004879, Valid from 01 July 2022 to 30 June 2023 Factory License No: 17717/Gazipur, Valid from 01 July 2022 to 30 June 2023 Fire License No: DD/Dhaka/25652/2015, Valid from 01 July 2022 to 30 June 2023				
Woven Garments (Top & Bottom) Item				
Day Apparels Ltd was located MH Tower, 21, Vogra, Gazipur Sadar, Gazipur, Bangladesh. The total land area was around 30,000 square feet where production area is around 67,300 square feet, warehouse area is around 13,000 and other area is 1550 square feet. The facility had operated in the existing location since January 2016 A total of 1300 employees were currently working in the facility which includes 1151 workers and 149 management. All workers were permanent and hired by the facility directly. The normal working time in the factory was arranged from 8:00 am to 5:00 pm and lunch break in 01.00 pm to 2.00 pm. If there was overtime, it was normally arranged from 5:00 pm to 7:00 pm. There are three shifts for Security Section, shift-1: 6:00 am to 2:00 pm, Shift-2: 2:00 pm to 10:00 pm and Shift-3: 10:00 pm to 06:00 am. Employees' wages were calculated on monthly basis and paid on or before 7th of each month. There was no declared peak season in this facility, production pressure was round the year same. There were one 6-storey building, two 1-storey				
Utility Building no-1	Description		Remark, if any	
Floor 1 Generator, Boiler Sharing with Day and Transformation Room Room Sharing with Day fashion Ltd sister concern factory under same owner.				
Is this a shared building?	Yes		Sharing with Day fashion Ltd sister concern factory under same owner.	
	Day Apparels Ltd GPS Address: MH Vogra, Gazipur Sa Trade License No: 2023 Factory License No: Dito 30 June 2023 Woven Garments Day Apparels Ltd Sadar, Gazipur, B 30,000 square feet square feet, ware 1550 square feet location since Jan A total of 1300 en which includes 11 were permanent working time in the pm and lunch bovertime, it was rathere are three she pm, Shift-2: 2:00 pam. Employees' was paid on or before peak season in the year same. There building and one Utility Building no-1 Floor 1	Day Apparels Ltd GPS Address: MH Tower,21, Vogra, Gazipur Sadar, Gazipur Trade License No: kha 0004879, 2023 Factory License No: 17717/Gazing June 2023 Fire License No: DD/Dhaka/2568 to 30 June 2023 Woven Garments (Top & Botton Sadar, Gazipur, Bangladesh. The 30,000 square feet where prosquare feet, warehouse area is 1550 square feet. The facility location since January 2016 A total of 1300 employees were which includes 1151 workers and were permanent and hired by working time in the factory was pm and lunch break in 01.00 overtime, it was normally arrar There are three shifts for Security pm, Shift-2: 2:00 pm to 10:00 pr am. Employees' wages were compaid on or before 7th of each peak season in this facility, proyear same. There were one building and one 1-storey sheds Utility Building no-1 Floor 1 Generator, Bangladesh. The facility proyear same. There were one building and one 1-storey sheds Utility Building no-1 Floor 1 Generator, Bangladesh. The facility proyear same. There were one building and one 1-storey sheds	Day Apparels Ltd GPS Address: MH Tower,21, Vogra, Gazipur Sadar, Gazipur Trade License No: kha 0004879, Valid from 2023 Factory License No: 17717/Gazipur, Valid June 2023 Fire License No: DD/Dhaka/25652/2015, Valid 30 June 2023 Woven Garments (Top & Bottom) Item Day Apparels Ltd was located MH Tow Sadar, Gazipur, Bangladesh. The total 30,000 square feet where production square feet, warehouse area is around 1 1550 square feet, warehouse area is around 1 1550 square feet. The facility had op location since January 2016 A total of 1300 employees were currently which includes 1151 workers and 149 mowere permanent and hired by the facily working time in the factory was arrange pm and lunch break in 01.00 pm to overtime, it was normally arranged from There are three shifts for Security Section, pm, Shift-2: 2:00 pm to 10:00 pm and Sham. Employees' wages were calculated paid on or before 7th of each month. The peak season in this facility, production pyear same. There were one 6-storey building and one 1-storey sheds. Utility Description Is this a shared Ves	

Production Building no-2	Description	Remark, if any
Floor 1	Fabric Store, Embroidery, Main Store, Day Care, Medical Room, Fire Pump Room.	Sharing with Day fashion Ltd sister concern factory under same owner.
Floor 2	Finished Goods, Sample, Dining and Office Room.	Sharing with Day fashion Ltd sister concern factory under same owner.
Floor 3	Cutting, Sewing, Finishing Section and Office Room.	Day Apparels Ltd
Floor 4	Cutting, Sewing, Finishing Section and Office Room.	Day Apparels Ltd
Floor 5	Cutting, Sewing, Finishing Section and Office Room.	Day Fashions Ltd sister concern factory under same owner.
Floor 6	Under Construction	Day Fashions Ltd sister concern factory under same owner.
Is this a shared building?	Yes	Sharing with Day fashion Ltd sister concern factory under same owner.

Security Building no-3	Description	Remark, if any
Floor 1	Security Room	Sharing with Day Apparels Ltd sister concern factory under same owner.
Is this a shared building?	Yes	Sharing with Day Apparels Ltd sister concern factory under same owner.

Shed-1 wastage Area	Description	Remark, if any
Floor 1	Wastage Area	Sharing with Day Apparels Ltd sister concern factory under same owner.
Is this a shared building?	Yes	Sharing with Day Apparels Ltd sister concern factory under same owner.

F1: Visible structural integrity issues (large cracks) observed?

Yes

	NoF2: Please give details: No crack was observed.
	F3: Does the site have a structural engineer evaluation?
	F4: Please give details: Structural evaluation has been carried out by RSC.
G: Site function:	Agent Factory Processing/Manufacturer Finished Product Supplier Grower Homeworker Labour Provider Pack House Primary Producer Service Provider Sub-Contractor
H: Month(s) of peak season: (if applicable)	Round of the year
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Product: Woven Garments (Top & Bottom) Item Main operations: Cutting> Embroidery> Sewing> Ironing> Finishing>Packing Number of production lines: 05 sewing lines Main equipment: Overlock Machine, Flatlock Machine, Thread cutter Machine, Cutting Machine, Rib Cutter Machine, Iron Machine, Needle Detector Machine, Piping machine, Bartek Machine, Fit Of the Arm machine, Ideal Machine, Reject Machine, Button attach machine, Embroidery machine, Generator, Boiler, Compressor etc.
J: What form of worker representation / union is there on site?	☐ Union (name) ☐ Worker Committee ☐ Other (specify) ☐ None
K: Is there any night production work at the site?	Yes No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	Yes No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	Yes No M1: If yes, approx. % of workers



N: Were all site-provided accommodation buildings included in this audit	Yes No N1: If no, please give details Factory does not provide accommodation to the workers and it was not included in this audit.
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Audit Parameters							
A: Time in and time out	Day 1 Time in: 09:00 Day 1 Time out: 17:35	Day 2 Time in: 08:50 Day 2 Time out: 17:36	Day 3 Time in: 9:40 Day 3 Time out:13: 30				
B: Number of auditor days used:	4.5 (02 auditors X 2.25 days	·)					
C: Audit type:	Full Initial Periodic Full Follow–up Partial Follow–Up Partial Other If other, please define:						
D: Was the audit announced?	☐ Announced ☑ Semi – announced: Window detail: 4 weeks ☐ Unannounced						
E: Was the Sedex SAQ available for review?	Yes No If No, why not						
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes ☐ No If Yes , please capture detail in appropriate audit by clause						
G: Who signed and agreed CAPR (Name and job title)	Khurshid Alam-Manager-HI	R & Compliance					
H: Is further information available (If yes, please contact audit company for details)	☐ Yes ☑ No						
I: Previous audit date:	25 November 2021						
J: Previous audit type:	Periodic						
K: Were any previous audits reviewed for this audit	☐ Yes ☐ No ☐ N/A						

Audit attendance	Management	Worker Representatives
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Worker Committee Senior Union management representatives representatives ☐ Yes ☐ No A: Present at the opening meeting? ☐ Yes ☐ No B: Present at the audit? ☐ Yes ⊠ No C: Present at the closing meeting? N/A D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present) E: If Union Representatives were not There is no union at this factory. present please explain reasons why: (only complete if no union reps present)



Worker Analysis

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

Worker Analysis								
	Local		Migrant*			Total		
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	1016
Worker numbers – Male	345	0	0	0	0	0	0	345
Worker numbers – female	806	0	0	0	0	0	0	806
Total	1151	0	0	0	0	0	0	1151
Number of Workers interviewed – male	16	0	0	0	0	0	0	16
Number of Workers interviewed – female	36	0	0	0	0	0	0	36
Total – interviewed sample size	52	0	0	0	0	0	0	52



A: Nationality of Management	Bangladeshi	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. Please add more nationalities as applicable to site. Add more rows if required.	Nationalities: B1: Nationality 1: Bangladeshi B2: Nationality 2: B3: Nationality 3:	Was the list completed during peak season? ☐ Yes ☐ No If no, please describe how this may vary during peak periods:
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1100 C1: approx % total workforce: Nationality 2 C2: approx % total workforce: Nationality 3	_
D: Worker remuneration (management information)	D:% workers on piece rate D1:% hourly paid workers D2: _100% salaried workers Payment cycle: D3:% daily paid D4:% weekly paid D5: _100% monthly paid D6:% other D7: If other, please give details	



Worker Interview S	ummary	
A: Were workers aware of the audit?	☐ Yes ⊠ No	
B: Were workers aware of the code?	∑ Yes □ No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	8 Groups of 4	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 8	D2: Female: 12
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☐ NoIf no, please give detail	S
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	∑ Yes □ No	
G: In general, what was the attitude of the workers towards their workplace?	□ Favourable □ Non-favourable □ Indifferent	
H: What was the most common worker complaint?	The management was supportive to the employees and all their rights are being respected, hence all workers interviewed had a positive attitude to management and site.	
I: What did the workers like the most about working at this site?	Working environment and on time payment of wages.	
J: Any additional comment(s) regarding interviews:	Most of the workers reported that they are free to report any concern directly to the management.	
K: Attitude of workers to hours worked:	Workers do maximum 0: happy that there is no e	· · · · · · · · · · · · · · · · · · ·
L. Is there any worker survey information available?		
⊠Yes		

П No

L1: If yes, please give details: Facility established a survey on grievance mechanism. The recent meeting was recorded on October 06, 2022.

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 factory allowed the auditors to conduct confidential interviews with workers who were chosen freely without any influence by the factory management. 52 workers were selected for interview including 16 males and 36 females, they were interviewed as 8 groups of 4 some mixed groups and some single sex and the balance of 20 workers were interviewed individually. The workers were assured of confidentiality and they spoke freely of their views of the factory. The workers showed a cooperative attitude during the interview process. Based on worker's interview, they expressed their positive attitude to the management and payment. All workers were satisfied with working conditions and benefits provided by the factory. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect. The workers were aware of their rights and duties and internal committees of the grievance mechanism. They can complain through confidential complaint boxes and also directly to the management if required.

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

There is no union in the factory. Interview with the participation committee (PC) representatives, the interviewees expressed that the facility management was nice to them, they can freely express their opinions and concerns without any fear to the management.

O: Attitude of managers:

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

The factory management had a system in place to check their current practices against their clients' requirements and the local law though they did not still implement all parts of the code; please see relevant section of report. The managers were courteous and professional throughout the audit and allowed full access for the auditor to all relevant documents and personnel. Khurshid Alam – Manager HR & Compliance was responsible for implementing legal and code standards. Throughout the audit management had provided all the requested documentation for review. At the end of the audit, auditor conducted a closing meeting with factory management to explain all findings except workers' interview information. The facility accepted all non-compliance at the end of the audit Khurshid Alam – Manager HR & Compliance, signed the CAPR and was given a copy.

Audit Results by Clause

0A: Universal Rights covering UNGP

(Click here to return to summary of findings)

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Based on the documents review and management interview, facility has established a system (policy and procedure) covering human rights impacts and issues and is communicated to all appropriate parties, including its own suppliers. The top managements including general manager, H & S supervisor, executives, and staffs were appointed to response to implement the standards, Khurshid Alam – Manager HR & Compliance and Md. Enamul Haque-Executive HR were responsible for implementing standards concerning employee universal rights. The factory defined some stakeholders including local government functional department to keep good awareness in compliance and other social issues. The factory encouraged the workers and staff to report any issues related to employee universal rights by name or anonymous. The terms and conditions for employees are stated in the employee contract letter and some workers were trained in the grievance procedure.

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

Details:

- Facility written policies & procedures,
- Procedure to cascade the ETI code to its significant partner or suppliers,
- List of main stakeholders including local government functional department (e.g. Tax, social insurance), Anonymous grievance records.

Description of Good Example (GE):		Objective Evidence	
Good exam	ples observed:		
Comments: Not Applicable			
Local law or ETI/Additional elements / customer spe Not Applicable	ecific requirement:	Not Applicable	
Finding: Observation Company NC Description of observation: None observed		Objective evidence observed:	
Fin	dings		
	personnel records if they red		
Which is implemented?	E1: Please give details: Facility has data privacy policy and procedures. The HR department did not have any improper practices according to this requirement. However, Workers can access their		
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	⊠ Yes □ No		
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rightscompatible, a source of continuous learning and based on stakeholder engagement)	Yes No D1: If no, please give details		
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	 ∑ Yes ☐ No C1: Please give details: The site has suggestion/ complaint box system available to workers for confidentially reporting. 		
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	 ∑ Yes ☐ No Please give details: Name: Khurshid Alam Job title: Manager HR & Compliance 		
A: Policy statement that expresses commitment to respect human rights?	∑ Yes □ No A1: Please give details:		

	Good examples observed:	
Description of Good Example (GE): None observed		Objective Evidence Observed: 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)	A1: Last year: 1.77 %	A2: This year 0.46 %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	0.13%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 1.57%	C2: This year 0.56 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	0.16%	
E: Are accidents recorded?	X Yes No E1: Please describe: Factory related accidents as per requi	keeps records of all the work- irement.
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total worke rs]	F1: Last year: Number: 36	F2: This year: Number: 31
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]	0.96%	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 0.04 days	H2: This year: 0.01 days
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0% workers	I2: 12 months0% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 0% workers	J2: 12 months 0% workers

0B: Management system and Code Implementation

(Click here to return to summary of findings)

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- Responsibility for meeting the legal and client code requirements was shared between Khurshid Alam Manager HR & Compliance and Md. Enamul Haque-Executive HR Together they were responsible to the factory manager for ensuring the standards are meet.
- Facility management has communicated the ETI base code with the workers and to their suppliers and obtained a commitment from them to comply with this code requirement.
- All the interviewees understood the basic components of the code such as do not use child labour and the control of working hours.
- And auditor crosschecked attendance records provided by management with related production records collected from workshops and interview sample workers. No inconsistency was noted.

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

Details:

- Internal audit documents,
- Written policies and procedure,
- Communication records of the ETI base code with the workers and to their suppliers,
- Company commitment of being compliant in all aspects of business and integrity aligned with the client's requirement and local law,
- All required documents and all appropriate procedures for meeting the client's code of conduct and the legal requirements,

Manageme	nt Systems:
A: In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	Yes No A1: Please give details: Auditor checked this and no such evidence was noted in any public information channel. This was also confirmed through employees and management interview.



B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	Yes No B1: Please give details: Policies existed for these areas like Forced labour, Health and Safety, Living Wage, Working Hours, No harsh treatment and no negative evidence was found.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Policies and procedures were communicated to workers via notice board and periodic training. During the audit no forced labour, no child labour was found and it was confirmed through documents review, workers and management interview.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	Yes No D1: Please give details: Based on documents review, worker and management interview it was noted that all new employees must go through an induction training that covers the facility's various policies and procedures. The same procedure was followed for all workers as planned, and the results were posted on the notice board for workers' reference.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	Yes No E1: Please give details: During the document verification, the training records were verified, and this was confirmed during the interview and interaction with the employees and staffs. The trainings were found to be effective.
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 G1: Please give details: Md. Enamul Haque- Executive HR
G: Is there a Human Resources manager/department? If Yes, please detail.	Yes No H1: Please give details: Khurshid Alam – Manager HR & Compliance
H: Is there a senior person / manager responsible for implementation of the code	Yes No I1: Please give details: The facility has a Data Privacy policy to ensure the confidentiality of all employee, supplier, and customer information.
I: Is there a policy to ensure all worker information is confidential?	Yes No I1: Please give details:



	The facility has a Data Privacy policy to ensure the confidentiality of all employee, supplier, and customer information.
J: Is there an effective procedure to ensure confidential information is kept confidential?	Yes No J1: Please give details: The facility had a system in place to ensure confidentiality, and information was only shared with those who needed to know. The information is saved properly, is maintained by the HR Officer, and is only accessible to the partner and management
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	Yes No K1: Please give details: The facility had conducted risk assessments for Health & Safety, Fire Accidents, and Covid Pandemic in order to identify workplace risks.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	Yes No L1Please give details: The facility assessed the risks related to all aspects of the ETI code and control methods were advised and implemented to remove, avoid or mitigate any risks identified.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	Yes No M1: Please give details: The facility has policy which requires their suppliers to adapt and implement the labour standards.
Land r	ights
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	Yes No N1: Please give details: The site has all necessary land rights licences.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	∑Yes ☐ No O1: Please give details: The factory set up the procedure and commercial department is responsible 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 P1: If yes, how does the company obtain FPIC: Not Applicable

Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	Yes No Q1: Please give details: Land owner / factory owner has valid purchase documents for the land to use for factory purposes.	
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	Yes No R1: Please give details: Facility did not demonstrate any alternatives specific land acquisitions were considered to avoid or minimize adverse impacts.	
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	Yes No S1: Please give details: All the areas of factory were legal according to the management interview and document review.	
Non-com	pliance:	
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)
Local law and/or ETI requirement: Not Applicable		Not Applicable
Recommended corrective action: Not Applicable		
Obser	vation:	
Description of observation: None observed.		Objective evidence observed:
Local law or ETI requirement: Not Applicable		Not Applicable
Comments: Nil		
Good Example	es observed:	
Description of Good Example (GE):		Objective evidence observed:
None observed.		Not Applicable

1: Freely Chosen Employment

(Click here to return to summary of findings)

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

- A policy which prohibits forced labour was available for review.
- Based on interview with the management & workers and document review, it was identified that the factory had established the employment policies & program.
- Through the walkthrough and employee interviews it was noted that facility had no apparent signs of forced, bonded, or involuntary labour, as well as prison subcontracting.
- All interviewed employees reported they did not pay any deposits to the facility. All employees
 maintained their own original identity documentation with themselves and were free to resign from
 the facility at any time.
- Based on the workers and management interviews, the workers were free to leave after work shift, and there was no bonded or involuntary prison labor identified.
- The terms and conditions of employment in the contract letter state that the workers are free to leave the workplace outside of their working hours.
- Security guards said that they cannot prevent workers from leaving the premises outside of working
 hours and when conducting searches (at request of management) it was on a sample basis,
 discretely and with no delay to workers leaving at the end of shift. The above was confirmed in
 management and workers' interview.

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

Details:

- Management and worker interview
- Contracts for security guards
- Policy to ensure employment is freely chosen, and all the relevant document.
- Personnel files.
- Contracts to establish notice periods.
- Workers' appointment letters and payroll records.
- Facility tour

A: Is there any evidence of retention of original documents, e.g. passports/ID's	☐ Yes ☐ No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	Yes No B1: If yes, please give details and category of worker affected:



C: Is there any evidence of retention of wages /deposits	Yes No C1: If yes, please give details and category	of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ☐ No D1: Please describe finding:	
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	Yes No Not applicable E1: Please describe finding: The factory employed Bangladeshi only, which complied with local legal requirements and international codes.	
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	Yes No F1: Please describe finding: The workers could leave the factory in his or her own willing even in the working time if he or she required.	
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	Yes No Not applicable G1: If yes, please give details and category of workers affected: The factory established policies and procedures on forced / trafficked / bonded labour and no negative evidence was found.	
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	 Yes No H1: Please describe finding: The factory set up the policy and procedure to avoid any form of force labour in its supply chain. 	
	Non-compliance:	
1. Description of non-compliance: NC against ETI NC against Local Law: NC against customer code: None Observed Local law and/or ETI requirement		Objective evidence observed: (where relevant please add photo numbers)
Not Applicable Recommended corrective action: Not Applicable		Not Applicable
Observation:		
Description of observation: None observed		Objective evidence observed:
Local law or ETI requirement: Not Applicable		Not Applicable
Comments: Nil		

Good Examples observed:

Description of Good Example (GE):
None observed

Objective evidence observed:
Not Applicable

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- The factory has a policy where no restriction imposed to the workers' formation of trade unions.
- The employees can approach top management directly to report their grievances and necessary steps are initiated by the management towards the grievance received and are being respected at all times.
- A workers committee was elected and meetings are conducted once in two months and the minutes of meetings are recorded for verification and future reference.
- Based from employee's interview, the facility does not restrict employees from organizing or joining trade unions and has an open-door policy approach.
- Based from the employee's interview and interaction with facility management, workers committee
 employee representatives are not discriminated and they are free to carry out their functions on
 periodical basis within the working

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

Details:

- Site policy on freedom of association
- Interview with workers
- Interview with worker's committee members
- Interview with managers
- Complaint & grievance record
- Freedom of Association policy
- Minutes of the works committee meeting

A: What form of worker representation/union is there on site?	☐ Union (name) ☑ Worker Committee ☐ Other (specify) ☐ None



B: Is it a legal requirement to have a union?	Yes No To form trade union is not mandatory but it depends on workers.	
C: Is it a legal requirement to have a worker's committee?	Yes No Note, if trade union is formed in the factory, then workers committee is not mandatory to form.	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	 ∑ Yes No D1: Please give details: Suggestion box and access to management directly. D2: Is there evidence of free elections? ∑ Yes No 	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	Yes No E1: Please give details: There was a room available for the worker's committee in the office building for meeting.	
F: Name of union and union representative, if applicable:	N/A: This is a non- unionized factory.	F1: Is there evidence of free elections? Yes No N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Worker Participation Committee	G1: Is there evidence of free elections? X Yes No N/A
H: Are all workers aware of who their representatives are?	⊠ Yes □ No	Interviewed workers were aware of their PC members. Ms. Sumi Akter- PC Member
I: Were worker representatives freely elected?	⊠ Yes □ No	11: Date of last election: 24 December 2020.
J: Do workers know what topics can be raised with their representatives?	⊠ Yes □ No	
K: Were worker representatives/union representatives interviewed?	∑ Yes □ No If Yes, please state how many: Two representatives from the committee were interviewed during the audit.	
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Confirmed by worker representative interview and worker interview, workers could complain to the representative directly or asked her for help when needed. Last meeting was conducted on 08 August 2022.	



M: Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ⊠ No	
If Yes , what percentage by trade Union/worker representation	M1:% workers covered by Union CBA	M2:% workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	☐ Yes ☐ No	
	Non–compliance:	
1. Description of non-compliance: NC against ETI NC against code: None observed Local law and/or ETI requirement: Not Applicable Recommended corrective action: Not Applicable	Local Law	Objective evidence observed: (where relevant please add photo numbers) Not Applicable
	Observation:	
Description of observation: None observed		Objective evidence observed:
Local law or ETI requirement:		Not Applicable
Not Applicable		
Comments: Nil		
Good Examples observed:		
Description of Good Example (GE):		Objective Evidence Observed:
None observed		Not Applicable

3: Working Conditions are Safe and Hygienic

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 1.General Health and Safety management
 - Khurshid Alam Manager HR & Compliance department was responsible for Health & Safety matters for the site.
 - Potable water was freely available in all areas and test certificates were up-to-date
 - Sufficient clean toilets segregated by gender were available at all the time to workers
 - Ventilation, temperature and lighting were adequate for the production processes
 - Personal protective equipment is provided to all the concerned employees free of charge and provided training on usage of PPE is imparted to all employees. However around 35% workers were not using PPE (face mask) in cutting, sewing, and finishing sections. NC Raised.
 - Minutes of meetings showed that Health & Safety meeting held on monthly basis.

2. Fire Safety

- There were at least 2 exits for most of work areas and marked clearly. Aisles were found marked clearly.
- Fire-fighting equipment was adequate, and checks were up to date.
- Evacuation diagrams were posted in all areas and understood by all workers interviewed
- Fire drills were organised and recorded every 02 months both in day and night.
- Training had been given by the local fire department and also provided extra training internally.

3. Machine & Electrical safety

- All electrical equipment was in good condition such as sockets, plugs, switches and main fuse boards.
- There were competent electricians at the site and their training certificates were available for review.
- There is a competent mechanic at the site to do the mechanical work for the machineries.
- Facility have system for periodic inspection of machineries.
- The safety guards in the machines are provided with adequate precautions.
- The broken needle register was followed by the facility and is maintained.

4. Chemical safety

- All chemicals were correctly labelled.
- Material Safety Data Sheets and secondary containment were available. However, MSDS was not updated for spot lifter-833 in the spot lifting room. NC Raised.



Workers in the chemical store confirmed that they had been trained on correct handling procedures.

5. Medical services

- There were adequate first aid kits in each production area and they were well stocked.
- There were adequate number of first aiders in the factory and 02 interviewed first aiders confirmed that they had been trained by the factory contracted doctor.

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

Details:

- Health and safety policy
- Health and safety manual
- Health and safety committee minutes
- Training records and certificates
- Fire equipment maintenance records
- Noise level test records
- Trained first aider register
- Accident reports
- Chemical list and MSDS for each chemical
- Potable water testing certificates
- Fire drill records. Last drill date: 29 September 2022
- First aid personnel training record. Last training date: 14 November 2022
- Fire fighter training record. Last training date: 03 November 2022
- Orientation training record. Last training date: 09 December 2022
- PPE training record. Last training date: 10 November 2022
- Hazardous materials handling training record. Last training date: 25 November 2022
- Interviews with H&S responsible person
- Interviews with workers and H&S committee members

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	Yes No A1: Please give details: The factory set up the policy and procedures and provided training including for those new workers.
B: Are the policies included in workers' manuals?	Yes No B1: Please give details: The employee manual, which was delivered to every worker covered general requirements of the H&S requirements.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	Yes No C1: Please give details: According to the documents, the construction structure of the factory is consistent with the completion acceptance.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	∑ Yes □ No



	·	
	D1: Please give details: The factory visitors to the site on H&S and to proequipment.	
E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	∑ Yes ☐ No E1: Please give details: As per the local medical facility were provided for adequate first aid kits in each product well stocked.	workers Also There were
F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?	☐ Yes ☐ No F1: Please give details: As per the local law, the factory had doctor and workers have easy access	
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	Yes No G1: Please give details: The factory transport for workers.	y does not provide any
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	☐ Yes ☑ No H1: Please give details: The factory did workers.	I not provide dormitory for
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	 ∑ Yes ☐ No I1: Please give details: The facility cor in order to take corrective and pridentified risks. 	
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?		vided all inspection report
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	 ∑ Yes No K1: Please give details: The factory requirements on environmental statements on the properties of the properties	
	Non-compliance:	
1. Description of non-compliance: NC against ETI NC against Lacode: Through site visit it was noted that around goods in sewing section at 3rd floor of problems of the local law and/or ETI requirement Local Law: Bangladesh Labour Law 2006 establishment shall be overcrowded to a workers employed therein. ETI requirement: ETI 3.1 A safe and hyprovided, bearing in mind the prevailing	oduction building. , Section-56: (1) No work-room in any an extent injurious to the health of the gienic working environment shall be	Objective evidence observed: (where relevant please add photo numbers) Site visit See photo NC 1



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. Recommended corrective action: It is recommended that facility should make all the workers blockage free for easy evacuation. 2. Description of non-compliance: NC against ETI code: During document review as well management interview, it was noted that facility has 02 diesel generators with capacity 510 KW but did not have permit Document review as from the concern authority. However, facility had applied on 01 November 2021, well management however not yet received the permit. interview Local law and/or ETI requirement: Local law: The Bangladesh Energy Regulatory Commission (BERC) Act 2003:27(1) No person shall engage himself in the following business unless he is empowered by a licence or exempted from having it under this Act or any other Act, such as:- (a) power generation; (b) energy transmission; (c) energy distribution and marketing; (d) energy supply; and (e) energy storage. ETI requirement: 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. Recommended corrective action: It is recommended that the facility management should have permit to operate power generators. 3. Description of non-compliance: NC against ETI code: Through site visit it was noted that around 35% workers were not using PPE (face Site visit mask) in cutting, sewing, and finishing sections. See photo NC 2 Local law and/or ETI requirement: See photo NC 3 Local Law: Bangladesh Labour Rules 2015, Section-67(2): In addition to the See photo NC 4 arrangement of safety and health protection measures mentioned in Subsection (1), the concerned manufacturing institute must provide necessary equipment's, including safety shoes, helmets, goggles, masks, hand gloves, ear muffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage. ETI requirement: 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. Recommended corrective action: It is recommended that the facility management should encourage workers to use PPE (face mask) for the workers in cutting, sewing, and finishing sections.

4. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: Through site visit, documents review and management interview it was noted that facility did not have proper machine maintenance schedule for regular maintenance. Local law and/or ETI requirement: ETI requirement: 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. Recommended corrective action: It is recommended that facility should facility should have proper machine maintenance schedule for regular maintenance.	Site visit, documents review and management interview
5. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: During the site visit it was noted that garments, fabric and cartons were stored near 01 out of 04 stairwells. Local law and/or ETI requirement: Local law: Bangladesh Labour Law-2006, Section-72(3) Passages and stairways shall be clean, wide and clear of all obstructions. ETI requirement: 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. Recommended corrective action: It is recommended that facility should remove garments, fabric and cartons from the stairwell area. 6. Description of non-compliance: NC against ETI NC against Local Law NC against customer	Site visit See photo NC 5
Through site visit it was noted that facility had canteen for the workers but during the audit canteen was not no-operational. Local law and/or ETI requirement: Local Law: Bangladesh Labour Law-2006, section-92: (1) In an establishment where more than 100 (one hundred) workers are ordinarily employed, adequate number of canteens shall be provided for their use. ETI requirement: 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. Recommended corrective action: It is recommended that the facility management should keep the canteen operational during the working period.	Site visit See photo NC 6

7. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: Through site visit it was noted that MSDS was not updated for spot lifter-833 in the spot lifting room Local law and/or ETI requirement: Local law: Bangladesh Labour Law-2006, section-79: Dangerous operation. Where the Government is satisfied that any operation carried on in an establishment exposes any person employed in it to a serious risk of bodily injury, poisoning or disease, it may, by rules. ETI requirement: 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. Recommended corrective action: It is recommended that the facility management should provide updated MSDS for spot lifter-833 in the spot lifting room	site visit	
Observation:		
Description of observation: None observed	Objective evidence observed:	
Local law or ETI requirement: Not Applicable	Not Applicable	
Recommended corrective action: Not Applicable		
Good Examples observed:		
Description of Good Example (GE):	Objective Evidence Observed:	
None observed	Not Applicable	

4: Child Labour Shall Not Be Used

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

FTI

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

Current Systems and Evidence Examined

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

Current systems:

- Facility has written child labor policy.
- As per the review of policy it was noted that the minimum hiring age of the facility for an employee is 18 years.
- During the employees' interview it was understood that any suspect of child labour can be reported to facility management.
- Based on documents review it was noted that, the factory kept valid and sufficient age information such as copies of national ID card, birth certificate.
- During the audit, no child labor or young worker was found in the factory. The youngest worker on site was 18 years 07 months and 06 days old.

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

Details:

- Child Labour and Child Labour Remediation Policy.
- Personnel files of all workers
- Latest list of workers
- Age Proof records of 52 out of 52 selected samples verified.
- Interaction with Management and Interview with workers

A: Legal age of employment:	18 years old
B: Age of youngest worker found:	18 years 07 months and 06
C: Are there children present on the work floor but not working at the time of audit?	☐ Yes ☑ No
D: % of under 18's at this site (of total workers)	0 %



E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety) Yes No E1: If yes, give details	
Non–compliance:	
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None observed Local law and/or ETI requirement:	Objective evidence observed: (where relevant please add photo numbers) Not Applicable
Not Applicable	
Recommended corrective action: Not Applicable	
Observation:	
Observation: Description of observation: Not observed	Objective evidence observed:
Description of observation:	
Description of observation: Not observed Local law or ETI requirement:	observed:
Description of observation: Not observed Local law or ETI requirement: Not Applicable	observed:
Description of observation: Not observed Local law or ETI requirement: Not Applicable	observed:
Description of observation: Not observed Local law or ETI requirement: Not Applicable Comments: Nil	observed:

5: Living Wages are Paid

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- The local legal minimum wage was BDT 8,000 per month as per Minimum Wage Gazette-2019 which was effective from January 24, 2019.
- The minimum wage paid by the factory was 8,000 and above per month according to the wage records.
- All workers' wages were calculated by monthly rate.
- All workers are 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.
- Document review of payroll and employee wage records showed that only 100% of workers had provided with group insurance.
- Benefits of paid, annual leave, was given to all workers and maternity leave to appropriate workers.
- The factory management compensated all workers at a legal mandated rate for their overtime hours, respectively 200% of regular pay for overtime work on working days, rest days and Friday holidays.
- All employees are monthly salary basis and paid salary usually within 07 working days after each pay periods.
- The employees are paid in Mobile banking (BKash).

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

Details:

- Working hour policy
- Wages policy
- Leave management policy
- Local and national laws
- Group insurance
- Resignation records
- Labour contracts for all employees
- Document review (wage sheet review, worker's personal file, bonus payment sheet review, pay slip, maternity register review, and wage & benefit policy etc.)
- Management and Employee interviews



- Payroll records from December 2021 to November 2022
- Attendance records from December 2021 to November 2022

Any other comments: Nil

Non-compliance:						
Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)					
Not observed Local law and/or ETI requirement: Not Applicable Recommended corrective action: Not Applicable	Not Applicable					
Observation:						
Description of observation: Not observed	Objective evidence observed:					

Good Examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:
GE-01 The facility provides attendance bonus BDT. 500 for the Operators and BDT. 300 for Asst. Operators who make no absent in entire month.	Worker's interview and documents review.

Summary Information

Local law or ETI requirement:

Not Applicable

Comments: Nil

Criteria	Local Law (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: 08 hours per day 48 hours per week 208 hours per month	A1: 08 hours per day 48 hours per week 208 hours per month	Legal maximum: 08 hours per day 48 hours per week 208 hours per month

Not Applicable



B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 4 hours/ day and 24 hour/ week 104 hour/ month (Daily 04 hours overtime waiver from April 2022 to October 2022)	B1: 2 hours/ day 12 hours/ week 50 hours/ month	Legal maximum: 4 hours/ day and 24 hour/ week 104 hour/ month (Daily 04 hours overtime waiver from April 2022 to October 2022)
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: Grade-1: 18,257 BDT/Month Grade-2: 15,416 BDT/Month Grade-3: 9,845 BDT/Month Grade-4: 9,347 BDT/Month Grade-5: 8,875 BDT/Month Grade-6: 8,420 BDT/Month Grade-7: 8,000 BDT/Month Trainee / Apprentice: 5,975BDT/Month	C1: Grade-1: 18,257 BDT/Month Grade-2: 15,416 BDT/Month Grade-3: 9,845 BDT/Month Grade-4: 9,347 BDT/Month Grade-5: 8,875 BDT/Month Grade-6: 8,420 BDT/Month Grade-7: 8,000 BDT/Month Trainee / Apprentice: 5,975BDT/Month	Legal minimum: Grade-1: 18,257 BDT/Month Grade-2: 15,416 BDT/Month Grade-3: 9,845 BDT/Month Grade-4: 9,347 BDT/Month Grade-5: 8,875 BDT/Month Grade-6: 8,420 BDT/Month Grade-7: 8,000 BDT/Month Trainee / Apprentice: 5,975BDT/Month
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 200% of basic wage	D1: 200% of basic wage	D2: Yes No

Wages analysis: (Click here to return to Key Information)				
A: Were accurate records shown at the first request?	Yes □ No			
A1: If No , why not?	NA			
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	52 samples for the month of November 2022 (Current month) 52 samples for the month of July 2022 (Random month) 52 samples for the month of February 2022 (Random month)			



C: Are there different legal minimum wage grades? If Yes , please specify all.	∑ Yes □ No	C1: If Yes , please give details: The Government has announced the new pay structure, which was implemented from 1st December 2018 for the workers of the Garments Industries. The Gazette Notification has been published on January 24, 2019. There are two separate pay structures; for the garment workers (Schedule A) 1. For the workers (Schedule A):							
			Grade	Monthly basic wage	House rent 40% of the basic	Medical allowance	Conveyance allowance	Food subsidy	Gross monthly wage
			Grade 1	Tk. 10938	Tk. 5469	Tk.600	Tk.350	Tk.900	Tk. 18257
			Grade 2	Tk. 9044	Tk. 4522	Tk.600	Tk.350	Tk.900	Tk. 15416
			Grade 3	Tk. 5330	Tk. 2665	Tk.600	Tk.350	Tk.900	Tk. 9845
			Grade 4	Tk. 4998	Tk. 2499	Tk.600	Tk.350	Tk.900	Tk. 9347
			Grade 5	Tk. 4683	Tk. 2342	Tk.600	Tk.350	Tk.900	Tk. 8875
			Grade 6	Tk. 4380	Tk. 2190	Tk.600	Tk.350	Tk.900	Tk. 8420
		_	Grade 7	Tk. 4100	Tk. 2050	Tk.600	Tk.350	Tk.900	Tk. 8000
			Apprentice	Tk. 2750	Tk. 1375	Tk.600	Tk.350	Tk.900	Tk. 5975
		2.	. For the sta	iff level (S	Schedule	e B) emplo	yees:	ı	
			Grade	Monthly basic wage	House rent 50% of the basic	Medical allowance	Conveyance allowance	Food subsidy	Gross monthly wage
			Grade 1	Tk.8150	Tk.4075	Tk.600	Tk.350	Tk.900	Tk. 14075
			Grade 2	Tk.6300	Tk.3150	Tk.600	Tk.350	Tk.900	Tk. 11300
			Grade 3	Tk.5950	Tk.2950	Tk.600	Tk.350	Tk.900	Tk. 10775
			Grade 4	Tk.4350	Tk.2175	Tk.600	Tk.350	Tk.900	Tk. 8375
			Apprentice	Tk. 2750	Tk.1375	Tk.600	Tk.350	Tk.900	Tk. 6164
D: If there are different legal minimum grades, are all workers graded and paid correctly?	Yes No N/A	D	1: If No , ple	ease give	details:				
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	Below legal min Meet Above	Е	1: Lowest a	ctual wa	ges four	nd: BDT 800	00 per mont	h.	
F: Please indicate the breakdown of workforce per earnings:	F2: _20_	9	of workforce % of workfor % of workfor	rce earni	ng minin	num wage	9		



G: Bonus Scheme found: Please specify details: H: What deductions are required by law e.g.	Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc. 1. Two festival bonus equivalent to one basic during Eid UlFitr, and Eid UlAzha. 2. The facility provides attendance bonus BDT. 500 for the Operators and BDT. 300 for Asst. Operators who make no absent in entire month. As per section 125 of the Bangladesh Labour Law, 2006, factory may deduct					
social insurance? Please state all types:	wages for un-authorized a payments, loans, income to deducting only for un-authorize			tax, provident fund, etc. However, factory is		
I: Have these deductions been made?	Yes No	I1: Please list all deductions that have been made.		deductions that have been made.		1. Absent deduction in case of worker is absent as per law. Please describe: 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.
		I2: Please deduction not been	ons that have	Group insurance Please describe: The group insurance was paid by factory supported by BGMEA. Factory Registration Number: 2145 Certificate Number: 20220549		
J: Were appropriate records available to verify hours of work and wages?	⊠ Yes □ No					
K: Were any inconsistencies found? (if yes describe nature)	□ Y	es o	K1: Type Poor record Isolated ind Repeated	. •		
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	Yes No L1: Please give details: Factory had provided accurate & complete payroll & attendance records to the auditors for review where all working hours were recorded.					
M: Is there a defined living wage: This is <u>not normally</u> minimum legal wage. If answered yes, please	Yes No M1: Please specify amount/time: Factory did not define living wages as it is not required by law. However, factory is providing above the minimum wage as per					

state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	Minimum Wages Gazette for Readymade Garments Sector published on January 24, 2019.
M2: If yes, what was the calculation method used.	□ ISEAL/Anker Benchmarks □ Asia Floor Wage □ Figures provided by Unions □ Living Wage Foundation UK □ Fair Wear Wage Ladder □ Fairtrade Foundation Other – please give details:
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	Yes No N1: Please give details: The factory reviews wages of the workers at least once in a year as required by law.
O: Are workers paid in a timely manner in line with local law?	⊠ Yes □ No
P: Is there evidence that equal rates are being paid for equal work:	Yes No P1: Please give details: Through factory policy review, payroll records review and employee's interview, it is confirmed that equal rates are being paid for equal work.
Q: How are workers paid:	☐ Cash ☐ Cheque ☐ Bank Transfer ☑ Other ☐ Other ☐ Some of the control of the con

6: Working Hours are not Excessive

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

ETI

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:
 - this is allowed by national law;
 - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
 - appropriate safeguards are taken to protect the workers' health and safety; and
 - The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined

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

Current systems:

- Working hours policy and procedures were in place and followed properly.
- Through employees' interview, overtime was voluntary.
- The factory provided hours and wages records from December 2021 to November 2022.
- Electronic attendance system was used to record time in and time out information for each employee.
- According to time records and worker interview basic working hours were 8 hours per day and 48 hours per week with no more than 2 hours overtime per day.
- Maximum overtime was 50 hours in the month of November 2022 within the sample and records showed that workers had at least 01 day off per week.
- All employees had one day off in every 7 days.
- Minimum wage, overtime wage and working hours were verified and found consistent.

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



Details:

- Facility working hours Policy,
- Employee interview
- Management interview
- Local and national laws
- Factory policy on working hours
- Time cards
- Sample pay slips with recorded hours all workers interviewed
- Workers' contracts
- 12 months' hours records to establish highest and lowest hours over all employees

Quality and production records to cross check hours					
Any other comments: Nil					
Non–compliance:					
Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None observed	Objective evidence observed: (where relevant please add photo numbers)				
Local law and/or ETI requirement: Not Applicable					
Recommended corrective action: Not Applicable					
Observation:					
Description of observation: Not observed	Objective evidence observed:				
Local law or ETI requirement: Not Applicable	Not Applicable				
Comments: Nil					
Good Examples observed:					
Description of Good Example (GE):	Objective Evidence Observed:				
None observed	Not Applicable				

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 attendance recording system.					
B: Is sample size same as in wages section?	∑ Yes □ No B1: If no, please (give details				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	⊠ Yes □ No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:				
D: Are there any other types of contracts/employment agreements used?	☐ Yes ⊠ No	D1: If YES, please complete as appropriate:				
		0 hrs Part time Variable hrs Other				
		If "Other", Please define:				
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	☐ Yes ☑ No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details:				
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: 1 in 7 days 2 in 14 days No If 'No', please explain:	F3: Is this allowed by local law? Yes No				
	Maximum numbe	er of days worked without a day off (in sample):				
	06 Days					



Standard/Contracted Hours worked			
G: Were standard working hours over 48 hours per week found?	☐ Yes ☑ No	G1: If yes, % of workers & frequency:	
H: Any local		H1: If yes, please give details:	
waivers/local law or permissions which allow averaging/annualised hours for this site?	No	Daily 04 hours overtime waiver from 17 October 2022 to 16 April 2023.	
Overtime Hours worked			
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 52 samples from November 2022 (Current month): 2 hours per day, 12 hours per week and 50 hours per month		
	52 samples from July 2022 (random month): 2 hours per day, 10 hours per week and 38 hours per month		
	52 samples from February 2022 (random month): 2 hours per day, 12 hours per week and 46 hours per month		
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	☐ Yes ☑ No		
K: Approximate percentage of total workers on highest overtime hours:	40%		
L: Is overtime voluntary?	☐ Yes ☐ No ☐ Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Through workers contract letter, policy review and workers interview it was noted that workers of the factory were doing overtime on voluntary basis if required.	
Overtime Premiums			
M: Are the correct legal overtime premiums paid?	Yes No N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of <u>standard</u> wages: 200% of Basic Wage	
N: Is overtime paid at a premium?	∑ Yes ☐ No	N1: If yes, please describe % of workers & frequency: 100% of total workers are entitled to get overtime at premium rate (200% of Basic Wage). Workers are being paid overtime payment within 7 working days of every wage period.	

O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes	□ No □ Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) □ Collective Bargaining agreements □ Other
where relevant.	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other
	N/A
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	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)
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:
	N/A
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	Yes No Q1: If yes, please give details:
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	∑ Yes □ No

7: No Discrimination is Practiced

(Click here to return to summary of findings)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- Based from review of wage records and employees' interview, no discrimination was noted in hiring, compensation, access to training, promotion, termination or retirement.
- Anti-discrimination procedure on hiring, compensation, promotion and access to training was available during the audit.
- No worker was required to do the examination of the hepatitis B virus and HIV.
- The facility provides the same pay for male/female employees for same work of similar nature.
- There was an internal grievance mechanism where employees can produce grievances confidentially.
- Khurshid Alam Manager HR & Compliance was responsible for the investigation and disposal of discrimination case.

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

Details:

- Facility discrimination Policy.
- Appointment letter with terms and conditions for 52 out 52 selected samples.
- The hiring and termination procedure and leave application records
- Attendance records
- Termination records
- Training records
- Other legal benefit records

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male:97 % A2: Female3 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	0%
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability,	Hiring Compensation Access to training



gender, marital status, sexual orientation, union membership or political affiliation?:	☐ Promotion ☐ Termination or retirement ☑ No evidence of discrimination fou	nd
	C1: Please give details:	
Professional Development		
A: What type of training and development are available for workers?	All workers were given Health & operation training provided on specworkers.	
B: Are HR decisions e.g. promotion, training, compensation based on	∑ Yes □ No	
objective, transparent criteria?	If no, please give details:	
	Non-compliance:	
1. Description of non-compliance: NC against ETI NC against Lo code: None observed	ocal Law NC against customer	Objective evidence observed: (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: None observed		Objective evidence observed:
Local law or ETI requirement: Not Applicable		Not Applicable
Comments: Nil		
G	ood Examples observed:	
Description of Good Example (GE): None observed		Objective Evidence Observed: Not Applicable

8: Regular Employment Is Provided

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

ETI

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

Additional Elements: Responsible Recruitment

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

Current Systems and Evidence Examined

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

Current systems:

- All permanent workers were recruited by the factory directly.
- Appointment letters are to issue to all 52 out of 52 selected workers.
- Factory does not employ any migrant workers.
- No labour agency was used to hire workers.
- No temporary worker, apprenticeship schemes or home worker was identified by the auditors.
- No subcontractor was used by factory.

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

Details:

- Facility Employment Policy
- The hiring and termination practises
- Personal files
- Payroll records
- Personnel files were checked and they all include a copy of employee's contract
- Management interview and employee interview



Non-compliance:		
1. Description of non-compliance: NC against ETI NC aga code:	ainst Local Law 🔲 NC against customer	Objective evidence observed: (where relevant please add photo numbers)
None observed		, , , , , , , , , , , , , , , , , , , ,
Local law and/or ETI requirement: Not Applicable		Not Applicable
Recommended corrective action: Not Applicable		
	Observation:	
	Observation.	I
Description of observation: None observed		Objective evidence observed:
Local law or ETI requirement: Not Applicable		Not Applicable
Comments: Nil		
	Good Examples observed:	
Description of Good Example (GE)	:	Objective Evidence Observed:
None 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? A: Were all workers presented Understood by workers Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:		ibe finding and specific
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	Yes No B1: If yes, please describe details and specifi affected:	c category(ies) of workers

	Any transport costs betw	d or processing fees lodging costs after employment offer veen work place and home er commencement of employment tation fees deposits y assets
D: If any checked, give details: N/A	4	
country of which they are not a national		•
migrant workers:		
B: Please give details about recruitment agencies for migrant workers:	· ·	country recruitment agencies) used: f (outside of local country) recruitment
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	Yes No C1: Please describe finding:	C2: Observations:
D: Are Any migrant workers in skilled, technical, or management roles Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)	Yes No D1: If yes, number and	d example of roles:

NON-EMPLOYEE WORKERS

Recruitment Fees:				
A: Are there any fees?	☐ Yes ☒ No			
B: If yes, check all that apply:	Serv App Reco Place Skills Cert Meco Pass Worl Any Any Any Any Any Any Other	Recruitment / hiring fees Service fees Application costs Recommendation fees Placement fees Administrative, overhead or processing fees Skills tests Certifications Medical screenings Passports/ID's Work / resident permits Birth certificates Police clearance fees Any transportation and lodging costs after employment offer Any transport costs between work place and home Any relocation costs after commencement of employment New hire training / orientation fees Medical exam fees Deposit bonds or other deposits Any other non-monetary assets Other If other, please give details:		
C: If any checked, give	N/A	mior, piedse give details.		
details:				
		Agency Workers (if applicable) who are not directly paid by the site, but paid by the agency, Usually the and the wages of the individual workers are paid by the agency.)		
A: Number of agencies used (average):		A1: Names if available: N/A, factory does not use any agency.		
B: Were agency workers' age / pay / hours included within the scope of this audit?		☐ Yes ☐ No		
C: Were sufficient documents for agency workers available for review?		☐ Yes ☐ No		
D: Is there a legal contract / agreement with all agencies?		☐ Yes ☐ No D1: Please give details:		



E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	Yes No E1: Please give details:
	Contractors: perally individuals who supply several workers to a site. Usually the contractors are workers are paid by the contractor. Common terms include, gang bosses, labor provider,
A: Any contractors on site?	Yes No A1: If yes, how many contractors are present, please give details:
B: If Yes , how many workers supplied by contractors?	
C: Do all contractor workers understand their terms of employment?	Yes No C1: Please describe finding:
D: If Yes , please give evidence for contractor workers being paid per la	w:



8A: Sub-Contracting and Homeworking

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

- A site tour showed that all production processes were present inside this factory premises.
- Factory is not using any subcontractor.
- Facility is not using any home workers.
- Factory has a sub-contract policy, if the client's product need subcontractor, they would inform the client.

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

Details:

- Site tour
- Production record review
- Materials in/out records review
- Management interview
- Worker interview

Non-compliance:		
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)	
None observed		
Local law and/or ETI requirement: Not Applicable	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: Nil			
	Good Examples ob	served:	
Description of Good Example (GE):			Objective Evidence Observed:
None observed			Not Applicable
		•	
Sun	nmary of sub-contracting Not Applicable p		
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	Yes No A1: Please describe:		
B: If sub–contractors are used, is there evidence this has been agreed with the main client?	Yes No B1: If Yes , summarise de	etails:	
C: Number of sub- contractors/agents used:			
D: Is there a site policy on sub- contracting?	Yes No D1: If Yes , summarise d	etails:	
E: What checks are in place to ensure no child labour is being used and work is safe?			
Summary of homeworking – if applicable Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	Yes No A1: If Yes , summarise d	etails:	
B: Number of homeworkers	B1: Male:	B2: Female:	Total:



C: Are homeworkers employed direct or through agents?	☐ Directly ☐ Through Agents	C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	☐ Yes ☐ No	
E: How does the site ensure worker hours and pay meet local laws for homeworkers?		
F: What processes are carried out by homeworkers?		
G: Do any contracts exist for homeworkers?	Yes No G1: Please give details:	
H: Are full records of homeworkers available at the site?	☐ Yes ☐ No	

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

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	Yes No A1: Please give details: Facility has provided complaint or suggestion box at the toilet area where workers can submit their complaint or suggestion in the confidential manner. Also, the facility has worker representative committee through which worker can raise their voice to the senior management.
B: If Yes , are workers aware of these channels and have access? Please give details.	Based on interview with workers, they understood how to use these channels.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion box, issues were discussed at senior management level and investigated by the responsible person.
D: Which of the following groups is there a grievance mechanism in place for?	☐ Workers ☐ Communities ☐ Suppliers ☐ Other D1: Please give details: As per management interview, document review and workers interview, there was a policy on Harsh Treatment. There is an internal process for grievance, which is complaint box and grievance committee where workers can report any grievances (harassment, bullying, discrimination etc.); any received complaint will be handled by management, without any reprisal for the worker in question.
E: Are there any open disputes?	Yes No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	X Yes No No F1: If no, please give details

G: Is there a published and transparent disciplinary procedure?	
	G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	
	H1: If no, please give details
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages	☐ Yes ☐ No
section)?	11: If yes, please give details

Current Systems and Evidence Examined

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

Current systems:

- Management had established a disciplinary procedure
- Worker interview confirmed that workers were aware of the disciplinary procedure.
- Disciplinary procedure was displayed on the facility's notice board.
- The factory treated every worker with respect and dignity, and no worker was subject to any physical, sexual, psychological or verbal harassment and abuse.
- As per management interview, documents review and workers interview, there was a policy on Harsh Treatment.
- There was an internal process for grievance, which was complaint box where workers could report any grievances.

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

Details:

- The relevant policy on prevention of harassment and abuse Internal grievance procedure documentation.
- Management interview and workers' interview
- Anti-harassment training records
- Grievance mechanism
- Training records



Non-compliance:		
Description of non-compliance: NC against ETI NC against Local Law NC against customer code: Name abserted.	Objective evidence observed: (where relevant please add photo numbers)	
None observed Local law and/or ETI requirement: Not Applicable	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: Nil		
Good Examples observed:		
Description of Good Example (GE):	Objective Evidence Observed:	
None observed	Not Applicable	



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:

- Based on documents review, factory management representation and worker interview, all workers in the factory were Bangladeshi, no migrant worker from other country was noted in the facility.
- All workers had the proper legal rights to work in this region.
- All of the workers were recruited directly by the facility.
- No foreign worker was used by the factory.

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

Details:

- Management interview and workers' interview
- Hiring procedure
- Personnel files

Non-compliance:		
Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)	
None observed	, , , , , , , , , , , , , , , , , , ,	
Local law and/or ETI requirement: Not Applicable	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: Nil	

Good examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:
None observed	Not Applicable

10. Other issue areas 10B4: Environment 4-Pillar

(Click here to return to summary of findings)

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

B.4. Compliance Requirements

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

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

10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements 10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).

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

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

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

B4. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- Through onsite inspection, interviews and document review, no violation of environment pollution was observed. The factory had established an environmental policy, covering their environmental impact, which is communicated to all appropriate parties,
- Factory management has appointed a designated person Mr. Iqbal Hossain-Sr. Executive (HR & Compliance) to take care about environmental requirement.
- Main production process of the factory is Cutting, Embroidery, Sewing, Ironing, Finishing & Packing.
- Facility uses chemical for their production process and provided training and Personal Protection Equipment.
- MSDS, label and secondary containments were found with all the chemicals. However, MSDS was not updated for spot lifter-833 in the spot lifting room. NC Raised.
- Factory management has the agreement with waste collect company for the disposal of general wastages like cotton fabrics, poly, cone, chemical containers, metal, wastage cartons, papers etc. Factory management is aware about the environmental impact of their business activities.



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

Details:

- Environmental policy and procedure,
- Training record,
- Different types of records for energy and water consumption,
- License,
- Chemical inventory etc.

Non-compliance:		
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None observed	Objective evidence observed: (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: None observed	Objective evidence observed:	
Local law or ETI requirement: Not Applicable	Not Applicable	
Comments: Nil		
Good examples observed:		
Description of Good Example (GE):	Objective Evidence Observed:	
None observed	Not Applicable	



Environmental Analysis (Site declaration only – this has not been verified by auditor. Please state units in all cases below.)		
A: Is there a manager responsible for Environmental issues (Name and Position):	Mr. Iqbal Hossain-Sr. Executive (HR & Compliance)	
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes No B1: Please give details: The factory had conducted risk assessment on the environmental impact of the site, including implementation of controls to reduce Identified risk.	
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	☐ Yes ☒ No C1: Please give details: The site has no recognised environmental system certification.	
D: Does the site have an Environmental policy? (For guidance, please see Measurement criteria)	Yes No D1: If yes, is it publicly available? During audit, policy was found available.	
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	Yes No E1: Please give details: Factory had environmental policy and procedure. Environment procedures defined for implementation and management of environmental performance.	
F: Does the site have a Biodiversity policy? (For guidance, please see Measurement criteria)	∑ Yes ☐ No	
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please gives details. (For guidance, please see Measurement criteria)	☐ Yes ☑ No G1: Please give details: Facility does not have such certification yet.	
H: Have all legally required permits been shown? Please gives details.	Yes No H1: Please give details: Factory had environmental legal permits.	
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	Yes No N/A 11: Please give details: Facility does not use hazardous chemicals for their production process.	
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes No J1: Please give details: Facility has environmental policy and procedure for managing client's requirements.	
K: Facility has reduction targets in place for environmental aspects e.g. water consumption	Yes □ No	



and discharge, waste, energy and green-house gas emissions:		e facility management set al to reduce water, energy ssion.
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	∑ Yes ☐ NoL1: Please give details recycling system.	: Facility has no waste
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	_	facility has measuring and of key utilities of water, rces.
N: Has the facility checked that any Sub- Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	☐ Yes ☑ No N1: Please give details:	
Usage/Discharge analysis		
Criteria	Previous year: Please state period: January to December 2021	Current Year: Please state period: January to November 2022
Electricity Usage: Kw/hrs	679,990 kw	605946 kw
Renewable Energy Usage: Kw/hrs	20,399 kw	18,178 kw
Gas Usage: Kw/hrs	49,600 m³	85150 m³
Has site completed any carbon Footprint Analysis?	☐ Yes ☒ No	☐ Yes ⊠ No
If Yes , please state result	Not Applicable	Not Applicable
Water Sources: Please list all sources e.g. lake, river, and local water authority.	Ground waterRain waterHarvesting	Ground waterRain waterHarvesting
Water Volume Used: (m³)	7177.8 m³	7897 m³
Water Discharged: Please list all receiving waters/recipients.	Municipal Drainage	Municipal Drainage
Water Volume Discharged: (m³)	4306 m³	4738 m³
Water Volume Recycled: (m³)	No	No

Total waste Produced (please state units)	11037 kg	20670 kg
Total hazardous waste Produced: (please state units)	620 kg	735 kg
Waste to Recycling: (please state units)	5500 kg	7040 kg
Waste to Landfill: (please state units)	No	No
Waste to other: (please give details and state units)	No	No
Total Product Produced (please state units)	48,30,000 pcs	50,42,000 pcs

10C: Business Ethics – 4-Pillar Audit

(Click here to return to summary of findings)

To be completed for a 4-Pillar SMETA Audit

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

• Khurshid Alam – Manager HR & Compliance was the designated person responsible for implementing standards concerning Business Ethics. The company established a business ethics policy to communicate both externally and internally and provide training on business ethics.

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

Details:

- The company business ethics policy including Bribery & Corruption
- Training records
- Worker handbook
- Reports from Anonymous email account
- Management interview



Non-compliance:		
1. Description of non–compliance: NC against ETI/Additional Elements NC against customer code: None observed Local law and/or ETI/Additional Elements required Not Applicable Recommended corrective action: Not Applicable	□ NC against Local uirement:	Objective evidence observed: (where relevant please add photo numbers) Not Applicable
	Observation	
Description of observation: None observed Local law or ETI requirement: Not Applicable Comments: Nil		Objective evidence observed: Not Applicable
Good examples observed:		
Description of Good Example (GE): None observed		Objective Evidence Observed: Not Applicable
A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate? B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues? C: Is the policy updated on a regular (as needed) basis?	 ☑ Internal Policy ☑ Policy for third parties including A1: Please give details: The fact Policy and the policy communic internally and externally. The base application performed through the providing policy requirement to e ☑ Yes ☑ No B1: Please give details: The site pabout sales and logistics membreview. ☑ Yes ☑ No 	fory has a Business Ethics cated and applied both oth communication and aining, notice board and atternal stake holders.
D: Does the site require third parties including suppliers to complete their own business ethics training	C1: Please give details: Factory h business ethics policy and proced Yes	

D1: Please give details: Site has conducted training on anti- corruption and bribery policy to their own supplier and employees

Other findings

Other Findings Outside the Scope of the Code

Nothing to report

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)

Nothing to report



Appendix 1

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

Not Applicable please x



Photo Form

NC Photo



NC 1: 10 workers were partially blocked by goods in sewing section at 3rd floor of production building.



NC 2: Around 35% workers were not using PPE (face mask) in cutting sections.



NC 3: Around 35% workers were not using PPE (face mask) in sewing sections.



NC 4: Around 35% workers were not using PPE (face mask) in finishing sections.



NC 5: Garments, fabric and cartons were stored near 01 out of 04 stairwells.



NC 6: Facility had canteen for the workers but during the audit canteen was not no-operational.

General Photo



Factory Name



Factory Gate



Front View of the Factory









Factory Roof Top

Cutting Section

Embroidery Section







Sewing Section

Finishing Section

Ironing Section







Packing Section

Accessories Store

Fabric Store







Evacuation Plan



Fire Fighting Equipment









Fire Extinguisher

Fire Hose

Fire Pump Room







Fire Alarm Siren

Fire Alarm Switch

Smoke Detector







Exit Sign

Exit Door

Fog Light







Emergency Light

PA (Public Address) System

Aisles Marked







First Aid Box

Drinking Water Point

Workers' Toilet Area







First Aid Box

Drinking Water Point

Gents Workers' Toilet Area







Ladies Workers' Toilet Area

Complaint Box

Notice Board





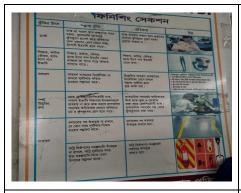




Attendance Machine

Worker Committee Members

Safety Committee Members







Finishing Risk Assessment

Emergency Procedure

Emergency Contract Number







Emergency Contract Number



Medical Room



Child Care Room



Workers Dining



Generator









Boiler Compressor Sub Station





For more information visit: <a>Sedexglobal.com

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

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

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

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

Click here for Supplier (B) members:

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

Click here for Auditors:

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