# Sedex Members Ethical Trade Audit (SMETA) Report

Version 5.0 Dec 2014, 2/4 Pillar Audit; replaces version 4.0 May 2012

Supplier name:	Factory LLP		
Site country:	India		
Site name:	Factory LLP		
Parent Company name (of the site):	Factory LLP		
SMETA Audit Type:	2-Pillar		
Date of Audit	20-21/03/2017		

#### Audit Content:

- (1) A SMETA audit was conducted which included some or all of Labour Standards, Health and Safety, Environment and Business ethics. The SMETA Best Practice Guidance Version 5 December 2015 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
  - FTI Base Code
  - SMETA Additions
    - Management systems and code implementation,
    - 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 new ETI Working Hours Clause

Now integrated into this latest SMETA version.

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.





## Intertek

Audit Company Name: Intertek		Rep	ort Owner (payee):
Sedex Company Refere (only available on Sedex			1
Sedex Site Reference: (only available on Sedex s	System)		
Audit Conducted By			
Commercial		Purchaser	
NGO		Retailer	
Trade Union		Brand Owner	
Multi-stakeholder		Combined Audit (sele	ect all that apply)
Auditor Reference Num (If applicable)	ber:	Not applicable	

### **SMETA Declaration**

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

Any exceptions to this must be recorded here (e.g. different sample size): None

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

Lead auditor: Pradeep Kungrani

Team auditor: None

Interviewers: Pradeep Kungrani

Date: March 20 & 21, 2017



### Non-Compliance Table

Issue (please click on the issue title to go direct to the appropriate audit results by clause)		(Only check be and only in the	Record the number of issues by line*:				
		ETI Base Code	Local Law	Additional Elements (i.e. not part of ETI code)	NC	Obs	GE
0	Management systems and code implementation				00	00	00
1	Employment Freely Chosen				00	00	00
2	Freedom of Association				00	00	00
3	Safety and Hygienic Conditions		⊠		05	01	00
4	Child Labour				00	00	00
5	Wages and Benefits				00	00	02
6	Working Hours				00	00	00
7	<u>Discrimination</u>				00	00	00
8	Regular Employment				00	00	00
8A	Sub-Contracting and Homeworking				00	00	00
9	Harsh or Inhumane Treatment				00	00	00
10A	Entitlement to Work				00	00	00
10B2	Environment 2-Pillar				NA	NA	NA
10B4	Environment 4-Pillar				00	00	01
10C	Business Ethics					00	00

<sup>\*</sup>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.



### **Summary of Findings**

	ary of main findings: (positive and negative) give a short summary of the main findings per clause)
	eriodic audit was conducted by Intertek India Pvt. Ltd. There was 01 auditor, who assessed the facility's ions in 1.5 days. The scope of this audit was based on 4 Pillar SMETA systems.
Auditor manag	ew of opening meeting, facility management responses:- s entered the facility at 09:17 am on March 20, 2017 and conducted an opening meeting with facility ement according to the ETI Base Code. Mr. — Managing Partner, Mrs. —— - Manager Admin was present in the meeting and assured full co-operation to this audit.
	ummary :-
	The products manufactured at this site are Cotton, Canvas & Jute Bags.  Overall responsibility for meeting the standards is taken by Mrs. ————————————————————————————————————
	The youngest worker on site was 17 years old. Further noted that facility has obtained Form No. 5 Certificate of fitness for young person from Certifying Surgeon Industrial Safety & Health Saurashtra & Kutch region Rajkot.
	There is no union at this factory.
5.	Worker committee is not a legal requirement. However facility has formed a grievance committee which meets at regular intervals to discuss any grievance related issues. Further, the members from grievance committee were not present during opening and closing meeting and management stated that the minutes of meeting will be communicated to them shortly.
	There is evidence of male employees and female employees hired in the facility. The distribution is Male 55%, Female 45% (employees).
	The facility has not used any subcontractors and home workers.
9.	The facility has no peak season and production is consistent throughout the year.  10 employees were selected for interview. Out of which 04 employees were interviewed as 01 group of 04 employees (04 Female) and the remaining of 06 Male employees were interviewed individually.
	All workers said they were satisfied with their employment at the factory.  They also said they were able to make suggestions to their supervisors and sometimes they had seen these suggestions used.
12	10 Records to show wages and hours were taken for 3 months from the period March 2016 to February 2017.
14	Standard hours on site were on average 171.92 hours/month with 1 day off in every 7-day-period.  Legal minimum wage was paid to all unskilled workers; legal minimum wage was INR 296.80 per day (7716.80 per month). Facility has paid INR 296.80 per day (7716.80 per month) which meets the Legal minimum wage.
	No Overtime hours were observed in any of the sampled months.
16	The employees work for 6 days a week in four shifts. The normal working hours are as follows:  1st Shift: 08:30am to 05:30pm (Male Workmen)
	2 <sup>nd</sup> Shift: 09:00pm to05:30 am (Staff and Women Workmen)
	3 <sup>rd</sup> Shift: 08:00am to 04:00pm (For Security Guards) 4 <sup>th</sup> Shift: 04:00pm to 12:00am (For Security Guards)
	5 <sup>th</sup> Shfit: 12:00pm to 06:00am (For Security Guards)
	Lunch Break: 30 minutes (12:30pm to 01:00pm for Women Workmen) & (01:00pm to 02:00pm for Male Workmen) & For Security Guards (Staggered)



Tea Break: 15 minutes twice in a day (11:00am to 11:15 am and 03:00 pm to 03:15pm for production and non-production employees). For Security guards (Staggered).

Weekly holiday: Wednesday for production and non-production employees & Sunday for Staff Members.

17. Based on the available wage and time records employees' wages are calculated on monthly basis and paid on or before 07<sup>th</sup> of next month to Company employees.

### Summary of Findings (Positive Observations and Negative Observations) Positive Observations:

Management approach towards this audit was very positive and they assured necessary steps to improve labor Standard in their facility.

#### **Negative Observations:**

Non-compliances were observed in the areas of "Working Conditions are Safe and Hygienic". Details are given below:

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

- It was noted from tour of the facility that, fire alarm call points (MCB) are not provided in the facility. Further
  noted that, fire alarm installed is connected to electric switch board and electric switch button is used to ring
  the fire alarm for evacuation drills conducted in the facility.
- 2. It was noted from Site tour that facility has not installed industrial specific emergency lights at
  - i) Exit door of RM Stores
  - ii) Staircases leading from First Floor to Ground Floor
  - iii) Exit door of Printing Section
  - Further noted that, remaining areas of production building are provided with self-battery back-up emergency lights.
- It was noted from the tour of the facility that, 17 out of 63 Sewing Machines located at first floor of production building are not provided with Lower pulley guards.
- It was noted from tour of the facility that, facility has not provided Cut-Resistant Gloves to the employees
  working with the cutting machine in cutting section located on ground floor of production building.
- It was noted from tour of the facility that, handrails were not provided to the staircases from terrace to first floor wherein cartoons and inks are stored by the facility.

#### Observation:

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

- It was noted from the review of records that, facility has obtained Fire NOC from the fire department dated 15/04/2015 which is valid till April 2017. Further noted that, facility has installed most of firefighting equipment's like Fire Extinguisher, Fire Alarm and Water Tank with capacity of 50,000 Litres. However, only two of the conditions written in FIRE NOC are not yet provided / installed in the facility.
  - a) Point No. 8 Fire Bucket (04 Nos.) not provided.
  - b) Point No. 10 Fire Hydrant not installed.

#### Good Examples :

#### 5: Wages and Benefits

Facility provides interest free loan to all employees.



Facility has issued gift voucher of Rs.1000/- to all employees during the festival of Diwali celebrated once in a year.

#### 10B4 : Environment 4-Pillar

1. Facility does tree plantation activities within the premises at least once in a year.

#### Other Good Examples / Community Benefits:

- Facility has organized Dandiya Raas for employees and its families during the festival of Navratri celebrated in India dated 12/10/2016.
- Facility has initiated employee engagement activity i.e., organizing a cricket match tournament for all employees dated 27/01/2017.
- Facility has initiated employee welfare activity program through which some part of the medical treatment expenses for the employee's family member are paid by them. If the said employee is not in a state to bear the complete medical expenses.





### **Audit Details**

Audit Details						
A: Report #:	IDA-12784-02					
B: Time in and time out (SMETA BPG recommends 9.00-17.00 hrs. if any different please state why in the SMETA declaration)	Day 1 Time in 09:17 AM Day 1 Time out: 06.40 PM	Day 2 Time in: 09:30 AM Day 2 Time out: 12:30 PM	Day 3 Time in: NA Day 3 Time out: NA			
C: Number of Auditor Days Used: (number of auditor x number of days)	1 Auditor X 1.5 Man-days					
D: Audit type:	☐ Full Initial ☐ Periodic ☐ Full Follow-up ☐ Partial Follow-Up ☐ Partial Other - Define					
E: Was the audit announced?	□ Announced     □ Semi – announced: Window detail: weeks     □ Unannounced					
F: Was the Sedex SAQ available for review?	⊠ Yes □ No					
If <b>No</b> , why not? (Examples would be, site has not completed SAQ, site has not been asked to complete the SAQ.)	Not Applicable					
G; Any conflicting information SAQ/Pre- Audit Info to Audit findings?	☐ Yes ☑ No If Yes, please capture	detail in appropriate audi	it by clause			
H: Auditor name(s) and role(s):	Pradeep Kungrani – Le	ead Auditor				
I: Report written by:	Pradeep Kungrani					
J: Report reviewed by:	Meeta Pednekar					
K: Report issue date:	3 April 2017					
L: Supplier name:	Factory LLP					
M: Site name:	Factory LLP		У-			
N: Site country:	India		7			
O: Site contact and job title:	Mr — Manager Admin					



P: Site address: (Please include full address)	(India).				
Site phone:					
Site fax:	Not Available				
Site e-mail:					
Q: Applicable business and other legally required licence numbers: for example, business license no, and liability insurance	Business License No Valid up to 31 <sup>st</sup> December 2017 (up to 250 employees)				
R: Products/Activities at site, for example, garment manufacture, electricals, toys, grower	Manufacturing of Cotton, Canvas & Jute Bags				
S: Audit results reviewed with site management?	Yes				
T: Who signed and agreed CAPR (Name and job title)	Mrs. Partner				
U: Did the person who signed the CAPR have authority to implement changes?	Yes				
V: Present at closing meeting (Please state name and position, including any workers/union reps/worker reps):	Factory Management :  Mr. Managing Partner  Mrs. Partner  Mr Manager Admin  Auditors :  Mr. Pradeep Kungrani – Lead Auditor				
W: What form of worker representation / union is there on site?	☐ Union (name) ☐ Worker Committee ☐ Other (Grievance Committee) ☐ None				
X: Are any workers covered by Collective Bargaining Agreement (CBA)	☐ Yes ☒ No				
Y: Previous audit date:	23 & 24 December 2015				
Z: Previous audit type:		SMETA 2-pillar	SMETA 4-pillar	Other	
	Full Initial				
	Periodic				



Full Follow-Up Audit			
Partial Follow- Up			
Partial Other*			
*If other, please	define: Not ap	plicable	



### Audit Scope/Actual Results

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: 8 hours per day and 48 Hours per week	8 Hours per day & 48 hours/week	☐ Yes ☑ No
B: Legal Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week and month)	Legal maximum: 2 hours / Day, 12 hours / Week & 50 hours / Quarter	No overtime hours found worked by any sampled employee	☐ Yes ☑ No
C: Legal age of employment: (Minimum legal and actual minimum age at site)	Legal minimum: 14 years completed	17 years old	
D: Legal minimum 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: The local minimum wages of Gujarat State are as follows: Unskilled - INR 296.80 per day, Semi - Skilled - 304.80 per day, Skilled - 313.80 per day, effective from 1st October 2016 to 31 March 2017	Minimum wage paid by the facility to unskilled employee is INR 296.80 per day (7716.80 per month), semiskilled employee is INR 304.80 per day (7924.80 per month).	☐ Yes ☑ No
E: Legal minimum overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr ,day, week and month)	Legal minimum: 200% of normal rate of wages for overtime work on weekdays, rest days and holidays	No overtime hours found worked by any sampled employee however if overtime done it will be calculated as per 200% of normal rate of wages for overtime work on weekdays, rest days and holidays	☐ Yes ☑ No

Audit company: Intertek Report reference: IDA-12784-02 Date: 20-21/03/2017



Audit Scope  (Please select the code and additional requirements that were audited against during this a	nudit)
2–Pillar Audit	
10B4: Environment 4–Pillar	
10C: Business Ethics	
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: The main 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.



### **Audit Overview**

Audit Overview						
Y	Management		Worker Representatives		s	
Audit attendance	Senior management		Worker Committee representatives		Union repr	esentatives
A: Present at the opening meeting?		☐ No	☐ Yes	⊠ No	☐ Yes	⊠ No
B: Present at the audit?	☑ Yes	☐ No	☐ Yes	⊠ No	Yes	⊠ No
C: Present at the closing meeting?	☑ Yes	☐ No	☐ Yes	⊠ No	☐ Yes	⊠ No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Works committee is not a legal requirement					
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	No union exist in the facility at present.					
(Include size, location and age of site. Also include structure and number of buildings)	up area was	s appox 22 ation since eriphery): sors - 01 - 01 (75 K	cupied was a 32 square me January 200	etres. The fa		
	Productio Building	n	Description		Rema	rk, if any
	Building 1- Ground Flo	or I	RM Store, Co Packing, Insp Finished Goo	pection &	None	
	Building 1- First Floor		Sewing, Finishing, Printing, Admin Office & Conference Room			
	Is this a sh building?	ared	No		None	
G: Site function:		Product S	/Manufacture	er		

......



	Labour Provider Pack House Primary Producer Service Provider Sub-Contractor
H: Month(s) of peak season: (if applicable)	Consistent throughout the year
I: Process overview: (Include products being produced, main of	operations, number of production lines, main equipment used)
The main production process flow cha	by facility are Cutting, Printing, Iron & Sewing, art is listed below: tting – Printing – Sewing – Thread Cutting – Checking – Pressing – Packing –
J: Attitude of workers: (Include their attitude to management, wo included) Note: Do not document any info	orkplace and the interview process. Both positive and negative information should be ormation that could put workers at risk
information was reported during the o	atisfied with the management and facility environment and no negative course of interview on the day of audit. All interviewed employees confirmed that be and they are free to express their concerns directly to the management.
K: Attitude of workers committee/unio (Include their attitude to management, wo included) Note: Do not document any info	orkplace and the interview process. Both positive and negative information should be
Members from worker committee look	ked very positive towards the management and no negative information reported.
L: Attitude of managers: (Include attitude to audit, and audit proces	ss. Both positive and negative information should be included)
documentation requested for review v	ositive attitude towards this audit during the whole audit process. All was provided timely. At the end of the audit, all the non-compliances were e facility management stated that they will take corrective actions on the non-



### **Key Information**

Key Information (click on the key information	ation title to go to a	appropriate section of the report)
A: Do all workers (including migrant workers) have contracts of employment/employment agreements?  (Go to clause 8 – Regular Employment)	⊠ Yes □ No	
B: Are maximum standard/contracted working hours clearly defined in contract/employment agreements?  (Go to clause 8 – Regular Employment)	⊠ Yes □ No	
C: Were appropriate records available to verify hours of work and wages?  (Go to clause 5 – Living Wage)	⊠ Yes □ No	
D: Were any inconsistencies found? (if yes describe nature) (Go to Wages Table)	☐ Yes ☑ No	☐ Poor record keeping ☐ Isolated incident ☐ Repeated occurrence
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?  (Go to clause 5 – Living Wage)	Wages found:	Please indicate the breakdown of workforce according to earnings:
	☐ Below legal min ☐ Meet ☐ Above	% of workforce earning under min wage% of workforce earning min wage % of workforce earning above min wage
F: % of piece rate workers: (if applicable)	No piece rate wo	rkers on this site
G: Do the standard/contracted hours stated in a contract/employment agreement exceed the law or 48 hours per week?  (Go to clause 6 – Working hours)	☐ Yes ☑ No	
H: If yes, what are the standard/contracted hours per week as stated in the contract/employment agreement?  (Go to clause 6 – Working hours)	NA hrs/week	NIL hrs/week
I: Combined hours (standard/contracted plus overtime = total hours) over 60 per week found?  (Go to Working Hours Analysis)	☐ Yes ☑ No	
J: Are workers provided with 1 day off in every 7-day-period, or 2 in 14-day-period (where the law allows)?	Yes No If 'No', please ex	plain:

Audit company: Intertek Report reference: IDA-12784-02 Date: 20-21/03/2017



K: Are the correct legal overtime premiums paid? (Go to Wages Table)	∑ Yes     ☐ No     ☐ N/A – there is no legal requirement to OT premium     No overtime hours found worked by any sampled employee
L: Please state what actual OT is paid. (As a percentage of the workers standard rate) (Go to Working Hours Analysis)	Please give details of overtime premium as a % of standard wages:  ☐ 0% ☐ 1% - 115% ☐ 116% - 124% ☐ 125% - 199% ☑ 200%+ Please give details: No overtime hours found worked by any sampled employee. Facility had a policy to compensate all OT hours at 200% of regular rate of wages
M: Is there any night production work at the site?	☐ Yes ☐ No
N: % of workers living in site provided accommodation (if applicable):	No
O: Age of youngest worker found: (Go to clause 4 - Child labour)	17 Years
P: Workers under 18 subject to hazardous work assignments?  (Go to clause 3 – Health and Safety)	☐ Yes ☑ No
% of under 18's at this site (of total workers)	NIL%
Q: What form of worker representation/union is there on site?  (Go to clause 2 – Freedom of Association)	☐ Union (name) ☐ Worker Committee ☑ Other (Grievance Committee) ☐ None
R: Is it a legal requirement to have a union? (Go to clause 2 – Freedom of Association)	☐ Yes ☑ No
S: Is It a legal requirement to have a workers committee?  (Go to clause 2 – Freedom of Association)	☐ Yes ☑ No
T: Is there any other form of effective worker/management communication channel? (Other than union/worker committee) (Go to clause 2 – Freedom of Association)	Yes No Describe: Facility has provided suggestion box, where employees are free to express their problems / suggestions / complaints for any grievances. While interviewing, all employees reported that they are free to approach the management for any problem.
U: Are there any External Processes? (Go to clause 8A – Sub–contracting and Home working)	□ Sub-Contracting □ Homeworking □ Other External Process ☑ No external processes



### **Management Systems**

Management Systems:	
A: Nationality of Management	Indian
B: Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 55 % Female: 45 %
C: Majority nationality of workers	Indian
D: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	15 %
E: Were accurate records shown at the first request?	⊠ Yes □ No
F: If No, why not?	Not Applicable
G: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	Yes No Please describe: The Facility has not been subject to any fines in last 12 months.
H: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	Yes No Please describe: Facility has policy and procedure to reduce the risk of forced labour, Child labour, discrimination, harassment & abuse These policies are displayed at notice board in local language and Communicated to all employees.
I: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Facility has policy and procedure to reduce the risk of forced labour, Child labour, discrimination, harassment & abuse These policies are displayed at notice board in local language and Communicated to all employees. All employees were aware about these policies and procedures.
J: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	
K: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	-Training records including interaction with management / employees shows and confirms that training given to all managers and workers was effective Introductory training record for new employees
L: Are there published, anonymous and/or open channels available for reporting any	⊠ Yes □ No



violations of Labour standards and H&S or any other grievances to a 3 <sup>rd</sup> party?	Please describe: Facility has provided suggestion box for any complaints/suggestions.	
M: If Yes, are workers aware of these channels? Please give details.	Yes. Workers are aware of suggestion box for any complaints/suggestions.	
N: Have health and safety risks been identified e.g. through internal audits, formal risk analysis process, worker involvement etc.?	Yes No Please describe: Facility has established potential risk analysis system with necessary corrective actions to reduce these evaluated risks. Further Facility has Health and Safety Committee and has regular meetings with its members. Last meeting was held on 24/01/2017.	
O: If Yes, has effective action been taken to reduce or eliminate these risks?	Yes. Facility has Health and Safety Committee and has regular meetings with its members. Last meeting was held on 24/01/2017.	
P: Are accidents recorded?		
Q: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work hours?		
R: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	Yes, Business License No Valid up to 31st December 2017 (up to 250 employees)	
S; 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).	None	
T: Is there a Human Resources manager/department? If Yes, please detail.		



### **Worker Analysis**

Worker Analysis								
		Local			Migrant			7
	Permanent	Tempora	ary Agency	Permanent	Temporary	Agency	Home workers	Tota
Worker numbers – male	33	00	00	00	00	00	00	33
Worker numbers – female	26	00	00	00	00	00	00	26
Total	59	00	00	00	00	00	00	59
Number of Workers interviewed	10	00	00	00	00	00	00	10
Contractors: (Individuals supplying we A: Any contractors on		th the work	kers paid by d ☐ Yes ☑ No	contractors, not	by site)			
B: If Yes, how many w contractors	vorkers supplie	ed by	Not Applica	able as there i	s no such em	ployees e	employed.	
C: Are all contractor w to law?	orkers paid ac	ccording	Yes No					
If Yes, Please give ev workers being paid ac			Not Applica	able as there i	s no such em	ployees e	employed.	
Migrant Workers: (Please see SMETA Bes	st Practice Guid	ance and l	Measuremen	Criteria for defi	initions of migr	ant worker	s)	
D: Originating Locations/Countries:				re is no such e	- SV/10			
E: Type of work under migrant workers :	taken by	Not Applic	cable as the	re is no such e	employees er	nployed.		y
F: Were migrant work		Yes No						



If yes, please give details.	Please describe: Not Applicable as there is no such employees employed.
If Yes, is there a contract with the agency? Provide details of agencies and contractual arrangements including any fees lodged during the recruitment process.	Not Applicable as there is no such employees employed.
G: Does the site have a system for checking labour standards of agencies?  If yes, please give details.	Yes No Please describe: Not Applicable as there is no such employees employed.
H: Percentage of migrant workers in company provided accommodation:	Not Applicable as there is no such employees employed.



### **Audit Results by Clause**

#### 0: Management systems and Code Implementation

 Managements system and Code Implementation (click here to return to NC Table)

- 0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
- 0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
- 0.3 Suppliers are expected to communicate this Code to all employees.
- 0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

#### 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 interaction with the facility management, it was understood that the facility management has communicated to all the employees about the ETI base code requirements.
- Mrs. Partner is responsible for implementation of all the social compliance activities in the facility.
- 3. The facility has communicated the code to their suppliers and all its business associates.

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

- Facility Policy and Procedures
- Factory license No Valid up to 31st December 2017 (up to 250 employees)
- ETI base code
- Interaction with Management and Interview with employees.

Non-compliance:	
Description of non-compliance:      NC against ETI/Additional Elements     None Observed  NONE Observed  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: Not Applicable
Local law or ETI requirement: Not Applicable	The Application
Comments: Not Applicable	

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



### 1: Employment is Freely Chosen (Click here to return to NC-table)

#### ETI

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

#### Current Systems and Evidence Examined

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

#### Current systems:

Based from interaction with employees, management and review of records,

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

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

- · Facility Policy and Procedures
- Interaction with Management and Interview with employees

Non-compliance:	
Description of non-compliance:      NC against ETI/Additional Elements     NC against Local Law 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: Not Applicable	
Local law or ETI requirement: Not Applicable		

Audit company: Intertek Report reference: IDA-12784-02 Date: 20-21/03/2017



Comments: Not Applicable	
Good Examples observe	od:
Description of Good Example (GE): None Observed	Objective evidence observed: Not Applicable



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

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

(Click here to return to NC-table)

(Click here to return to Key Information)

#### ETI

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

#### Current Systems and Evidence Examined

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

#### Current systems:

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

- Facility encourages and respects all employees' rights to join union freely.
- Facility recognizes and encourages the right to freedom of association and collective bargaining under the law provision.
- The facility does not restrict employees on organizing trade unions and has an open approach to get associated with trade unions and their organizational activities without management interference.
- Facility has formed Grievance committee which consists of 06 members (02 from management and 04 from workmen). Meeting is held once in two months. Last conducted on 10/01/2017. The topics covered were general labour issues.
- Facility has posted suggestion box at accessible location where employees can share their concerns anonymously.
- There was no evidence of suppression of employees' rights.

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

- Facility Policy and Procedures.
- Suggestion Box.
- Grievance Committee Minutes dated 10<sup>th</sup> January 2017.
- Interaction with Management and Interview with employees.



	Non-compliance:	
Description of non-compliance:     NC against ETI/Additional Elements     None Observed	☐ NC against Local Law	Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI requirement: Not	Applicable	Not Applicable
Recommended corrective action: Not A	Applicable	
	Observation:	
Description of observation: None Observation   Local law or ETI requirement: Not Applicable		Objective evidence observed: Not Applicable
A: Name of union and union representative, if applicable:	Not Applicable	Is there evidence of free elections?  ☐ Yes ☐ No ☒ N/A
B: If no union what is parallel means of consultation with workers e.g. worker committees?	Facility has formed Grievance committee.	Is there evidence of free elections?  ☑ Yes ☐ No ☐ N/A
consultation with workers e.g. worker		☑ Yes ☐ No ☐ N/A
consultation with workers e.g. worker committees?  C: Were worker representatives/union	committee.  Yes No If Yes, please state how many:01  Facility has formed Grievance co	Yes □ No □ N/A representative
consultation with workers e.g. worker committees?  C: Were worker representatives/union representatives interviewed  D: State any evidence that union/workers committee is effective?  Specify date of last meeting; topics covered;	committee.  Yes No If Yes, please state how many:01  Facility has formed Grievance co intervals. The last meeting was h	Yes □ No □ N/A  representative  mmittee which meets at regular



G: If Yes, does the Collective Bargaining Agreement (CBA) inclurates of pay	☐ Yes☐ No Not Applicable				
Good Examples observed:					
Description of Good Example (GE	): None Observed	Objective evidence observed: Not Applicable			
		·			



#### Working Conditions are Safe and Hygienic (Click here to return to NC-table) (Click here to return to Key Information)

#### ETI

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

#### Current Systems and Evidence Examined

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

#### Current systems:

#### General Health & Fire Safety

- Mrs.
   Partner is responsible to ensure a healthy and safe work environment in the facility.
- The facility has established General health and safety policy, occupational health and safety policy and emergency evacuation procedure.
- Facility has provided 02 Toilets with 02 Urinals and 02 pots for male employees and 02 pots for female
  employees which comply with the legal requirements. Facility has provided 02 well equipped first aid kits.
  The facility has a system to replenish first aid kit at a regular interval.
- Facility has provided training to 06 employees in rendering first aid treatment. Out of which 03 employees
  were trained on 09/03/2017 and 10/03/2017 through J.K. Occupational Health Centre recognized by Govt.
  of Gujarat.
- Facility has provided clean and potable drinking water (01 drinking water point with water coolers) to all their employees free of cost. Latest test was conducted through Envirto Laboratories Pvt Ltd on 27/02/2017
- Facility has provided accessible and functional (18 fire extinguishers, 01 fire alarm system and 03
   Emergency Lights). Further based from the review of fire extinguisher service records, facility conducts inspection for the fire extinguisher on monthly basis internally and externally once in two months. Last inspection conducted on 10/02/2017.
- Facility has conducted Health and Safety (OHSAS) periodic firefighting training for 09 employees and for remaining it will be conducted in separate batches. Last training was done on 12/03/2017.
- Facility has provided personal protective equipment like hand gloves and masks at free of cost to the
  employees. However, Cut-Resistant Gloves are not provided to the employees working with the cutting
  machine in cutting section.
- Facility has conducted mock drills once in a period of two months. Last two drills were conducted on 20/02/2017 and 20/12/2016.
- 10. All accidents are recorded in accident register. However, records show no accident till date.
- 11. Facility has obtained FIRE NOC from fire department dated 15/04/2015 which is valid till April 2017.



However, two of the conditions written in FIRE NOC are not yet provided / installed in the facility.

- a) Point No. 8 Fire Bucket (04 Nos.) not provided.
- b) Point No. 10 Fire Hydrant not installed.
- 12. Facility has formed Health and Safety committee which consists of 05 members (03 from management and 02 workmen). Meeting is held once in three months. Last conducted on 24/01/2017. The topics covered were general health and safety issues.

#### Electrical safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- 2. Facility has made an agreement with external competent electricians at offsite.

#### Chemical safety:

- All chemicals were correctly labelled. Further noted that, no hazardous chemicals were used in printing process.
- Material Safety Data Sheets were available and there were hazard marking on the chemicals which needed careful handling.
- Workers working with chemical confirmed that they had been trained on correct handling procedures as well as what to do in an emergency.

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

- Factory Plan Layout no –DISH/F/PLN/2007/805 dated 10<sup>th</sup> October 2007.
- Accident records Updated till February 2017.
- First Aid Training dated 09<sup>th</sup> March 2017 and 10<sup>th</sup> March 2017.
- Firefighting Training records dated 12<sup>th</sup> March 2017.
- Mock drill records dated 20<sup>th</sup> February 2017 and 20<sup>th</sup> December 2016.
- Drinking Water Test report dated 27th February 2017.
- . Fire NOC valid till April 2017.
- Interaction with Management and Interview with employees.
- · Health and safety policy.
- Health and safety committee minutes dated 24<sup>th</sup> January 2017.
- Fire equipment maintenance records.

#### Non-compliance:

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

It was noted from tour of the facility that, fire alarm call points (MCB) are not provided in the facility. Further noted that, fire alarm installed is connected to electric switch board and electric switch button is used to ring the fire alarm for evacuation drills conducted in the facility.

#### Local law:

In accordance with the Factories Act 1948, Section 38 (1) In every factory, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and to provide and maintain (a) safe means of escape for all persons in the event of a fire, and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory all the workers are familiar with the means of escape in case of fire and have been

#### Objective evidence observed:

(where relevant please add photo numbers)

Tour of the facility



adequately trained in the routine to be followed in such cases.

#### 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 facility shall provide fire alarm call points (MCB) in the facility.

Action by: Partner - Mrs.

Verification Method: Desktop

Timescale: 60 days

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

It was noted from Site tour that facility has not installed industrial specific emergency lights at

- i) Exit door of RM Stores
- ii) Staircases leading from First Floor to Ground Floor
- iii) Exit door of Printing Section

Further noted that, remaining areas of production building are provided with selfbattery back-up emergency lights.

#### Local law-

In accordance with the Factories Act 1948, Section 38 (1) In every factory, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and to provide and maintain (a) safe means of escape for all persons in the event of a fire, and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory all the workers are familiar with the means of escape in case of fire and have been adequately trained in the routine to be followed in such cases.

#### 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 to the facility to install emergency lights with self-battery back-up and ensure they are functional at all times in the said areas.

Action by: Partner - Mrs.
Verification Method: Desktop

Timescale: 30 days

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

It was noted from the tour of the facility that, 17 out of 63 Sewing Machines located at

### Objective evidence observed:

(where relevant please add

### Objective evidence observed:

(where relevant please add photo numbers)

Tour of the facility



first floor of production building are not provided with Lower pulley guards.

#### Local law:

In accordance with Factories Act 1948, Chapter IV, Section 26

- (a) every set screw, bolt or key on any revolving shaft, spindle, wheel or pinion shall be so sunk, encased or otherwise effectively guarded as to prevent danger;
- (b) all spur, worm and other toothed or friction gearing which does not require frequent adjustment while in motion shall be completely encase, unless it is so situated as to be as safe as it would be if it were completely encased.

#### 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 factory to provide lower pulley guard on all Sewing machines as required by law.

Action by: Partner - Mrs.
Verification Method: Desktop

Timescale: 30 days

#### 4. Description of non-compliance:

It was noted from tour of the facility that, facility has not provided Cut-Resistant Gloves to the employees working with the cutting machine in cutting section located on ground floor of production building.

#### Local law:

In accordance with Factories Act 1948 Section 7A. General duties of the occupier.-

- (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.
- (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include-
- (a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health;
- (b) the arrangement in the factory for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances;

#### 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 facility shall provide Cut-Resistant Gloves to the employees working with the cutting machine in cutting section located on ground floor of production building.

photo numbers)

Tour of the facility

Photo No. 1

#### Objective evidence observed:

(where relevant please add photo numbers)

Tour of the facility

Photo No. 2



Action by: Partner - Mrs. Verification Method: Desktop

Timescale: 30 days

5. Description of non-compliance:

 NC against ETI NC against Local Law

It was noted from tour of the facility that, handrails were not provided to the staircases from terrace to first floor wherein cartoons and inks are stored by the facility.

Local law:

According to Section 32(a) of The Factories Act, 1948, all floors, steps, stairs, passage and gangways shall be of sound construction and properly maintained and shall be kept free of obstruction and substances likely to cause persons to slip and where it is necessary to ensure safety, steps, stairs gangways shall be provided with substantial handrails.

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 to the facility to provide the handrails to the staircases from terrace to first floor wherein cartoons and inks are stored by the facility.

Action by: Partner - Mrs.

Verification Method: Desktop

Timescale: 60 days

#### Objective evidence observed:

(where relevant please add photo numbers)

Tour of the facility

Photo No. 3

#### Observation:

#### 1. Description of observation:

It was noted from the review of records that, facility has obtained Fire NOC from the fire department dated 15/04/2015 which is valid till April 2017. Further noted that, facility has installed most of firefighting equipment's like Fire Extinguisher, Fire Alarm and Water Tank with capacity of 50,000 Litres. However, only two of the conditions written in FIRE NOC are not yet provided / installed in the facility.

- a) Point No. 8 Fire Bucket (04 Nos.) not provided.
- b) Point No. 10 Fire Hydrant not installed.

In accordance with the Fire NOC Sr. No. 68 issued by Fire Officer Mahanager Seva Sadan dated 15.04.2015,

#### 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

Objective evidence observed:

Review of Records



causes of hazards inherent in the working environment.

Comments:

It is recommended that facility shall provide / install the firefighting equipment's mentioned in the FIRE NOC issued by the Fire Department.

Good Examples observed:

Description of Good Example (GE): None Observed

Objective evidence observed:
Not Applicable



#### 4: Child Labour Shall Not Be Used (Click here to return to NC-table) (Click here to return to Key Information)

#### ETI

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

#### Current Systems and Evidence Examined

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

#### Current systems:

- Facility has displayed Child Labour policy in Local Language which states that "No Child labour allowed in the factory".
- 2. Facility has established Child labour policy.
- Based on the review of age proof records, physical appearance of employees during walk through and Interviews with employees, there was no evidence of child labour or young labour observed / reported.
- 4. Facility has maintained valid age proof documents in the form of Voter Id Card, Aadhar Card & School Leaving Certificate
- The age of youngest worker found in the facility is 17 years. Further noted that facility has obtained Form No. 5
  Certificate of fitness for young person from Certifying Surgeon Industrial Safety & Health Saurashtra & Kutch region
  Rajkot.

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

- Company's Hiring Policy
- Employees Personnel Files (Age proof records Voter Id Card, Aadhar Card & School Leaving Certificate)

Non-compliance:			
Objective evidence observed: (where relevant please add photo numbers)			
Not Applicable			



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

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



#### 5: Living Wages are Paid (Click here to return to NC-table) (Click here to return to Key information)

#### ETI

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

#### Current Systems and Evidence Examined

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

#### Current systems:

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

- All eligible employees are covered under Provident Fund and Employee State Insurance Corporation.
- 2. No fines / illegal deductions are made from the wages of the employees as disciplinary measures.
- 3. All employees are paid on or before 07th of every month.
- 4. All employees are provided with clear, written and understandable pay stub in local language.
- All 10 out of 10 sampled employees were paid the legal minimum wage.
- Facility has paid bonus @ 20% to all applicable employees on yearly basis.
- 7. Facility has also extended Leave with benefits to all applicable employees as per the legal requirement.

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

- 10 employees were interviewed and the same numbers of records were reviewed for the month of February 2017, October 2016 and June 2016.
- List of National and Festival Holidays.
- Bonus Records
- Leave with wage records.
- Interaction with management and Employees.



Non-compliance:		
Objective evidence observed: (where relevant please add photo numbers)		
Not Applicable		

OI	bservation:
Description of observation: None Observed	Objective evidence observed: Not Applicable
Local law or ETI requirement: Not Applicable	
Comments: Not Applicable	
Comments. Not Applicable	

Good Examples observed:		
Description of Good Example (GE):  1. Facility provides interest free loan to all employees.	Objective evidence observed: Review of Records and Interaction with Management	
Description of Good Example (GE):  2. Facility has issued gift voucher of Rs. 1000/- to all employees during the festival of Diwali celebrated once in a year.	Objective evidence observed: Review of Records and Interaction with Management.	

Audit company: Intertek Report reference: IDA-12784-02 Date: 20-21/03/2017



Wages analysis:	ere to return to Ke	y Information)	
A: 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)	records were	s were interviewed and the same numbers of reviewed for each month of February 2017 ober 2016 (Random) and June 2016 (Random).	
B: Are there different legal minimum wage grades? If Yes, please specify all.	⊠ Yes □ No	If Yes, please give details: Legal minimum: The local minimum wages of Gujarat State are as follows: Unskilled - INR 296.80 per day, Semi - Skilled – 304.80 per day, Skilled – 313.80 per day, effective from 1st October 2016 to 31 March 2017	
C: If there are different legal minimum grades, are all workers graded correctly?	⊠ Yes □ No □ N/A	If No, please give details:	
D: What deductions are required by law e.g. social insurance? Please state all types:	Provident Fund ,Employee State Insurance Corporation & Profession tax		
E: Have all of these deductions been made? Please list all deductions that have/have not been made.	⊠ Yes □ No	If Yes, Please list all deductions that have been made: Provident Fund ,Employee State Insurance Corporation & Profession tax	
		If No, please give details on any deductions which have not been made:  Not Applicable	
F: Industry norm for this region: (please include time period e.g. hour/week/month)	In accordance	with Minimum Wages Act 1948, Section 12.	



#### Wages analysis: Wages table

Wages table						
Wages table (Click here to return to Key information)						
Worker Type	Process Operator (Lowest paid)	Process Operator (Average paid)	Process Operator (Highest paid)			
Select from individual worker records one worker from, lowest, average and highest wages and populate the boxes. Ensure comparison is made for same pay period and only uses full-time workers. See SMETA Best Practice Guidance and Measurement Criteria for completing this:						
A: Pay period: (State month selected)	Monthly- February 2017	Monthly- February 2017	Monthly- February 2017			
B: <u>Anonymous</u> Employee Reference/Dept.	Helper	Tailor	Inspector			
C: Employee Gender	Male	Male	Male			
D: Contracted/Standard working hours: (excluding OT – please include time period e.g. hour/week/month)	168 hours / month	136 hours / month	146 hours / month			
E: Contracted /Standard work pay rate: (excluding OT - please include lime period e.g. hour/week/month)	INR 7716.80 / month	INR 7924.80 / month	INR 7924.80 / month			
F: Standard day overtime – hours: (please include time period e.g. hour/week/month)	Nil	Nil	Nil			
G: Standard day overtime – wage: (please include time period e.g. hour/week/month)	INR 0	INR 0	INR 0			
H: Rest day overtime – hours: (please include time period e.g. hour/week/month)	Nil	Nil	Nil			
: Rest day overtime – wage: (please include time period e.g. hour/week/month)	INR 0	INR 0	INR 0			
J: Statutory Holiday overtime – hours: (please include time period e.g. hour/week/month)	Nil	Nil	Nil			



K: Statutory holiday OT – wages: (please include time period e.g. hour/week/month)		INR 0	INR 0	INR 0	
L: Total overtime hours: (please include time period e.g. hour/week/month)		Nil	Nil	Nil	
M: Incentives/Bonus/ Allowances etc.: (please include time period e.g. hour/week/month)		INR 0	INR 0	INR 0	
N: Gross wages: (please include time period e.g. hour/week/month)	INR	6753.00 / month	INR 5182.00 / month	INR 5563.00 / month	
O: Social insurance and other deductions; please list which and amount.	Fur ES	1009.00 (Provident nd = INR 810.00, IC = INR 119.00, ression Tax = INR 80.00	INR 713.00 (Provident Fund = INR 622.00, ESIC-INR 91.00.	INR 766.00 (Provident Fund = INR 668.00, ESIC-INR 98.00)	
P: Actual wage paid after deduction: (please include time period e.g. hour/week/month)	INR	5744.00 / month	INR 4469.00 / month	INR 4797.00 / month	
Comments: (Please state here any specific i	reasons	/circumstances that e	xplain the lowest and highest	gross wages)	
The above analysis is based o	n availa	ble wage records. Als	so wages depend on skill set	S.	
Q: Is there a defined living way This is not normally minimum I wage. If answered Yes please amount and source of info: Please see SMETA Best Practic Guidance and Measurement Crite	egal state e		unt/time period: ve any defined living wage. with the Government stipula		
R: Are workers paid in a timely manner in line with local law?	N.S.	⊠ Yes □ No			
S: Is there evidence that equal are being paid for equal work:	rates	☐ No Details: It was noted	available wage records d during interview with emplo paid the same wages and no		
T: How are workers paid:		☐ Cash ☐ Cheque ☑ Bank Transfer (1 ☐ Other If other explain:	100%)		



#### 6: Working Hours are not Excessive (Click here to return to NC-table) (Click here to return to Key Information)

#### ETI

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

#### Current Systems and Evidence Examined

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

#### Current systems:

Based from the In/Out time records, interaction with the employees and management,

- 1. There is no overtime hours done in the facility.
- 2. The employees work for 6 days a week in four shifts. The normal working hours are as follows:
- 1<sup>st</sup> Shift: 08:30am to 05:30pm (Male Workmen)
- 2<sup>nd</sup> Shift: 09:00pm to05:30 am (Staff and Women Workmen)
- 3<sup>rd</sup> Shift: 08:00am to 04:00pm (For Security Guards)
- 4th Shift: 04:00pm to 12:00am (For Security Guards)
- 5th Shfit: 12:00pm to 06:00am (For Security Guards)

Lunch Break: 30 minutes (12:30pm to 01:00pm for Women Workmen) & (01:00pm to 02:00pm for Male Workmen) & For Security Guards (Staggered)

Tea Break: 15 minutes twice in a day (11:00am to 11:15 am and 03:00 pm to 03:15pm for production and non-production employees). For Security guards (Staggered).



Weekly holiday: Wednesday for production and non-production employees & Sunday for Staff Members.

3. Facility has maintained Biometric Punch Card as Attendance recording system for all employees.

#### Working hours analysis as follows based on available records:

- For February 2017 (Current month) the average working hours of 10 selected samples were 38.20 hours/week. Maximum working hours per week were 48 hours (04 out of 10 selected samples).
- For October 2016 (Random month), the average working hours of 10 selected samples were 35.50 hours/week. Maximum working hours per week were 48 hours (03 out of 10 selected samples).
- For June 2016 (Random month), the average working hours of 10 selected samples were 38.84 hours/week. Maximum working hours per week were 48 hours (04 out of 10 selected samples).

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

- Review of In/out time records from March 2016 to February 2017
- Working Hours policy

Non-compliance:	
Description of non-compliance:  NC against ETI/Additional Elements None Observed  Local law and/or ETI requirement: Not Applicable  Recommended corrective action: Not Applicable	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: Not Applicable	Objective evidence observed: Not Applicable
	^
Good Examples observed:	
Description of Good Example (GE): None Observed	Objective evidence observed: Not Applicable



Working hours analysis

Pl	Working h		ysis ur/week/month		
Systems & Processes		-72			
A. What timekeeping systems are used: time card etc.	Describe: Facility has main system for all er		metric Punch Car	d as Attendance re	cording
B: Sample Size Checked (State number of worker records checked and from which weeks/months and type – should be current, peak and random/low: See SMETA Best Practice Guidance and Measurement Criteria)		ch month of	February 2017 (	ne numbers of record Current), October 2	
C: Do ALL workers have contracts/employment agreements?	⊠ Yes □ No	If NO, state which type of workers do NOT have contracts/employment agreements:		ve	
	Not Applicable				
D: Are standard/contracted working hours defined in all	⊠ Yes □ No	Yes If NO, please state which type of workers NOT standard hours have defined in contracts/employment agreements.			
contracts/employment agreements?		Not Applicable			
E: Are there any other types of	Yes	If YES, P	lease complete a	s appropriate:	
contracts/employment agreements used?	⊠ No	0 hrs	☐ Part time	☐ Variable hrs	Other
		If "Other", Please define:			
		Not Applie	cable		
Standard/Contracted Hours wor	ked				
F: Do standard/contracted standard hours ever exceed the law <i>or</i> 48 hours per week?	☐ Yes ☑ No	If YES giv week)	e details and cor	mparison (local law/	48 hrs
nours per week?					
G: What are the actual standard/contracted hours worked in sample (State per week/month)	Highest hours:	hest hours:  48 hours / week for February 2017  48 hours / week for October 2016  48 hours / week for June 2016			
	Lowest hours:	21.33 ho	urs / week for Feb urs / week for Oc / week for June 2	tober 2016	

Audit company: Intertek Report reference: IDA-12784-02 Date: 20-21/03/2017



		Above da	ata from a	available v	vage and i	n/out time	records
H: Any local waivers/local law or	Yes	If YES, Please give details					
permissions which allow averaging/annualised hours for this site?	⊠ No	Not Appli	icable.				
Overtime Hours							
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours:	0 hours of OT / week for the month of February 2017 0 hours of OT / week for the month of October 2016 0 hours of OT / week for the month of June 2016					
	Lowest OT hours:	0 hours o	f OT / we	ek for the	month of	February : October 2 June 2016	016
J: Range of overtime hours over all workers/or as large a sample as possible. (State per week/month and details)	0 hours of OT / 0 hours of OT / 0 hours of OT /	week for th	e month	of Octobe	r 2016		
K: Approximate percentage of workers on highest overtime hours	_0_%						
L: Is overtime voluntary?							
	Information Not Applicable	ANALYSI SI SANION A S. C. C.				terview	
Overtime Premiums			4				
M: Is overtime paid at a premium?	⊠ Yes □ No	Please gi % of <u>star</u>			al day ove	rtime prem	nium as a
	Not Applicable	0%	1 – 115%	116 - 124%	125 - 149%	150 - 199%	200%+
		Any other comments: No overtime hours found worked by any sampled employee. Facility had a policy to compensate all OT hours at 200% of regular rate of wages.					
N: ETI Code requires a prevailing standard to give greatest worker protection. If a site pays less than 125% OT	No □ Consolidated no/low overtime p □ Collective Ba □ Other	remium)			bove minim	num legal w	age, with



premium <u>and</u> this is allowed under local law, are there other	Please explain any checked boxes in N above e.g. detail of consolidated pay CBA or Other.		
considerations? Please complete the boxes where relevant. Multi select is possible.	Not Applicable		
Rest Days			
O: Are workers provided with 1 day off in every 7-day-period, or 2 in 14-	⊠ Yes □ No	Maximum number of days worked without a day off (in sample):	
day-period (where the law allows)?		6 days	
Total Hours			
P: Range of total hours: (Quote highest and lowest please include time period e.g. hour/week/month)	Highest total hours	48 hours / week for February 2017 48 hours / week for October 2016 48 hours / week for June 2016	
	Lowest total hours	17.33 hours / week for February 2017 21.33 hours / week for October 2016 16 hours / week for June 2016	
R: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. Multi select is possible.	☐ Safeguard:	lective bargaining allows 60+ hours/week s are in place to protect worker's health and safety emonstrate exceptional circumstances ons	
	Please explain any checked boxes in R above  No overtime hours found worked by any sampled employee		
Comments: (please state here any specific reasons/cir	cumstances that	explain the highest working hours)	
Based on the wage and working hours any sampled employee.	records verified	d, it was observed that overtime hours are not performed by	



#### No Discrimination is Practiced (Click here to return to NC-table)

#### ETI

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

#### Current Systems and Evidence Examined

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

#### Current systems:

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

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

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

- Facility Policy.
- Salary records.
- Interaction with management and Employees.

Non-compliance:			
Description of non-compliance:      NC against ETI/Additional Elements     None Observed  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: Not Applicable		
Local law or ETI requirement: Not Applicable			



Comments: Not Applicable	
Good Examples observed	d:
Description of Good Example (GE): None Observed	Objective evidence observed: Not Applicable



#### 8: Regular Employment Is Provided (Click here to return to NC-table) (Click here to return to Key Information)

#### ETI

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

#### Current Systems and Evidence Examined

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

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:

- Employment contracts (appointment letters) were available and maintained for 10 out of 10 sampled employees.
- 2. Facility does follow and believe in fixed term employment.
- Facility has not hired any Temporary and Contract employees.

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

· Facility Policy.

Employment contracts.

Non-compliance:			
Description of non-compliance:      NC against ETI/Additional Elements     None Observed	al Law 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:			

(47)

Objective evidence

observed: Not Applicable



Comments: Not Applicable	

Good Examples observed:		
escription of Good Example (GE): None Observed	Objective evidence observed: Not Applicable	



#### 8A: Sub-Contracting and Homeworking (Click here to return to NC-table) (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.

#### 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:

At present, no subcontractor and home workers are used. All production processes are done in-house.

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

Inward / Outward material records along with material challan records.

#### If any processes are sub-contracted - please populate below boxes Not applicable

Process Subcontracted	Process 1	Process 2	
Name of factory			
Address			
Process Subcontracted	Process 3	Process 4	
Name of factory	11100000	110000	
Address			
Process Subcontracted	Process 5	Process 6	
Name of factory			
Address	8		



Non-compliance:		
1. Description of non-compliance:  NC against ETI/Additional Elements  None Observed  Local law and/or ETI requirement: Not Applicable  Recommended corrective action: Not Applicable	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: Not Applicable	Objective evidence observed: Not Applicable	
Good Examples observed	1:	
Description of Good Example (GE): None Observed	Objective evidence observed: Not Applicable	



### Summary of sub-contracting - if applicable

Summary of sub-contracting - if applied	cable		
A: If sub-contractors are used, is there evidence this has been agreed with the main client?	Yes No If Yes, summarise details: Not Applicable		
B: Number of sub- contractors/agents used	Not Applicable as no subcontractor used. All production are done in-house		
C: Is there a site policy on sub- contracting?	☐ Yes ☐ No If Yes, summarise details: Not Applicable		
D: What checks are in place to ensure no child labour is being used and work is safe?	Not Applicable		
E: What processes are sub- contracted?	Not Applicable		
Summary of homeworking – if applicat	ole		
F: If homeworking is being used, is there evidence this has been agreed with the main client?	Yes No	details: Not Applicable	
G: Number of homeworkers	Male: Nil	Female: Nil	Total: Nil
H: Are homeworkers employed direct or through agents?	Directly Through Agents Not Applicable		
I: If through agents, number of agents	Not Applicable		
J: Is there a site policy on homeworking?	Yes No Not Applicable		
K: How does site ensure worker hours and pay meet local laws for homeworkers?	Not Applicable		
L: What processes are carried out by homeworkers?	Not Applicable		
M: Are written agreements in place for homeworkers that include regular employment?	Yes No Not Applicable		



Sedex Members Ethical Trade Audit (SMETA) Report (Version 5.0 Dec 2014)

Are full records available at the e?	Yes No Not Applicable	



# 9: No Harsh or Inhumane Treatment is Allowed (Click here to return to NC-table)

#### FTI

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.

#### Current Systems and Evidence Examined

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

#### Current systems:

- 1. There is no evidence of harsh or inhumane treatment of employees.
- 2. All employees are treated with respect and dignity.
- 3. Facility's disciplinary policies are explained to all employees and all employees are well aware about their rights.
- 4. No evidence of physical abuse, sexual or any other harassment / verbal abuse is observed / reported.
- Facility formed Anti Sexual Harassment committee to discuss and resolve the issues. Last meeting was conducted on 12/01/2017.

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

- Disciplinary policies
- Committee Meeting records. Dated: 12<sup>th</sup> January 2017.

	Non-compliance:		
Description of non-compliance:  NC against ETI/Additional Elements  NC against Local Law None Observed  NC against Local Law	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: Not Applicable	
Local law or ETI requirement: Not Applicable		
Comments: Not Applicable		

Audit company: Intertek Report reference: IDA-12784-02 Date: 20-21/03/2017



Good Examples observed:		
scription of Good Example (GE): None Observed	Objective evidence observed: Not Applicable	



#### Other Issue areas: 10 A: Entitlement to Work and Immigration (Click here to return to NC-table)

#### **Additional Elements**

10A1 Only workers with a legal right to work shall be employed or used by the supplier.

10A2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

10A3 Employment agencies must only supply workers registered with them.

10A4 The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.

#### 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 not employed any foreign or migrant employees.
- 2. Facility has not engaged any contract employees for production purposes.
- 3. Based from the review of personal files of company employees (10 out of 10), all of them are holding the legal rights to work.

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

Recruitment policies/ Procedure.

Non-compliance:		
1. Description of non-compliance:  NC against ETI/Additional Elements None Observed  NC against Local Law	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: Not Applicable	
Local law or ETI requirement: Not Applicable	Trot Applicable	
Comments: Not Applicable		



	Good Examples observed	d:
cription of Good Example (GE)	: None Observed	Objective evidence observed: Not Applicable



#### 10. Other issue areas 10B4: Environment 4–Pillar (Click here to return to NC–table)

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 Suppliers as a minimum must meet the requirements of local and national laws related to environmental standards.

10B4.2. Where it is a legal requirement, suppliers 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. The supplier shall be aware of their end client's environmental standards/code requirements and have a system in place to monitor their performance against these.

#### **B4.** Guidance for Observations

- 10B4.4. Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.
- 10B4.5. Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.
- 10B4.6. Suppliers shall be aware of the significant environmental impact of their site and its processes.
- 10B4.7. 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).
- 10B4.8. Suppliers shall seek to make continuous improvements in their environmental performance.
- 10B4.9. Suppliers shall have available for review any environmental certifications or any environmental management systems documentation
- 10B4.10. Suppliers should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.
- 10B.4.11. 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:

- Mr
   Manager Admin is responsible for all environmental issues.
- 2. Facility is aware of the legal environmental requirements.
- Facility has conducted necessary air quality monitoring and workplace, boiler noise assessment through Comet Consultancy Services dated 01/03/2017.
- Facility has conducted necessary noise testing of D.G.Sets (75 KVA) through Comet Consultancy Services dated 01/03/2017,
- Facility has obtained air and water pollution control board consent to operate which is valid till 03/06/2020.

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

Environmental Policy



Pollution Consent Certificate dated 03<sup>rd</sup> June 2020. Test Reports (Air Quality Monitoring, Noise Assessment and Stack Emission of Boiler & D.G. Set (75 KVA)) dated 01<sup>st</sup> March 2017.

Non-compliance:	
1. Description of non-compliance:  NC against ETI/Additional Elements None Observed  Local law and/or ETI requirement: Not Applicable	Objective evidence observed: (where relevant please add photo numbers) Not Applicable
Recommended corrective action: Not Applicable	
Observation:	
Description of observation: None Observed  Local law or ETI requirement: Not Applicable	Objective evidence observed: Not Applicable
Comments: Not Applicable	
Good Examples observed:	
Description of Good Example (GE):  1. Facility does tree plantation activities within the premises at least once in	a year.  Objective evidence observed: Review of Records and Interaction with Management.



**Environmental Analysis** 

Environmental Analysis (Site declaration only – th	is has not been verified	d by auditor. Please st	ate units in all cases below.)
A; Responsible for Environmental issues (Name and Position):		Mr	Manager Admin
B: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please detail.		☐ Yes ⊠ No Details:	
C: Does the site have an Environmental policy? (For guidance, please see Measurement criteria)		⊠ Yes □ No	
Does the site have a Biodiversity poli (For guidance, please see Measurement		⊠ Yes □ No	
E: Is there any other sustainability sy as Chain of Custody, Forest Steward (FSC), Marine Stewardship Council ( Please detail. (For guidance, please see Measurement	Iship Council MSC) etc.?	☐ Yes ☒ No Details:	
F: Have all legally required permits been shown? Please detail.		∑ Yes  No     Details: It was noted from the interaction with facility management that facility has obtained NOC under Air & Water Act.	
G: Is there a documentation process to record hazardous chemicals used in the manufacturing process?		☐ Yes    ☐ No    ☐ N/A     Details: Pollution Consent	
H: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?		☐ Yes ⊠ No Details:	
Usage/Discharge analysis			
Criteria	Current year: Ple 1st April 2016 – 2	ase state period: 8 <sup>th</sup> February 2017	Previous Year: Please state period: 01st April 2015 – 31st March 2016
Electricity Usage: Kw/hrs	148377 Units		146321 Units
Renewable Energy Usage: Kw/hrs	Nil		Nil
Gas Usage: Kw/hrs	1102 Kgs		1483 Kgs
Has site completed any carbon Footprint Analysis?	☐ Yes ☒ No		☐ Yes ☒ No



If Yes, please state result			
Water Sources: Please list all sources e.g. lake, river, and local water authority.	GIDC water supply / R.M.C.	GIDC water supply / R.M.C.	
Water Volume Used: (m³)	5000 Ltr. Per Day	5000 Ltr. Per Day	
Water Discharged: Please list all receiving waters/recipients.	GIDC Drainage	GIDC Drainage	
Water Volume Discharged: (m³)	4350 Ltr. Garden 450 Ltr. Boiler 120 Ltrs. Per day	4750 Ltr. Garden 450 Ltr. Boiler 120 Ltrs. Per day	
Water Volume Recycled: (m³)	Nil	Nil	
Total waste Produced (please state units)	17065 Kgs	13629 Kgs	
Total hazardous waste Produced: (please state units)	Nil	Nil	
Waste to Recycling: (please state units)	Nil	Nil	
Waste to Landfill: (please state units)	Nil	Nil	
Total Product Produced (please state units)	3056261 Bags	2521249 Bags	



10C: Business Ethics – 4-Pillar Audit
(Click here to return to NC-table)
To be completed for a 4-Pillar SMETA Audit

#### 10C. Guidance for "Observations"

- 10C.1. Suppliers should have completed the appropriate section of the SAQ and have made it available to the auditor.
- 10C.2. The supplier should have received and acknowledged- preferably in writing the Business Ethics policy of the auditor/audit company.
- 10C.3. Suppliers shall seek to conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
- 10C.4. Suppliers shall be aware of any applicable laws, their end client's Business Ethics standards/code requirements and have a system in place to monitor their performance against these.
- 10C.5. Supplier should have a Business Ethics policy concerning bribery, corruption, or unethical Business Practice. This should be clearly communicated to all relevant parties.
- 10C.6. Suppliers should have a designated person responsible for implementing standards concerning Business Ethics
- 10C.7. Suppliers should have a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter
- 10C.8. 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.

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 and the main requirement is to gather information on the relevant Business Ethics issues in a supply chain. All findings will be recorded as observations not Non– Compliances and the data collected will allow the membership to define appropriate standards over time as part of a continuous review process.

#### 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:

- Mrs. Partner is responsible for compliance.
- The SAQ was completed by the site and reviewed prior to the audit.
- There is no current local legislation. However, It was noted from the interaction with the facility management, the facility has verbally communicated business code of conduct to all employees.

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

Anticorruption & Anti bribery policy

Based on interaction with facility management.



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

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



# Worker Interview Summary Worker Interview Summary

	Worker Interview	Summary
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)	01 group of 04 employ	rees
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	Male: 06	Female: 00
E: Total number of interviewed workers (Please see SMETA Best Practice Guidance and Measurement Criteria)	Male: 06	Female: 04
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?	None observed	
I: What did the workers like the most about working at this site?	Based from employee's interview, all of them were favourable with the management and facility environment and no negative information was reported. Overall they displayed a positive attitude towards the management and the workplace.	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	Positive	



Agency Workers (if applicable) (workers sourced from a local agent who are not directly paid by the site)		
A: Number of agencies used (average):	None And names if available:	
B: Were agency workers' age/pay/hours included within scope of this audit	☐ Yes ☐ No Not Applicable	
C: Were sufficient documents for agency workers available for review?	☐ Yes ☐ No Not Applicable	

# Other findings

	Other Findings Outside t	the Scope of the Code	
None observed			

#### **Community Benefits**

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

- Facility has organized Dandiya Raas for employees and its families during the festival of Navratri celebrated in India dated 12/10/2016.
- Facility has initiated employee engagement activity i.e., organizing a cricket match tournament for all employees dated 27/01/2017.
- Facility has initiated employee welfare activity program through which some part of the medical treatment expenses for the employee's family member are paid by them. If the said employee is not in a state to bear the complete medical expenses.



# **Photo Form**



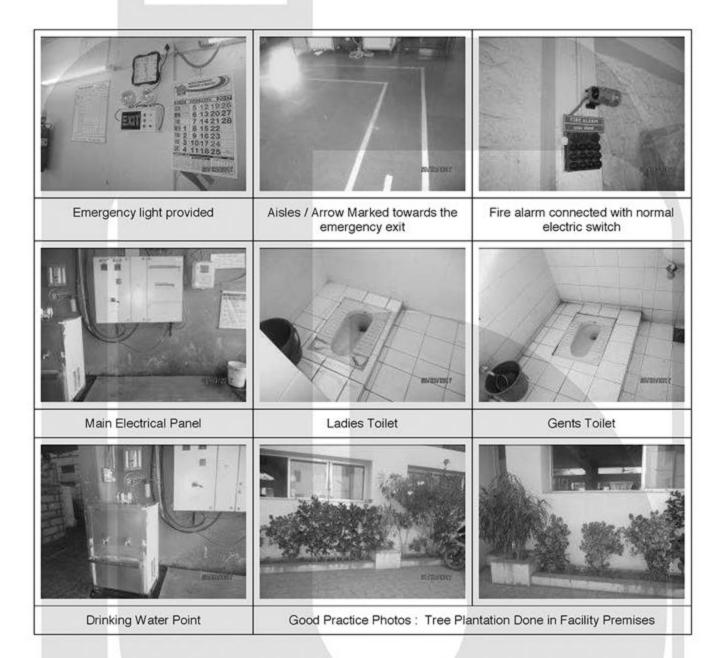






Sewing Section	Finishing Section	Printing Section
ANNOT		RAVENIENT
Admin Office & Conference Room Area	Finished Goods Storage Area	Pressing Section
EXIT CASE DE LA CONTRACTOR DE LA CONTRAC	The state of the s	FLARL EXPOSES  White the second secon
Exit Signage Marked	Fire Extinguishers provided	Evacuation Plan posted displayed in English and Local Language
NATION ENT	TASTAID BOX	Difference of the second of th
Employee Wearing PPE (Safety Mask) in Cutting Section	First aid box	Eye Guard provided for stitching machine

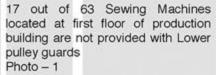






## Non-Compliance Photos:







Cut-Resistant Gloves not provided to the employees working with the cutting machine in cutting section located on ground floor of production building. Photo – 2



Handrails were not provided to the staircases from terrace to first floor wherein cartoons and inks are stored.

Photo – 3

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 A & AB members:
http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5Iw\_3d\_3d

Click here for B members:
http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRqIY\_2brq\_3d\_3d

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