

Sedex Members Ethical Trade Audit (SMETA) Report

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

Supplier name:		
Site country:	India	
Site name:		
Parent Company name (of the site):		
SMETA Audit Type:	<input checked="" type="checkbox"/> 2-Pillar	<input type="checkbox"/> 4-Pillar
Date of Audit	April 22, 2016	

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
 - ETI 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	Report Owner (payee): [REDACTED]
Sedex Company Reference: (only available on Sedex System)	[REDACTED]
Sedex Site Reference: (only available on Sedex System)	[REDACTED]

Audit Conducted By			
Commercial	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>
NGO	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Trade Union	<input type="checkbox"/>	Brand Owner	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)	

Auditor Reference Number: (If applicable)	Not applicable
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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: Kushan Banerjee

Team auditor: Not applicable

Interviewers: Kushan Banerjee

Date: April 22, 2016

Non-Compliance Table

Issue (please click on the issue title to go direct to the appropriate audit results by clause)	Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)			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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	03	00	00
1 Employment Freely Chosen	<input type="checkbox"/>	<input type="checkbox"/>		00	00	00
2 Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		00	00	00
3 Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		02	00	00
4 Child Labour	<input type="checkbox"/>	<input type="checkbox"/>		00	00	00
5 Wages and Benefits	<input type="checkbox"/>	<input type="checkbox"/>		00	00	00
6 Working Hours	<input type="checkbox"/>	<input type="checkbox"/>		00	00	00
7 Discrimination	<input type="checkbox"/>	<input type="checkbox"/>		00	00	00
8 Regular Employment	<input type="checkbox"/>	<input type="checkbox"/>		00	00	00
8A Sub-Contracting and Homeworking		<input type="checkbox"/>	<input type="checkbox"/>	00	00	00
9 Harsh or Inhumane Treatment	<input type="checkbox"/>	<input type="checkbox"/>		00	00	00
10A Entitlement to Work		<input type="checkbox"/>	<input type="checkbox"/>	00	00	00
10B2 Environment 2-Pillar		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	02	00	00
10B4 Environment 4-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA
10C Business Ethics		<input type="checkbox"/>	<input type="checkbox"/>		NA	NA

*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

Summary of main findings: (positive and negative)
(Please give a short summary of the main findings per clause)

Audit Process

This Initial audit was conducted by Intertek India Pvt. Ltd. one auditor assessed the facility's operations in one day. The scope of this audit was based on 2 Pillar SMETA systems.

Overview of opening meeting, facility management responses

The Auditors has visited the facility at 10.10 AM and an opening meeting was conducted based on the ETI base code. The following persons from the management has present at the time of opening meeting.

Mr. Anup Kumar Bhuwalka- General Manager

Site summary:

1. The facility is engaged in the manufacturing of Jute and cotton shopping bags
2. Over all responsibility with - Mr. Anup Kumar Bhuwalka- General Manager
3. A total of 97 employees (87 male; female – 10) are currently working in the facility, in which 70 employees (all male- 60 & female – 10) are from four contractors (All for production) and 27 employees (all male & female-00) are from company payroll. Production employees 78 (male – 68 & female - 10) and non-production employees 19 (all male, female 00). The facility does not employ any foreign nationals.
4. The youngest worker on site was 25 years old
5. There is no union in the facility. However workers committee available and meeting is carried out in every 03 months.
6. 10 workers were selected for interview including all 08 male and 02 female employees, they were interviewed as 1 groups of 4 employees and 06 individual
7. 10 selected samples for the month of March 2016 (Current month). 10 selected samples for the month of November 2015 (Random month). 10 selected samples for the month of May 2015 (Random month).
8. Legal minimum wage - Unskilled-INR 6634.00 per month; Semi skilled- INR 7296.00 per month; Skilled- INR 8026.00 per month; Applicable from January 2016
9. No overtime carried out.
10. It was noted through review of records that facility had not obtained registration certificate for employees working through labour contractors. At present facility working with four labour contractors as per below-
M/S Hindustan Fabric – 51 employees (Production)
M/S M. K. Enterprise - 10 employees (Production)
M/S Md. Faruk – 05 employees (Production)
M/S Jagdish Sarkar – 04 employees (Production).

Summary of Findings (Positive and negative)

Positive observations:

1. There is no evidence of child labour.
2. There is no evidence of any discrimination, harassment and abuse or unfair disciplinary practices.

Negative observations:

In this Initial audit, it was noted from tour of the facility, interview with employees, review of records and from interaction with facility management, that the non-Compliance was observed in the area of "Management systems and code implementation", Safety and Hygienic Conditions and "Environment". Details are listed in the corresponding sections of the report. For other areas no violations were noted.

1. Based upon document review and interaction with management it was noted during that factory license (no. 16794) was expired on dated 31/12/2015. However facility had applied for the same on dated 31/12/2015.
2. It was noted through review of records that one of the contractor called M/S Hindustan Fabric (51 employees working in production) license was expired on dated 31/12/2015. However the contractor was applied on dated 30/12/2015 for the renewal of the license.
3. During review of prevention of harassment and abuse committee meeting records and management interaction it was noted that facility has members from management (05 employees) and employees side (06 employees); however they have not ensured that member from outside NGO's is also member of Prevention of Sexual Harassment committee. Last meeting conducted on 31/03/2016.
4. It was noted through facility tour that in the printing section situated in third floor of the second building, 01 out of 02 emergency exit opening inward direction (Not opening in the direction of travel).
5. It was noted through facility tour that facility had not provided rubber mat below the electrical panel in ground floor of the building 1.
6. Based on the management interaction it was noted that facility had not conducted noise monitoring tests
7. Based on the management interaction it was noted that facility had not conducted ambient air test.

Observation: None

Auditor Note: Nil

Audit Details

Audit Details			
A: Report #:	IDA-13667-01		
B: Time in and time out (SMETA Best Practice Guidance and Measurement Criteria recommends 9.00–17.00 hrs. if any different please state why in the SMETA declaration)	Day 1 Time in: 10.10 AM Day 1 Time out: 17.50 PM	Day 2 Time in: NA Day 2 Time out: NA	Day 3 Time in: NA Day 3 Time out: NA
C: Number of Auditor Days Used: (number of auditor x number of days)	01 (One Auditor on one day)		
D: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other - Define		
E: Was the audit announced? (AAG recommends a window of three weeks for semi-announced, this gives optimum results)	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: <input type="checkbox"/> Unannounced		
F: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
If No, 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, please capture detail in appropriate audit by clause		
H: Auditor name(s) and role(s):	Kushan Banerjee- Lead Auditor		
I: Report written by:	Kushan Banerjee		
J: Report reviewed by:	Gargi Banerjee		
K: Report issue date:	28 April 2016		
L: Supplier name:	[REDACTED]		
M: Site name:	[REDACTED]		

N: Site country:	India			
O: Site contact and job title:	Mr. Anup Kumar Bhuwalka- General Manager			
P: Site address: (Please include full address)	West Bengal, India.			
Site phone:				
Site fax:	Nil			
Site e-mail:				
Q: Applicable business and other legally required licence numbers: for example, business license no, and liability insurance	Factory License No: PAN (Permanent Account Number): IEC (Import export code): TIN:			
R: Products/Activities at site, for example, garment manufacture, electricals, toys, grower	Manufacturing of Jute and cotton shopping bags			
S: Audit results reviewed with site management?	Yes			
T: Who signed and agreed CAPR (Name and job title)	Mr. Anup Kumar Bhuwalka- General Manager			
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):	Mr. Anup Kumar Bhuwalka- General Manager Auditor- Kushan Banerjee			
W: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) (Suggestion box) <input type="checkbox"/> None			
X: Are any workers covered by Collective Bargaining Agreement (CBA)	<input type="checkbox"/> Yes <input type="checkbox"/> No No CBA in the facility			
Y: Previous audit date:	Not applicable			
Z: Previous audit type:		SMETA 2-pillar	SMETA 4-pillar	Other
	Full Initial	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Periodic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Full Follow-Up Audit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Partial Follow-Up	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Partial Other*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	*If other, please define: Not applicable			

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, 48 hours per week	8 hours per day, 48 hours per week	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Legal Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week and month)	Legal maximum: 2 hours per day, 12 hours per week and 50 hours per quarter	0 hours-March 2016 (Current month) 0 hours-November 2015 (Random month) 0 hours-May 2015 (Random month)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Legal age of employment: (Minimum legal and actual minimum age at site)	Legal minimum: 15 Years	25 Years	
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 West Bengal Minimum Wages w.e.f January 1, 2016 for Tanneries & Leather Manufactories. Zone B Unskilled-INR 6634.00 per month Semi skilled- INR 7296.00 per month Skilled- INR 8026.00 per month	INR 6810 per month (Minimum) Unskilled worker	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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% from normal rate of wages	No overtime performed by the employees	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Audit Scope

(Please select the code and additional requirements that were audited against during this audit)

2-Pillar Audit	<input checked="" type="checkbox"/>
10B4: Environment 4-Pillar	<input type="checkbox"/> NA
10C: Business Ethics	<input type="checkbox"/> NA
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.	<input checked="" type="checkbox"/>

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																								
	Management	Worker Representatives																						
Audit attendance	Senior management	Worker Committee representatives	Union representatives																					
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No																					
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No																					
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No																					
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	The facility has not invited the workers representative for meeting as they are busy in production																							
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	The facility does not have union.																							
F: Site description: (Include size, location and age of site. Also include structure and number of buildings)	<p>Ecoline Exim Pvt. Ltd is a partnership concern and it is situated at Village- Khilkapur (North), PO-Noapara, PS-Duttapukur, District- 24 Parganas (North), Barasat, Pin - 700 125, West Bengal, India. They have started their operations in the existing location since July 2008.</p> <p>The total land area occupied by the facility is around 50,000 Square feet and the production floor area is about 40,000 Square feet. The facility is engaged in the Manufacturing of jute & cotton shopping bags.</p> <p>In view of facilities, the facility constitutes of two (02) One concrete building with below details:</p> <table border="1"> <thead> <tr> <th>Production Building no:1</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground floor</td> <td>Checking & packing; finished goods storage</td> <td>Year of establishment is 2008</td> </tr> <tr> <td>First floor</td> <td>Checking & packing</td> <td>Year of establishment is 2008</td> </tr> <tr> <td>Second floor</td> <td>Vacant</td> <td>Year of establishment is 2008</td> </tr> <tr> <td>Production building -2</td> <td></td> <td></td> </tr> <tr> <td>Ground floor</td> <td>Fabric store, cutting, admin</td> <td>Year of establishment is 2010</td> </tr> <tr> <td>First floor & Second floor</td> <td>Stitching</td> <td>Year of establishment is</td> </tr> </tbody> </table>			Production Building no:1	Description	Remark, if any	Ground floor	Checking & packing; finished goods storage	Year of establishment is 2008	First floor	Checking & packing	Year of establishment is 2008	Second floor	Vacant	Year of establishment is 2008	Production building -2			Ground floor	Fabric store, cutting, admin	Year of establishment is 2010	First floor & Second floor	Stitching	Year of establishment is
Production Building no:1	Description	Remark, if any																						
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Second floor	Vacant	Year of establishment is 2008																						
Production building -2																								
Ground floor	Fabric store, cutting, admin	Year of establishment is 2010																						
First floor & Second floor	Stitching	Year of establishment is																						

	<table border="1"> <tr> <td></td> <td></td> <td>2010</td> </tr> <tr> <td>Printing</td> <td>Upper store, Finished goods store</td> <td>Year of establishment is 2010</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td></td> </tr> </table>			2010	Printing	Upper store, Finished goods store	Year of establishment is 2010	Is this a shared building?	No	
		2010								
Printing	Upper store, Finished goods store	Year of establishment is 2010								
Is this a shared building?	No									
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor									
H: Month(s) of peak season: <i>(if applicable)</i>	The facility management representative states that they have consistent production throughout the year.									
I: Process overview: <i>(Include products being produced, main operations, number of production lines, main equipment used)</i>										
<p>The main products manufactured by the facility are jute & cotton shopping bags.</p> <p>The main production processes are listed as follows: Raw material receiving – Cutting – Checking components – Printing - Stitching – Finishing – Packing – Dispatch.</p> <p>Equipment used : Stitching machine , cutting machine ,metal detector .</p> <p>A total of 97 employees (87 male; female – 10) are currently working in the facility, in which 70 employees (all male-60 & female – 10) are from four contractors (All for production) and 27 employees (all male & female-00) are from company payroll. Production employees 78 (male – 68 & female - 10) and non-production employees 19 (all male, female 00). The facility does not employ any foreign nationals.</p> <p>Employees work 6 days a week in a general shift and the facility's working hours as follows.</p> <table border="1"> <tr> <td>General Shift</td> <td>9.00 AM to 6.00 PM</td> </tr> <tr> <td>Lunch</td> <td>1.00 PM to 2.00 PM</td> </tr> <tr> <td>Tea break</td> <td>2 tea breaks staggered each for 15 minutes.</td> </tr> <tr> <td>Weekly off</td> <td>Sunday.</td> </tr> </table> <p>All 97 employees' wages were calculated on monthly basis and paid once in a month on or before 7th day after the expiry of wage period by cash for all the employees. It was given to understand by the facility management that their production remains evenly distributed thought the year.</p>		General Shift	9.00 AM to 6.00 PM	Lunch	1.00 PM to 2.00 PM	Tea break	2 tea breaks staggered each for 15 minutes.	Weekly off	Sunday.	
General Shift	9.00 AM to 6.00 PM									
Lunch	1.00 PM to 2.00 PM									
Tea break	2 tea breaks staggered each for 15 minutes.									
Weekly off	Sunday.									
J: Attitude of workers: <i>(Include their attitude to management, workplace and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>										

10 employees were selected for interview, all the interviewees were favourable with the management and facility environment and no negative information was raised.

K: Attitude of workers committee/union reps:

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

The facility workers showed a positive attitude and favourable during the interview process and observed favourable with the management and facility environment and no negative information was raised.

L: Attitude of managers:

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

The facility management showed a positive attitude during the whole process. All documentation requested for review was provided timely. Access was provided to every part of the facility with ease.

Key Information

Key Information

(click on the key information title to go to appropriate section of the report)

A: Do all workers (including migrant workers) have contracts of employment/employment agreements? <i>(Go to clause 8 – Regular Employment)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Are maximum standard/contracted working hours clearly defined in contract/employment agreements? <i>(Go to clause 8 – Regular Employment)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Were appropriate records available to verify hours of work and wages? <i>(Go to clause 5 – Living Wage)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Were any inconsistencies found? (if yes describe nature) <i>(Go to Wages Table)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence </div> </div>	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum? <i>(Go to clause 5 – Living Wage)</i>	Wages found:	Please indicate the breakdown of workforce according to earnings:
	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	____% of workforce earning under min wage ____% of workforce earning min wage _100_% of workforce earning above min wage
F: % of piece rate workers: (if applicable)	It was noted through review of records and audit process that no piece rate employees are engaged in the facility	
G: Do the standard/contracted hours stated in a contract/employment agreement exceed the law or 48 hours per week? <i>(Go to clause 6 – Working hours)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
H: If yes, what are the standard/contracted hours per week as stated in the contract/employment agreement? <i>(Go to clause 6 – Working hours)</i>	____ hrs/week	Approx. ____% of ALL workers on these contacted hours
	Not applicable	
I: Combined hours (standard/contracted plus overtime = total hours) over 60 per week found? <i>(Go to Working Hours Analysis)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
J: Are workers provided with 1 day off in every 7-day-period, or 2 in 14-day-period (where the law allows)?	<input checked="" type="checkbox"/> Yes 1 day off in every 7-day period <input type="checkbox"/> No If 'No', please explain: Not applicable	

<p>K: Are the correct legal overtime premiums paid? (Go to Wages Table)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium</p> <p>It was noted through review of records and audit process that facility has not engaged their employees for overtime</p>
<p>L: Please state what actual OT is paid. (As a percentage of the workers standard rate) (Go to Working Hours Analysis)</p>	<p>Please give details of overtime premium as a % of standard wages: <input type="checkbox"/> 0% <input type="checkbox"/> 1% – 115% <input type="checkbox"/> 116% – 124% <input type="checkbox"/> 125% – 199% <input type="checkbox"/> 200%+ Please give details: <p>It was noted through review of records and audit process that facility has not engaged their employees for overtime</p> </p>
<p>M: Is there any night production work at the site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>N: % of workers living in site provided accommodation (if applicable):</p>	<p>It was noted through facility tour and audit process that facility has not provided the accommodation to any of their employees inside the facility.</p>
<p>O: Age of youngest worker found: (Go to clause 4 – Child labour)</p>	<p>25 Years old</p>
<p>P: Workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>It was noted through facility tour, review of records and audit process that facility has not engaged any employees under 18 years old and all the employees are found more than 18 years old.</p>
<p>% of under 18's at this site (of total workers)</p>	<p>0 %</p>
<p>Q: What form of worker representation/union is there on site? (Go to clause 2 – Freedom of Association)</p>	<p><input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (specify) (Suggestion box) <input type="checkbox"/> None</p>
<p>R: Is it a legal requirement to have a union? (Go to clause 2 – Freedom of Association)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>S: Is It a legal requirement to have a workers committee? (Go to clause 2 – Freedom of Association)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>T: Is there any other form of effective worker/management communication channel? (Other than union/worker committee) (Go to clause 2 – Freedom of Association)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Describe: The employees states that they can approach their supervisor directly for any grievances, further the facility has provided</p>

	the suggestion box in which the employees can drop their grievances and complaints.
U: Are there any External Processes? <i>(Go to clause 8A – Sub-contracting and Home working)</i>	<input type="checkbox"/> Sub-Contracting <input type="checkbox"/> Homeworking <input type="checkbox"/> Other External Process <input checked="" type="checkbox"/> No external processes

Management Systems

Management Systems:	
A: Nationality of Management	India
B: Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 89.69 % Female: 10.31 %
C: Majority nationality of workers	Indians
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)	__10__ %
E: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe: Not applicable
H: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: The facility has established the policies and procedure with respect to social compliance.
I: If Yes, is there evidence (an indication) of effective implementation? Please give details.	1. The facility has communicated all the policies by displaying the same in the notice board. 2. It was noted through facility tour and audit process that no child labours and forced labour is evidenced in the facility. 3. It was noted through review of records and audit process that no discrimination and Harassment & abuse were observed.
J: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: It was noted through review of records and audit process that the latest training on forced labour, child labour, discrimination, harassment & abuse is conducted on 31/03/2016.
K: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	It was noted through review of records that facility has conducted the latest training on 31/03/2016 and maintained the training records for the same.
L: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: It was noted through facility tour that facility has provided the

	suggestion box in the facility.
M: If Yes , are workers aware of these channels? Please give details.	It was noted through audit process that all the interviewed employees are aware of the suggestion box provided in the facility.
N: Have health and safety risks been identified e.g. through internal audits, formal risk analysis process, worker involvement etc.?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: The facility has conducted the risk assessment to identify the health and safety risks on the facility
O: If Yes , has effective action been taken to reduce or eliminate these risks?	It was noted through review of records and audit process that facility has provided the training to their employees for Personal Protective Equipment's (PPE) usage, Machine handling and chemical handling.
P: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: It was noted through review of records that facility has maintained the Accident register and the same found updated till March 2016, further no accidents were observed in past one year.
Q: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work hours?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: It was noted through review of records that the work load is matching with the production records.
R: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	Yes
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).	No
T: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: One Manager with 01 executive available.

Worker Analysis

Worker Analysis								
	Local			Migrant				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – male	27	00	60	00	00	00	00	87
Worker numbers – female	00	00	10	00	00	00	00	10
Total	27	00	70	00	00	00	00	97
Number of Workers interviewed	02	00	08	00	00	00	00	10

Contractors:

(Individuals supplying workers to site with the workers paid by contractors, not by site)

A: Any contractors on site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: If Yes, how many workers supplied by contractors	<p>It was noted through review of records that facility had not obtained registration certificate for employees working through labour contractors. At present facility working with four labour contractors as per below-</p> <ol style="list-style-type: none"> 1.. M/S Hindustan Fabric – 51 employees (Production) 2. M/S M. K. Enterprise - 10 employees (Production) 3. M/S Md. Faruk – 05 employees (Production) 4. M/S Jagdish Sarkar – 04 employees (Production).
C: Are all contractor workers paid according to law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, Please give evidence for contractor workers being paid according to law:	<p>During the audit process the contract workers has been included in the workers interview and wages verification based on the review of selected contract employees wages records which is provided by the audit facility shows that the audit factory paying the legal minimum wages to the all contract employees fixed by the concern authority in the state Minimum Wages Notification.</p>

Migrant Workers:
(Please see SMETA Best Practice Guidance and Measurement Criteria for definitions of migrant workers)

D: Originating Locations/Countries:	No migrant workers on site
E: Type of work undertaken by migrant workers :	No migrant workers on site
F: Were migrant workers recruited through an agency? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe: No migrant workers on site
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
G: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Not applicable as the facility does not use any agencies.
H: Percentage of migrant workers in company provided accommodation:	No migrant workers on site

Audit Results by Clause

0: 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:

1. It was noted through review of documents that the facility has implemented and maintained the system for delivering compliance to this code.
2. The facility has appointed Mr. Mr. Anup Kumar Bhuwalka- General Manager is responsible for compliance with the code.
3. It was observed during tour of the facility that the facility has displayed ETI Code of conduct at notice board.
4. It was also noted through interaction with the employees, review of documents that the facility has conducted ETI awareness to all the employees. Last training was conducted 31/03/2016.
5. It was noted through review of records that facility has established social policy and procedures based on the ETI code of conduct and communicated to employees by posting.
6. ETI code is communicated to supplier and their supply chain via purchase contract evaluation form.

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

1. Policies review
2. ETI base code
3. Documents review (Statutory and Non Statutory)
4. Management Interview
5. Workers Interview.

Non-compliance:

1. Description of non-compliance:

☒ NC against ETI/Additional Elements

☒ NC against Local Law

Based upon document review and interaction with management it was noted during that factory license (no. 16794) was expired on dated 31/12/2015. However facility had applied for the same on dated 31/12/2015.

Local law:

In accordance with the West Bengal Factories Act 1958, as applicable to West Bengal, Rule 6, Renewal of license

(1) Every applicant for renewal shall be submitted as nearly as possible in Form No. 2, in duplicate, to the Chief Inspector, on or before the 31st December of the year prior to that to which the application relates.

(2) The fee that shall be charged for the renewal of a license shall be subject to the scale of fees laid down in Schedule A or Schedule B or Schedule C as may then be applicable to the factory in respect which application for renewal of license is submitted to the Chief Inspector.

ETI requirement:

In accordance to ETI base code 0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.

Recommended corrective action:

It is recommended that the facility shall obtain renewed factory license.

Action By: Mr. Anup Kumar Bhuwarka- General Manager

Time Scale: 90 Days

Verification method - Desktop

Objective evidence observed:

(where relevant please add photo numbers)

Review of records & and interaction with management.

Non-compliance:

2. Description of non-compliance:

☒ NC against ETI/Additional Elements

☒ NC against Local Law

It was noted through review of records that one of the contractor called M/S Hindustan Fabric (51 employees working in production) license was expired on dated 31/12/2015. However the contractor was applied on dated 30/12/2015 for the renewal of the license.

Local law:

The Contract Labour (Regulation & Abolition) Act, 1970. The Act Applies : (i) To Every Establishment Employing twenty or more contract labourers; and (ii) to every contractor who employs/employed twenty or more workmen [Sec.I(4)]. In West Bengal the number of workmen is 10 or more.

In accordance with The Contract Labour (Regulation and Abolition) Central Rules, 1971, Section 29 1) Every contractor shall apply to the licensing officer for renewal of the licence. 2) Every such application shall be in Form VII in triplicate and shall be made not less than thirty days before the date on which the licence expires, and if the application is so made, the licence shall be deemed to have been renewed until such date when the renewed licence is issued

ETI requirement:

In accordance to ETI base code 0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.

Recommended corrective action:

It is recommended to the facility contractor to obtain renewed license from the authority.

Action By: Mr. Anup Kumar Bhuwarka- General Manager

Time Scale: 90 Days

Verification method - Desktop

Objective evidence observed:

(where relevant please add photo numbers)

Review of records.

Non-compliance:

3. Description of non-compliance:

☒ NC against ETI/Additional Elements

☒ NC against Local Law

During review of prevention of harassment and abuse committee meeting records and management interaction it was noted that facility has members from management (05 employees) and employees side (06 employees); however they have not ensured that member from outside NGO's is also member of Prevention of Sexual Harassment committee. Last meeting conducted on 31/03/2016.

Local law:

In accordance with Sexual harassment of women at workplace (prevention prohibition redressal) Act 2013, Section – 4 (2) the internal committee shall consist of the following members to be nominated by the employer namely (c) one member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment in time.

Objective evidence observed:

(where relevant please add photo numbers)

Review of records.

<p>ETI requirement: In accordance to ETI base code 0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>Recommended corrective action: It is recommended to the facility to engage member from outside NGO in Prevention of Sexual Harassment (POSH) committee meetings and to maintain relevant records with respect to their attendance during committee meeting.</p> <p>Action By: Mr. Anup Kumar Bhuwarka- General Manager</p> <p>Time Scale: 60 Days Verification method - Desktop</p>	
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Observation:	
<p>Description of observation: None observed</p> <p>Local law or ETI requirement: Not applicable.</p> <p>Comments: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective evidence observed: Not applicable</p>

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:

1. It was noted through audit process, that all the employees in the facility are free to leave their employment with reasonable notice period.
2. The facility does not hold any part of the wages which restrict the employees to leave their jobs.
3. The facility has provided the terms and conditions to all the employees without any agreement to restrict the employees to resign their job.
4. It was noted through audit process, the facility does not require any deposit of employee's identification such as education certificates and passport.
5. It was noted through audit process, that the facility does not limit the employee's freedom in any way.
6. It was noted through audit process, there is no evidences of involuntary labour.

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

1. Recruitment Policy
2. Employees Personal files
3. Employees contract to establish notice periods.
4. Employees Interview to verify the deposits, any contract agreement.

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law:

No Non-compliance was observed on the date of audit.

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

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:

1. The facility has established the policy and procedures on Freedom of association, which states that employees are free to form the union and bargain collectively, further the facility shall not restrict any of the employees to join the union and the union members shall not be discriminated or restricted for job.
2. It was noted through audit process that employees can approach their supervisors and if required managers to resolve any issues.
3. It was noted through facility tour that facility has provided the confidential suggestion box which are easily accessible to all the employees where employees can drop their grievances/suggestions.
4. It was noted through audit process that employees without distinction, have the right to join or form trade unions of their own choosing.
6. It was noted through audit process that facility does not have labour union/collective bargaining agreements.
7. Workers committee meeting conducted in every 03 months. Last meeting conducted on dated 31/03/2016

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

1. Company policies and procedures.
2. Management interview
3. Worker interview
4. Suggestions box records.
5. Works committee meeting records.

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: No Non-compliance was observed on the date of audit. Local law and/or ETI requirement Not applicable. Recommended corrective action: Not applicable.	Objective evidence observed: <i>(where relevant please add photo numbers)</i> Not applicable.

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

A: Name of union and union representative, if applicable:	No union exists in the facility	Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
B: If no union what is parallel means of consultation with workers e.g. worker committees?	It was noted through audit process that employees can approach their supervisors and if required managers to resolve any issues. It was noted through facility tour that facility has provided the confidential suggestion box which are easily accessible to all the employees where employees can drop their grievances/suggestions. Workers committee meeting conducted in every 03 months. Last meeting conducted on dated 31/03/2016	Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

C: Were worker representatives/union representatives interviewed	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please state how many: Not applicable	
D: State any evidence that union/workers committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	Workers committee meeting conducted in every 03 months. Last meeting conducted on dated 31/03/2016	
E: Are any workers covered by Collective Bargaining Agreement (CBA)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
F: If Yes what percentage by trade Union/worker representation	<input type="text"/> % workers covered by Union CBA	<input type="text"/> % workers covered by worker rep CBA
G: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay	<input type="checkbox"/> Yes <input type="checkbox"/> No There is no Collective bargaining agreement in the facility	

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

3: Working Conditions are Safe and Hygienic

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. The facility has assigned Mr. Anup Kumar Bhuwarka- General Manager with the responsibility to ensure a healthy and safe working environment in the facility.
2. The facility has provided 29 fire extinguishers, 11 fire alarms with hooter, 08 smoke detectors, 07 hydrant & hose reels, 20 emergency lights, 02 centralized fire alarm indication panel and 10 first aid boxes in the facility.
3. The facility has provided the clean & sufficient number of functional toilets for male (Toilets-09) & female employees (Toilets-01).
5. The facility has provided the clean drinking water to their employees (02 drinking water points) and the last drinking water portability test was conducted on 09/07/2015.
6. The facility has provided the required appropriate Personal Protective Equipment's (PPE) like face mask, apron, gum boot, hand gloves, finger guard etc to all the applicable employees
7. The facility has provided the Health and safety training (PPE training & Chemical training) for their employees and records were maintained, last training for PPE was conducted on 31/03/2016
8. The facility has trained 29 employees for fire fighting and last training was conducted on 31/03/2016.
9. The facility is conducting fire drill every 06 months in place of in every 02 months and the last fire drill was conducted on 31/03/2016.
10. The facility has provided the Personal protective equipment to all the concerned employees free of cost.
11. The facility has trained 06 employees in rendering first aid treatment and last training was conducted on 12/03/2016 through St.John Ambulance (India).

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

1. Accident records,
2. Facility tour
3. Training records

4. Various legal certificates related to employee safety and machinery safety tests.
5. Fire fighting / drill training records.
6. First aid training records.

Non-compliance:

1. Description of non-compliance:

☒ NC against ETI ☒ NC against Local Law

It was noted through facility tour that in the printing section situated in third floor of the second building, 01 out of 02 emergency exit opening inward direction (Not opening in the direction of travel).

Local law:

According to West Bengal Factories Rules (1958), Rule 61(10) (t) Exit doorways shall open outwards, that is way from the room but shall not obstruct the travel along any exit. No door, when opened, shall reduce the required width of stairway or landing to less than 90 centimeters. Sliding doors with up_down movement shall not be installed for this purpose.

ETI requirement:

In accordance to ETI base code 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, 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 exit doors opening in direction of travel (outward direction) in the printing section situated in third floor of the second building,

Action By: Mr. Anup Kumar Bhuwalka- General Manager

Time Scale: 30 Days

Verification method - Desktop

Objective evidence observed:

(where relevant please add photo numbers)

Facility tour

Non compliance Photo no# 01

Non-compliance:	
<p>2. Description of non-compliance:</p> <p><input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law</p> <p>It was noted through facility tour that facility had not provided rubber mat below the electrical panel in ground floor of the building 1.</p> <p>Local law: In accordance with Factories Act 1948, Section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall 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 arrangements 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, (c) the provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.</p> <p>ETI requirement: In accordance to ETI base code 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Recommended corrective action: It is recommended to the facility to provide rubber mat below the electrical panel to avoid electrical hazard to its user.</p> <p>Action By: Mr. Anup Kumar Bhuwalka- General Manager</p> <p>Time Scale: 30 Days Verification method - Desktop</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>Facility tour Non compliance Photo no# 02</p>

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

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:

1. The facility has established a policy on prohibition of child labour which stated that the facility prohibit child labour in the facility.
2. This policy is communicated to all employees and displayed on notice board of the facility.
3. The facility has maintained the copies of school certificate, voter's ID card, PAN card and adhar card for the verification of age of the employees.
4. The minimum hiring age for working in the facility is 18 years old and the facility has displayed the "No child labour policy" at the security area.
5. It was noted through audit process that the least age of the employee working the facility is 25 years old.

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

1. Facility hiring policy
2. Anti child labour policy
3. Review of Age proof records- dental certificates and school leaving certificates
4. Review of Personnel files

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law:

No Non-compliance was observed on the date of audit.

Local law and/or ETI requirement

Not applicable.

Recommended corrective action:

Objective evidence observed:

(where relevant please add photo numbers)

Not applicable.

Not applicable.	
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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

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:

1. The facility has displayed the applicable minimum wage rates on the notice boards and all employees are aware of the same.
2. It was noted through review of existing records, interview with the employees that the facility issues detailed pay slips for each period in easily understandable language to all the employees.
3. It was noted through review of records and audit process that the facility not employed any employees on piece rate system.
4. It was noted through audit process that, the facility is paying the wages of their employees before the expiry of 5th of every month.
5. It was noted through review of records and audit process that, all the employees are paid as per applicable legal minimum wages as per law.
6. It was noted through review of records and audit process that no fines / illegal deductions are made from the wages of the employees as a disciplinary measure.
7. It was noted through review of records and audit process that facility has the system in place to provide attendance bonus to their employees who achieves the full attendance in a month.
8. The facility has extended the leave with wages and bonus benefits to all the applicable employees and maintains the records for the same.
9. The facility has paid the wages for all the declared paid holidays to their employees.

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

1. Wages records for the period April 2015 to March 2016.
2. Social security benefits records for the period April 2015 to March 2016
3. Workers interview.

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: No Non-compliance was observed on the date of audit. Local law and/or ETI requirement Not applicable. Recommended corrective action: Not applicable.	Objective evidence observed: <i>(where relevant please add photo numbers)</i> 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

Wages analysis: <i>(Click here to return to Key Information)</i>		
A: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	10 selected samples for the month of March 2016 (Current month). 10 selected samples for the month of November 2015 (Random month). 10 selected samples for the month of May 2015 (Random month).	
B: Are there different legal minimum wage grades? If Yes, please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If Yes, please give details: Unskilled-INR 6634.00 per month Semi skilled- INR 7296.00 per month Skilled- INR 8026.00 per month Applicable from January 2016
C: If there are different legal minimum grades, are all workers graded correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	If No, please give details:
D: What deductions are required by law e.g. social insurance? Please state all types:	Provident Fund and Employment State Insurance.	
E: Have all of these deductions been made? Please list all deductions that have/have not been made.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If Yes, Please list all deductions that have been made: 1. Provident Fund 2. Employee state insurance If No, please give details on any deductions which have not been made:
F: Industry norm for this region: <i>(please include time period e.g. hour/week/month)</i>	In Accordance with Minimum wages Act 1948 Sec 12(1) Where in respect of any scheduled employment a notification under section 5 is in force, the employer shall pay to every employee engaged in a scheduled employment under him, wages at a rate not less than the minimum rate of wages fixed by such notification for that class of employees in that employment without any deductions except as may be authorised within such time and subject to such conditions as may be prescribed.	

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)	March 2016	March 2016	March 2016
B: Anonymous Employee Reference/Dept.	A / Production	B / Production	C / Production
C: Employee Gender	Male	Male	Male
D: Contracted/Standard working hours: (excluding OT – please include time period e.g. hour/week/month)	160 hours/ month	208 hours/ month	152 hours/ month
E: Contracted /Standard work pay rate: (excluding OT – please include time period e.g. hour/week/month)	INR 6810 per month	INR 8680 per month	INR 9300 per month
F: Standard day overtime – hours: (please include time period e.g. hour/week/month)	0 hours/month	0 hours/month	0 hours/month
G: Standard day overtime – wage: (please include time period e.g. hour/week/month)	INR 00.00 per month	INR 00.00 per month	INR 00.00 per month
H: Rest day overtime – hours: (please include time period e.g. hour/week/month)	0 hours / month	0 hours / month	0 hours / month
I: Rest day overtime – wage: (please include time period e.g. hour/week/month)	INR 00.00 per month	INR 00.00 per month	INR 00.00 per month
J: Statutory Holiday overtime – hours: (please include time period e.g. hour/week/month)	0 hours / month	0 hours / month	0 hours / month

K: Statutory holiday OT – wages: (please include time period e.g. hour/week/month)	INR 00.00 per month	INR 00.00 per month	INR 00.00 per month
L: Total overtime hours: (please include time period e.g. hour/week/month)	0 hours / month	0 hours / month	0 hours / month
M: Incentives/Bonus/ Allowances etc.: (please include time period e.g. hour/week/month)	INR 1206	INR 00.00 per month	INR 00.00 per month
N: Gross wages: (please include time period e.g. hour/week/month)	INR 5600 per month	INR 7280 per month	INR 5700 per month
O: Social insurance and other deductions; please list which and amount.	Total – INR 204 per month (Provident Fund & Employee State Insurance)	Total – INR 290 per month (Provident Fund & Employee State Insurance)	Total – INR 346 per month (Provident Fund & Employee State Insurance, Tax)
P: Actual wage paid after deduction: (please include time period e.g. hour/week/month)	INR 5396 per month	INR 6990 per month	INR 5354 per month
Comments: (Please state here any specific reasons/circumstances that explain the lowest and highest gross wages)			
The above data is based on wage and time records made available to auditor for verification. Wages depend on the skill sets.			
Q: Is there a defined living wage: <i>This is <u>not</u> normally minimum legal wage. If answered Yes please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No Please specify amount/time period: Facility has not defined any living wages. However the facility follows the legal minimum wage as notified by the West Bengal state government.		
R: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes- All the employees are paid on or before 7th of every month <input type="checkbox"/> No		
S: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: It was noted through review of existing records and audit process that same skill employees were paid with the same wages.		
T: How are workers paid:	<input checked="" type="checkbox"/> Cash (Contracted employees) <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other		

	If other explain:
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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 **all** of the following are met:

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

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

Current Systems and Evidence Examined

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

Current systems:

1. It was noted through audit process that there is no compulsion on overtime work and the overtime work is voluntary for all the employees in the facility.
2. It was noted through review of records that, employees are working 8 hours per day and 48 hours per week as regular work hours and overtime worked by employees does not exceed legal requirements.
3. It was noted through review of records and audit process that facility is working in General shift with 1 hour break and provided the Sunday as weekly rest day.
4. The facility has provided the weekly rest day after every 6 consecutive working days for all the employees.
5. The facility has declared 13 days as paid holidays for the year 2015-2016 and displayed the same in the facility notice board.

Evidence examined – to support system description (Documents examined & relevant comments. Include

renewal/expiry date where appropriate):

1. In/Out Time records from April 2015 to March 2016.
2. Employees Interview.
3. Management interview
4. Employment contracts

Working hours analysis:

- In March 2016 (Current month), the average working hours of 10 selected samples were 42.00 hours/week. Maximum working hours per week were found as 48 hours per week (04 out of 10 selected samples).
- In November 2015 (Random month), the average working hours of 10 selected samples were 41.90 hours/week. Maximum working hours per week were found as 48 hours per week (05 out of 10 selected samples).
- In May 2015 (Random month), the average working hours of 10 selected samples were 40.60 hours/week. Maximum working hours per week were found as 48 hours per week (03 out of 10 selected samples).

Non-compliance:
1. Description of non-compliance:
☐ NC against ETI ☐ NC against Local Law:

No Non-compliance was observed on the date of audit.

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):	Objective evidence observed:
None observed	Not applicable

Working hours analysis			
Please include time period e.g. hour/week/month (Go back to Key information)			
Systems & Processes			
A: What timekeeping systems are used: time card etc.	Manual time recording system		
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)	10 selected samples for the month of March 2016 (Current month). 10 selected samples for the month of November 2015 (Random month). 10 selected samples for the month of May 2015 (Random month).		
C: Do ALL workers have contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If NO, state which type of workers do NOT have contracts/employment agreements: Not applicable	
D: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If NO, please state which type of workers do NOT have standard hours defined in contracts/employment agreements. Not applicable	
E: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Please complete as appropriate: <input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other If "Other", Please define: Not applicable	
Standard/Contracted Hours worked			
F: Do standard/contracted standard hours ever exceed the law or 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES give details and comparison (local law/48 hrs week) Not applicable	
G: What are the actual standard/contracted hours worked in sample (State per week/month)	Highest hours:	48 hours per week	
	Lowest hours:	48 hours per week	
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Please give details Not applicable	

site?								
Overtime Hours								
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours:	0 hours overtime worked in the month of March 2016 0 hours overtime worked in the month of November 2015 0 hours overtime worked in the month of May 2015						
	Lowest OT hours:	0 hours overtime worked in the month of March 2016 0 hours overtime worked in the month of November 2015 0 hours overtime worked in the month of May 2015						
J: Range of overtime hours over all workers/or as large a sample as possible. (State per week/month and details)	___ to ___ in ___ (month) ___ to ___ in ___ (month) ___ to ___ in ___ (month) It was noted through review of actual in/out time records and audit process that no overtime is performed by any of the selected employees.							
K: Approximate percentage of workers on highest overtime hours	___ 0 ___ %							
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	Please detail evidence e.g. Wording of contract/employment agreement/handbook/worker interviews/refusal arrangements:						
		As per employees interview and employment contract.						
Overtime Premiums								
M: Is overtime paid at a premium?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Please give details of normal day overtime premium as a % of standard wages:						
		<table border="1"> <tr> <td><input type="checkbox"/> 0%</td> <td><input type="checkbox"/> 1 – 115%</td> <td><input type="checkbox"/> 116 – 124%</td> <td><input type="checkbox"/> 125 – 149%</td> <td><input type="checkbox"/> 150 – 199%</td> <td><input type="checkbox"/> 200%+</td> </tr> </table>	<input type="checkbox"/> 0%	<input type="checkbox"/> 1 – 115%	<input type="checkbox"/> 116 – 124%	<input type="checkbox"/> 125 – 149%	<input type="checkbox"/> 150 – 199%	<input type="checkbox"/> 200%+
		<input type="checkbox"/> 0%	<input type="checkbox"/> 1 – 115%	<input type="checkbox"/> 116 – 124%	<input type="checkbox"/> 125 – 149%	<input type="checkbox"/> 150 – 199%	<input type="checkbox"/> 200%+	
Any other comments: It was noted through review of actual in/out time records and audit process that no overtime is performed by any of the selected employees.								
N: ETI Code requires a prevailing standard to give greatest worker protection. If a site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant. Multi select is	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other Not applicable							
	Please explain any checked boxes in N above e.g. detail of consolidated							

possible.	pay CBA or Other.	
	Not applicable	
Rest Days		
O: Are workers provided with 1 day off in every 7-day-period, or 2 in 14-day-period (where the law allows)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Maximum number of days worked without a day off (in sample):
		06 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 in the month of March 2016 48 hours/week in the month of November 2015 48 hours/week in the month of May 2015
	Lowest total hours	32 hours/week in the month of March 2016 24 hours/week in the month of November 2015 24 hours/week in the month of May 2015
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.	<input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons	
	Not applicable	
	Please explain any checked boxes in R above	
	Not applicable	
Comments: (please state here any specific reasons/circumstances that explain the highest working hours)		
None		

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. The facility has established an Anti-discrimination policy, which states that there shall not be any discrimination based on caste, creed, sex, religion, gender, colour, language, race, political affiliation, union membership etc.
2. The facility provides equal access to employment as well as equal pay for equal work.
3. It was noted through review of records and audit process that, there is no case of discrimination based on gender, race, religion etc. in hiring, compensation, access to training, promotion, termination or retirement.
4. The facility has assigned Mr. Rajeev Kumar Mishra/ General Manager as responsible for the investigation and disposal of any discrimination issues.

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

1. Anti Discrimination Policy
2. Management interview
3. Wage records.
4. Employees interview

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law:

No Non-compliance was observed on the date of audit.

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

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

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

Current systems:

1. The facility has established the policy and procedures for hiring.
2. The facility has hired the all the employees working in the facility through direct recruitment.
3. The facility has extended all the required benefits to all the applicable employees in the facility.
4. The facility has provided the terms and conditions to all the selected employees in the facility and had filed a copy of the same in the employee's personal file.
5. The facility has provided the regular employment for all the employees working in the facility.

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

1. Review of employment / recruitment policies.
2. Copy of employment contracts (Appointment letters) of all selected employees.

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law:

No Non-compliance was observed on the date of audit.

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

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:

It was noted through facility tour, review of records and audit process that facility is carrying out all parts of its production inside the facility premises and no processes are sub-contracted. No homeworkers are used.

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

1. Facility tour
2. Production records
3. Material Inward/Outward Register
4. Management interview
5. Workers interview

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

Process Subcontracted	Process 1	Process 2
Name of factory		
Address		

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: No Non-compliance was observed on the date of audit. Local law and/or ETI requirement Not applicable. Recommended corrective action: Not applicable.	Objective evidence observed: <i>(where relevant please add photo numbers)</i> 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

Summary of sub-contracting – if applicable	
A: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , summarise details:
B: Number of sub-contractors/agents used	Not applicable
C: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> 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 applicable Not applicable			
F: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , summarise details:		
G: Number of homeworkers	Male: Nil	Female: Nil	Total: Nil
H: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents Not applicable		
I: If through agents, number of agents	Not applicable		
J: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable		

N: Are full records available at the site?

☐ Yes
☐ No
Not applicable

9: No Harsh or Inhumane Treatment is Allowed

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. The facility has established the policy and procedures for anti-sexual harassment and all employees are aware of the policy and disciplinary procedures of the facility.
2. It was noted through audit process that, there is no case of harsh, inhumane or abuse of the employees were noted. Since March 2016, no complaints or issues were raised by the employees against this clause.
3. It was noted through audit process that, all the employees are treated with respect and dignity.
4. It was noted through review of records and audit process that no evidence of physical abuse, sexual or any other harassment / verbal abuse is observed / reported.

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

1. Policy review
2. Worker interview
3. Management interview

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law:

No Non-compliance was observed on the date of audit.

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

10. 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:

1. It was noted through review of documents, interview with the employees and interaction with the facility management that facility does not have or employ any foreign or immigrant employees. All employees are local employees who have legal right to work in the facility.
2. It was noted through review of records and interaction with facility management that facility hires employees only through registered contractors or external agencies, however at present there is no migrant employees are employed in the facility.
3. It was noted through facility tour and audit process that there is no evidence of prison labour in the facility.

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

1. Personnel records.
2. Interaction with facility management.

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law:

No Non-compliance was observed on the date of audit.

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

10. Other issue areas 10 B 2: Environment 2-pillar

(Click here to return to NC-table)

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

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

10B2. 2 The supplier should be aware of and comply with their end clients' environmental requirements.

Note for auditors and readers, This is not a full environmental assessment but a check on basic systems and management approach.

Current Systems and Evidence Examined

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

Current systems:

1. The facility is aware of legal requirements related to environment and the facility has established the Environment policy and procedures.
2. The facility has assigned Mr. Anup Kumar Bhuwalka- General Manager as the responsible person to ensure that environmental activity is carried out in a proper manner.
3. The facility has obtained the Air & Water Combined Consent obtained from West Bengal State Pollution Control Board under Water Act 1974 and Air Act 1981 valid till 30/09/2018.

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

1. Consent for Air and Water.
2. Environmental policy.
4. Environmental policy
5. Electricity bills
6. Water consumption records
7. Worker and management interview.
8. Facility tour

Non-compliance:	
<p>1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law:</p> <p>Based on the management interaction it was noted that facility had not conducted noise monitoring tests.</p> <p>Local law: Noise - In accordance with Noise Pollution (Regulation and Control) Rules 2000, Rule 4 (01) the noise levels in any area/zone shall not exceed the ambient air quality standards in respect of noise as specified in schedule 2.</p> <p>ETI requirement 10B2. 1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p>Recommended corrective action: It is recommended to the facility to get the noise tests conducted from approve agency and to keep records for compliance verification.</p> <p>Action By: Mr. Anup Kumar Bhuwalka- General</p> <p>Time Scale: 60 Days Verification method - Desktop</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>During document review</p>

Non-compliance:	
<p>2. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law:</p> <p>Based on the management interaction it was noted that facility had not conducted ambient air test.</p> <p>Local law: According to Section 9 of The Environment (Protection) Act, 1986: Furnishing of information to authorities and agencies in certain cases.- (1) Where the discharge of any environmental pollutant in excess of the prescribed standards occurs or is apprehended to occur due to any accident or other unforeseen act or event, the person responsible for such discharge and the person in charge of the place at which such discharge occurs or is apprehended to occur shall be found to prevent or mitigate the environmental pollution caused as a result of such discharge and shall also forthwith- (a) intimate the fact of such occurrence or apprehension of such occurrence; and (b) be found, if called upon, to render assistance, to such authorities or agencies as may be prescribed.</p> <p>ETI requirement 10B2. 1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>During document review</p>

<p>Recommended corrective action: It is recommended to the facility to get ambient air tests in regular interval..</p> <p>Action By: Mr. Anup Kumar Bhuwalka- General</p> <p>Time Scale: 60 Days Verification method - Desktop</p>	
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Observation:	
<p>Description of observation: None observed</p> <p>Local law or ETI requirement: Not applicable.</p> <p>Comments: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective evidence observed: Not applicable</p>

Worker Interview Summary

Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria)	4 workers in 1 group	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	Male: 04	Female: 02
E: Total number of interviewed workers (Please see SMETA Best Practice Guidance and Measurement Criteria)	Male: 08	Female: 02
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	None	
I: What did the workers like the most about working at this site?	It was noted through employee's interview, all the employees were favourable with the management and facility environment. 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:	It was noted through audit process that all the interviewed showed their positive attitude to the hours worked in the facility.	

Agency Workers (if applicable) <i>(workers sourced from a local agent who are not directly paid by the site)</i>	
A: Number of agencies used (average):	<p>It was noted through review of records that facility had not obtained registration certificate for employees working through labour contractors. At present facility working with four labour contractors as per below-</p> <p>M/S Hindustan Fabric – (Production) M/S M. K. Enterprise - (Production) M/S Md. Faruk – (Production) M/S Jagdish Sarkar – (Production).</p>
B: Were agency workers' age/pay/hours included within scope of this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Other findings

Other Findings Outside the Scope of the Code



None Observed

Community Benefits

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

None Observed

Photo Form

		
Facility name; timing displayed	Employee attendance system-biometric	Facility building
		
Facility 2 nd building	Facility notice board	Suggestion box
		
Assembly point	Sprinkler system	Smoke detector

		
Fire extinguisher	Fire extinguisher- refill date	Fire hydrant, hose box
		
Hose reel	Fire alarm call point	Fire alarm control panel
		
Evacuation plan displayed	Aisled route	Drinking water point
		
Lift	Toilet	First aid box

		
Fabric store	Cutting section	Printing section
		
Stitching section	Finishing & packing	Packed goods section

NON COMPLIANCE PHOTOS

		Not applicable
1. Inward opening exit in third floor – second building- printing section	2. Rubber mat not provided	Nil

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=riPsbE0PQ52ehCo3Ing5lw_3d_3d

Click here for B members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d

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