



# Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: [REDACTED]	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: [REDACTED]	
Business name (Company name):	[REDACTED]			
Site name:	[REDACTED]			
Site address: <i>(Please include full address)</i>	[REDACTED] [REDACTED] [REDACTED] [REDACTED] Tamil Nadu	Country:	India	
Site contact and job title:	[REDACTED]			
Site phone:	[REDACTED]	Site e-mail:	[REDACTED]	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	02.09.2021 to 04.09.2021			

<b>Audit Company Name &amp; Logo:</b>   ...making excellence a habit™ BSI Group India Pvt. Ltd.	<b>Report Owner (payer):</b> <i>(If paid for by the customer of the site please remove for Sedex upload)</i>  [REDACTED]
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact [grievance@sedex.com](mailto:grievance@sedex.com).

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



## Audit Content:

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

(2) The audit scope was against the following reference documents

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)

(3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.

(4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.



## SMETA Declaration

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

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

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

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

Lead auditor: Karthikeyan. G

APSCA number: RA 21700724

Lead auditor APSCA status: RA

Team auditor:

APSCA number:

Interviewers: Karthikeyan. G

APSCA number: RA 21700724

Report writer: Karthikeyan. G

Report reviewer:

Date of declaration: 04.09.2021

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

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



## Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> <i>Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A <u>Universal Rights covering UNGP</u>			<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>Summary of Observation finding 1</li> <li>Summary of Observation finding 2</li> <li>Summary of Good Example finding 1</li> <li>Summary of Good Example finding 2</li> </ul>
0B <u>Management systems and code implementation</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>Summary of Non-Compliance finding 1</li> <li>Summary of Non-Compliance finding 2</li> <li>Summary of Observation finding 1</li> <li>Summary of Observation finding 2</li> <li>Summary of Good Example finding 1</li> <li>Summary of Good Example finding 2</li> </ul>
1. <u>Freely chosen Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> <li></li> <li></li> </ul>
2. <u>Freedom of Association</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> <li></li> <li></li> </ul>



3	<u>Safety and Hygienic Conditions</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>				Rubber mat is not evidenced in one of the electric panel of DG set.
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				•
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				•
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				•
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				•
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				•
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				•
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				•
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				•



10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• •
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• •
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• •

#### General observations and summary of the site:

#### General observations and summary of the site:

- The organisation is involved in the Manufacture and Exports home textile made ups.
- Out Source Process: Dyeing and Lamination  
Contracted Process : Nil  
Overall responsibility for ETI Base Coded standards is taken by Mr.
- There is a total of On Roll workers 170 on site out of which Male 103 and Female 67. During the audit days 129, 130 and 134 were present.
- The youngest worker on site is 21 years old. No young and child labour observed during the audit. No historical child labour noted.
- There is no union at this factory. Workers committees, Health and Safety Committees and Anti Sexual harassment committees are functioning as the channel mechanism for their complaints in addition to the suggestion boxes
- There is evidence of both male and female in management and among supervisor. The distribution of manpower is Male 61%, Female 39%.
- No discrimination, harsh treatment and forced labour identified in the factory. Workers are given equal opportunity in work distribution, enjoying benefits according to the legal requirement, promotions and move freely without any restriction.



- 26 workers were randomly selected for interview covering 11 Female and 15 Male workers; they were interviewed as 6 individual workers and five group of four workers were interviewed. As per the outcome of the interview, they are equally treated and entitle to benefits as required by the local regulation. All workers said they were satisfied with their employment.
- Standard working hours in the facility is 8 hours a day, 48 hours per week and rest on Sunday. No overtime given to the employees.
- All workers are paid above the minimum wage of as per the Tamil Nadu minimum wage (Please refer to clause 5 for more details) per month and provided with payslip at least one day before the salary day. No late salary payment noted.

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



## Site Details

Site Details		
A: Company Name:		
B: Site name:		
C: GPS location: (If available)	GPS Address:	Latitude: Longitude:
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>1. Verified Factory License No: Register No: VN approved by Joint Director of Industrial Safety and Health, Sivakasi. Maximum of 250 Employees and 500 HP. Valid up to 31.12.2021.</p> <p>2. Verified the Fire License No: L. Dis No: E/2020, dated 21.12.2020, Issued by District Officer – Fire rescue service, Virudhunagar.</p> <p>3. Verified the Sanitary Certificate, Certified by Health Inspector, Government Health Centre – Chatrapatti. Dated 11.05.2021.</p> <p>4. Verified the Certified Standing Order, certified by Certifying Officer – JCL – Madurai – D/ Dated 05.11.18. The standing orders are displayed in local language (Tamil) in the Notice board.</p> <p>5. Verified Genset installation certificate No. /2013 Dated 21.03.13 for 82.5 KVA and for 110 KVA – Refer Certificate No : – Dated 26.07.99, issued by the Electrical Inspector, Virudhunagar.</p> <p>6. Verified The Building complete plans are approved by the Joint Director, Directorate of Industrial Safety and Health, Sivakasi through Letter Nimu No: /2020, dated 21.09.2020.</p> <p>7. Verified the Building Stability dated 22.09.2020 – issued by Er. M. Loganathan, (H1/ /2017 dated 06.10.2017). Valid for 3 years from the date of issue.</p> <p>8. Verified the Drinking Water test certificate done by Tamilnadu water supply and drainage board district water Testing Laboratory Virudhunagar. Report No: Letter No. /JWA/ DWTL/VNR/2021 Dated 14.06.2021. concluded that the water sample is Physically, chemically and bacteriological potable.</p> <p>9. Verified the Noise Level Survey Report done by Excellence Laboratory Report No: -2020 Dated 12.11.2020, tested all the areas.</p> <p>10. Verified the Lux level monitoring report done by Excellence Laboratory Report No -2020 Dated 12.11.2020 tested at all the areas.</p> <p>11. Verified the Indoor Air Quality survey report done by Excellence Laboratory Report No: -2020 Dated 12.11.2020 and tested in all the areas.</p> <p>12. verified the Genset Stack &amp; Wooden Boiler Stack monitoring done by Excellence Laboratory Report No: -2020 Dated 12.11.2020, tested for CO, NOx, PM and SO2.</p>	



	<p>result concludes that the meets the requirement of TNPCB Standards with respect to the parameters tested. (2 DG Set 110 KVA &amp; 82.5 KVA &amp; Boiler 250 KG)</p> <p>13. Verified Form 8 for 2 Air Compressor, 1 Fire wood boiler, 2 cooker and 12 cylinders approved by Joint Director Industrial Safety and Health – Sivakasi Dated 14.08.2021.</p> <p>14. Verified the consent order from TNPCB for Air – F. [REDACTED] /2019 Dated 09.05.2019, Valid till 31.12.2021.</p> <p>15. Verified the consent order from TNPCB for water – F. [REDACTED] /2019 Dated 09.05.2019, Valid till 31.12.2021. Consent Order Number: [REDACTED] dated 09.05.2019.</p> <p>16. Verified form 36- Report of examination of Hoist / Lift issued by Mr. N. Govindarajulu – Competent person- Safe working load – 1000 kgs, certified on 02.07.2021.</p> <p>17. Verified the IBR Boiler certificate for use of a boiler issued by Senior director of Boilers, Madurai circle Madurai Ref No. [REDACTED] /2019-20 Dated 25.05.2021.</p> <p>18. Verified the test certificate for conveyor for 500 KGs pull chord, 2.0 T and 3.0 T Chain pulley block, Refer certificate No: [REDACTED] Dated 02.07.2021, Valid for one year, tested by N. Govindarajulu Competent person.</p> <p>19. Verified the ambient air Quality Monitoring test report done by Excellence Laboratory Report No: [REDACTED] -2020 Dated 12.11.2020, tested for all the parameters.</p>												
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	<p>Manufacturers Of Cotton Fabrics, Bath Linen, Bath Robes, Kitchen Linen, Blankets &amp; Beddings, Tote Bags, Industrial Linen- Drop Cloth/ Dust Sheet Cleaning Rags and Wiping Cloth through</p> <p>the Process of Warping, Sizing, Weaving, Dyeing, Fabric Lamination, Cutting, Stitching, Checking, Packing and Dispatch</p> <p>Outsourcing Process : Weaving(Partially Outsourced) Dyeing And Fabric Lamination</p> <p>Contracted Process : Nil</p>												
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<table><tr><th>Production Building no</th><th>Description</th><th>Remark, if any</th></tr><tr><td>Building 1 - Ground Floor</td><td>2200.50 SQM</td><td>Sizing, Warping, Packing &amp; Finished Goods Storage Area</td></tr><tr><td>Building 2 - First Floor</td><td>1887 SQM</td><td>Rolling, Stitching, Storage Area</td></tr><tr><td>Building 2 – Ground Floor</td><td>533 SQM</td><td>Guest Room, Production Sample And Pantry</td></tr></table>	Production Building no	Description	Remark, if any	Building 1 - Ground Floor	2200.50 SQM	Sizing, Warping, Packing & Finished Goods Storage Area	Building 2 - First Floor	1887 SQM	Rolling, Stitching, Storage Area	Building 2 – Ground Floor	533 SQM	Guest Room, Production Sample And Pantry
Production Building no	Description	Remark, if any											
Building 1 - Ground Floor	2200.50 SQM	Sizing, Warping, Packing & Finished Goods Storage Area											
Building 2 - First Floor	1887 SQM	Rolling, Stitching, Storage Area											
Building 2 – Ground Floor	533 SQM	Guest Room, Production Sample And Pantry											



	Building 3 – Ground Floor	803 SQM	Packing Area
	Building 4	878 SQM	Boiler Area
	Building 5	286 SQM	CAR & Two Wheeler Area
	Is this a shared building?	No.	

For below, please add any extra rows if appropriate.

F1: Visible structural integrity issues (large cracks) observed?  
☐ Yes  
☒ No

F2: Please give details: No such observations.

F3: Does the site have a structural engineer evaluation?  
☒ Yes  
☐ No

F4: Please give details: Verified the Structural Stability Certificate Issued on 22.09.2020 by Er. M. Loganathan, competent No. H1/15045/2017 dated 06.10.2017.

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
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H: Month(s) of peak season: (if applicable)	Consistent throughout the year
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I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Scope: "Manufacturers Of Cotton Fabrics. Bath Linen, Bath Robes, Kitchen Linen, Blankets & Beddings, Tote Bags, Industrial Linen- Drop Cloth/ Dust Sheet Cleaning Rags and Wiping Cloth through the Process of Warping, Sizing, Weaving, Dyeing, Fabric Lamination, Cutting, Stitching, Checking, Packing and Dispatch Outsourcing Process : Weaving(Partially Outsourced) Dyeing And Fabric Lamination Contracted Process : Nil Products: cotton – Fabrics, Bath linen, Bath robes, Kitchen linen, Blankets & Beddings, Tote bags, Industrial Linen- Drop cloth/ dust sheet cleaning rags and wiping cloth
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	<p>Production process flow as below:-  Receipt of Yarn, Warping, sizing, weaving, rolling, lamination,  Cutting, stitching, packing and despatch  Out Source Process: lamination  List of Machinery:  Warping Machine – 2 Nos  Sizing Machine – 1 No  Boiler – 1No  Power loom – 6 No  Rolling Machine – 4 Nos  Stitching machine – 32 Nos  Conveyor -2  Lift – 1 Nos  Compressor – 2 Nos  Terry towel stitching machine -1 No  Shrink packing machine-2 Nos  Hand cutting machine- 2 Nos  Bale machine-2 Nos  Metal detector -1 No  Conveyor – 2 Nos</p>
J: 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) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes – Warping, Sizing and Weaving. <input type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If No, please give details. Not Applicable. Accommodation not provided



Audit Parameters			
A: Time in and time out	Day 1 Time in: 09.00 AM Day 1 Time out: 06.00 PM	Day 2 Time in: 09.00 AM Day 2 Time out: 06.00 PM	Day 3 Time in: 09.00 AM Day 3 Time out: 01.30 PM
B: Number of auditor days used:	2.5 man days		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other  If other, please define		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail:    weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	<div style="background-color: black; width: 150px; height: 1.2em; margin-bottom: 5px;"></div>		
H: Is further information available (If yes, please contact audit company for details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
I: Previous audit date:	Nil		
J: Previous audit type:	NA		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input 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 checked="" type="checkbox"/> Yes <input 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 checked="" type="checkbox"/> Yes <input 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)	NA		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	There is no trade union		



## Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	103							103
Worker numbers – female	67							67
Total	170							170
Number of Workers interviewed – male	15							15
Number of Workers interviewed – female	11							11
Total – interviewed sample size	26							26

A: Nationality of Management	Indian	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i>	Nationalities: B1: Nationality 1: India B2: Nationality 2: B3: Nationality 3:	B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i>
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 100 % C1: approx % total workforce: Nationality 2 C2: approx % total workforce: Nationality 3	
D: Worker remuneration (management information)	D: % workers on piece rate D1: % hourly paid workers D2: 100 % salaried workers  Payment cycle: D3: % daily paid D4: % weekly paid D5: 100 % monthly paid D6: % other D7: If other, please give details	



Worker Interview Summary	
A: Were workers aware of the audit?	<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: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	Five group of 4 workers
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	Male: 3      Female: 3
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details: NIL
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?	As per the workers interview, there is no complaints against the facility.
I: What did the workers like the most about working at this site?	Work environment and equal treatment, Even if no work is, the management is paying the full salary.
J: Any additional comment(s) regarding interviews:	Workers having good knowledge about the Emergency evacuation and the procedure
K: Attitude of workers to hours worked:	There is no specific issue with respect to working hours
L. Is there any worker survey information available?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, please give details:	





#### M: Attitude of workers:

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

26 workers were selected for interview including 15 Male and 11 Female employees, they were interviewed by individual and also in group; in the closed room without the presence of the factory management.

The workers were assured of confidentiality and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory and with the current wages which in their view were in line with wages in the locality. They had good relationships with their supervisors and managers who treated them with respect.

Factory management and employees were found cooperative during the interview process without any signs of coaching. In general, workers have expressed their concern in both positive and negative constructive manner throughout their employment in the facility.

Through interview with workers, it was noted that all workers were satisfied with the factory and no negative comment was received.

Management is issuing appointment order to all employees on the day of joining.

Copy of Valid Age proof document is being submitted at the time of employment.

It was found that employees were aware of their rights and duties legal minimum wage and deductions. Employees had informed that Biometric – Finger Reader is used for In and out time punching and no complaints on the same.

During employee's interview noted that all of them receive wages on time and through cash on or before 5th of every month.

- All the interviewed told they receive salary slip on day of their wage day and understandable to them. Deductions were made only for Employee State Insurance and Provident Fund.
- Employees were informed that facility does not have any employees with age less than 18 years.
- They work voluntarily in the facility including overtime. Double wages are paid during over time
- No discrimination found in any form in facility, everyone was treated equally.
- Having good knowledge about their worker representatives and committee members.
- Having good knowledge about emergency procedure
- Emergency response team available and the members knows their responsibility.

Employees were satisfied with the working conditions inside facility.

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

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

Through interview with worker representative, that they are satisfied with the management and no negative comment raised by them.

#### O: Attitude of managers:

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

The factory management was found to be co-operative throughout the audit. Provided full access to auditor throughout the audit and they allowed to take photographs.



## Audit Results by Clause

### 0A: Universal Rights covering UNGP

[\(Click here to return to summary of findings\)](#)

#### 0.A. Guidance for Observations

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

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

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

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

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

Description of current status:

Factory implements and maintains systems for delivering compliance to this code.

Mr. [REDACTED] has been made responsible for compliance with the code. Display of ETI Base code is evidenced in English and in local (Tamil) Language. The factory communicates this code to all employees by training as confirmed through training records and interviews conducted. The last training conducted on ETI base was on 09.08.2021.

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

#### Details:

- Management Interview
- Workers interview
- Document and Record review
- Site Tour

Any other comments: None

A: Policy statement that expresses commitment to respect human rights?

☒ Yes  
☐ No

	Please give details (mainly applicable for the parent company): Policies are available for all the clauses of the ETI Base Code.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: Name: Mr. <span style="background-color: black; color: black;">XXXXXXXXXX</span> Job title: G. M
C: Does the businesses have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: A transparent system for confidentially reporting is in place, One Confidential Suggestion box is available Near Rest Rooms. Last opening on 19.08.2021.
D: Does grievance mechanism meet with UNGP requirement of e.g. (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details:
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: The organisation data procedures and its implementation do not have any deviation on the data privacy procedures for worker's information

Findings	
Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/> Description of observation:  Local law or ETI/Additional elements / customer specific requirement:  Comments:	Objective evidence observed:

Good examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:



## Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 3.6 %	A2: This year 3.2 %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	1.5 from Apr 2021 to June 2021	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2.2 %	C2: This year 2.5 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	2.8 from Apr 2021 to June 2021	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1. Please describe: No accidents happened till date, Verified the accident record – Form 26.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 0 Number: 0	F2: This year: 0 Number: 0
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 0	H2: This year: 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0 % workers	I2: 12 months 0 % workers

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

J1: 6 months  
 0 % workers

J2: 12 months  
 0 % workers

### 0B: Management system and Code Implementation

[\(Click here to return to summary of findings\)](#)

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

### Current Systems and Evidence Examined

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

#### Current systems:

Factory implements and maintains systems for delivering compliance to this code.

Mr. has been made responsible for compliance with the code. Display of ETI Base code is evidenced in English and in local Language. The factory communicates this code to all employees by training as confirmed through training records and interviews conducted. The last training conducted on ETI base was on 09.08.2021, the awareness found low. The ETI Base code is ben communicated to the suppliers. Verified the supplier audit report for Srinivasa Art Printers dated 01.10.2020, and Primer Pack dated 05.10.2020.

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

#### Details:

- Management Interview
- Workers interview
- Document and Record review
- Site Tour

Any other comments: None

### Management Systems:

A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?

☐ Yes

☒ No

A1: Please give details: No legal or regulations violations made by the organisation.



B: 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 give details: Policies are available and displayed in the notice board.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Training provided on policies to employees.
D: 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 give details: Yes, Training records dated 09.08.2021, Verified
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Verified the records of training and training Log.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: NA
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:
H: Is there a senior person / manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details:
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Yes. Policy is made available. Verified Policy dated 01.04.2019
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Yes, Policy is made available and implemented. Verified policy dated 01.04.2019
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Risk assessment is available and verified dated 01.07.2021
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1 Please give details: Risk assessment addresses the controls to reduce the identified risk.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No





	M1: Please give details: Yes, all legal licences and permissions were available. The suppliers also should have all.
<b>Land rights</b>	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details:
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: Yes, all legal licences and permissions were available
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: The building is owned by the organisation and all the consent, approvals are evidenced which was obtained after due diligence.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: The building is owned by the organisation and all the compensation requirement was verified in the agreement. all the consent, approvals are evidenced which was obtained after due diligence.
R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: The building is owned by the organisation and all the consent, approvals are verified and addressed in this report.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: No such evidenced.

<b>Non-compliance:</b>	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against customer code:  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action: :</b>  <b>2. Description of non-compliance:</b>	<b>Objective evidence observed:</b> Supplier communication records not available. <i>(where relevant please add photo numbers)</i>

☐ NC against ETI/Additional Elements  
☐ NC against customer code:

☐ NC against Local Law

ETI requirement:

Recommended corrective action:

#### Observation:

Description of observation:

Local law or ETI requirement:

Comments:

Objective evidence observed:

#### Good Examples observed:

Description of Good Example (GE):

Objective evidence observed:



## 1: Freely Chosen Employment

[\(Click here to return to summary of findings\)](#)

### ETI

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

1. Abstract of the act has been displayed in the local language. Worker interviews, security procedures/interviews, worker behaviour, management behaviour and the facility walkthrough did not evidence any area of concern.
2. No recruiting agents are employed; no deposits or original documents are collected and retained. The employees are free to leave employment on their own will.
3. Movement of employee within the premises is not restricted and they are free to leave the facility after work. 26 personnel files were reviewed, the personnel files do not include any original documentation for age verification.
4. The employment contract includes all the areas to be addressed with regard to the standards including working hours, remuneration and the benefits due to them.
5. People are free to leave after the work. Overtime is Voluntary. The company does not withhold any part of any personnel's salary, benefits, property, or documents in order to force such personnel to continue working for the company.
6. All the personals who are working in the company have the right to leave the work place premises after completing the standard work day and free to terminate their employment provided that they give reasonable notice to the company.
7. The security Guards at the main gate perform their normal duties. They do not hold the workers inside the premises after end of the shift.

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

#### Details:

- Management Interview
- Workers interview
- Document and Record review
- Site Tour

Any other comments: None

A: Is there any evidence of retention of original documents, e.g. passports/ID's

- ☐ Yes  
☒ No

A1: If yes, please give details and category of workers affected:



B: Is there any evidence of a loan scheme in operation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:
C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: All employees are free to leave or terminate on their own.
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding: All for the Export Market, but registered in India.
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: All employees are free to leave or terminate on their own.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected:
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: Policies are available.

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code:  Nil <b>Local law and/or ETI requirement</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>
<b>2. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code:	

Local law and/or ETI requirement:

Recommended corrective action:

#### Observation:

Description of observation:

Local law or ETI requirement:

Comments:

Objective evidence  
observed:

#### Good Examples observed:

Description of Good Example (GE):

Objective evidence  
observed:



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

[\(Click here to return to summary of findings\)](#)

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

### ETI

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

### Current Systems and Evidence Examined

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

#### Current systems:

1. Laws of the land applicable are Trade Union Act 1926 and Industrial Disputes Act 1947.
2. The organization has documented the system for compliance to this requirement. The factory has a written policy which states that workers have the right to lawfully form unions or similar organizations which give them the opportunity to address worker grievances and workplace issues collectively.
3. There is no Union in the facility. - Packer is the elected Worker Representative. Re election held on 05.01.2021. and constitutes the Workers Welfare Committee. This Workers Welfare committee addresses the workers needs and grievances at work place. This workers committee addresses the worker's needs. Works committee meets once in 02 months, verified the meeting minutes for the last one year, from 21.12.2020 to 14.08.2021
4. Management has an open-door policy to address the employees' needs, as revealed during the interviews.
5. The Organisation does not discriminate, penalize, threaten, restrict or interfere with workers choosing to lawfully form or join unions or associations.
6. The worker interviews and document review confirm compliance to this standard.
7. The Organisation implements systems to establish better worker and management relations such as Health and Safety Committee, Workers welfare Committee and Anti Sexual Harassment committee.

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

##### Details:

- Management Interview
- Workers interview
- Document and Record review
- Site Tour

Any other comments: None



A: 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) <input type="checkbox"/> None	
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Describe: Workers Committee, Anti sexual Harassment committee and one confidential suggestion boxes is available. Committees meets at once in 02 months and suggestion boxes are opened once in a month. Last opened on dated 19.08.2021.  Is there evidence of free elections? <input checked="" type="checkbox"/> Yes re. election Conducted on 05.01.2021 <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Yes committee meetings and its records are verified.	
F: Name of union and union representative, if applicable:	No Trade Union available	Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Workers Committee, Health & Safety committee, Anti Sexual Harassment committee, and Workers Committee	Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	- Tailor
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Date of last election: 05.01.2021
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: workers committee have 6 members and members interviewed	
L: Please describe any evidence that union/worker's committee is effective?	Yes, workers committee meetings were conducted once in 2 months. Workers committee Meeting from 22.12.2020 to 14.08.2021. The Minutes of workers Welfare committee are recorded in the	



Specify date of last meeting; topics covered; how minutes were communicated etc.	meeting note and signed by the employees. The topics covered are Working hours, Employee State Insurance / Provident Fund, Health and safety related and Remuneration.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes, what percentage by trade Union/worker representation	NA % workers covered by Union CBA	NA % workers covered by Union CBA
M3: If Yes, does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Wages as paid as per the Tamil Nadu Minimum wages act , as detailed in clause No. 5	

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>  <b>2. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>    Workers Interview

Observation:	
<b>Description of observation:</b>  <b>Local law or ETI requirement:</b> <b>Comments:</b>	<b>Objective evidence observed:</b>

Good Examples observed:	
<b>Description of Good Example (GE):</b>	<b>Objective evidence observed:</b>





### 3: Working Conditions are Safe and Hygienic

[\(Click here to return to summary of findings\)](#)

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

#### ETI

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

### Current Systems and Evidence Examined

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

#### Current systems:

Description of current status:

1. The Organisation has a written Health and Safety plan that indicates how all Health and Safety issues are being managed at the factory. The plan includes what steps the factory is taking to ensure that health and safety risk areas are being identified and addressed.
2. The Organisation has a health and safety representative Mr. [REDACTED] – Production Incharge to oversee compliance.
3. Health & Safety risk assessment is available as part of the Health & Management System documentation. Evidenced for Office, Warping, Sizing, Weaving, Stitching and Packing section, Electrical Generators and Machine Maintenance. Verified the H & S risk assessment on 01.07.2021 which includes the Covid 19 risk assessment.
4. Fire Safety external training was provided on 02.06.2021 by M/s. Smart Safety Solution for 16 employees in the organisation. Conducted for once in a year.
5. The fire evacuation drill is being conducted once in two months, Verified the records of fire drill conducted. It was done on 13.08.2021 for 108 employees with the evacuation time of 178 seconds and on 22.06.2021 for 108 employees with the evacuation time of 171 seconds by Smart Safety Solution.
6. It was verified that there are visible, appropriate and accessible fire extinguishers available. The Organization has installed adequate number of fire extinguishers Total 63 dry type Fire extinguishers available, ABC – 4 Kgs. The frequency of checking of fire extinguishers is once in 2 months, verified dated 28.08.2021.
7. First Aid training was provided by St. John Ambulance service. The factory has 24 first aid trained employees. Adequate first aid kits with adequate medicines provided in all the factory areas. Training conducted on 11.01.2021 and valid till 11.01.2022.
8. There are 8 first aid kits available in the factory. The emergency contact numbers are appropriately displayed inside factory.
9. Emergency exits have been displayed. Evacuation plans are exhibited at prominent points.
10. Documents related to accident reporting are available in the factory (form 26). No Accidents reported in the report. Verified the Form 26-A, Register of Dangerous Occurrences- No Dangerous occurrences happened in the last 12 months.
11. Health & Safety training was conducted on 19.06.2021 to all the employees.
12. Good Ventilation, Illumination and Work Environment evidenced.





13. Adequate Wash Rooms are available in the factory (Separate for Men & Women) 9 for Men + 3 Urinals & 7 for Women.

14. Complaint / Suggestion Boxes are available. Last opening dated 19.08.2021

The frequency of health safety committee meeting are once in three months – These committee members monitor the fire and risk prevention and report to the H & S Representative and also address during the meeting

15. Verified the records of health and safety committee. Members are , and . Verified the meeting conducted from 21.12.2020 to 14.08.2021.

16. Safety instructions are displayed at various places in vernacular language. Safety posters, first aid instructions, usage of Safety instructions are available.

17. there are 16 smoke detectors are available, located at Storage areas. 19 Fire alarm call points, 22 emergency lights, 5 Fire hydrant with sprinklers and 8 Hose boxes with the fire hydrant . The frequency of checking is once in 2 months. Last verification happened on 28.08.2021.

18. Awareness on Emergency Evacuation Plan found to be satisfactory among the workers.

19. Canteen agreement with dated 09.01.2020 and the FSSAI Licence number 224213788000191 dated 01.04.2021 were verified. Canteen employees medical check report dated 04.01.2021, by Dr. , Director of Industrial Safety and Health.

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

**Details:**

- Management Interview
- Workers interview
- Document and Record review
- Site Tour
- Training Records

Any other comments: None

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Communicated to all workers through regular awareness sessions.
B: Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Policies are the part of organisation manual.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: No such additions.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Visitors are informed about the H & S requirements at the gate by the Management Staff
E: Is a medical room or medical facility provided for workers?  If yes, do the room(s) meet legal requirements and is the size/number of	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: 02 First Aid trained Personals available. Training conducted on 11.01.2019.



rooms suitable for the number of workers.	
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: All workers are staying nearby to the facility
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: All workers are staying nearby to the facility
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Workers are provided with personal storage space
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Verified the risk assessment record.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No J1: Please give details: The facility do not have the environmental consents.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: No banned chemicals were used in the facility according to facility tour and document review





### Non-compliance: 1

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

☐ NC against ETI
 ☒ NC against Local Law
 ☐ NC against customer code:

Rubber mat is not evidenced in one of the electric panel of DG set.

#### Local law and/or ETI requirement

Factories Act 1948.

#### Recommended corrective action:

Rubber mat to be provided and training to be given to the workers on PPE's usage.

#### Objective evidence observed:

(where relevant please add photo numbers)

Site tour

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

☐ NC against ETI
 ☐ NC against Local Law
 ☐ NC against customer code:

#### Local law and/or ETI requirement:

#### Recommended corrective action:

### Observation:

#### Description of observation:

#### Local law or ETI requirement:

#### Recommended corrective action:

#### Objective evidence observed:

### Good Examples observed:

#### Description of Good Example (GE):

#### Objective Evidence Observed:



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

[\(Click here to return to summary of findings\)](#)
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##### 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 factory has hiring policies and procedures that ensured that the minimum age of workers corresponds to all local laws, ILO Standards and other requirements.
2. The age of each worker is verified prior to his or her employment.
3. Updated personnel files are maintained for each worker. Such files have copies of basic worker information such as an identification card. School leaving certificate for age proof. Nomination forms. Appointment order and service records.
4. The factory ensures that these workers are not working beyond the restricted hours and comply with all applicable laws governing minimum working age. No one is under 18 is permitted to work in this factory, however the minimum age for work as per law is set at 15 years
5. There were no young workers. Child labour remediation is established. Worker interviews confirmed the absence of child labour or young workers in the factory.
6. The organization has communicated the requirement by displaying outside the main gate
7. All the workers, staff confirmed that there is no child labour working in the organization. The lowest age is 21. Ms. [REDACTED] joined on 01.01.2021, and D.O.B is 12.09.1999

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

##### Details:

- Management Interview
- Workers interview
- Document and Record review
- Site Tour

Any other comments: None

A: Legal age of employment: Above 18 Years

B: Age of youngest worker found: 21 Years.





C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  Nil <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>
<b>2. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	

Observation:	
<b>Description of observation:</b>  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

Good Examples observed:	
<b>Description of Good Example (GE):</b>	<b>Objective Evidence Observed:</b>

## 5: Living Wages are Paid

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key information\)](#)

### ETI

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

##### Description of current status:

1. Minimum rates of wages for Employment in Tailoring Industry under the Minimum Wages Act. G.O. (2D) No. 59, Notification No. II (2)/LE/723/2014 Dated 03.12.2014 and as per the Power Loom Industry under the Minimum Wages Act. G.O. (2D) No. 114, Notification No. II (2)/LE/25/2019 Dated 09.01.2019.

2. For Power Loom Industry from 01.04.2021

G.O. (2D) No. 114, Notification No. II (2)/LE/25/2019 Dated 09.01.2019

Sl. No	Designation	Salary as per Notification - per day / Per month(INR)	Salary paid by the organisation- Per month(INR)
1	Warper	502 / 13052	502 / 13052
2	Back Sizer	442 / 11492	442 / 11492
3	Sizer	460 / 11960	460 / 11960
4	Weaver	559 / 14534	559 / 14534
5	Boiler Attend	436 / 11336	436 / 11336
6	Weaving Helper	328 / 8528	328 / 8528

For Tailoring Industry from 01.04.2021

G.O. (2D) No. 59, Notification No. II (2)/LE/25/2019 Dated 09.01.2019

Sl. No	Designation	Salary as per Notification - per day / Per month(INR)	Salary paid by the organisation- Per month(INR)
1	Tailor II	362 / 9412	362 / 9412
2	Cutter, Checker II	369 / 9494	369 / 9494
3	Packer	354 / 9204	354 / 9204
4	Helper	354 / 9204	354 / 9204



The organisation payment are same as above.

3. Verified the salary slips and wage register. Verified the Salary given to the employees for the past 12 months and found that organisation is paying the Minimum wages prescribed by the Government. Payslips details are mentioned in Both Tamil and English Languages.

4. The organization remits the ESIC & EPF contributions as per the law requirements. Verified the ESI and PF paid challan for the past 12 months . Some month late payments are noticed and a minor NC raised.

5. Workers are aware of their leave policy, leave wages and bonus.

6. The workers are paid through Bank Transfer once in 15 days on or before 1<sup>st</sup> of every month and 16<sup>th</sup> of every month.

7. There are no piece rate workers employed. And also no Home workers involved.

8. No Contract employees are engaged in the organisation.

9. No deduction or fine charged on any of worker participating in committee meetings.

10. There is no payroll agency deployed by the organization.

11. No one receives wages on behalf of a worker.

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

**Details:**

- Management Interview
- Workers interview
- Document and Record review
- Site Tour

Any other comments: None

#### Non-compliance:

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

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:

**Local law and/or ETI requirement:**

**Recommended corrective action:**

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

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:

**Local law and/or ETI requirement:**

**Recommended corrective action:**

##### Objective evidence observed:

(where relevant please add photo numbers)

Wage register, PF and ESI payment records



<b>Observation:</b>	
<b>Description of observation:</b>  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

<b>Good Examples observed:</b>	
<b>Description of Good Example (GE):</b>	<b>Objective Evidence Observed:</b>

### Summary Information

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 minimum: 8 hours per day 6 days per week and 26 days per month.	A1: 8 hours per day 6 days per week and 26 days per month.	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal minimum: 12 hours per week and 50 hours per quarter.	B1: No over time given to any employees.	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: Listed in the page number 39	C1: Listed in the page number 39	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: Double salary as premium	D1: No over time given.	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Wages analysis:</b> <a href="#">(Click here to return to Key Information)</a>			
A: Were accurate records shown at the first request?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	



A1: If <b>No</b> , why not?																						
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	July 2021 – 6 Samples May 2021 – 4 samples Feb 2021 – 4 samples Dec 2020 – 6 samples Oct 2020 – 4 samples Aug 2020 – 4 samples																					
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If <b>Yes</b> , please give details: Category – Per day / Per month (INR) <table border="1"> <tr><td>Warper</td><td>502 / 13052</td></tr> <tr><td>Back Sizer</td><td>442 / 11492</td></tr> <tr><td>Sizer</td><td>460 / 11960</td></tr> <tr><td>Weaver</td><td>559 / 14534</td></tr> <tr><td>Boiler Attend</td><td>436 / 11336</td></tr> <tr><td>Weaving Helper</td><td>328 / 8528</td></tr> <tr><td>Tailor II</td><td>362 / 9412</td></tr> <tr><td>Cutter, Checker II</td><td>369 / 9494</td></tr> <tr><td>Packer</td><td>354 / 9204</td></tr> <tr><td>Helper</td><td>354 / 9204</td></tr> </table>	Warper	502 / 13052	Back Sizer	442 / 11492	Sizer	460 / 11960	Weaver	559 / 14534	Boiler Attend	436 / 11336	Weaving Helper	328 / 8528	Tailor II	362 / 9412	Cutter, Checker II	369 / 9494	Packer	354 / 9204	Helper	354 / 9204
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D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	D1: If <b>No</b> , please give details:																				
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above	E1: Lowest actual wages found: Note: full time employees and please state hour / week / month etc. Category – Per day / Per month (INR) <table border="1"> <tr><td>Warper</td><td>502 / 13052</td></tr> <tr><td>Back Sizer</td><td>442 / 11492</td></tr> <tr><td>Sizer</td><td>460 / 11960</td></tr> <tr><td>Weaver</td><td>559 / 14534</td></tr> <tr><td>Boiler Attend</td><td>436 / 11336</td></tr> <tr><td>Weaving Helper</td><td>328 / 8528</td></tr> <tr><td>Tailor II</td><td>362 / 9412</td></tr> <tr><td>Cutter, Checker II</td><td>369 / 9494</td></tr> <tr><td>Packer</td><td>354 / 9204</td></tr> <tr><td>Helper</td><td>354 / 9204</td></tr> </table>	Warper	502 / 13052	Back Sizer	442 / 11492	Sizer	460 / 11960	Weaver	559 / 14534	Boiler Attend	436 / 11336	Weaving Helper	328 / 8528	Tailor II	362 / 9412	Cutter, Checker II	369 / 9494	Packer	354 / 9204	Helper	354 / 9204
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Cutter, Checker II	369 / 9494																					
Packer	354 / 9204																					
Helper	354 / 9204																					

F: Please indicate the breakdown of workforce per earnings:	F1: ____% of workforce earning under minimum wage F2: _100_ % of workforce earning minimum wage F3: ____% of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: 12.00 % of Bonus given in July 2021. 22.07.2021 <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i>		
H: What deductions are required by law e.g. social insurance? Please state all types:	Employees Provident Fund. Employee State Insurance. Employee State Insurance – 0.75% on Gross Wages Employee Provident Fund – 12 % Basic & DA		
I: Have these deductions been made?	<input type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that <b>have</b> been made.	1. Employee State Insurance – 0.75% on Gross Wages 2. Employee Provident Fund – 12 % Basic & DA  Please describe:
		I2: Please list all deductions that <b>have not</b> been made.	1. Nil 2.  Please describe:
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type  <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details:		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please specify amount/time: The living wages is calculated as INR 4689 per month.		
M2: If yes, what was the calculation method used.	<input checked="" type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions		



	<input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details:
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: Please give details: Periodic review of the Basic Living Wages is evidenced.
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: As per the Minimum wage Notification published by the Tamil Nadu Government
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:

## 6: Working Hours are not Excessive

[\(Click here to return to summary of findings\)](#)

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

### ETI

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where **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. Working hours of the organizations is as follows:

General Shift: 08:30 to 17:30 Hrs, Lunch Break – 13:00 – 13:30 Hrs. Tea Time: 11:00 to 11:15 and 16:00 to 16:15, Sunday is a weekly off.

Warping, sizing and weaving are working on 3 shifts, the weekly holiday is provided to the workers on a rotational basis after every 6 days of work.

First Shift : 07:00Hrs to 15:00 Hrs, Lunch Break – 12:00 to 12:30 Hrs

Second Shift: 15:00 Hrs to 23:00 Hrs, Lunch Break – 19:30 to 20:00 Hrs.

Third Shift: 23:00 Hrs to 07:00 Hrs, Lunch Break: 03:00 – 03:30 hrs.

2. List of Holidays for the Year 2021 displayed on notice board - Totally 9 Holidays declared for the year 2021 and stated communicated among employees / workers.

3. Attendance & time monitoring is being carried out through io Metric and manual time card and attendance register for all employees. Proper record maintained & made available. In time/out time are updated daily in the Manual time card, records verified.

4. Over time is voluntary. No over time given.



5. Leave records are maintained. The Earn Leaves are 1 per 20 working days after having worked for 240 days. These are as per the government rules. Form V as per the Factories Act maintained for the mandatory Holidays.
6. Employees are free to leave after the work. Verified this from Time card verification and workers interview.
7. All trainings and various committee meetings are conducted during the factory working timings. No deduction or fine is charged from any of worker participating in committee meetings.
8. In and out timings to mark presence / absence are recorded. Biometric – Finger Reader are used by the workers daily.
9. Verified the Manual Time cards and Bio Metric attendance of the workers, the attendance sheets evidenced to be accurate and complete.

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

**Details:**

- Management Interview
- Workers interview
- Document and Record review
- Site Tour

Any other comments: None

**Non-compliance:**

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

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:

Nil

**Local law and/or ETI requirement:**

**Recommended corrective action:**

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

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:

**Local law and/or ETI requirement:**

**Recommended corrective action:**

**Objective evidence observed:**

*(where relevant please add photo numbers)*

**Observation:**

**Description of observation:**

**Objective evidence observed:**

Local law or ETI requirement:	
Comments:	

Good Examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:

Working hours' analysis			
Please include time e.g. hour/week/month <a href="#">(Go back to Key information)</a>			
Systems & Processes			
A. What timekeeping systems are used: time card etc.	Describe: Manual Time Card and Bio Metric System		
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details		
C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:	
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: 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:	
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If <b>yes</b> , please detail hours, %, types of workers affected and frequency Please give details:	



F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Maximum number of days worked without a day off (in sample):	
<b>Standard/Contracted Hours worked</b>		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: No Over time given.	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	Nil ____%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:  Verified during the interview.
<b>Overtime Premiums</b>		

M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages:  Double salary paid if there is a over time.
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: Double to be given and no over time given in the last one year.
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input checked="" 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 Factories act 1948 and Tamil Nadu Factory rules 1950	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	
	As per the Factories act 1948 and Karnataka Factory rules 1950 the overtime to be paid double salary.	
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<input checked="" type="checkbox"/> <b>Overtime is voluntary</b> <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 (please specify)	
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:	
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details:	
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	



## 7: No Discrimination is Practiced

[\(Click here to return to summary of findings\)](#)

### ETI

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

### Current Systems and Evidence Examined

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

#### Current systems:

##### Description of current status:

1. The company has documented their Non-Discriminatory Policy.
2. Laws of the land: Equal Remuneration Act 1976, Factories Act 1948, Industrial Employment (standing orders) Act 1946. Worker interviews did not raise any area of concern.
3. There are both female and male workers in the organization.
4. The company does not interfere with the right of employees to observe tenets or practices that meet religion, race, national or social origin disability, gender sexual orientation, family responsibilities, caste union membership or political.
5. The company does not allow any behaviour that is threatening, abusive, exploitative or sexually coercive, including gestures, language, and physical contact, in the workplace and, where applicable in residences and other facilities provided by the company for use by personnel.
6. The workers interview clearly established that there is Non-discrimination policy prevalent in the organization. Workers reported they are free to observe religious holidays.
7. Company, in their Manual has defined "No Discrimination" related to age, cast, creed, race, sex, nationality etc. to be considered.
8. The company does not entertain any type of pregnancy or virginity test under any circumstances for any female employee.
9. Anti-discrimination policy is documented & communicated to workers.
10. The Organization has constituted an Anti-Sexual Harassment committee constitutes of elected members. Anti Sexual Harassment Committee ( Internal Complaints Committee ) constitutes of members such as [REDACTED] and [REDACTED]. [REDACTED] Verified the meetings conducted from 22.12.2020 to 14.08.2021. NGO - Annai Theresa Mahalir Munnera Sangam Participate in the above meeting.

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

##### Details:

- Management Interview
- Workers interview
- Document and Record review
- Site Tour

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: _61_ % A2: Female _39_ %. Management + supervisors.
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	0
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found  C1: Please give details:

### Professional Development

A: What type of training and development are available for workers?	Training Plan 2021 verified
B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details:

### Non-compliance:

<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  Nil Local law and/or ETI requirement:  Recommended corrective action:	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>
<b>2. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  Local law and/or ETI requirement:  Recommended corrective action:	



Observation:	
<b>Description of observation:</b>  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

Good Examples observed:	
<b>Description of Good Example (GE):</b>	<b>Objective Evidence Observed:</b>

8: Regular Employment Is Provided <a href="#">(Click here to return to summary of findings)</a> <a href="#">(Click here to return to Key Information)</a>
<p style="text-align: center;"><b>ETI</b></p> <p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>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.</p> <p style="text-align: center;"><b>Additional Elements: Responsible Recruitment</b></p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p> <p>8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.</p> <p>8.5 Employment agencies must only supply workers registered with them.</p> <p>8.6 Workers pay no recruitment fee at any stage of the recruitment process.</p> <p>8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>



### 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. Work performed is on the basis of recognised employment relationship established through national law and practice.
2. The factory signs labour contract with the employees at the time of employment
3. No home workers employed by the facility.
4. Facility does not use 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.
5. There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.
6. Workers do not pay no recruitment fee at any stage of the recruitment process.
7. Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.
8. Interviewed workers confirm that have a contract of employment detailing all terms, including their rights and obligations, as well as notice and grievance procedures. The contracts are in in languages understood by the them and all workers have a copy of their contract signed by themselves (not a third party) and the employer. Workers are not asked to sign any blank / unofficial documents. The original contract terms are not replaced or changed without the Worker's knowledge / consent. No extended probationary periods are used to prevent Regular Employment. Workers are not kept on temporary contracts to avoid regular employment or other benefits.

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

##### Details:

- Management Interview
- Workers interview
- Document and Record review
- Site Tour

Any other comments: None



Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  Nil <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>   <b>2. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>

Observation:	
<b>Description of observation:</b>  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

Good Examples observed:	
<b>Description of Good Example (GE):</b>	<b>Objective Evidence Observed:</b>

## Responsible Recruitment

All Workers	
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions  A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category(ies) of workers affected:
C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details:
D: If any checked, give details:	

### Migrant Workers:

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

A: Type of work undertaken by migrant workers:	NA since there is no migrant workers in this organisation.
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used:  B2: Total number of (outside of local country) recruitment agencies used:



C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:	C2: Observations:
D: Are Any migrant workers in skilled, technical, or management roles  <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: If yes, number and example of roles:	

## NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other  B1 – If other, please give details:
C: If any checked, give details:	

<b>Agency Workers (if applicable)</b> <i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	A1: Names if available: NA
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: Please give details:
E: 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  E1: Please give details:

<b>Contractors:</b> <i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details: NA
B: If <b>Yes</b> , how many workers supplied by contractors?	
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:
D: If <b>Yes</b> , please give evidence for contractor workers being paid per law:	



### 8A: Sub-Contracting and Homeworking

[\(Click here to return to summary of findings\)](#)

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

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

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

*Note to auditor on homeworking:*

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

NA since no sub contracting and no Home working

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

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

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

Details:

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  Nil <b>Local law and/or ETI /Additional Elements requirement:</b>  <b>Recommended corrective action:</b>  <b>2. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>

Observation:	
<b>Description of observation:</b>  <b>Local law or ETI/Additional elements requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

Good Examples observed:	
<b>Description of Good Example (GE):</b>	<b>Objective Evidence Observed:</b>

Summary of sub-contracting – if applicable <input checked="" type="checkbox"/> Not Applicable please x	
<b>A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <b>A1: Please describe:</b>



B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: If <b>Yes</b> , summarise details:
C: Number of sub-contractors/agents used:	
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If <b>Yes</b> , summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	

Summary of homeworking – if applicable			
<input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If <b>Yes</b> , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?			
F: What processes are carried out by homeworkers?			
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

## 9: No Harsh or Inhumane Treatment is Allowed

[\(Click here to return to summary of findings\)](#)

### ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Suggestion box is also placed at toilets. No such violations evidenced.
B: If Yes, are workers aware of these channels and have access? Please give details.	Yes, confirmed during the workers interview
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion box
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other Please give Details: Suggestion box
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details
F: Does the site encourage its business partners (e.g., suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. help lines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, please give details



### Current Systems and Evidence Examined

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

#### Current systems:

1. No Case of any Disciplinary Action taken against any worker the same was verified through the sampled worker interview.
2. The Organisation treats all its personnel with dignity and respect. The company does not engage in or tolerate the use of corporal punishment.
3. No physical abuse or discipline, threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation evidenced.
4. Confidential grievance mechanism such as suggestion box is evidenced.

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

#### Details:

- Management Interview
- Workers interview
- Document and Record review
- Site Tour

Any other comments: None

### Non-compliance:

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

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:

Nil

Local law and/or ETI requirement:

Recommended corrective action:

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

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:

Local law and/or ETI requirement:

Recommended corrective action:

#### Objective evidence observed:

(where relevant please add photo numbers)

### Observation:

Description of observation:

Local law or ETI requirement:

Comments:

Objective evidence observed:

### Good Examples observed:

Description of Good Example (GE):

Objective Evidence Observed:

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

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

#### Additional Elements

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.

10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

#### Current Systems and Evidence Examined

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

Current systems:

1. No immigrant workers employed in the facility.
2. Country's legal system does not permit outside workers to be employed without permit

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

- Management Interview
- Workers interview
- Document and Record review
- Site Tour

Any other comments: None

### Non-compliance:

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

- ☐ NC against ETI/Additional Elements  
☐ NC against customer code:

☐ NC against Local Law

Nil

Local law and/or ETI /Additional Elements requirement:

Recommended corrective action:

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

**Objective evidence observed:**
*(where relevant please add photo numbers)*



☐ NC against ETI/Additional Elements
 ☐ NC against Local  
☐ NC against customer code:  
**Local law and/or ETI/Additional Elements requirement:**

**Recommended corrective action:**

#### Observation:

Description of observation:

Local law or ETI/Additional Elements requirement:

Comments:

Objective evidence  
observed:

#### Good examples observed:

Description of Good Example (GE):

Objective Evidence  
Observed:

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

[\(Click here to return to summary of findings\)](#)

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

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

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

### Current Systems and Evidence Examined

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

Current systems:

Verified and found complied with all the Environment Laws

1. Verified the consent order from TNPCB for Air – F. /2019 Dated 09.05.2019, Valid till 31.12.2021.
2. Verified the consent order from TNPCB for water – F. /2019 Dated 09.05.2019, Valid till 31.12.2021. Consent Order Number: 1908221885131, dated 09.05.2019.
3. Verified the Drinking Water test certificate done by Tamilnadu water supply and drainage board district water Testing Laboratory, Report No: Letter No. /2021 Dated 14.06.2021, concluded that the water sample is Physically, chemically and bacteriological potable.
4. Verified the Noise Level Survey Report done by Excellence Laboratory Report No: -2020 Dated 12.11.2020, tested all the areas.
5. Verified the Lux level monitoring report done by Excellence Laboratory Report No: -2020 Dated 12.11.2020 tested at all the areas.
6. Verified the Indoor Air Quality survey report done by Excellence Laboratory Report No 2020 Dated 12.11.2020 and tested in all the areas.
7. verified the Genset Stack & Wooden Boiler Stack monitoring done by Excellence Laboratory Report No: 2020 Dated 12.11.2020, tested for CO, NOx, PM and SO2, result concludes that the meets the requirement of TNPCB Standards with respect to the parameters tested. (2 DG Set 110 KVA & 82.5 KVA & Boiler 250 KG)

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

**Details:**

- Management Interview
- Workers interview
- Document and Record review
- Site Tour

Any other comments: None



Non-compliance:	
<p><b>1. Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI/Additional Elements      <input type="checkbox"/> NC against Local Law</p> <p>Local law and/or ETI/Additional Elements requirement:</p> <p>Recommended corrective action:</p>	<p><b>Objective evidence observed:</b> (where relevant please add photo numbers)</p>
<p><b>2. Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI/Additional Elements      <input type="checkbox"/> NC against Local Law</p> <p>Local law and/or ETI/Additional Elements requirement:</p> <p>Recommended corrective action:</p>	

Observation:	
<p><b>Description of observation:</b></p> <p>Local law or ETI/additional elements requirement:</p> <p>Comments:</p>	<p><b>Objective evidence observed:</b></p>

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**Good examples observed:**

Description of Good Example (GE):	Objective Evidence Observed:
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## 10. Other issue areas 10B4: Environment 4–Pillar

[\(Click here to return to summary of findings\)](#)

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

### B.4. Compliance Requirements

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

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

10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements

10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.

10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details).

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

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

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

### B4. Guidance for Observations

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

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

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

## Current Systems and Evidence Examined

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

### Current systems:

Verified and found complied with all the Environment Laws

1. Mr. [REDACTED] – Compliance Manager is appointed as the Environmental representative.
2. The Organisation has an Environmental policy Dated 01.04.2019 and is displayed in local language in the notice board.
3. The Environmental awareness is conducted to the employees on 18.06.201 for all the employees
4. verified the Environmental Aspect Impact Analysis Dated 01.01.2021. Aspects are identified and necessary controls are established.
5. Verified the procedure for Environmental aspects, Criteria and evaluation methods – SAMS -PRO- 17 Issue A, Rev :01 Dated 01.01.2021
6. Verified the Power and Water consumption details
7. Verified the records of Disposable E waste, Food waste, cutting waste etc., And all the wastes are disposed to the authorized agency and records were maintained. Verified the agreement with Vinayaka Lubricants dated 12.10.2020.



Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local <input type="checkbox"/> NC against customer code:  <b>Local law and/or ETI/Additional Elements requirement:</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>
<b>2. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local <input type="checkbox"/> NC against customer code:  <b>Local law and/or ETI/Additional elements requirement:</b>  <b>Recommended corrective action:</b>	

Observation:	
<b>Description of observation:</b>  <b>Local law or ETI/Additional elements requirements:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

Good examples observed:	
<b>Description of Good Example (GE):</b>	<b>Objective Evidence Observed:</b>

Environmental Analysis	
<i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
<b>A: Is there a manager responsible for Environmental issues (Name and Position):</b>	Mr. [REDACTED] – HR Manager and HSE Manager
<b>B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Verified the risk assessment and the environmental aspect and impact assessment dated 01.01.2021. The implementation of the operational controls were verified for the waste reduction and power consumption.
<b>C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details:



Please give details.	
D: Does the site have an Environmental policy? (For guidance, please see Measurement criteria)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? Yes, it is publicly available, Verified the Environmental Policy Dated 01. 04.2019
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Operational control procedures for the improvement of the environmental performance was evidenced and verified for the waste reduction and power consumption.
F: Does the site have a Biodiversity policy? (For guidance, please see Measurement criteria)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. (For guidance, please see Measurement criteria)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details:
H: Have all legally required permits been shown? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Verified the consent given by the Tamil Nadu Pollution Control Board and addressed above.
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: No Hazardous chemicals been used.
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The details of clients requirement and legislation in the destination countries regarding environmental and chemical issues are captured and recorded in the Environmental aspects Document Dated 01.01.2021
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Organisation has formulated Environmental objectives and targets in line with the established policy for the waste reduction and power consumption.
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: Please give details: All these waste are non recyclable.
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Verified the records of water and power consumption. Data's given below.

N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: Please give details: Not applicable for this facility, No subcontracting agencies or business partners operating in this facility	
<b>Usage/Discharge analysis</b>		
Criteria	Previous year: Please state period: 2020	Current Year: Please state period: 2021_____
Electricity Usage: Kw/hrs	1,90,084	1,45,727
Renewable Energy Usage: Kw/hrs	NA	NA
Gas Usage: Kw/hrs	NA	BA
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If <b>Yes</b> , please state result		
Water Sources: Please list all sources e.g. lake, river, and local water authority.	<ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>•</li> </ul>
Water Volume Used: (m³)		
Water Discharged: Please list all receiving waters/recipients.	<ul style="list-style-type: none"> <li>• Drinking water by tanker</li> <li>• Under ground water for the domestic use</li> </ul>	<ul style="list-style-type: none"> <li>• Drinking water by tanker</li> <li>• Under ground water for the domestic use</li> </ul>
Water Volume Discharged: (m³)	502.17	446.68
Water Volume Recycled: (m³)	Nil	Nil
Total waste Produced (please state units)	1778 Kgs	1522 Kgs
Total hazardous waste Produced: (please state units)	53 litres of used oil	45 litres of used oil
Waste to Recycling: (please state units)	Nil	Nil;
Waste to Landfill: (please state units)	Nil	Nil



Waste to other: (please give details and state units)	Nil	Nil
Total Product Produced (please state units)	21 Lakh Metres	24 Lakh Metres



### 10C: Business Ethics – 4-Pillar Audit

[\(Click here to return to summary of findings\)](#)

To be completed for a 4-Pillar SMETA Audit

#### 10C. Compliance Requirements

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

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

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

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

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

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

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

#### 10C. Guidance for Observations

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

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

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

#### Current Systems and Evidence Examined

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

#### Current systems:

1. Verified the Anti Bribery and corruption Policy SA-P-016, Issue 0, Rev : 01, Dated 01.04.2019 and procedure for Bribery Investigation Document Ref No : SAMS-PRO-15, Issue No:A, Rev : 00 Dated 02.01.2020.

2. Verified the Ethical Business practices policy, Issue A, Rev :00, Dated 01.04.2019

3. Verified the training provided to the staff on 17.08.2020, whose job roles carry a higher level of risk in the area of ethical Business Practices

4. Verified the training provided on Anti Bribery and corruption policy on 18.06.2021

5. Mr. [REDACTED] – Compliance manager, responsible for implementing standards concerning Business Ethics

6. Anti-bribery policy and Ethical Business practices are displayed in the notice board.



## Details:

Anti-Bribery and corruption Policy  
Ethical Business Policy  
Workers interview  
Environmental Test reports

Any other comments: Nil

## Non-compliance:

## 1. Description of non-compliance:

☐ NC against ETI/Additional Elements  
☐ NC against customer code:

☐ NC against Local

Nil

Local law and/or ETI/Additional Elements requirement:

Recommended corrective action:

## 2. Description of non-compliance:

☐ NC against ETI/Additional Elements  
☐ NC against customer code:

☐ NC against Local

Local law and/or ETI/Additional elements requirement:

Recommended corrective action:

## Objective evidence observed:

(where relevant please add photo numbers)

## Observation

## Description of observation:

Local law or ETI/Additional elements requirement:

## Objective evidence observed:



Comments:

## Good examples observed:

Description of Good Example (GE):

Objective Evidence Observed:

A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?

☒ Internal Policy  
☒ Policy for third parties including suppliers  
A1: Please give details:  
1. Verified the Anti Bribery and corruption Policy SA-P-016, Issue 0, Rev : 01, Dated 01.04.2019  
2. Verified the Ethical Business practices policy. Issue A, Rev: 00, Dated 01.04.2019

B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?

☒ Yes  
☐ No  
B1: Please give details: Verified the training record dated 18.06.2021, which includes the sales, logistics and other employees also.

C: Is the policy updated on a regular (as needed) basis?

☒ Yes  
☐ No  
C1: Please give details: Yes, the Policy is been reviewed in all the MRM and been updated if required. Verified the last MRM dated 24.06.2021.

D: Does the site require third parties including suppliers to complete their own business ethics training

☒ Yes  
☐ No  
D1: Please give details: Verified the training record dated 18.06.2021, which includes the suppliers also.





## Other findings

**Other Findings Outside the Scope of the Code****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)*



## Appendix 1

<p><b>Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."</b></p> <p><input type="checkbox"/> Not Applicable please x</p>	
<p><b>NOTE:</b> The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p><b>Instruction to Audit Company:</b> fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
ETI Code / Additional Elements	Customer's Supplier Code equivalent
<p><b>0.A. Universal Rights covering UNGP</b></p> <p><b>0.A. Guidance for Observations</b>  0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.  0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights  0.A.3 Businesses shall identify their stakeholders and salient issues.  0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.  0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.  0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.</p>	<p><b>0.A. Universal Rights covering UNGP</b></p>
<p><b>0.B. Management Systems &amp; Code Implementation</b></p> <p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p>	<p><b>0.B. Management Systems &amp; Code Implementation</b></p>



<p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>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.</p>	
<b>ETI 1. Forced Labour</b>	<b>ETI 1. Forced Labour</b>
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>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.</p>	
<b>ETI 2. Freedom of association and the right to collective bargaining are respected</b>	<b>ETI 2. Freedom of association and the right to collective bargaining are respected</b>
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>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.</p>	
<b>ETI 3. Working conditions are safe and hygienic</b>	<b>ETI 3. Working conditions are safe and hygienic</b>
<p>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.</p> <p>3.2 Workers shall receive regular and recorded Health &amp; Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p>	



<p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health &amp; Safety to a senior management representative.</p>	
<b>ETI 4. Child labour shall not be used</b>	<b>ETI 4. Child labour shall not be used</b>
<p>4.1 There shall be no new recruitment of child labour.</p> <p>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.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	
<b>ETI 5. Living wages are paid</b>	<b>ETI 5. Living wages are paid</b>
<p>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.</p> <p>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.</p> <p>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.</p>	
<b>ETI 6. Working Hours are not excessive</b>	<b>ETI 6. Working Hours are not excessive</b>
<p>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.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p>	



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.

#### ETI 7. No discrimination is practised

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

#### ETI 7. No discrimination is practised

#### ETI 8. Regular employment is provided

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or

#### ETI 8. Regular employment is provided

<p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p><b>Additional Elements: Responsible Recruitment</b></p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p> <p>8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.</p> <p>8.5 Employment agencies must only supply workers registered with them.</p> <p>8.6 Workers pay no recruitment fee at any stage of the recruitment process.</p> <p>8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
<b>8A: Sub-Contracting and Homeworking</b>	<b>8A: Sub-Contracting and Homeworking</b>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.</p> <p>8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<b>ETI 9. No harsh or inhumane treatment is allowed</b>	<b>ETI 9. No harsh or inhumane treatment is allowed</b>
<p>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.</p> <p>Additional elements:</p> <p>9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<b>10. Other Issue areas: 10A: Entitlement to Work and Immigration</b>	
<p><b>Additional Elements</b></p> <p>10A.1 Only workers with a legal right to work shall be employed or used by the supplier.</p> <p>10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
<b>10. Other issue areas 10B2: Environment 2-Pillar</b>	



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.*

**SMETA Extra Sections for 4 Pillar Audit:**
**Environment Section**
**B.4. Compliance Requirements**

10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.  
10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.  
10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements  
10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.  
10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.  
10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).  
10B4.7 Businesses shall make continuous improvements in their environmental performance.  
10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation  
10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.  
**B4. Guidance for Observations**  
10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.  
10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

**Business Practices Section**
**SMETA Extra Sections for 4 Pillar Audit:**
**Environment Section**

### 10C. Compliance Requirements

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

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

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

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

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

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

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### 10C. Guidance for Observations

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







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



## Photo Form

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- 1) To start Microsoft Paint, click 'Start', 'Programs', 'Accessories', then 'Paint'.
- 2) Open the image file you wish to edit.
- 3) Click the 'Image' Menu at the top and select "Stretch/Skew Image".
- 4) Choose a percentage figure to resize the image: to avoid distortion, choose the same percentage for horizontal and vertical stretch. Click OK.
- 5) Once you have the desired size, click File > Save As... (To prevent overwriting the original image).
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- 6) Please delete this text once complete.

		
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FIRE ALARM	FIRST AID	Genset



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PRODUCTION AREA



FIRE EXTINGUISHER



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DRINK WATER



FIRE BUCKETS



Suggestion box



Clean Toilet


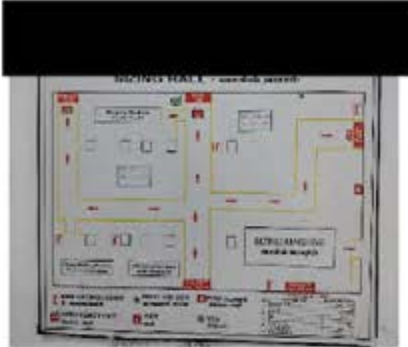



MALE TOILET



SMOKE DETECTOR



		
Assembly point	EVACUATION PLAN	EB PANEL



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

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