

Sedex Members Ethical Trade Audit Report

Version 7



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Audit content

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Minimum Requirements were applied and the SMETA Auditor Manual was followed. 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.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the following Code Areas:

Included in a 2-Pillar audit:

1. Labour Standards Code Areas:

- 0: Enabling accurate Assessment
- 1: Employment is Freely Chosen
- 1.A: Responsible Recruitment & Entitlement to Work
- 2: Freedom of Association and Right to Collective Bargaining are Respected
- 4: Child Labour Shall Not be Used
- 5: Legal Wages are Paid
- 5.A: Living Wages are Paid
- 6: Working Hours are Not Excessive
- 7: No Discrimination is Practiced
- 8: Regular Employment is Provided
- 8.A: Sub-contracting and Homeworkers are Used Responsibly
- 9: No Harsh or Inhumane Treatment is Allowed

2. Health & Safety Code Area:

- 3: Working Conditions are Safe and Hygienic

3. Environment Code Area:

- 10.A: Environment 2-Pillar

Included in a 4-Pillar audit:

1. Labour Standards Code Areas

- As 2-pillar

2. Health & Safety Code Area

- As 2-pillar

3. Environment Code Area:

- 10.A: Environment 2-Pillar
- 10.B: Environment 4-Pillar

4. Business Ethics Code Area:

- 10.C: Business Ethics

- (2) Where appropriate, non-compliances or non-conformances were raised where either local law or the Base Code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.
- (3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit and site details

Audit details

Sedex company reference	██████████	Auditor company name	BSI Group
Date of audit	2024-10-03	Audit conducted by	Sedex member
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		

Site details

Sedex site reference	██████████	Site name	████████████████████
Business name	██████████████████	Site address	████████████████████ ██████████████████ ██████████████ IN
Site phone	██████████	Site email	████████████████████

Audit parameters

Time in and out	Day 1		Day 2		Day 3	
	In	10:15	In	09:15	In	09:30
	Out	18:45	Out	17:45	Out	13:30
Audit type	Periodic					
Was the audit announced?	Semi announced					
Was the Sedex SAQ available for review?	Yes					
Who signed and agreed CAPR?	[REDACTED] / General Manager					
Any conflicting information SAQ/Pre-Audit Info	No					
Is further information available?	No					

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	No trade union exists.		
Reason for absence during the audit	No trade union exists.		
Reason for absence at the closing meeting	No trade union exists.		

SMETA declaration

Auditor team

SMETA declaration	<p>I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.</p> <p>1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.</p> <p>2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.</p> <p>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.</p>		
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	Nil		
Lead auditor	Hemamalini Ganesan	APSCA Number	21704170
Additional auditor			
Date of declaration	2024-10-05		

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	
Title	General Manager
Date of declaration	2024-10-05

































Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.M Ensure all machinery is installed, mainta...		NC [REDACTED]

Local law issues

No local law issues

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen				
1.A. Responsible recruitment and entitlement to work				
2. Freedom of association and right to collective bargaining are respected				
3. Working conditions are safe and hygienic				
4. Child labour shall not be used				
5. Legal wages are paid				
6. Working hours are not excessive				
7. No discrimination is practiced				
8. Regular employment is provided				



Not addressed



Fundamental improvements required







Some improvements recommended



Robust management systems

	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	✔	✔	✔	✔
9. No harsh or inhumane treatment is allowed	✔	✔	✔	✔
10.A. Environment 2-Pillar	ⓘ	✔	ⓘ	ⓘ
10.C. Business ethics	✔	✔	✔	✔

-  Not addressed
-  Fundamental improvements required
-  Some improvements recommended
-  Robust management systems

Site details

Company and site details

Sedex company reference		
Sedex site reference		
Company name		
Business ownership type	GOODS	
Site name		
Site name in local language		
GPS location	GPS address	
	Coordinates	
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	
	Job title	Compliance Manager
	Phone number	+91
	Email	

Company and site details

Applicable business and other legally required business license numbers and documents

Factory Registration No: [REDACTED] approved by Joint Director of Industrial Safety and Health, [REDACTED] on 21.10.2023 Maximum of 250 workers and 500 HP. Valid up to 31.12.2024.

Fire License No. [REDACTED]/E/2023 dated 27.10.2023 valid for 1 year issued by District Officer – Fire rescue service, [REDACTED]

Sanitary Certificate no. [REDACTED] A3/SC/2023, Certified by Deputy Director of Health Services, [REDACTED] dated 28.12.2023 valid for 1 year.

Certified Standing Order, certified by Certifying Officer – JCL – Madurai – D/[REDACTED]/08 Dated 05.11.18. The standing orders are displayed in local language (Tamil) in the Notice board.

Genset installation certificate No. [REDACTED]/EI/VNR/R 32/SC/2013 Dated 21.03.13 for 82.5 KVA issued by the Electrical Inspectorate, [REDACTED]

Genset installation certificate No. [REDACTED]/EI/VNR/R 32/SC/2023 Dated 07.12.23 for 125 KVA issued by the Electrical Inspectorate, [REDACTED]

Approved Building plan by the Director, Directorate of Industrial Safety and Health, Chennai through Letter No. D1/[REDACTED]/2024 dated 07.05.2024.

Building Stability dated 13.05.2024 issued by [REDACTED] (H1/[REDACTED]/2022 dated 02.06.2022) [REDACTED] valid for 3 years from the date of issue.

Import Export Code no. [REDACTED] dated 04.04.2023.

Boiler certificate number TN-[REDACTED] dated 11.07.2024 valid till 10.01.2025 issued by Joint Director, Boilers, [REDACTED]

Consent order for Air and Water from TNPCB [REDACTED] dated 30.04.2023 valid till 31.03.2025 by District Environmental Engineer, TNPCB, [REDACTED]

FSSAI License no. [REDACTED] for [REDACTED] dated 29.03.2023 valid till 31.03.2025 issued by Food Safety and Standards Authority of India.

GST Registration no. [REDACTED] DATED 01.07.2017.

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	Primary	Manufacture of made-up textile articles, except apparel
	Secondary	Manufacture of other textiles n.e.c.
	Other	Weaving of textiles
Product type	Manufacture and Supply of Home Textile Products.	
Process overview	The products includes Tote Bags, Bedsheets, Blankets, Towels and Grey Fabrics. The process flow of Receipt of Yarn, Winding, Warping, Sizing, Weaving, Grey Fabric Inspection, Dyeing, Dyed Fabric Inspection, Cutting, Sewing, Checking, Packing and Despatch. Production lines - 3. The main equipment includes Sizing Boiler Water Feed Pump - 2, Boiler - 1, Cooker - 2, Cooker storage - 1, Sizing machine - 1, Warping machine - 2, Cone winding - 2 (Both Side), Piller Drilling machine - 1, Bench Gridding machine - 1, Welding machine - 2, Folding machine - 1, Hydrualic Bale machine - 3, Sulzor Loom - 6, Rolling machine - 4, Conveyor belt - 2, Fabric checking machine (4 point Checking) - 1, Single Needle - 28, Double Needle - 4, Overlock - 1.	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes	
What is the area of audited site to its boundary?	8052m ²	
Building 1	Last construction works on site	2023
	If building is shared, provide details	Not a shared building
	Number of floors	2
	Description of floor activities	Ground Floor (24003.99 Square Feet) - Warping, Cone winding, Sizing, Yarn storage, Lamination cutting, Finished Goods Storage, Chemical storage, Genset, Creche, Male Restroom, Female Restroom, Car Parking, Boiler. First Floor (19,184.2 Square Feet) - Trims Stores, Fabric storage, Stitching, Checking, packing, Rolling.
Building 2	Last construction works on site	2021
	If building is shared, provide details	Not a shared building
	Number of floors	2
	Description of floor activities	Ground Floor (8000 Square Feet) - Finished goods Storage First Floor (8000 Square Feet) - Fabric Storage & Cutting
Building 3	Last construction works on site	2020
	If building is shared, provide details	Not a shared building
	Number of floors	1
	Description of floor activities	Ground Floor (2562 Square feet) - Yarn Storage
Building 4	Last construction works on site	2015
	If building is shared, provide details	Not a shared building
	Number of floors	1
	Description of floor activities	Ground floor (6920 Square feet) - Weaving, Workshop and waste storage

Site scope

Building 5	Last construction works on site	2015
	If building is shared, provide details	Not a shared building
	Number of floors	1
	Description of floor activities	Ground Floor (4,297.83 Square Feet) - Admin Office, Compliance Room, Security
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	
Is any activity conducted onsite not included within the scope of the audit?	No	

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No
Does the site organise worker transport to the worksite?	Site provided Four buses are provided for workers transport.

Work patterns

Approximate workers on site per month (% of peak)	January	90-95%	February	90-95%
	March	90-95%	April	90-95%
	May	90-95%	June	90-95%
	July	75-90%	August	75-90%
	September	75-90%	October	90-95%
	November	90-95%	December	90-95%

Work patterns

Is there any night or back shift work at the site?	Yes Warping, Sizing and Weaving operates in night shift.
What percentage of the workforce, including temporary and agency workers, work during the night/ back shift?	5%
Was the audit conducted across all shift times, and did it include a representative sample of workers from each shift time in interviews and sampling?	Yes The audit was covered all the shifts performed and the workers representative was sampled for worker interaction.

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	ISO 14001 (Environmental management), SA 8000 (Social performance management), Other management system certification, Other certification GRS, GCL [REDACTED]-GRS-2024 dated 25.04.2024 valid till 20.04.2025 by M/s. GCL. GOTS, GCL [REDACTED]-GOTS-2024 dated 25.04.2024 valid till 20.04.2025 by M/s. GCL. ISO 9001:2015 certificate no. IN/[REDACTED] dated 04.04.2024 valid till 03.04.2027 by M/s. ICV Certification. OKEOTEX certificate no. 15.HIN [REDACTED] dated 14.06.2024 valid till 31.05.2025.
Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	Yes The social risk assessment covers all the requirements for relevant interested parties.
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	Yes The human rights impact assessment was conducted with the social risk assessment.

Worker analysis

Gender disaggregated data available

Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	35 (35%)	65 (65%)	- -	100 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	35 (35%)	65 (65%)	- -	100 (100%)
Temporary or fixed term employees	0 (0%)	0 (0%)	- -	0 (0%)
Agency or subcontracted workers	0 (0%)	0 (0%)	- -	0 (0%)
Seasonal workers	0 (0%)	0 (0%)	- -	0 (0%)
Self-employed workers	0 (0%)	0 (0%)	- -	0 (0%)
Informal workers including home workers	0 (0%)	0 (0%)	- -	0 (0%)
Apprentices, trainees or interns	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
International migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
Total migrant workers	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Where workers have migrated internally,
list the most common internal states
workers have moved from

Not applicable

Workers by age

	Men	Women	Other	Total
18 - 24 years old	2 (2%)	1 (1%)	- -	3 (3%)
15 - 17 years old	0 (0%)	0 (0%)	- -	0 (0%)
Under 15 years old	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Workers by employee type

	Men	Women	Other	Total
Employees in management positions	43 (43%)	1 (1%)	- -	44 (44%)
Supervisors or team leaders	15 (15%)	1 (1%)	- -	16 (16%)
Administrative staff	10 (10%)	0 (0%)	- -	10 (10%)

* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit?

Yes

Please list the nationalities of all workers, with the three most common nationalities listed first

Indian

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Indian	35%	65%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid hourly / daily rate	0 (0%)	0 (0%)	- -	0 (0%)
Salaried workers	35 (35%)	65 (65%)	- -	100 (100%)

* % of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 (0%)	0 (0%)	- -	0 (0%)
Paid weekly	0 (0%)	0 (0%)	- -	0 (0%)
Paid monthly	0 (0%)	0 (0%)	- -	0 (0%)
Other	35 (35%)	65 (65%)	- -	100 (100%)

* % of total workforce

If other payment cycle entered, please provide details

Workers are paid fortnightly.

Worker interview summary

Gender disaggregated data available	Men and women
Which methods of worker engagement were used?	Individual interviews Group interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?	
Was the interview sample representative of all types of nationality and employment types of workers?	Yes
Was the interview sample representative of the gender composition of the workforce?	Yes
Number and size of group interviews	4 Groups of 5 workers
Did workers understand the purpose of the audit?	Yes
Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?	Yes
Was there any indication that workers had been 'coached' in how they should respond to questions?	No
What was the general attitude of the workers towards their workplace?	Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) Not applicable, as no complaints or concerns raised.
What did the workers like the most about working at this site?	Hours worked, rest days or breaks Transport Equal opportunities Job security Social benefits & insurance (e.g. ability to book annual leave, maternity leave, pensions etc.) Facilities (e.g. rest area, recreation, canteen)
Additional comments	Nil
Attitude of workers' committee/union representatives	During the interview with worker representative and committee members, it was noted that they are satisfied with the management and no negative comment raised by them.
Attitude of managers	The managers found to be co-operative throughout the audit. Provided full access to auditor throughout the audit process.

Workers interviewed by type

	Total
Permanent workers	100
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	100

Workers interviewed by group/individual

	Men	Women	Other	Total
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Workers interviewed by group/individual

Workers interviewed in groups	7	13	-	20
Workers interviewed individually	3	3	-	6

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	0	0	-	0

Measuring workplace impact

Gender disaggregated data available

Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	3.0%	2.5%	-	5.5%
Last full calendar year (2023)	5.0%	6.3%	-	11.3%
Previous full calendar year (2022)	4.0%	5.2%	-	9.2%

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	7.8%	8.2%	-	16.0%
Last full calendar year (2023)	7.0%	9.0%	-	16.0%
Previous full calendar year (2022)	8.0%	10.0%	-	18.0%

* Number of days lost through job absence in the year, calculated as (the number of employees on 1st day of the year + number employees on the last day of the year) / 2)* number available workdays in the year*100

Are accidents recorded?

Yes

Verified the register for accidents and dangerous occurrences and found nil reported.

Annual number of work related accidents and injuries (per 100 workers)*

	Men	Women	Other	Total

Annual number of work related accidents and injuries (per 100 workers)*

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

* Calculated as (number of lost days due to work accidents and work related injuries * 100) / number of total workers.

Percentage of workers that work on average more than 48 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 standard hours in a given week

Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	<p>Current Systems: The company implements and maintains systems for delivering compliance to this code.</p> <p>██████████ Compliance Manager is responsible for compliance with the code. List of Internal and External stakeholders are identified and the risk assessment on human rights found documented.</p> <p>Confidential means of complaining is in place, through the provision of complaint box ensured, however, no such complaints were received.</p> <p>Human rights policy statement was approved by the top management and found communicated to the employees through trainings and display in notice board.</p> <p>Evidence examined: Human Rights Policy Risk assessment on human rights</p>		

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	No

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The company has developed relevant policy and procedure dated 01.06.2022. [REDACTED] Compliance Manager is appointed to implement the procedure. The policies and procedures are communicated through the display in notice board and the trainings are provided at regular intervals to all te employees including workers, managers and supervisors. The effectiveness of the procedures to meet the policy and the requirements are ensured during the regular monitoring activities including internal audit dated 17.06.2024 and 18.06.2024.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current Systems:

Abstract of the acts including minimum wages, Bonus, ESI, EPF, POSH, Maternity benefit, etc. has been displayed in the local language, Tamil. Worker interviews, security procedures/interviews, worker behavior, management behavior and the facility walkthrough did not evidence any area of concern.

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.

Movement of employee within the premises is not restricted and they are free to leave the facility after work.

Twenty Six personal files were reviewed, the personnel files do not include any original documents for age verification.

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.

People are free to leave after the work. No overtime is being demanded as forced labour condition. 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.

All the personnel 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.

Evidence examined:

Recruitment Policy & Procedure, SAMS-POL-02, Rev. No. 01 dated 01.06.2022.
Employment Contract documents.

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Yes
	Human Rights Policy dated 02.01.2024
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The company has developed relevant policy and procedure, SAMS-POL-02, Rev. No. 01 dated 01.06.2022.</p> <p>Compliance Manager is appointed to implement the procedure. The policies and procedures are communicated through the display in notice board and the trainings are provided at regular intervals to all te employees including workers, managers and supervisors.</p> <p>The effectiveness of the procedures to meet the policy and the requirements are ensured during the regular monitoring activities including internal audit dated 17.06.2024 and 18.06.2024.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current Systems: No immigrant workers employed in the facility. Country's legal system does not permit outside workers to be employed without permit.</p> <p>Evidence examined: Employment contracts of interviewed personnel. Recruitment procedure dated 01.06.2022.</p>		

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (including dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	0%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	No

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?	Not Applicable
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Were recruitment fees or costs identified during worker interviews?	No
	No recruitment fees obtained.

2. Freedom of association and right to collective bargaining are respected

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The company has developed relevant policy and procedure, SAMS-POL-07, Rev. No. 01 dated 01.06.2022.</p> <p>██████████ Compliance Manager is appointed to implement the procedure. The policies and procedures are communicated through the display in notice board and the trainings are provided at regular intervals to all te employees including workers, managers and supervisors.</p> <p>The effectiveness of the procedures to meet the policy and the requirements are ensured during the regular monitoring activities including internal audit dated 17.06.2024 and 18.06.2024.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current Systems:
Laws of the land applicable are Trade Union Act 1926 and Industrial Disputes Act 1947. The company has documented the system for compliance to this requirement. It 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. There is no Union in the facility. However, the company has committee with the elected Worker representatives.
[redacted] were elected as worker representatives were elected on 16.12.2022.
The Workers Welfare committee addresses the workers needs at work place. The Committee meets at regular intervals of once in two months. Management has an open door policy to address the employees' needs, as revealed during the interviews. The company does not discriminate, penalize, threaten, restrict or interfere with workers choosing to lawfully form or join unions or associations. The worker interviews and document review confirm compliance to this Code. The company implements systems to establish better worker and management relations such as Environmental, Health and Safety Committee meeting minutes dated 13.08.2024 and 14.06.2024, Workers Welfare Committee meeting minutes dated 07.08.2024 and 14.06.2024, Grievance handling Committee meeting minutes dated 07.08.2024 and 06.06.2024, Internal Complaints committee meeting minutes dated 12.08.2024 and 07.06.2024, participation of [redacted] (NGO), Canteen committee meeting minutes dated 21.08.2024 and 15.06.2024. Verified the records of all Committee Meetings.

Evidence examined:
FOA & CB Policy, SAMS-POL-07, Rev. No. 01 dated 01.06.2022.
Committee meeting minutes

2. Freedom of association and right to collective bargaining are respected

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Yes
Does the membership reflect the nationality composition of the workforce?	Yes
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	The company has developed relevant policy and procedure, SAMS-POL-06, Rev. No. 01 dated 01.06.2022. [REDACTED] Compliance Manager is appointed to implement the procedure. The policies and procedures are communicated through the display in notice board and the trainings are provided at regular intervals to all te employees including workers, managers and supervisors. The effectiveness of the procedures to meet the policy and the requirements are ensured during the regular monitoring activities including internal audit dated 17.06.2024 and 18.06.2024.

Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.M Ensure all machinery is installed, mainta...		NC [REDACTED]



Systems and evidence examined to validate this code section

Current Systems:
General Health and Safety management
[REDACTED] Compliance Manager is appointed as Environmental, Health & Safety representative on 01.01.2022.
Potable water was freely available in the production floor and test certificate for the same was verified.
First aid training imparted to 14 dated 12.03.2022 valid for 3 years by St. John Ambulance.
Recent firefighting training dated 01.06.2024 imparted to 22 employees by [REDACTED]
[REDACTED]
Recent mock drill reports dated 27.08.2024 and 18.06.2024 covering all the shifts by [REDACTED]
[REDACTED]
Fire extinguishers - 63 numbers. Recently checked on 30.09.2024 and 23.09.2024 in the frequency of once in a week.
First aid boxes - 8 numbers, Smoke detectors - 65 numbers checked on 28.09.2024 and 21.09.2024 in the frequency of once in a week, Fire alarm points - 30 numbers checked on 28.09.2024 and 21.09.2024 in the frequency of once in a week, Emergency lights - 27 numbers checked on 28.09.2024 and 21.09.2024 in the frequency of once in a week, Fire water hose reel - 11 numbers, checked on 28.09.2024 and 21.09.2024 in the frequency of once in a week, Fire water hydrants - 6 numbers, , checked on 28.09.2024 and 21.09.2024 in the frequency of once in a week
Fire water tank capacity - 1.75 lakhs liters.
Drinking water points - 9 numbers provided in all the floors.
Sufficient clean toilets segregated by gender were available and evidenced the cleaning checklist for daily basis. Total toilets, Male - 7 numbers and Female - 8 numbers and urinals - 8 numbers.
Ventilation, temperature and lighting were adequate for the production processes. Minutes of meetings with the Health & Safety committee workers and the managers made available for verification.
There were at least 2 exits from each work area and these were clearly marked
Fire-fighting equipment was adequate and checks were up-to-date.
Evacuation plans were posted in all areas and understood by all workers interviewed
All electrical equipment was in good condition such as sockets, plugs, switches and main fuse boards.
There were competent electricians at the site and their training certificates were available for review. Electrician, [REDACTED] dated 10.03.2023 valid till 09.03.2027.
Hazardous chemicals are stored with the display of MSDS.
There were adequate first aid kits in each production area and they were well stocked.
Nil injuries were reported.
Verified the register for the accidents, dangerous occurrences, Accident (ESI) - Form no. 11, Maternity benefit.
Health check-up reports dated 31.07.2024 by [REDACTED], certifying Surgeon, Industrial Safety and Health, [REDACTED] for 20 personnel (Boiler, Waring, Sizing, Weaving).
Audiometry test dated 31.07.2024 for 5 personnel.
First aid log books were verified and no injuries were reported.
Earthpit testing certificate dated 10.09.2024 valid for 1 year by M/s. Tandem Enterprises.
Fitness certificate for two canteen workers dated 28.04.2024 by Dr. [REDACTED] Clinic.
Drinking Water test certificate issued by Tamilnadu water supply and drainage board district water Testing Laboratory, Virudhunagar dated 21.05.2024, concluded that the water sample is Physically, chemically and bacteriological potable;
Workplace monitoring report (Ambient Air quality, Source Emission, Noise Level, Lux level, Indoor Air quality) by [REDACTED] dated 01.11.2023 valid for 1 year.
Boiler certificate number TN-1820240708101 dated 11.07.2024 valid till 10.01.2025 issued by Joint Director, Boilers, [REDACTED]
Consent order for Air and Water from TNPCB 2308250837817 dated 30.04.2023 valid till 31.03.2025 by District Environmental Engineer, TNPCB, [REDACTED]
Test certificates for conveyor for 500 KGs pull chord, 2.0 T and 3.0 T Chain pulley block, Manual Stacker (3 Ton), Electrical hoist (2 numbers - 1 Ton), hydraulic Bale press machines - 3 numbers, Report dated 01.07.2024 valid for one year, tested by Mr. [REDACTED], M/s. Industrial Safety consultant - Competent person (H1/[REDACTED]/2021 dated 22.10.2021 valid till 21.10.2024).
Form 36- Report of examination of Hoist / Lift issued by [REDACTED] -

Competent person (H1/16867/2021) - Safe working load - 1000 kgs Goods lift and 1 Ton - Goods cum passenger lift certified on 03.10.2024 valid till 03.04.2025.
Form 8 for 3 Air Compressors, 9 cylinders, 2 Cookers approved by Joint Director Industrial Safety and Health, [REDACTED] dated 07.03.2024 valid for 6 months for first half of 2024, evidenced the payment for the second half of 2024 on 11.01.2024, however, awaiting for inspection by Joint Director of Industrial Safety & Health, [REDACTED] FSSAI License no. 22421378000191 for [REDACTED] dated 29.03.2023 valid till 31.03.2025 issued by Food Safety and Standards Authority of India.
Health & Safety including PPE awareness, Fire safety, Chemical handling training dated 10.07.2024 and 06.05.2024 covering 118 personnel.
Health & safety risk assessment, SAMS 056, Issue no. A, Rev. No. 02 dated 01.08.2024.
The agreement dated 27.12.2022 valid for 3 years with [REDACTED] Clinic.

Evidence examined:
Health and safety policy
Health and safety manual
Health & Safety committee meeting minutes.
Training records and certificates
Fire equipment maintenance records
Fire drill records
Government licenses and checks on air quality and noise level
Building structure safety certificate
Trained first aider register
Accident reports
Potable water testing certificates
Interviews with H&S manager
Interviews with workers and H&S committee members

Findings: non-compliances

		Non-compliance	Due 2024-11-09
Code area 3 Working conditions are safe and hygienic		Status Closed (2024-10-16)*	
Workplace requirement 3.M Ensure all machinery is installed, maintained, and used in a safe manner.		Time given to resolve 30 days	
Issue title 264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt/hand guards on other machines)		Verification method Desktop audit	
Description During the site tour, it was observed that pedal mat found missing in one out of nineteen sewing machineries and needle guards found missing in two out of nineteen sewing machineries in the first floor of block A1.		Area of non-compliance/non-conformance Base code	
Corrective and preventative actions The company will ensure the availability of adequate safety provisions including the pedal mat, needle guard, etc. in all the sewing machineries.			
Corrective and preventative actions (carried over) CAP			
Evidence			
<div><div></div><div></div></div>			
<div><div>Missing pedal mat.JPG</div><div>Missing needle guard.JPG</div></div>			

* PDF generated at 09:29 on 16 Oct 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	Yes
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes No hazardous chemicals, only organic chemicals are used.
Who organises accommodation for workers?	Not applicable
Who organises worker transportation between accommodation and worksite?	Not applicable
Who organises worker transportation while at work?	Site owned transport
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes Approved Building plan by the Director, Directorate of Industrial Safety and Health, [REDACTED] through Letter No. D1/[REDACTED]/2024 dated 07.05.2024 for the newly built creche, male restroom, female restroom, car parking and lathe.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The company has developed relevant policy and procedure, SAMS-POL-01, Rev. No. 01 dated 01.06.2022.</p> <p>██████████ Compliance Manager is appointed to implement the procedure. The policies and procedures are communicated through the display in notice board and the trainings are provided at regular intervals to all te employees including workers, managers and supervisors.</p> <p>The effectiveness of the procedures to meet the policy and the requirements are ensured during the regular monitoring activities including internal audit dated 17.06.2024 and 18.06.2024.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current Systems:

The hiring policies and procedures ensures that the minimum age of workers corresponds to all local laws and other requirements and defined as completion of 18 years.
The age of each worker is verified prior to their employment.
Personal files are maintained with the copies of basic worker information such as an identification card, School leaving certificate for age proof, Nomination forms, appointment order and service records, etc.
The young workers are not working in the company.
Child labor remediation is established. Worker interviews confirmed the absence of child labor in the facility.
The company has communicated the requirement by displaying in the notice board.
All the workers, staff confirmed that there is no child labor working in the company.
The youngest employee is 22 years of age.

Evidence examined:

Child labor Policy and child Remediation procedure dated 01.06.2022.
Employment contracts.

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	3%
Enter the legal age of employment	15
Enter the age of the youngest worker identified	22
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The company has developed relevant policy and procedure, SAMS-POL-14, Rev. No. 01 dated 01.06.2022.</p> <p>██████████ Compliance Manager is appointed to implement the procedure. The policies and procedures are communicated through the display in notice board and the trainings are provided at regular intervals to all te employees including workers, managers and supervisors.</p> <p>The effectiveness of the procedures to meet the policy and the requirements are ensured during the regular monitoring activities including internal audit dated 17.06.2024 and 18.06.2024.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current Systems:

The company follow the notification for Employment in Power loom industry and Notification, G.O. (2D), No. 113, Labor Welfare and Skill Development (J1) dated 13.12.2022. Notification no. II(2)/LWSD/8/2022, the dearness allowance for the period 01.04.2024 to 31.03.2025 is INR 9434.10/month and Tailoring industry by the government of Tamil Nādu, Notification, G.O. (2D), No. 59, Labor and Employment (J1) dated 10.10.2014. Notification no. II(2)/LE/723/2014, the dearness allowance for the period 01.04.2024 to 31.03.2025 is INR 5496/month.

The minimum wages notified by the government for Power loom industry, Weaver- INR 20276.10/month, Warper- INR 18410.60/month, Sizer- INR 17073.68/month, Back sizer - INR 16471.26/month, Warper Helper - INR 15994.68/month, Boiler Attender - INR 16306.68/month.

The minimum wages notified by the government for Tailoring industry, Cutter - INR 13462.80/month, Tailor - INR 13210.86/month, Helper - INR 12895.74/month, Checker - INR 13462.80/month, Packer - INR 12895.74/month, and the company pays, Weaver - INR 20280/month, Warper- INR 18434/month, Sizer- INR 17082/month, Back sizer- INR 16484/month, Warper Helper- INR 16016/month, Boiler Attender - INR 16328/month. Cutter - INR 13468/month, Tailor - INR 13234/month, Helper - INR 12896/month, Checker - INR 13468/month, Packer - INR 12896/month.

Twenty Six samples from the month of October'2023, April'2024 and September'2024. The organization remits the ESIC & EPF contributions as per the law requirements. Verified the ESI and PF paid challan for the past 12 months, September 2023 to September'2024.

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

The Earned leave - 15, 1 day for every 20 working days paid on 02.01.2024 for the year 2023 paid to 95 employees.

CL of 10 days/year was paid on 02.01.2024 for the year 2023 to 119 employees.

Full and final settlement record of the left employee was evidenced.

The management has paid 12% Bonus for the period July'2023 - June'2024 paid on 03.08.2024 to 99 personnel.

The workers are paid through bank transfer every month. A payslip with the details of the payment is provided to the workers when they receive their pay.

Overtime paid in premium rates (200%).

There are no piece rate workers employed and no home workers involved.

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

Labor welfare fund paid for 164 workers was paid on 11.01.2024.

EPF establishment code: [REDACTED]

ESIC establishment code: [REDACTED]

Evidence examined:

Local legal minimum wage documents
Payroll records
Social insurance and payment receipts from the local labour department
Labour contracts
Settlement records
Payslips of all workers interviewed.

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	Wages meet a living wage The legal minimum wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Only digital payments
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	I don't know

Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Not applicable
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Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Daily Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	48.0
	Max hours per month	208.0
Actual required working hours	Required hours per day	8.0
	Required hours per week	48.0
	Required hours per month	208.0
Maximum legal overtime hours	Max hours per day	2.0
	Max hours per week	12.0
	Max hours per month	48.0

Actual overtime hours	Max hours per day	0.0
	Max hours per week	0.0
	Max hours per month	0.0
Minimum legal wage	Min per hour	61.99
	Min per day	495.99
	Min per week	2975.94
	Min per month	12895.74
Actual minimum wage	Actual per hour	62.0
	Actual per day	496.0
	Actual per week	2976.0
	Actual per month	12896.0
Minimum legal overtime wage	Min per hour	123.98
	Min per day	991.98
	Min per week	5951.88
	Min per month	25791.48
Actual minimum overtime wage	Actual per hour	124.0
	Actual per day	992.0
	Actual per week	5952.0
	Actual per month	25792.0

Wage analysis

Number of workers' records checked	26
Provide the date and details of the records	Twenty six samples from the month of October'2023, April'2024 and September'2024.

Are there different legal minimum/ legally recognised CBAs wage grades?	<p>Yes</p> <p>The minimum wages notified by the government for Power loom industry, Weaver- INR 20276.10/month, Warper- INR 18410.60/month, Sizer- INR 17073.68/month, Back sizer - INR 16471.26/month, Warper Helper - INR 15994.68/month, Boiler Attender - INR 16306.68/month.</p> <p>The minimum wages notified by the government for Tailoring industry, Cutter - INR 13462.80/month, Tailor - INR 13210.86/month, Helper - INR 12895.74/month, Checker - INR 13462.80/month, Packer - INR 12895.74/month, and the company pays, Weaver - INR 20280/month, Warper- INR 18434/month, Sizer- INR 17082/month, Back sizer- INR 16484/month, Warper Helper- INR 16016/month, Boiler Attender - INR 16328/month. Cutter - INR 13468/month, Tailor - INR 13234/month, Helper - INR 12896/month, Checker - INR 13468/month, Packer - INR 12896/month.</p>
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Above legal minimum
Indicate the breakdown of workforce per earnings	100% of the workforce earnings are above legal minimum.
Are there any bonus schemes used?	<p>Yes</p> <p>The management has paid 12% Bonus for the period July'2023 - June'2024 paid on 03.08.2024 to 99 personnel.</p>
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	<div>Current Systems: The living wage calculated on 01.06.2024 by the company is INR 7122/month whereas the lowest wages paid by the company is INR 12896/month.</div> <div>Evidence Examined: Minimum wages notification Living wages calculation Wage records of workers</div>		

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The company has developed relevant policy and procedure, SAMS-POL-15, Rev. No. 01 dated 01.06.2022.</p> <p>██████████ Compliance Manager is appointed to implement the procedure. The policies and procedures are communicated through the display in notice board and the trainings are provided at regular intervals to all te employees including workers, managers and supervisors.</p> <p>The effectiveness of the procedures to meet the policy and the requirements are ensured during the regular monitoring activities including internal audit dated 17.06.2024 and 18.06.2024.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current Systems:
The company follows Single Shift for Home Textiles section and three shifts for Sizing and Weaving Section.
The working hours of the workers in the home textiles division is 08:30 am to 17:30 pm with half an hour lunch break, 13:00 pm – 13:30 pm and tea breaks twice a day, 11:00 am – 11:15 am and 16:00 pm – 16:15 pm.
The Sizing and Weaving section operates in three shifts, Shift I - 07:00 am – 15:00 pm with lunch break, 12:00 pm – 12:30 pm; Shift II – 15:00 pm – 23:00 pm with dinner break, 19:30 pm – 20:00 pm; Shift III – 23:00 pm – 07:00 am with break 03:00 am – 03:30 am. The in and out monitoring is done through the face reader system since August'2024, earlier Bio-metric system was used.
Payroll and time sheets for the months, October'2023, April'2024 and September'2024 were reviewed.
Worker interviews and the records support what is claimed to be practiced.
The working hours are displayed on the notice board.
Over time is voluntary.
Time sheets for the last 12 months were reviewed for compliance.
Verified the attendance register – Register of Young workers and Adult workers combined with Muster roll – for the last 12 months.
Legal standard work week (hours): 48 Hours/week and maximum OT per Quarter should not exceed 50 Hrs.
The Holidays (National, Festival and Religious) are being provided to the workers / employees as per the requirement of relevant act. Holiday list is observed and displayed in the notice board.

Evidence Examined:
Payroll records
Time sheets
Pay slips
Attendance register

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	200%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	Not applicable.
Excluding overtime, what are the regular working hours per week for workers at this site?	48.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	48.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	48.0
Maximum number of days worked without a day off in sample	6

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The company has developed relevant policy and procedure, SAMS-POL-08, Rev. No. 01 dated 01.06.2022.</p> <p>██████████ Compliance Manager is appointed to implement the procedure. The policies and procedures are communicated through the display in notice board and the trainings are provided at regular intervals to all te employees including workers, managers and supervisors.</p> <p>The effectiveness of the procedures to meet the policy and the requirements are ensured during the regular monitoring activities including internal audit dated 17.06.2024 and 18.06.2024.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current Systems:

The Company has documented their Non-Discriminatory Policy, SAMS-POL-08, Rev. No. 01 dated 01.06.2022.

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.

There are both female and male workers in the company.

It 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.

It does not allow any behavior 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.

The workers interview clearly established that there is Non-discrimination policy prevalent in the organization. Workers reported they are free to observe religious holidays.

"No Discrimination" related to age, cast, creed, race, sex, nationality etc. found defined and documented.

The Company does not entertain any type of pregnancy or virginity test under any circumstances for any female employee.

Anti-discrimination policy is documented & communicated during the ETI base code trainings to the employees.

Evidence examined:

Recruitment procedure & Anti-discrimination policy dated 01.06.2022.

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	0%
Representation of women in managerial roles (ratio of women workers to women managers)	1%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	1%
Three most common nationalities in managerial and supervisory roles	Indian

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The company has developed relevant policy and procedure dated 01.06.2022. [REDACTED] Compliance Manager is appointed to implement the procedure. The policies and procedures are communicated through the display in notice board and the trainings are provided at regular intervals to all te employees including workers, managers and supervisors. The effectiveness of the procedures to meet the policy and the requirements are ensured during the regular monitoring activities including internal audit dated 17.06.2024 and 18.06.2024.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current Systems:
 Work performed is on the basis of recognized employment relationship established through national law and practice.
 The Company signs employment contract with the employees at the time of employment.
 No home workers employed.
 All the employees engaged are permanent in nature including the security guard.
 Interstate migrant workers are not engaged.
 No subcontractors were engaged.
 Personal files of the twenty six interviewed workers were verified.

Evidence examined:
 Employment contracts
 Personal files
 Payroll records

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

8.A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The company has developed relevant policy and procedure, SAMS-PRO-10, Rev. No. 01 dated 01.06.2022.</p> <p>Compliance Manager is appointed to implement the procedure. The policies and procedures are communicated through the display in notice board and the trainings are provided at regular intervals to all te employees including workers, managers and supervisors.</p> <p>The effectiveness of the procedures to meet the policy and the requirements are ensured during the regular monitoring activities including internal audit dated 17.06.2024 and 18.06.2024.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current Systems: No Subcontracting or home working. The production is not outsourced and carried out fully inside the company.</p> <p>Evidence examined: Supplier control documents Inward and outward delivery challans.</p>		

8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent?

Not applicable

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers?

No

No products or services provided by the homeworkers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?

No

No unrecorded or undeclared sub-contracting on site.

Are any sub-contractors used?

No

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The company has developed relevant policy and procedure dated 01.06.2022. [REDACTED] Compliance Manager is appointed to implement the procedure. The policies and procedures are communicated through the display in notice board and the trainings are provided at regular intervals to all te employees including workers, managers and supervisors. The effectiveness of the procedures to meet the policy and the requirements are ensured during the regular monitoring activities including internal audit dated 17.06.2024 and 18.06.2024.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

**Systems and evidence examined to
validate this code section**

Current Systems:

The company has a documented disciplinary practice and follows the laws of the land on this matter (Industrial Disputes Act and the Industrial Employment Standing Orders Act).

The disciplinary practices are detailed in the Factories Act 1948 and the abstract of the same is displayed.

No Case of any Disciplinary Action taken against any worker. The same was verified through the sampled worker interview.

No deductions for disciplinary purpose are imposed anytime within the facility.

Confirmed through workers interview.

The Company treats all its personnel with dignity and respect. The company does not engage in or tolerate the use of corporal punishment.

Disciplinary action procedure found documented.

Certified Standing Order, D/6418/08 Dated 05.11.18 certified by Certifying Officer, JCL,

██████████ The standing order is displayed in local language ██████████ in the Notice board.

Evidence examined:

Approved Standing order

Disciplinary Procedure

Disciplinary action records

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process The grievance process is available to all workers The grievance process is available to members of the local community
What type of grievance mechanism(s) are available?	Open door policy, complaint/suggest boxes, grievance committee
Number of grievances raised in the last 12 months	3
Number of grievances resolved in the last 12 months	3

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	The company has developed relevant policy and procedure dated 01.06.2022. [REDACTED] Compliance Manager is appointed to implement the procedure. The policies and procedures are communicated through the display in notice board and the trainings are provided at regular intervals to all te employees including workers, managers and supervisors. The effectiveness of the procedures to meet the policy and the requirements are ensured during the regular monitoring activities including internal audit dated 17.06.2024 and 18.06.2024.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current Systems:

Compliance Manager is appointed as Environmental representative on 02.01.2024.
 EMS Manual, Issue no. A, Rev. No. 00 dated 01.01.2022.
 Environmental policy dated 02.01.2024.
 Aspects & Impacts, EMS-ST-15, Issue A, Rev. No. 01 dated 02.01.2024.
 Environmental awareness training dated 12.08.2024 imparted to 135 employees.
 Chemical handling & MSDS training dated 12.04.2024 imparted to 11 employees.
 E-waste disposal agreement dated 24.04.2024 with [REDACTED] valid for 1 year (Authorization no. [REDACTED] dated 17.07.2023 valid till 31.03.2028).
 Used oil disposal agreement dated 24.04.2024 with [REDACTED] - Unit II valid for 1 year (Authorisation no. [REDACTED] dated 02.06.2022 valid till 31.03.2027).
 Workplace monitoring report (Ambient Air quality, Source Emission, Noise Level, Lux level, Indoor Air quality) by [REDACTED] dated 01.11.2023 valid for 1 year.
 Consent order for Air and Water from TNPCB [REDACTED] dated 30.04.2023 valid till 31.03.2025 by District Environmental Engineer, TNPCB, [REDACTED]

Evidence examined:

Environmental Policies and Procedures.
 Workplace monitoring records
 Disposal Agreements

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	ISO 14001:2015 certificate no. DAS [REDACTED] /47/E. Rev. No. 01 dated 21.11.2022 valid till 20.11.2025 by [REDACTED].
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	No

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current Systems:</p> <p>Aspects & Impacts, EMS-ST-15, Issue A, Rev. No. 01 dated 02.01.2024.</p> <p>Environmental objectives monitoring plan (EMS-06) dated 02.01.2024.</p> <p>Carbon Foot print - Energy records, Consumption/Generattion data analysis report dated 20.08.2024 by [REDACTED] valid for 1 year.</p> <p>Ozone depleting substances monitoring report dated 20.08.2024 by [REDACTED] valid for 1 year.</p> <p>EIP Waste water analysis report dated 20.08.2024 by [REDACTED] valid for 6 months.</p> <p>Green house gas monitoring report dated 06.01.2024 by [REDACTED] valid for 6 months.</p> <p>Sewage Waste water analysis report dated 05.01.2024 by [REDACTED] valid for 6 months.</p> <p>Drinking water test report dated 20.08.2024 by [REDACTED] valid for 6 months.</p> <p>Evidence examined:</p> <p>Environmental Policies and Procedures.</p> <p>Workplace monitoring records</p>		

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Other (provide details) Not applicable.
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes Done during the contract review.
Does the site have reduction targets in place to manage climate related risks?	Yes, to reduce scope 1 greenhouse gases (GHGs) Yes, to reduce scope 2 greenhouse gases (GHGs) Yes, to reduce scope 3 greenhouse gases (GHGs)
Are any of these science-based targets?	No, and we do not intend to set one in the next two years
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	Yes Reduction target of 1% water usage from the last year. Reduction target of 1% energy usage from the last year.
Has the site 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?	Not Applicable

Usage/discharge analysis

	Last full calendar year (2023)	Previous full calendar year (2022)
Total electricity consumption from non-renewable sources (kWh)	225,980.8	171,512.4
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	Data not available	Data not available

Types of renewable energy used	Data not available	Data not available
Total natural gas consumption (kWh)	0	0
Usage of other purchased fuels	Diesel - 53491.01 Litres	Diesel - 48835.35 Litres
Has the site completed any carbon footprint analysis?	No	No
Water sources	Ground Water	Ground Water
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	951.2	471.2
Water discharged	Used for Gardening	Used for Gardening
Water volume discharged (m3)	27.9	21.5
Water volume recycled (m3)	9.5	7.5
Total waste produced (mt)	54.5	33.8
Total hazardous waste produced (mt)	0	0
Waste to recycling (mt)	0	0
Waste to landfill (mt)	0	0
Waste to other (mt)	1.7	1
Total product produced (mt)	927.3	699.6

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The company has developed relevant policy and procedure dated 01.06.2022. General Manager is appointed to implement the procedure. The policies and procedures are communicated through the display in notice board and the trainings are provided at regular intervals to all te employees including workers, managers and supervisors. The effectiveness of the procedures to meet the policy and the requirements are ensured during the regular monitoring activities including internal audit dated 17.06.2024 and 18.06.2024.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	Current Systems: General Manager is appointed as Ethics Management Representative. Recent trainings dated 18.08.2024 and 07.05.2024 on anti-bribery and anti-corruption. Verified the Anti-bribery policy dated 02.01.2024 displayed in notice board. During the interaction with the employees, it was noted that the company doesn't entertain bribery / corruption at any levels. Evidence examined: Data Confidentiality & Anti-bribery policy and procedure Training records		

10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?	No
Provide any certified anti-bribery management systems for the site	Not certified.

Attachments



[CAPR \[redacted\] signe d.pdf](#)



[Photo form.pdf](#)





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