

# Sedex Members Ethical Trade Audit Report

Version 7



# Contents

[Audit content](#)

[Audit and site details](#)

[Audit parameters](#)

[Audit attendance](#)

[SMETA declaration](#)

[Summary of findings](#)

[Management systems](#)

[Site details and data points](#)

[Site details](#)

[Worker analysis](#)

[Worker interviews](#)

[Measure workplace impact](#)

[0. Enabling accurate assessment](#)

[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](#)

[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](#)

[10.A. Environment 2-Pillar](#)

[Attachments](#)

## 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	Intertek India
Date of audit	2024-11-19	Audit conducted by	Sedex member
Audit pillars	Labour Standards   Health and safety		

## Site details

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

# Audit parameters

Time in and out	Day 1	
	In	09:30
	Out	18:40
Audit type	Periodic	
Was the audit announced?	Announced	
Was the Sedex SAQ available for review?	No	
Who signed and agreed CAPR?	[REDACTED] / Partner	
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	No	No
B: Present at the audit?	Yes	No	No
C: Present at the closing meeting?	Yes	No	No
Reason for absence at the opening meeting	Worker Representative were busy in production activities and no union on site		
Reason for absence during the audit	Worker Representative were busy in production activities and no union on site		
Reason for absence at the closing meeting	Worker Representative left for the day and no union on site		

# SMETA declaration

Auditor team

SMETA declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

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.
2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

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.

Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)

None

Lead auditor

Mala Biredar

APSCA Number

21700385

Additional auditor

Date of declaration

2024-11-19

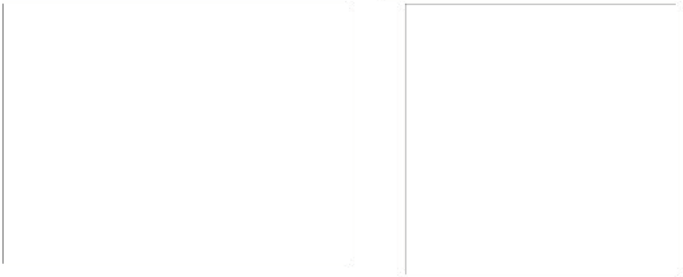
Site representation

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	Partner
-------	---------

Date of declaration	2024-11-19
---------------------	------------









































# Local law issues

§1

In accordance with The Factories Act, 1948 section 40A. Maintenance of buildings. If it appears to the Inspector that any building or part of a building in a factory is in such a state of disrepair as is likely to lead to conditions detrimental to the health and welfare of the workers, he may serve on the occupier or manager or both of the factory an order in writing specifying the measures which in his opinion should be taken and requiring the same to be carried out before such date as is specified in the order



# 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	✔	✔	✔	✔
<div>✖ Not addressed</div> <div>⚠ Fundamental improvements required</div> <div>ⓘ Some improvements recommended</div> <div>✔ Robust management systems</div>				

Site details

Company and site details

Sedex company reference			
Sedex site reference			
Company name	LLP		
Business ownership type	GOODS		
Site name	LLP		
Site name in local language			
GPS location	GPS address		
	Coordinates	Latitude: , Longitude:	
Is the worksite in a remote location, far from habitation?	No		
Site contact	Contact name		
	Job title	General Manager	
	Phone number		
	Email		
Applicable business and other legally required business license numbers and documents	Factory License no Valid till 31-December-2025 for 250 employees and 50 HP.		

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	Primary	Other manufacturing n.e.c.
	Secondary	
	Other	

## Site activities

Product type	Facility is into manufacturing of cotton, Canvas and Jute Bags
Process overview	Facility is engaged into manufacturing of Cotton, Jute and Canvas Bags Main equipment's/machineries used by facility are cutting printing, sewing machine, Ironing machine, DG set and compressors, Process flow Raw material reception (Fabric) – Cutting – Printing – Sewing – Thread Cutting – Checking – Pressing – Packing – Final Dispatch. Facility has 50 sewing machines , 02 printing machines ,02 Knife cutting machines
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?	██████ m <sup>2</sup>
Building 1	<div> <div>Last construction works on site</div> <div>2020</div> </div> <div> <div>If building is shared, provide details</div> <div>No</div> </div> <div> <div>Number of floors</div> <div>2</div> </div> <div> <div>Description of floor activities</div> <div>Ground Floor: RM Store, Cutting, Press Packing, Inspection &amp; Finished Goods Store, Printing First Floor: Sewing, Finishing, Admin Office &amp; Conference Room Periphery : Creche , Security cabin</div> </div>
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?	Not provided No transport provided

## Work patterns

Approximate workers on site per month (% of peak)	January	95-100%	February	95-100%
	March	95-100%	April	95-100%
	May	95-100%	June	95-100%
	July	95-100%	August	95-100%
	September	95-100%	October	95-100%
	November	95-100%	December	95-100%

Is there any night or back shift work at the site?	No
--	----

## Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	No
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 site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	Yes Facility has not conducted Human Rights Impact Assessment (HRIA)

Worker analysis

Gender disaggregated data available      Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	28 (43.8%)	36 (56.3%)	- -	64 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	28 (43.8%)	31 (48.4%)	- -	59 (92.2%)
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%)	5 (7.8%)	- -	5 (7.8%)

\* % of total workforce

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	2 (3.1%)	4 (6.3%)	- -	6 (9.4%)
International migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
Total migrant workers	2 (3.1%)	4 (6.3%)	- -	6 (9.4%)

\* % of total workforce

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

Orissa , Uttar Pradesh

Workers by age

	Men	Women	Other	Total
18 - 24 years old	2 (3.1%)	12 (18.8%)	- -	14 (21.9%)
15 - 17 years old	- -	5 (7.8%)	- -	5 (7.8%)
Under 15 years old	0 (0%)	0 (0%)	- -	0 (0%)

\* % of total workforce

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

No

Describe how this may vary during peak periods

No peak season mentioned

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	44%	56%	-	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	44 (68.8%)	56 (87.5%)	- -	100 (156.3%)

\* % 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	28 (43.8%)	36 (56.3%)	- -	64 (100%)
Other	0 (0%)	0 (0%)	- -	0 (0%)

\* % of total workforce

If other payment cycle entered, please provide details

0



## 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	1 group of 05 employees			
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?	Pay Work environment – comfort (e.g. temperature, noise or dust levels)
What did the workers like the most about working at this site?	Work environment – comfort (e.g. temperature, noise or dust levels) Work atmosphere (e.g. treatment by supervisors)
Additional comments	None
Attitude of workers' committee/union representatives	Based on the interaction with works committee members, it was noted that committee representative & members are not discriminated, and their grievances / suggestions stated by the workers were effectively solved by the facility management. Further no negative comments were received.
Attitude of managers	The facility management showed a positive attitude to this audit during the whole process. Facility team was very proactive & showed active participation in the audit. All documentation requested for review was provided timely. At the end of the audit, all the non-compliances were accepted by the facility.

## Workers interviewed by type

	Total
Permanent workers	64
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	64

## Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	0	5	-	5



# Measuring workplace impact

Gender disaggregated data available

Men and women

## Annual worker turnover (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	6.0%	9.0%	-	15.0%
Last full calendar year (2023)	12.0%	16.0%	-	28.0%
Previous full calendar year (2022)	12.0%	15.0%	-	27.0%

\* 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)	3.0%	6.0%	-	9.0%
Last full calendar year (2023)	4.0%	5.0%	-	9.0%
Previous full calendar year (2022)	5.0%	7.0%	-	12.0%

\* 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

Facility has maintained accident register in the prescribed format of form no.30. However, from accident register no accidents occurred till date. Same was confirmed from worker interviews.

## 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)	12.0%	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%





# 0. Enabling accurate assessment

## Summary of findings

Code area	Workplace requirement	Local law	Finding
0. Enabling accurate assessment	0.D Maintain a written human rights policy st...		NC <a href="#">ZAF-</a>
<div><div>Systems and evidence examined to validate this code section</div><div><ul style="list-style-type: none"><li>- The facility has allowed the auditor to conduct and complete the audit without any obstruction to requested documents, interviewees and the facility itself (including outbuildings and accommodation).</li><li>- Facility has shown authentic &amp; accurate records. Facility has extended complete transparency towards to audit process.</li><li>- Facility did not engaged in any of the audit integrity issue like bribes or threatening to the auditor, nor in any way induce the auditor to be dishonest.</li><li>- Facility has designated [REDACTED] General Manager responsible for implementing standards on human rights.</li><li>- No human rights violation was observed in the facility. Same also confirmed from worker interviews.</li><li>- Facility has identified its stakeholders &amp; their salient issues. Also, facility has evaluated direct, indirect &amp; adverse impact on human rights through its stakeholders &amp; its process.</li><li>- Facility provides regular trainings to all the employees in batches / groups on ETI base code &amp; social policies covering human rights. However some deviation noted is raised.</li><li>- Facility has communicated ETI base code &amp; social policies to its stake holders like suppliers &amp; customers.</li></ul><div>Evidence Examined:</div><ul style="list-style-type: none"><li>- Policy &amp; procedures on Anti-bribery, Anti-corruption &amp; Human rights.</li><li>- Appointment letter of [REDACTED] General Manager as responsible person for overall social compliance.</li><li>- ETI base code / social policies communication records of suppliers &amp; customer dated 10.09.2024.</li><li>- Management interaction &amp; worker interviews.</li></ul></div></div>			

# Findings: non-compliances

ZAF-	Non-compliance	Due 2025-01-31
<b>Code area</b> 0 Enabling accurate assessment	<b>Status</b> Open*	
<b>Workplace requirement</b> 0.D Maintain a written human rights policy statement that is approved at the most senior level, communicated to all personnel, and trained to relevant personnel.	<b>Time given to resolve</b> 60 days	
<b>Issue title</b> 804 - Written human rights policy in place but does not meet the full requirement to be approved at the most senior level, communicated to all personnel, and trained to relevant personnel.	<b>Verification method</b> Desktop audit	
<b>Description</b> It was noted from review of records & management interaction that facility has not provided training on ETI base code or social policies to its employees in last one year. As per facility they trained the new employees who have joined in said period however no records found. Further, it was noted from workers interview that employee were not aware of the same.	<b>Area of non-compliance/non-conformance</b> Base code	
<b>Corrective and preventative actions</b> It is recommended facility to provide ETI base code training to their employees and maintain the records.		
* PDF generated at 04:31 (UTC) on 06 Dec 2024. <a href="#">View this finding on the Sedex platform</a> for live updates and closure details.		



# 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

1. Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met.
2. Facility have appointed manager with sufficient seniority who is responsible for implementing procedures.
3. Facility have not communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures.
4. Facility have monitored the effectiveness of procedure to meet policy and workplace requirements.

## Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

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

**Current Systems:**

- [REDACTED] General Manager is responsible to ensure that no forced, bonded, involuntary or prison labour is employed at site & its supply chain.
- Facility has a policy which prohibits forced labour, and this was available for review.
- There was a formalised application procedure & recruitment policy which states that workers must present their identity cards for proof of age but only copies to be kept in the personnel files and the originals were given back to the workers.
- The terms and conditions of employment state that the workers are free to leave the workplace outside of their working hours. No bonds signed by any of the sampled workers.
- The factory did not require any payment for work tools, PPE, Identity card, trainings, etc.
- No loan schemes are functional in the facility. Same confirmed from worker interviews. No wage retention observed from audit process.
- Facility has installed CCTV however not for the purpose of controlling or intimidating workers.
- There is no evidence of forced, bonded, involuntary or prison labour in the factory.

**Evidences Examined:**

- Facility policy on no forced labour & no bonded labour.
- Personnel files including application forms & appointment letters for 10 out of 10 sampled employees.
- Wage records & bank statements.
- Full & Final Settlement & resignation records.
- Time records.
- Management interaction & worker interviews.





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

**Current Systems:**

- [REDACTED] General Manager is responsible to ensure compliance with this code.
- Based on the review of employee attendance records and employee's interview, the facility has not employed any national migrant workers, foreign nationals, etc.
- Based on the review of employee personal files, all the employees are holding the legal rights to work in country.
- Facility has a system to review original identity documents of all the employees prior to recruitment to confirm its nationality. Facility maintains copy of the verified identity document in the employees personal files.
- As per facility hiring policy, employees not need to pay any recruitment fees and related costs.

**Evidence Examined:**

- Policy & procedure on hiring & recruitment.
- 10 out of 10 sampled employee's personnel files.
- Management interaction & Worker interviews.



## 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?	Directly
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?	No
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	9%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	Yes
List the sending states/provinces/regions	Orissa, Uttar Pradesh



## 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	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	1. Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met. 2. Facility have appointed manager with sufficient seniority who is responsible for implementing procedures. 3. Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4. Facility have monitored the effectiveness of procedure to meet policy and workplace requirements

### Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current System

- [REDACTED] General Manager is responsible to ensure that 'Freedom of Association & Right to Collective Bargaining' is respected by the management.
- Facility encourages and respects all employees' rights to join union freely & legally. Facility recognizes and encourages the right to freedom of association and collective bargaining under the law provision.
- No labour union exists in the facility as legally not mandatory. However, facility has formed grievance committee with equal representatives of 06 members (03 staff and 03 workmen) from staff & workmen. Meeting is held every three month. Verified minutes of meeting.
- Worker representatives are appointed in committee through appropriate election procedure amongst all the employees inline with the legal requirement.
- All the committee meetings are conducted during regular work hours.
- Facility also has open door policy wherein any employee can directly approach the management & raise his concern.
- Facility has installed suggestion boxes at accessible location where employees can share their concerns anonymously.
- There was no evidence of suppression of employees' rights.
- Facility has displayed list of committee members at the notice board.

Evidence examined

- Policy & procedures on freedom of association.
- Minutes of meeting of grievance committee record dated 12-11-2024
- Management interaction & worker interviews.

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?	Yes
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)?	Not Applicable
Are the worker representatives freely elected by the workforce as a whole?	Not Applicable
Does union/worker committee membership reflect the gender composition of the workforce?	Not Applicable
Does the membership reflect the nationality composition of the workforce?	Not Applicable
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	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	Some Improvements Recommended
Explanation for management systems grades	1. Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met. 2. Facility have appointed manager with sufficient seniority who is responsible for implementing procedures. 3. Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4. Facility have not monitored the effectiveness of procedure to meet policy and workplace requirements

#### Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.K Ensure that all premises are safe and hav...	§1	NC <a href="#">ZAF-</a>

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

**1) General Health and Safety management**

- Facility has documented occupational health & safety policy endorsed by [REDACTED] General Manager
- [REDACTED] General Manager is responsible for Health & Safety aspects for the site.
- Potable water was freely available in all areas. Water potability test is conducted on regular basis through external laboratories.
- Adequate & clean toilets were always available to the workers all the time.
- Ventilation, temperature, and lighting were adequate for the production processes.
- The facility including its workstations, storage areas, utilities were generally neat and clean & found safe.
- Facility has documented onsite emergency preparedness plan.
- Facility also conducts health & safety risk assessment based on their processes carried out in its premises.
- Facility has formed health & safety committee wherein quarterly meetings are held to discuss health & safety related matters.
- Regular training on general safety & PPE awareness is provided to all the employees in batches.
- Facility has provided adequate PPE to all the employees.
- Facility has also provided creche / child care room inline with legal requirement. However not found operational

**2) Fire Safety**

- Secondary exit was provided at each floor of the building. Further, all the exits found free from obstructions.
- All the exit & emergency exit doors were kept unlocked during facility working hours. Facility has marked all the exits and emergency exits in a language understood by majority of the employees.
- Evacuation maps were posted in all areas & floors which were matching to the actual floor layout.
- Adequate firefighting equipment installed such as 74 Firefighting equipment such as 24 Fire extinguisher, 3 Siren and 3 Fire alarm call points, 7 Emergency lights, 6 emergency exits.
- Fire-fighting equipment's were found free from obstructions on the day of audit.
- Monthly inspection of fire-fighting equipment's were done by internal safety Incharge.
- Based on the facility tour it was noted that operating instructions were posted near the fire equipment's.
- Evacuation mock drills are conducted every six months.
- Fire NOC not applicable in state of [REDACTED] as per notification dated 08-07-2021

**3) Machine & Electrical safety**

- All machines and electrical equipment's were maintained in good conditions.
- There were competent mechanic & licensed electricians vendors associated with site to do the maintenance & electrical work.
- Six monthly inspection of pressure vessel machines i.e., air compressors & lifting tools i.e., goods lift were carried out by competent person. Legally required hydraulic test for air compressors also conducted on regular basis.
- Facility has obtained diesel generator permit from the electricity dept.
- Rubber mat were placed below the electrical panels.
- Machines or motors having pulley guards were found guarded.
- Regular machine preventive maintenance is carried out as per the maintenance schedule.
- All the sewing machines were equipped with needle guards, eye guards & pulley guards.

**4) Chemical safety**

- Facility is engaged in manufacturing of readymade garments which involves only cut to pack process. No wet process carried out.
- Facility mainly uses diesel oil for diesel generator set & machine oil for stitching machines. Further chemicals are used for Printing
- Diesel oil & machine oil containers are stored in secondary containment.
- MSDS is posted near the storage area. Eye wash shower is also provided.

**5) Medical services**

- Facility has provided well equipped with adequate supplies 3 no. of first aid boxes.
- Facility had trained 30 employees from through M/s. St. John Ambulance first aid training institute & training found valid for 03 years dated 06-03-2023.
- Legally required ambulance room is provided by the facility in its premises. Full time



nursing staff & visiting doctor is appointed.  
- As per the accident register no accidents occurred till date. Same confirmed from worker interview & management interaction.

**Evidence Examined:**

- Health & Safety Policy.
- Drinking Water Test report dated 05.04.2024.
- Onsite emergency preparedness plan and health & safety risk assessment record dated 17.09.2024.
- Stability Certificate dated 21.10.2020.
- Health & safety committee meeting records dated 23.07.2024
- List of machines & equipment's last updated on 31.03.2024.
- Diesel generator set permit dated 20.09.2008.
- Fire-fighting equipment's inspection records dated 06.10.2024.
- Fire drill records dated 26.09.2024 & 21.06.2024.
- Fire-fighting training record dated 13.04.2024
- Air compressors & goods lift inspection reports i.e., Form-11 & form-09 dated 21.10.2024
- Machine service maintenance record dated 07.11.2024.
- PPE usage / chemical handling training record dated 13.04.2024
- List of first aid boxes.
- First aid training certificates dated 06-03-2023 valid for 3 years.
- Industrial accident records – Updated till October 2024.
- Electrical inspection dated 08.04.2024
- Management interaction & worker interviews.



# Findings: non-compliances

ZAF-

Non-compliance

Due 2025-01-31

## Code area

3 Working conditions are safe and hygienic

## Status

Open\*

## Workplace requirement

3.K Ensure that all premises are safe and have valid safety certifications for their current layout and use. If it is currently not possible for a required license or certificate to be obtained, implement inspections by appropriate third parties to ensure building safety.

## Time given to resolve

60 days

## Verification method

Desktop audit

## Issue title

261 - Premises require minor repairs that may affect personal safety (e.g. missing handrails)

## Area of non-compliance/non-conformance

Local law

Base code

## Description

It was noted from site tour that : a) crack observed in ground floor on wall near cutting section b) Upper left side closure found broken above production office adjacent to color store area c) glass from all sides found broken of the production office's) d) wooden roof of the stores section found partially broken.

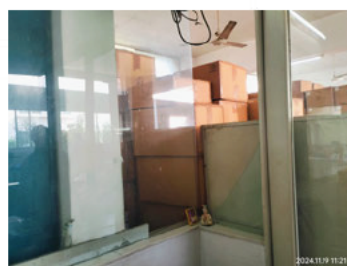
## Corrective and preventative actions

It is recommended to the facility to ensure that crack and other broken parts of the office and store is repaired

## Local law reference

In accordance with The Factories Act, 1948 section 40A. Maintenance of buildings. If it appears to the Inspector that any building or part of a building in a factory is in such a state of disrepair as is likely to lead to conditions detrimental to the health and welfare of the workers, he may serve on the occupier or manager or both of the factory an order in writing specifying the measures which in his opinion should be taken and requiring the same to be carried out before such date as is specified in the order

## Evidence



[broken roof in stores.jpg](#)

[broken roof above office.jpg](#)

[Broken glasses of office.jpg](#)

[crack observed on wall.jpg](#)

\* PDF generated at 04:31 (UTC) on 06 Dec 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?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	Not applicable
Who organises worker transportation between accommodation and worksite?	Not applicable
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes  Facility has obtained approved building layout plan from the concerned authority & same was found matching to the actual layout.
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?	Yes  Minor Cracks were noted and mentioned in CAPR
Does the site have a structural engineer evaluation?	Yes



Systems and evidence examined to validate this code section

- Current Systems:
- [REDACTED] General Manager is responsible to ensure that no child / underage workers are employed at site & their supply chain.
  - Facility has displayed "No Child Labour" board outside the Main Gate.
  - Based on the physical appearance of employees during walk through and Interviews with employees, there was no evidence of child labour or young labour observed / reported.
  - Based on review of facility recruitment policy, employee's ID for age proof such as Pan Card or Aadhar card was checked by hiring team prior to hiring.
  - Facility has documented No Child Labour policy & as per review of policy, the minimum hiring age of the facility is 16 years old.
  - The age of youngest worker found in the facility through audit process is 16 years.
  - 10 out of 10 sampled employee's personnel files were reviewed to check the copy of age proof documents.
- Evidence examined:
- Policy on no child labour & child labour remediation.
  - Personal files for verification of age proof records of 10 out of 10 selected samples.
  - Management interaction & worker interviews.
  - form 5 certificate of fitness for young person verified for young workers

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	29%
Enter the legal age of employment	14
Enter the age of the youngest worker identified	16
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	7%
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	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	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	1. Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met. 2. Facility have appointed manager with sufficient seniority who is responsible for implementing procedures. 3. Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4. Facility have monitored the effectiveness of procedure to meet policy and workplace requirements like living wages have not been completed

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		



## Systems and evidence examined to validate this code section

### Current Systems:

- [REDACTED] General Manager is responsible to ensure that all employees are paid legal minimum wages with all legal benefits on time as per law.
- 10 sampled employees were selected for interview. Out of which 05 employees were interviewed individually & remaining 05 employees were interviewed in 01 group of 05 employees in each group.
- All employees said they were satisfied with their employment at the facility. Workers were happy with the wage's facility pays and found meeting the government notified minimum wages in the region.
- From last 12 months, 10 sampled employee's wages & working hours records were verified for randomly selected 03 sampled months i.e., October 2024, April 2024 & November 2023.
- The legal minimum wages applicable in [REDACTED] with effect from 01.10.2024 to 31.03.2025 is as follows – Unskilled Labour: INR 12662.00 per month, Semi- Skilled Labour: INR 12922.00 per month & Skilled Labour: INR 13104.00 per month.
- Legal minimum wages were paid to all the sampled employees; INR 12622.00 per month (unskilled category), INR 12922.00 per month (semi- skilled category) & INR 22000.00 per month (skilled category) in October 2024 from the sampled employees.
- Wage slips were provided to all the employees. Verified sampled wage slips & confirmed from worker interviews too.
- Employee provident fund benefit is extended to all the eligible employees. Contribution remittance was deposited on time.
- Employee state insurance scheme benefit is extended to all the eligible employees.
- Employees' wages are calculated on monthly basis & paid through bank transfers only.
- Statutory benefits like bonus & leave with wages were also provide to all the eligible employees. Facility has paid bonus to its employees at the rate of 20% of its Basic salary. Leave with wages benefit is extended to all the eligible employees as per the law i.e., 1 day for every 20 days worked.
- Based on employee's interview and record review all the employees received appointment letter with written and understandable information about their employment conditions in respect to wages.
- No inconsistency was noted between the provide payroll records, worker interviews & production records.
- Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules.
- From sampled months of October 2024, April 2024 & November 2023., regular hours were within the legal limits in all the sampled employees time records. Facility has not worked overtime hours in any of the sampled months.
- Full & final settlement records verified for 01 sampled left employee.

### Evidence Examined:

- Wages and benefits policy.
- 10 sampled payroll records for October 2024 (most recent paid month), 10 sampled payroll records for April 2024 (random month) & 10 sampled payroll records were reviewed for November 2023 (random month).
- All attendance records pertained to the corresponding 10 sampled payroll records were reviewed.
- Employee provident fund remittance challans for 03 sampled months.
- Leave with wage register for year 2023 & 2024.
- Employment contracts for all 10 sampled employees (to examine agreed wage rates).
- Pay slips of all reviewed corresponding payroll records.
- List of national & festival holidays.
- Minimum wages notification.
- Bank statements of salary paid (of 3 sampled months) & bonus paid.
- Management interaction & worker interviews.

## 5. Legal wages are paid

### Data points

What is the basic wage paid to workers?	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

### Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	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	Non applicable
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	Non applicable



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	0.0
	Min per day	487.0
	Min per week	0.0
	Min per month	12662.0
Actual minimum wage	Actual per hour	Non applicable
	Actual per day	487.0
	Actual per week	Non applicable
	Actual per month	12662.0
Minimum legal overtime wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	0.0
	Actual per day	0.0
	Actual per week	0.0
	Actual per month	0.0

## Wage analysis

Number of workers' records checked	10
Provide the date and details of the records	10 sampled payroll records for October 2024 (most recent paid month), 10 sampled payroll records for April 2024 (random month) & 10 sampled payroll records were reviewed for November 2023 (random month)
Are there different legal minimum/ legally recognised CBAs wage grades?	Yes  The legal minimum wages applicable in [REDACTED] with effect from 01.10.2024 to 30.04.2025 is as follows – Unskilled Labour: INR 12662.00 per month, Semi- Skilled Labour: INR 12922.00 per month & Skilled Labour: INR 13104.00 per month



## 5.A. Living wages are paid

### Summary of findings

Code area	Workplace requirement	Local law	Finding
5.A. Living wages are paid	5.A.A Review workers' total pay including ben...		NC <a href="#">ZAF-</a>

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

Current Systems:

- 1. [REDACTED] - General Manager is responsible to ensure that all employee Estimation of the needs of workers and their families monthly basis.
- 2. Facility has not defined procedure to take feedback and methodology to collect the data and conducted food basket analysis to decide the minimum requirements of living wages.
- 3. Validation of living wage calculation not performed by the facility.
- 4. Periodic review and update on living wage not done based on the changes in cost of living.
- 5. Facility is paying standard minimum wages beyond the living wages which is meeting local law requirements.

Evidence Examined.

- 1. Interaction with management and Employees

# Findings: non-compliances

ZAF-

Non-compliance

Code area

5.A Living wages are paid

Status

Open\*

Workplace requirement

5.A.A Review workers' total pay including benefits and compare it with a credible 'living wage' to calculate a 'living wage gap', and understand what proportion of the workforce has a gap.

Time given to resolve

Verification method

Collaborative action required

Issue title

903 - CAR: A living wage gap analysis has not been completed

Area of non-compliance/non-conformance

Base code

Description

Based on the audit process and record review it was noted that facility has not conducted a review considering the total pay of employees including benefits and compare it with a credible 'living wage' to calculate a 'living wage gap' and understand what proportion of the workforce has a gap.

Corrective and preventative actions

It is recommended that facility shall ensure to conduct a living wage gap analysis.

\* PDF generated at 04:31 (UTC) on 06 Dec 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

## 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	1. Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met. 2. Facility have appointed manager with sufficient seniority who is responsible for implementing procedures. 3. Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4. Facility have monitored the effectiveness of procedure to meet policy and workplace requirements

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

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

**Current Systems:**

- [REDACTED] General Manager is responsible for ensuring compliance with regular and overtime hours as per law.
- Facility has restricted normal working hours to 8 hours per day and 48 hours per week.
- Based on tour of the facility, it was noted that the working hours and weekly rest day are displayed on notice board.
- The facility has implemented Show card attendance recording system to record IN/OUT time of employees.
- The employees work for 6 days a week in four shifts. The normal working hours are as follows:  
 1st Shift: 08:30am to 05:30pm (Male Workmen)  
 2nd Shift: 09:00 am to 05:30 pm (Staff and Women Workmen)  
 Security found working in 3 shifts as follow  
 3rd Shift: 08:00am to 04:00pm (For Security Guards)  
 4th Shift: 04:00pm to 12:00am (For Security Guards)  
 5th Shift: 12:00pm to 08:00am (For Security Guards)

Lunch Break: 30 minutes (12:30pm to 01:00pm for Women Workmen) & (01:00pm to 02:00pm for Male Workmen) & For Security Guards (Staggered)  
 Tea Break: 15 minutes twice in a day (11:00am to 11:15 am and 03:00 pm to 03:15pm for production and non-production employees). For Security guards (Staggered).  
 Weekly holiday: Wednesday for all staff and workers.

Based on review of time records, the working hours analysis is summarized as follows:

- a) In October 2024 (Current month), the average regular working hours of 10 selected samples were 46 hours per week. Maximum overtime hours worked were 10 hours per week. Maximum total weekly working hours per week were 48.00 hours.
- b) In April 2024 (Current month), the average regular working hours of 10 selected samples were 44 hours per week. Maximum overtime hours worked were 08 hours per week. Maximum total weekly working hours per week were 48.00 hours.
- c) In November 2023 (Current month), the average regular working hours of 10 selected samples were 47 hours per week. Maximum overtime hours worked were 04 hours per week. Maximum total weekly working hours per week were 48.00 hours

**Evidence Examined:**

- Working hours & overtime policy.
- In / Out time records for 10 selected samples for each of 03 sampled payroll months of October 2024, April 2024 & November 2023.
- List of national & festival holidays for year 2024 & 2023.
- Production records.
- Management interaction & worker interviews.

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?	No overtime performed by employees
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





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

**Current system**

- Facility has documented policy on anti-discrimination.
- Based on review of wage records and employee's interview, no discrimination was noted in hiring, compensation, access to training, promotion, termination or retirement.
- [REDACTED] General Manager is responsible for the investigation and disposal of discrimination case.
- Based on wage records review, the facility provides the same pay for employees doing same work of similar nature.
- Facility avoids unfair practices during recruitment / hiring stage like conducting medical of female employees.
- Based on interaction with employees, no recruitment fees are required at any stage of the recruitment.
- Facility has effective grievance mechanisms accessible to all workers, regardless of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership and political affiliation.

**Evidence examined**

- Facility anti-discrimination Policy.
- Appointment letter with terms and conditions for 10 out of 10 selected samples.
- Salary and other benefit records.
- Grievance committee records & redressal mechanism.
- Interaction with management and Employees.





Systems and evidence examined to validate this code section

- Current Systems:
- [REDACTED] General Manager is responsible to ensure compliance with these code requirements.
  - Based on record review and worker interviews appointment letters were issued to all 10 out of 10 sampled employees. Employment terms & conditions in the appointment letters found to be inline with legal requirement
  - Based on interaction with the facility management, it was noted all the employees are hired directly; No temporary workers, part time workers, seasonal workers, casual or contractual workers were engaged.
  - Facility has not employed any foreign migrant workers. However, there are interstate workers of different states of Orissa and Uttar Pradesh.
  - Based on interaction with employees, no recruitment fees are required at any stage of the recruitment.
  - Facility is paying benefits to the employees which they are legally entitled to as mentioned in their appointment letter.
  - Based on interaction with management, it was confirmed that facility has certified standing orders.
- Evidence examined
- Facility hiring policy.
  - Appointment letters with terms and conditions for 10 out of 10 selected samples.
  - Salary and other benefit records.
  - Interaction with management and Employees.

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	92.19%	
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	7.81%	

## 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

1. Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met.  
2. Facility have appointed manager with sufficient seniority who is responsible for implementing procedures.  
3. Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures.  
4. Facility have monitored the effectiveness of procedure to meet policy and workplace requirements

### Summary of findings

Code area

Workplace requirement

Local law

Finding

No findings

Systems and evidence examined to validate this code section

Current Systems:  
- Facility has not sub-contracted any of the processes to any of the sub-contractors.  
- No Homeworking is practiced in the facility for any of the manufacturing process/activity.  
Evidence Examined:  
- Inward / Outward material records, Invoices.  
- Process flow chart.  
- Management interaction & worker interviews

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 homeworker?				
Are full records of homeworkers available at the site?				
Does the supplier buy products or services from suppliers that use homeworkers?	No			
	No			
Sub-contracting				
Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?	No	No sub - contracting onsite		
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	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1. Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met. 2. Facility have appointed manager with sufficient seniority who is responsible for implementing procedures. 3. Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. However employees found not aware of the same. 4. Facility have monitored the effectiveness of procedure to meet policy and workplace requirements

### Summary of findings

Code area	Workplace requirement	Local law	Finding
9. No harsh or inhumane treatment is allowed	9.E Ensure appropriate training for workers a...		NC <a href="#">ZAF-</a>



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

**Current Systems:**

- [REDACTED] General Manager is responsible to ensure no harsh or inhumane treatment is practiced in facility & its supply chain.
- Based on the interaction with the facility management and employee's interview, it is noted that no case of abuse or discipline has happened in the facility and the facility has a written disciplinary procedure that is displayed in the notice board of the facility.
- All employees are treated with respect and dignity.
- Facility has formed legally required works committee with elected & equal representatives from workmen & staff for reporting any complaints / issues.
- Facility has also formed Internal Complaints Committee / POSH committee as required by law. External member [REDACTED] - [REDACTED] NGO is appointed.
- From committee minutes of meeting no complaints were raised by the workers till date.

**Evidence Examined**

- Facility policy on anti harassment at workplace.
- Minutes of meeting of internal complaints committee record dated 20.06.2024
- External member [REDACTED] - [REDACTED] NGO appointment letter.
- Management interaction & worker interviews.

# Findings: non-compliances

ZAF-

Non-compliance

Due 2025-01-31

Code area

9 No harsh or inhumane treatment is allowed

Status

Open\*

Workplace requirement

9.E Ensure appropriate training for workers at all levels in roles where risk has been identified and those with relevant supervisory or administrative responsibilities, to prevent harsh or inhumane treatment in the workplace. Have systems in place to monitor the understanding/implementation of the training.

Time given to resolve

60 days

Verification method

Desktop audit

Issue title

942 - There is no or insufficient training programme in place to prevent harsh or inhumane treatment in the workplace, or key members of staff have not received the training

Area of non-compliance/non-conformance

Base code

Description

It was noted from audit process that 30% employees were not aware of POSH -Prevention of sexual harassment requirement or committee in the facility. However facility conducts regularly the meeting , last meeting was conducted on 20-06-2024 , which includes 05 members along with external member.

Corrective and preventative actions

It is recommended to ensure that employees are made aware of the requirement.

\* PDF generated at 04:31 (UTC) on 06 Dec 2024. [View this finding on the Sedex platform](#) for live updates and closure details.





Systems and evidence examined to validate this code section

- Current Systems:
- 1. The facility has established and maintained environmental policy & [REDACTED] – General Manager responsible for environmental aspects.
  - 2. Based on management interaction, facility and their suppliers are aware the environmental requirements.
  - 3.Facility has environmental policy displayed
  - 4. Facility does not produce any wastewater.
  - 5. Facility is aware of the legal environmental requirements.

- Evidence Examined:
- Environment Policy.
  - Facility has obtained air and water consent from pollution department on 3rd June 2020, which is valid till 1st February 2026.
  - Facility has conducted noise monitoring test of DG area and working area and production area. Last Noise monitoring test was conducted by Tatvam Envirotech LLP on 08th April 2024. •Last Ambient Air and stack monitoring (DG) test was conducted Tatvam Envirotech LLP Labs on 08th April 2024.
  - Interaction with management and Employees..



## Attachments



[Gender based toilet marked.jpg](#)



[Fire Extinguishers.jpg](#)



[Fire Extinguishers.jpg](#)



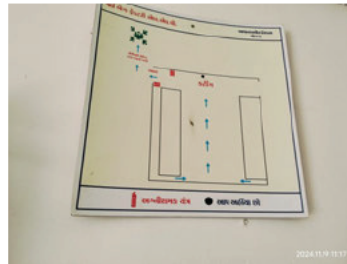
[first aid box.jpg](#)



[Folding section.jpg](#)



[Fire Extinguisher working instructions.jpg](#)



[Evacuation Map.jpg](#)



[Drinking water point.jpg](#)



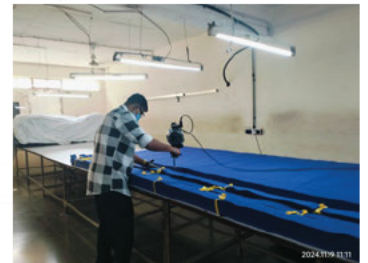
[Emergency exit with light.jpg](#)



[Eye wash station.jpg](#)



[Diesel generator.jpg](#)



[Cutting section.jpg](#)





[broken roof in stores.jpg](#)



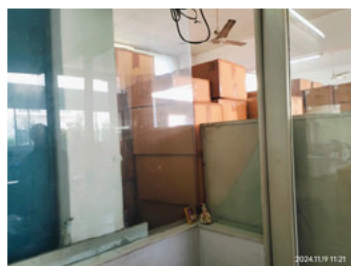
[broken roof above office.jpg](#)



[Chemicals store with MSDS.jpg](#)



[crack observed on wall.jpg](#)



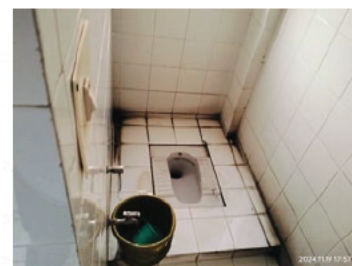
[Broken glasses of office.jpg](#)



[Aisles Marked.jpg](#)



[Aisles Marked.jpg](#)



[Clean Toilets.jpeg](#)



[Chemicals store with MSDS.jpg](#)



[Suggestion Box.jpeg](#)



[Storage area for employees.jpg](#)



[Sewing machine , employees wearing PPE.jpg](#)



[Punching machine.jpg](#)



[Raw Materials store.jpg](#)



[Sewing section.jpg](#)



[Printing machine.jpg](#)





[Press section.jpg](#)



[Notice Board.jpg](#)



[Packing section.jpg](#)



[Panel Electrical.jpg](#)



[Overview of the building.jpg](#)



[policies displayed.jpg](#)



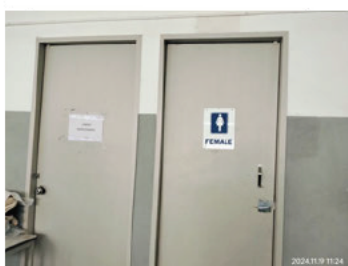
[Needle Guard Provided.jpg](#)



[Manual Call point with Hooter.jpg](#)



[Name of the factory.jpg](#)



[Gender based toilet marked.jpg](#)



[Main gate of the building.jpg](#)



[Folding section.jpg](#)



[Laws Abstract displayed.jpg](#)



[first aid box.jpg](#)



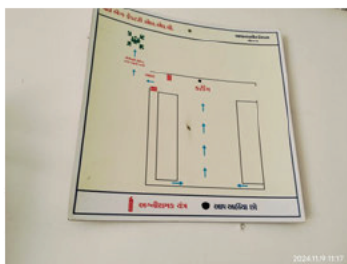
[Fire Extinguishers.jpg](#)



[Fire Extinguishers.jpg](#)



[Eye wash station.jpg](#)



[Evacuation Map.jpg](#)



[Fire Extinguisher working instructions.jpg](#)



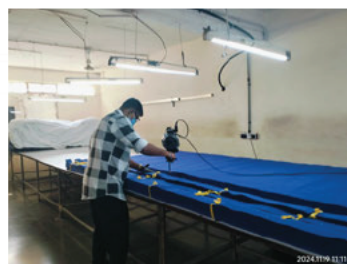
[Emergency exit with light.jpg](#)



[Drinking water point.jpg](#)



[Diesel generator.jpg](#)



[Cutting section.jpg](#)



[Assembly point.jpg](#)



[Creche.png](#)



[signed capr.pdf](#)





For more information visit <https://www.sedex.com>

---

# SMETA Corrective Action Plan Report (CAPR)

Version 7



# Contents

[Audit content](#)

[Audit and site details](#)

[Audit parameters](#)

[Audit attendance](#)

[SMETA declaration](#)

[Findings](#)

[Summary of findings](#)

[Non-compliances](#)

[Good examples](#)

[Management systems](#)

[Guidance](#)



## 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	Intertek India
Date of audit	2024-11-19	Audit conducted by	Sedex member
Audit pillars	Labour Standards   Health and safety		

## Site details

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



# Audit parameters

Time in and out	Day 1	
	In	09:30
	Out	18:40
Audit type	Periodic	
Was the audit announced?	Announced	
Was the Sedex SAQ available for review?	No	
Who signed and agreed CAPR?	[redacted] / Partner	
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	No	No
B: Present at the audit?	Yes	No	No
C: Present at the closing meeting?	Yes	No	No
Reason for absence at the opening meeting	Worker Representative were busy in production activities and no union on site		
Reason for absence during the audit	Worker Representative were busy in production activities and no union on site		
Reason for absence at the closing meeting	Worker Representative left for the day and no union on site		

# SMETA declaration

Auditor team

SMETA declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

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.
2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

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.

Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)

None

Lead auditor

Mala Biredar

APSCA Number

21700385

Additional auditor

Date of declaration

2024-11-19

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.

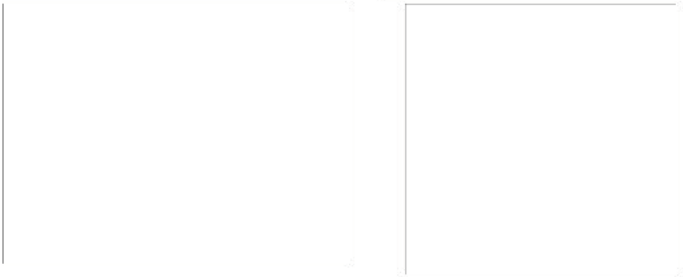
Full name

Title

Partner

Date of declaration

2024-11-19



# Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.K Ensure that all premises are safe and hav...	§1	NC [REDACTED]
0. Enabling accurate assessment	0.D Maintain a written human rights policy st...		NC [REDACTED]
9. No harsh or inhumane treatment is allowed	9.E Ensure appropriate training for workers a...		NC [REDACTED]
5.A. Living wages are paid	5.A.A Review workers' total pay including ben...		NC [REDACTED]

# Local law issues

§1

In accordance with The Factories Act, 1948 section 40A. Maintenance of buildings. If it appears to the Inspector that any building or part of a building in a factory is in such a state of disrepair as is likely to lead to conditions detrimental to the health and welfare of the workers, he may serve on the occupier or manager or both of the factory an order in writing specifying the measures which in his opinion should be taken and requiring the same to be carried out before such date as is specified in the order

# Findings: non-compliances

<div></div>		Non-compliance	Due 2025-02-05
Code area			
3 Working conditions are safe and hygienic			
Workplace requirement			
3.K Ensure that all premises are safe and have valid safety certifications for their current layout and use. If it is currently not possible for a required license or certificate to be obtained, implement inspections by appropriate third parties to ensure building safety.			
Issue title			
261 - Premises require minor repairs that may affect personal safety (e.g. missing handrails)			
Description			
It was noted from site tour that : a) crack observed in ground floor on wall near cutting section b) Upper left side closure found broken above production office adjacent to color store area c) glass from all sides found broken of the production office's) d) wooden roof of the stores section found partially broken.			
Corrective and preventative actions			
It is recommended to the facility to ensure that crack and other broken parts of the office and store is repaired			
Local law reference			
In accordance with The Factories Act, 1948 section 40A. Maintenance of buildings. If it appears to the Inspector that any building or part of a building in a factory is in such a state of disrepair as is likely to lead to conditions detrimental to the health and welfare of the workers, he may serve on the occupier or manager or both of the factory an order in writing specifying the measures which in his opinion should be taken and requiring the same to be carried out before such date as is specified in the order			
Evidence			
<a href="#">broken roof in stores.jpg</a> <a href="#">broken roof above office.jpg</a> <a href="#">Broken glasses of office.jpg</a> <a href="#">crack observed on wall.jpg</a>			

\* PDF generated at 06:02 (UTC) on 13 Dec 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

<div></div>		Non-compliance	Due 2025-02-05
Code area			
0 Enabling accurate assessment			
Status			
Closed (2024-12-13)*			

### Workplace requirement

0.D Maintain a written human rights policy statement that is approved at the most senior level, communicated to all personnel, and trained to relevant personnel.

### Issue title

804 - Written human rights policy in place but does not meet the full requirement to be approved at the most senior level, communicated to all personnel, and trained to relevant personnel.

### Description

It was noted from review of records & management interaction that facility has not provided training on ETI base code or social policies to its employees in last one year. As per facility they trained the new employees who have joined in said period however no records found. Further, it was noted from workers interview that employee were not aware of the same.

### Corrective and preventative actions

It is recommended facility to provide ETI base code training to their employees and maintain the records.

### Time given to resolve

60 days

### Verification method

Desktop audit

### Area of non-compliance/non-conformance

Base code

\* PDF generated at 06:02 (UTC) on 13 Dec 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

Non-compliance

Due 2025-02-05

### Code area

9 No harsh or inhumane treatment is allowed

### Workplace requirement

9.E Ensure appropriate training for workers at all levels in roles where risk has been identified and those with relevant supervisory or administrative responsibilities, to prevent harsh or inhumane treatment in the workplace. Have systems in place to monitor the understanding/implementation of the training.

### Issue title

942 - There is no or insufficient training programme in place to prevent harsh or inhumane treatment in the workplace, or key members of staff have not received the training

### Description

It was noted from audit process that 30% employees were not aware of POSH -Prevention of sexual harassment requirement or committee in the facility. However facility conducts regularly the meeting , last meeting was conducted on 20-06-2024 , which includes 05 members along with external member.

### Corrective and preventative actions

It is recommended to ensure that employees are made aware of the requirement.

### Status

Closed (2024-12-13)\*

### Time given to resolve

60 days

### Verification method

Desktop audit

### Area of non-compliance/non-conformance

Base code

\* PDF generated at 06:02 (UTC) on 13 Dec 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

Non-compliance

### Code area

5.A Living wages are paid

### Status





































Open\*







# 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	✔	✔	✔	✔
<div>✖ Not addressed</div> <div>⚠ Fundamental improvements required</div> <div>ⓘ Some improvements recommended</div> <div>✔ Robust management systems</div>				

# Guidance

The Corrective Action Plan Report summarises the site audit findings and a corrective, and preventative action plan that both the auditor and the site manager believe is reasonable to ensure conformity with the ETI Base Code, Local Laws and additional audited requirements. After the initial audit, the form is used to re-record actions taken and to categorise the status of the non-compliances/ non-conformances.

Good practice examples should be pointed out at the closing meeting as well as discussing non-compliances/ non-conformances and corrective actions, Collaborative Action Required findings and the Management Systems Assessment.

## Next steps:

1. The site shall request, via Sedex, that the audit body upload the audit report, NCs, CARs, MSA and good examples. If you have not already received instructions on how to do this then please visit the [Sedex Members' E-learning Platform](#).
2. Sites shall action its NCs and document its progress via Sedex.
3. Once the site has effectively progressed through its actions then it shall request that the audit body verify its actions. Please visit [Sedex Members' E-learning Platform](#) for information on how to do this.
4. The audit body shall verify corrective actions taken by the site by either a "Desk-Top" review process via the Sedex Platform or by Follow-up Audit.
5. Some NCs that cannot be closed off by "Desk-Top" review may need to be closed off via a "Follow Up Audit" charged at normal fee rates. If this is the case, then the site will be notified after its submission of documentary evidence relating to that NC. Any follow-up audit must take place within twelve months of the previous initial/periodic audit and the information from the previous audit must be available for sign off of corrective action.
6. For changes to wages and hours to be correctly verified it will normally require a follow up site visit. Auditors will generally require to see a minimum of two months wages and hours records, showing new rates in order to confirm changes (note some clients may ask for a longer period, if in doubt please check with the client).
7. The site shall develop and share with Sedex an action plan to work on CAR findings, and take actions to work on these areas as identified.

8. The site should use the MSA gradings to help to improve internal systems, focusing where their systems are weakest and the risks of harm are highest. These actions should better prepare them for future audits and help sustain compliance.

## Management Systems Assessment (MSA)

A management system is defined as a comprehensive framework comprising of processes, policies, procedures, and tools that are strategically designed and implemented within a business to plan, organise, execute, monitor, and continuously improve its activities. Management systems are the systems that underpin how a company runs its day-to-day operations, makes decisions, and helps avoid the recurrence of common problems.

Where management systems are weak a site is at higher risk of non-compliance over time, the SMETA MSA can help sites to proactively reduce the likelihood of risks occurring. Sites should take actions commensurate with their size and resources, focusing on where their systems are weakest and the likelihood of risks is highest, based on their sector, location and workforce profile.

The MSA Grades do not result in NCs, and will not be re-assessed in follow-up audits.

For more information on Management Systems please refer to the Management Systems Workbooks.

## Collaborative Action Required

The SMETA Workplace Requirements identify certain specific issues where a site may not meet the Base Code, but the usual mechanisms of NC verification and closure are not appropriate, for some or all of the following reasons;

- The audited party does not have the capacity/ responsibility to close the issue without support from other relevant stakeholders, such as commercial partners/buyers.
- Remediation of the issue requires an indeterminate and possibly extended timeframe, rather than a predetermined deadline as set within the Sedex platform.
- There is a risk of adverse consequences if closure of a particular issue is not approached with due consideration and time provided for adequate risk assessment.
- Evidencing effective remediation is complex and it is outside the capacity of existing SMETA methodology to validate through evidence provided during an onsite assessment alone.

These specific WRs have a Collaborative Action Required (CAR) finding raised against them.

Collaborative Action Required findings require a different way of working from other NCs for buyer and supplier members. The activities required to close these issues may involve actions from both buyers and suppliers, as well as additional stakeholders such as third-party labour providers, impacted workers, local NGOs, and trade unions. Due to the complexity of the issues and the spectrum of potential stakeholders that may need to act, CARs may need long-term closure plans, potentially spanning multiple years. To facilitate a longer-term approach and to reduce the likelihood of undue pressure on suppliers to close issues that may be out of their control, Sedex does not prescribe a closure date nor a verification methodology for these findings. Sedex encourages all its members to work collaboratively and responsibly on these issue areas, sharing responsibilities and actions as appropriate.

When developing a methodology to prioritise action on these more complex areas, Sedex recommends following a due diligence process and prioritising activities based on the most salient risks.

#### **For Suppliers**

Where CARs are raised suppliers should create an action plan for how they are going to address these areas. Sedex also recommends suppliers reach out to their buying partners to understand their expectations on these issues and start a constructive dialogue. The action plans can be uploaded on to the Sedex platform, which will change the status of the CAR finding from “open” to “in progress”. Management and assessment of action plans is encouraged as an activity between linked buyer and supplier members.

#### **For Buyers**

Where CARs are raised buyer members should prioritise resolution of these issues based on a salient risk approach. Buyers should assess their own roles and responsibilities in the closure of these findings, especially considering any increased financial costs and how these may relate to the buyers own purchasing practices. Buyers should work with suppliers to ensure that closure plans are realistic, taking a long-term approach to improvement where it is necessary, and working with multi-stakeholder initiatives, NGOs, Trade Unions and other third parties to address these issues, which may be widespread. In the interests of enabling transparency, collaboration and long-term effective remediation, the application of commercial penalty against suppliers where these issues are identified and action plans are in place is not encouraged.

### **For Auditors**

Auditors will assess whether the CARs are met through the SMETA audit process and raise the findings where relevant. Auditors will not assess the action plans shared or provide guidance on closure methodology, due to the limitations of assessing scope and responsibilities through a supplier site assessment alone. CAR findings will be superseded and closed in periodic audits. The auditor will assess the Workplace Requirements anew and raise a CAR in following audits until there is no longer a finding to raise.





For more information visit <https://www.sedex.com>