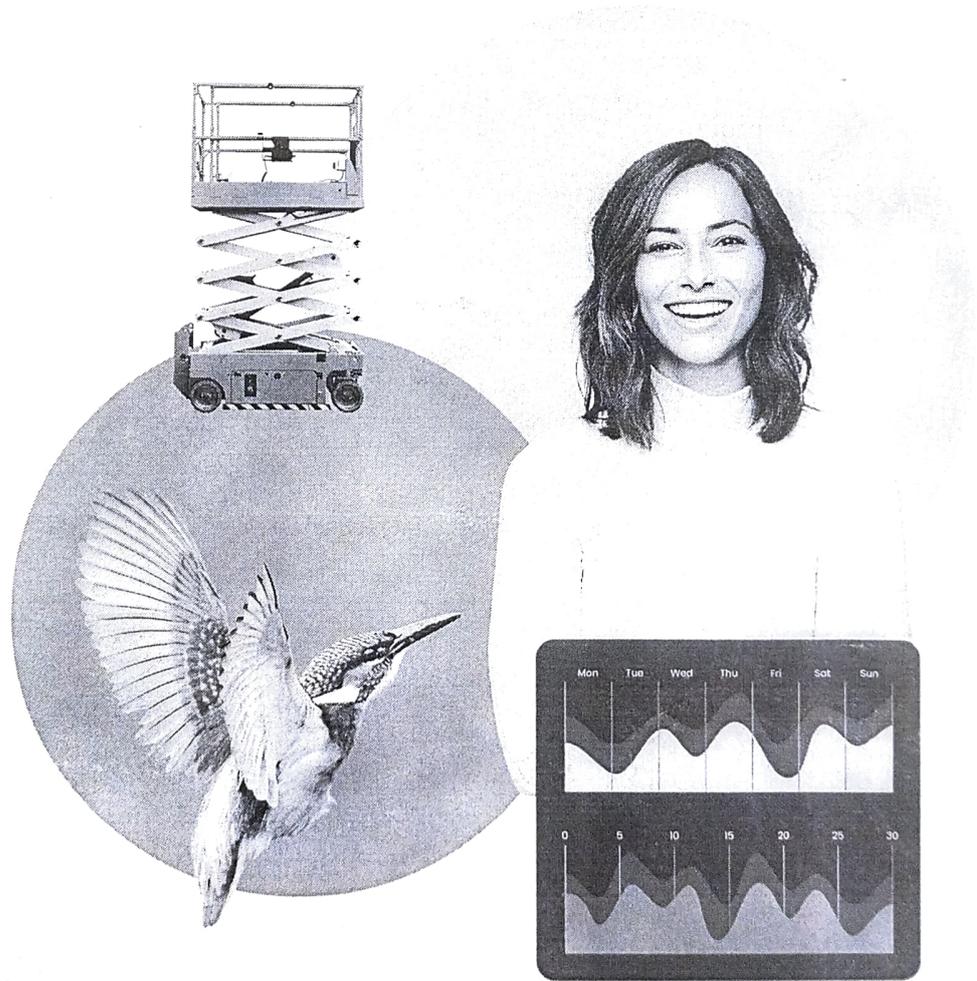


SMETA Corrective Action Plan Report (CAPR)

Version 7



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Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA 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 code areas below.

2-pillar audits include:

- Labour standards:
 - 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
 - 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
- Health and safety:
 - 3. Working conditions are safe and hygienic
- Environment:
 - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
 - 10.B. Environment 4-pillar
- Business ethics:
 - 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 details

Site details

| | | | |
|----------------------|------------|--------------|--------------------------------|
| Sedex site reference | [REDACTED] | Site name | [REDACTED] |
| Business name | [REDACTED] | Site address | [REDACTED] IN [REDACTED] |

Audit details

| | | | |
|-------------------------|---|----------------------|----------------|
| Sedex company reference | ZC1025370 | Auditor company name | BSI Group |
| Audit company address | Max House, Tower – C, 7th Floor, Bahapur, Okhla Industrial Estate, Phase-3, New Delhi, IN, 110020 | | |
| Date of audit | 2025-10-13 | Audit conducted by | Asoke Dasgupta |

Audit pillars Labour Standards | Health and safety | Environment 4-Pillar | Business ethics

| Time in and out | Day 1 | | Day 2 | | Day 3 | |
|-----------------|-------|-------|-------|-------|-------|-------|
| | In | 09:30 | In | 09:30 | In | 09:30 |
| Out | 18:30 | Out | 18:30 | Out | 18:00 | |

Audit type Periodic

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Audit company:
BSI Group



Start Date:
2025-10-13

End Date:
2025-10-15

Was the audit announced? Semi announced

Was the Sedex SAQ available for review? Yes

Who signed and agreed CAPR? [REDACTED] Sr. manager R & D

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 | Yes |
| B: Present at the audit? | Yes | Yes | Yes |
| C: Present at the closing meeting? | Yes | Yes | Yes |

Reason for absence at the opening meeting

Reason for absence during the audit

Reason for absence at the closing meeting



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)

No Exception

Lead auditor

Asoke Dasgupta

APSCA Number

32200132

Additional auditor

Anshu Ghosh

APSCA Number

21700877

Date of declaration

2025-10-15

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Audit company:
 BSI Group



Start Date:
 2025-10-13

End Date:
 2025-10-15

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 Upendra Kumar Mehta

Upendra K. Mehta

Title Sr. manager R & D

Date of declaration 2025-10-15



Summary of findings

| Code area | Workplace requirement | Area of NC | Finding |
|---|--|------------------------|----------------|
| 3. Working conditions are safe and hygienic | 3.L Implement effective processes to manage f... | Base code | NC <u>ZAF-</u> |
| | 3.L Implement effective processes to manage f... | Base code | NC <u>ZAF-</u> |
| | 3.M Ensure all machinery is installed, mainta... | Base code | NC <u>ZAF-</u> |
| 5. Legal wages are paid | 5.F Provide all workers with clearly written ... | Local law Base code | NC <u>ZAF-</u> |
| 6. Working hours are not excessive | 6.C Provide workers with at least 24 hours of... | | NC [REDACTED] |
| 10.B. Environment 4-Pillar | 10.B.F Have and communicate policies and proc... | | NC [REDACTED] |

Findings: non-compliances

Non-compliance

Due 2021-05-31



Code area

10.B Environment 4-Pillar

Status

Open*

Workplace requirement

10.B.F Have and communicate policies and processes, endorsed at the highest level, that includes commitments to improve environmental performance and an approach to managing environmental impacts on relevant stakeholders

Time given to resolve

90 days

Verification method

Desktop audit

Issue title

604 - Management lack awareness of the significant environmental impact of their site and its processes

Area of non-compliance/non-conformance

Description

It was observed during the site tour that the filled and used oil drums were stored directly under the sunlight and rainwater. Chemicals spills were observed on the ground and facility has not provided secondary containers to the oil drums.

Description (carried over)

It was observed during the site tour that the filled and used oil drums were stored directly under the sunlight and rainwater. Chemicals spills were observed on the ground and facility has not provided secondary containers to the oil drums.

Corrective and preventative actions

N/A

Corrective and preventative actions (carried over)

N/A

* PDF generated at 10:36 (UTC) on 15 Oct 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF-

Non-compliance

Code area

3 Working conditions are safe and hygienic

Status

Open*

[← Findings](#)

[Management systems →](#)



Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

207 - Isolated or partial occurrence of blocked fire exits causing an elevated but not significant risk

Area of non-compliance/non-conformance

Base code

Description

During Site Visit in Bag Unit, it has been observed that one of the fire exit is partially blocked as the exit pathway is going through a narrow space.

Corrective and preventative actions

Organisation shall arrange to make a clear pathway for emergency exit.

* PDF generated at 10:36 (UTC) on 15 Oct 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF-

Non-compliance

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Time given to resolve

60 days

Verification method

Desktop audit

Issue title

211 - Emergency notification and exit lighting systems not connected to secondary power source

Area of non-compliance/non-conformance

Base code

Description

While site visit in bag unit it has been observed that the emergency lights are not connected to secondary power source.

Corrective and preventative actions

Organisation shall arrange for a secondary power source for its emergency lights.

[← Findings](#)

[Management systems →](#)



* PDF generated at 10:36 (UTC) on 15 Oct 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF-

Non-compliance

| | |
|---|---|
| Code area | Status |
| 3 Working conditions are safe and hygienic | Open* |
| Workplace requirement | Time given to resolve |
| 3.M Ensure all machinery is installed, maintained, and used in a safe manner. | 30 days |
| Issue title | Verification method |
| 264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt/hand guards on other machines) | Desktop audit |
| Description | Area of non-compliance/non-conformance |
| During site visit it has been observed that needle guards are not in place (Positioned not to guard the finger adequately)while stitching operation was going on. | Base code |
| Corrective and preventative actions | |
| Organisation shall ensure that needle guards are kept in palce while operator are working. | |

* PDF generated at 10:36 (UTC) on 15 Oct 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF-

Non-compliance

| | |
|------------------------|---------------|
| Code area | Status |
| 5 Legal wages are paid | Open* |



Workplace requirement

5.F Provide all workers with clearly written information, in a language workers understand, outlining wage information (rates of and total pay, overtime, payment frequency, deductions, benefits and insurances, and paid leave) before employment begins, and with clearly written information relating to any changes of the same during the course of employment.

Issue title

898 - Wage information (rates of and total pay, overtime, payment frequency, deductions, benefits and insurances, and paid leave) is not adequately communicated to workforce

Description

During review of wage payment it has been observed that in the month of September 25, one of the contractors did not issue payslip to 7 employees out of sampled 76 employees.

Corrective and preventative actions

Organisation shall ensure that all employees receive the payslip as per the applicable law.

Local law reference

West Bengal Minimum wage rules 1951, Section 21 (iv), Every employer or a person authorised by him shall issue wage slip in form XV at least a day prior to disbursement of wages.

* PDF generated at 10:36 (UTC) on 15 Oct 2025. [View this finding on the Sedex platform](#) for live updates and closure details.



Non-compliance

Due 2021-05-31

Code area

6 Working hours are not excessive

Status

Open*



| | |
|---|--|
| <p>Workplace requirement</p> <p>6.C Provide workers with at least 24 hours of consecutive rest in every 7-day period or, where allowed by national law, two 24 hour periods in every 14-days.</p> <p>Issue title</p> <p>485 - Workers do not take off 1 day in 7, and this is contrary to law or collective bargaining agreement (CBA) - systemic</p> <p>Description</p> <p>It was observed during the document review that the contracted security personnel were found working for continuous 28 days without a weekly off day in the month of January 2021.</p> <p>Description (carried over)</p> <p>It was observed during the document review that the contracted security personnel were found working for continuous 28 days without a weekly off day in the month of January 2021.</p> <p>Corrective and preventative actions</p> <p>N/A</p> <p>Corrective and preventative actions (carried over)</p> <p>N/A</p> | <p>Time given to resolve</p> <p>90 days</p> <p>Verification method</p> <p>Follow up audit</p> <p>Area of non-compliance/non-conformance</p> |
|---|--|

* PDF generated at 10:36 (UTC) on 15 Oct 2025. [View this finding on the Sedex platform](#) for live updates and closure details.



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

[← Findings](#)

[Guidance →](#)



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

✗ Not addressed

⚠ Fundamental improvements required

i Some improvements recommended

✓ Robust management systems



Guidance

The Corrective Action Plan Report (CAPR) 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 (NCs) and corrective actions, Collaborative Action Required (CAR) findings and the Management Systems Assessment (MSA).

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 desktop review process via the Sedex platform or by follow-up audit.
5. Some NCs that cannot be closed off by desktop 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.

[← Guidance](#)

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>

