

Sedex Members Ethical Trade Audit Report





				Audi	t Details				
Sedex Company Reference: (only available on System)		ZC 43113	19		Sedex Site R (only availabl System)			00327	
Business name (Company nam	e):	AV Fashio	on						
Site name:		AV Fashio	on						
Site address: (Please include fu address)	II	8/3794, A		r,	Country:		India		
Site contact and title:	d job	Ms. Malai	rvizhi A – H	R & Ac	dmin				
Site phone:		+91 94458	3 23682		Site e–mail:		malar	@avfash	nion.in
SMETA Audit Pillo	ars:	∑ Labou Standard		Safet	ealth & ty (plus onment 2-)	☐ Env 4-pillar	ironment	☐ Busi	ness Ethics
Date of Audit:		10/01/202	22						
Audit		ny Name &	Logo:		(I	Report Owner (payer): (If paid for by the customer of the site please remove for Sedex upload) AV Fashion			
			Δ	dit Cor	aduated By				
	Γ		Au	ait Cor	nducted By				
Affiliate Audit Company	\boxtimes		Purchase	r			Retailer		
Brand owner			NGO				Trade Uni	on	
Multi– stakeholder					Combined	d Audit (select all th	nat appl	

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact grievance@sedex.com.

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



Audit Content:

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.



SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size): None

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

Lead auditor: Raja T – Auditor APSCA number: RA 21704583

Lead auditor APSCA status: Registered Auditor

Team auditor: Raja T – Auditor

APSCA number: RA 21704583
Interviewers: Raja T – Auditor

APSCA number: RA 21704583

Report writer: Raja T - Auditor

Report reviewer: Abhirami.S - Senior Report Reviewer

Date of declaration: 10/01/2022

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

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



Summary of Findings

(plea. to the	Issue (please click on the issue title to go direct to the appropriate audit results by clause)	Area of No (Only check box 'conformity, and only non-conformity	Area of Nor (Only check box w nor-conformity,	Area of Non–Conformity Iy check box when there is a non– mity, and only in the box/es where the non–conformity can be found)	non- here the	Record	Record the number of issues by line*:	mber ne*:	Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
the	the audit report, hyperlinks are retained.	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Universal Rights covering UNGP						Ë	Ē	None observed
08	Management systems and code implementation					萝	10	₹	Summary of Observation 01 It was noted during document review and interaction with management that the facility had not completed SAQ at the time of audit.
	Freely chosen Employment					豆	壹	툳	None observed
2	Freedom of Association					豆	壹	툳	None observed
က	Safety and Hygienic Conditions					60	10	₹	Summary of Non-Compliance finding 01 It was noted from facility tour that 06 out of 09 exit & emergency exits were not installed with illuminated type emergency sign board.
									And facility had not provided industrial type emergency lights in First floor emergency exit (packing, checking sections).
									Summary of Non-Compliance finding 02 It was noted from the facility tour that 02 out of 02 ironing operator were not worn the provided ear plugs.

Sedexglobal.com 5 Date: 10/01/2022 Report reference: IDA-27613-01

Audit company: Intertek



Summary of Non-Compliance finding 03 It was noted from the facility tour that 20% of the sewing operators tampered their finger protection guard.	Summary of Non-Compliance finding 04 It was noted from the facility tour that toilets were found to be in Unhygienic Condition.	Summary of Non-Compliance finding 05 It was noted from facility tour that stain removal machine was found near to checking section without any closure.	Summary of Non-Compliance finding 06 It was noted from facility tour that aisle markings were found to be faded in packing section.	Summary of Non-Compliance finding 07 It was noted from the facility tour and document review that the facility has installed 6 sewing machines on the ground floor which is not reflected in the current building layout plan.	Summary of Non-Compliance finding 08 It was noted from facility tour that fencing was not provided for staircases leading from 2nd to 3rd Floor.	Summary of Non-Compliance finding 09 It was noted from the facility tour that 02 out of 03 exits and 03 out of 06 emergency exits were found to be inward opening doors.

Report reference: IDA-27613-01 Audit company: Intertek



Facility has provided latches for 01 out of 02 exit and 01 out of 03 emergency exit inward opening door to keep the door opened during working hours. However, facility had not provided latches for 01 out of 02 exit and 01 out of 03 emergency exit inward opening doors. Summary of Observation 01 It was noted from document review that 03 out of 03 first aid trained person certificate validity has expired on 31/03/2020. The facility has applied for refresher training continuously and recent communication dated on 08/09/2021 to the concerned agency, however authorized	authority (St. John Ambulance Association) was not providing training due to COVID-19 situation.	Summary of Non-Compliance finding 01 It was noted from review of records that the facility has delayed the provident fund from 01 – 02 days remittance to the authority in month of February 2021 to October 2021.and employee state insurance from 01 – 35 days remittance to the authority in month of June 2021 to November 2021.	None observed	None observed
	ラ	Ē	ijZ	Ē
	ラ	Ē	ijZ	Ī
	ラ	10	Zii	₹
	Child Labour	Living Wages and Benefits	Working Hours	Discrimination
	4	10	2	_

Report reference: IDA-27613-01 Date: 10/01/2022 Sedexglobal.com 7

Audit company: Intertek



3	Regular Employment					Ē	₹	Ē	None observed
8 ∀	Sub-Contracting and Homeworking					壹	Ē	壹	None observed
_	Harsh or Inhumane Treatment					ラ	壹	Ē	None observed
10A	Entitlement to Work					壹	壹	Ē	None observed
1082	Environment 2-Pillar		\boxtimes			01	ラ	₹	Summary of Non-Compliance finding 01 It was noted from facility tour that stack emission height found low for the installed 40 KVA diesel generator.
10B4	Environment 4-Pillar					₹ Z	₹ Z	∀ Z	Not Applicable
0C	<u>Business Ethics</u>					Ϋ́	₹ Z	∢ Z	Not Applicable
Sene	Seneral observations and summary of the site:	ne site:							
-	 This initial announced audit conducted by Intertek India Private Lim against the ETI Base Code and local legislations on a sampling basis. 	ducted by I	_	dia Private Lii sampling bas	mited. 01 , is.	Auditor X	01 day	(1 Man	India Private Limited. 01 Auditor X 01 day (1 Man-day) assessed / verified the facility's operations a sampling basis.
2		20 am on 10 us present ii	0/01/2022 in the mee	and conducting and assu	ted an ope	ening me o-operati	eting wi on to thi	th facili s audit.	Auditor entered the facility at 09.20 am on 10/01/2022 and conducted an opening meeting with facility management according to the ETI Base Code. Ms. Malarvizhi A – HR & Admin was present in the meeting and assured full co-operation to this audit.
ю.	Facility is involved in the process of knitted garments	of knitted g	yarments.						
4.		mployees, yees.	which inc	cludes 39 pro	oduction e	mployee	ss and C	-uou 8	Facility has employed total 42 employees, which includes 39 production employees and 03 non-production employees. There are total 20 male employees and 22 Female Employees.
5.	Facility operational 06 days a week as per below detail The working hours are as under: Working hours 08:30 am to 05	ek as per b	r below detail 08:30 am to 05:30 pm	ail 35:30 pm					

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Tea breaks	10:30 am to 10:45 am
	03:30 pm to 03:45 pm
Lunch break	12:30 pm to 01:30 pm
Weekly holiday	Appuns

- meeting. Management would communicate the outcome of the audit to the employees through next worker committee meeting. Further, auditor There was a worker committee at this facility. A worker representative was present in the facility. Worker representatives were present in the opening interacted with works committee member during audit process. ۶.
- As per discussion with Management, there was no peak season for the facility. 7.
- 10 employees were randomly selected for interview, 1 group of 4 employees interviewed and 06 employees were interviewed individually. ω.
- Payrolls for the period from January 2021 to December 2021 and attendance records for the period from January 2021 to December 2021 were provided by the facility for review. Randomly sampled 10 employees' payroll records and time records from December 2021 (Current Month), April 2021 (Random Month) and January 2021 (Random Month) were reviewed for checking on status of wages and working hours. ۶.

Based on review of time records, the working hours could be summarized as follows:

- For December 2021 (Current month), the average total working hours of 10 selected samples were 43.29 hours/week. 0
 - For April 2021 (Random month), the average total working hours of 10 selected samples were 27.69 hours/week.

0

- For January 2021 (Random month), the average total working hours of 10 selected samples were 27.32 hours/week.
- 10. As per available attendance record, weekly rest after 06 days of working is provided to all the employees.
- 11. No piece rate employees employed at site.
- 12. All employees are paid on monthly basis on or before 7th by cash (100%).

Positive observations:

1. Based on employee interview, it was confirmed that no physical abuse, threat of physical abuse, sexual or other harassment and verbal abuse in the factory.

Audit company: Intertek



- There was no evidence of child labour in the factory. The workers on physical appearance seemed to be above 18 years of age.
- 3. There was no evidence of forced/bonded/involuntary labour in the factory.
- 4. No discrimination was found on any grounds as confirmed from employee's interview.
- 5. Factory has not engaged any home workers.
- 6. Factory has adequate number of fire extinguishers, fire buckets, and smoke detectors installed within the factory premises.
- 7. Adequate numbers of first aid boxes are also installed in the factory.
- 8. Management has installed suggestion box in the factory.
- 9. Factory management was cooperative during the audit.
- 10. Overall general working conditions of the facility was found to be in order.

Non-Compliance:

03 - Safety and Hygienic Conditions: -

- 1. It was noted from facility tour that 06 out of 09 exit & emergency exits were not installed with illuminated type emergency sign board. And facility had not provided industrial type emergency lights in First floor emergency exit (packing, checking sections).
- 2. It was noted from the facility tour that 02 out of 02 ironing operator were not worn the provided ear plugs.
- 3. It was noted from the facility tour that 20% of the sewing operators tampered their finger protection guard.
- 4. It was noted from the facility tour that toilets were found to be in Unhygienic Condition.
- 5. It was noted from facility tour that stain removal machine was found near to checking section without any closure.
- 6. It was noted from facility tour that aisle markings were found to be faded in packing section.



- It was noted from the facility tour and document review that the facility has installed 6 sewing machines on the ground floor which is not reflected in the current building layout plan.
- It was noted from facility tour that fencing was not provided for staircases leading from 2nd to 3rd Floor. ω.
- Facility has provided latches for 01 out of 02 exit and 01 out of 03 emergency exit inward opening door to keep the door opened during working It was noted from the facility tour that 02 out of 03 exits and 03 out of 06 emergency exits were found to be inward opening doors. ۶.

However, facility had not provided latches for 01 out of 02 exit and 01 out of 03 emergency exit inward opening doors.

5 - Living wages are Paid: -

February 2021 to October 2021.and employee state insurance from 01 – 35 days remittance to the authority in month of June 2021 to November 10. It was noted from review of records that the facility has delayed the provident fund from 01 – 02 days remittance to the authority in month of

10B - Environment 2-pillar: -

11. It was noted from facility tour that stack emission height found low for the installed 40 KVA diesel generator.

Observation:

0B - Management systems and code implementation: -

1. It was noted during document review and interaction with management that the facility had not completed SAQ at the time of audit.

03 - Safety and Hygienic Conditions:

refresher training continuously and recent communication dated on 08/09/2021 to the concerned agency, however authorized authority (St. John It was noted from document review that 03 out of 03 first aid trained person certificate validity has expired on 31/03/2020. The facility has applied for Ambulance Association) was not providing training due to COVID-19 situation. 2

Good Example:



Auditor Notes:

pandemic of Covid-19. The facility has resumed to work dated on 14/06/2021 by complying govt regulations with limited employee strength as regulated by the state government to ensure social distancing. Further, the facility had not paid any wages for the period of 15/05/2021 to 13/06/2021 as there is no work It was noted that the facility was closed from 15/05/2021 to 13/06/2021 as per the state-wide lockdown rules imposed by the State government due to carried out and there was no clear govt. notification to pay the wages during lockdown period.

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

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Date: 10/01/2022

Report reference: IDA-27613-01



Site Details

	Site Details			
A: Company Name:	AV Fashion			
B: Site name:	AV Fashion			
C: GPS location: (If available)	GPS Address: Door No.: 8/3794, Anna No Kothampalayam Pirix Road, Taluk, Tiruppur 641602.	agar, vu, P.N.	Latitude: 11.1549 Longitude: 77.50	_
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business License Num TPR 18274 license is is: employees and its vo	sued for en	nploying maximur	
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturer of Knitt	ted Garme	nts	
F: Site description: (Include size, location, and age of site. Also, include structure and number of	Production Building no	Description	on	Remark, if any
buildings)	Building 1 Ground Floor		orage, Cutting, abins, Sample	None
	Building 1 First Floor		g, Ironing, Finished Goods Show Room	None
	Building 1 Second Floor	Accessor	ies Store, Sewing	None
	Auxiliary Buildings		cks, EB Panel, Compressor	None
	Is this a shared building?		No	None
	This Audited Site AV 8/3794, Anna Nagar, Tiruppur District – operations since 201 facility is 2400 sq ft ar facility is engaged in For below, please ad F1: Visible structural ir Yes No F2: Please give detail	, Kothamp 641602, In 18. The tot nd the Built the manuf Id any extra ntegrity issu	alayam Pirivu, P.N. Idia. They have al land area occur-up area is about acturing of Knitted a rows if approprices (large cracks) o	I. Road, Taluk, started their cupied by the 7200 sq ft. The d Garments. ate.



	F3: Does the site have a structural engineer evaluation? Yes No
	F4: Please give details: The facility has obtained stability certificate from structural engineer on 17/03/2020 which is valid for 3 years.
G: Site function:	Agent Factory Processing/Manufacturer Finished Product Supplier Grower Homeworker Labour Provider Pack House Primary Producer Service Provider Sub-Contractor
H: Month(s) of peak season: (if applicable)	Uniform throughout the year
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	The facility is involved in manufacturing of Knitted garments The main production processes are listed as follows: Fabric Receipt – Cutting – Sewing – Checking – Ironing – Packing – Dispatch The main equipment used by the facility for the production process was cutting, sewing & ironing machines.
J: What form of worker representation / union is there on site?	☐ Union (name) ☐ Worker Committee ☐ Other (Grievance committee) ☐ None
K: Is there any night production work at the site?	☐ Yes ☑ No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	Yes No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	Yes No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	Yes No N1: If no, please give details - No dormitory available



	Audit Par	rameters	
A: Time in and time out	Day 1 Time in: 09:20 AM Day 1 Time out: 06:00 PM	Day 2 Time in: NA Day 2 Time out: NA	Day 3 Time in: NA Day 3 Time out: NA
B: Number of auditor days used:	01 Auditor X 01 day (1 Mar	n-day)	
C: Audit type:	Full Initial Periodic Full Follow-up Partial Follow-Up Partial Other If other, please define		
D: Was the audit announced?	Announced Semi – announced: Win Unannounced	dow detail:	
E: Was the Sedex SAQ available for review?	Yes No If No, why not : Facility had	I not completed the SAQ c	at the time of audit.
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	Yes No If Yes , please capture deta	ail in appropriate audit by (clause
G: Who signed and agreed CAPR (Name and job title)	Ms. Malarvizhi A – HR & Adı	min	
H: Is further information available (If yes, please contact audit company for details)	☐ Yes ☑ No		
I: Previous audit date:	NA		
J: Previous audit type:	NA		
K: Were any previous	☐ Yes ⊠ No		
audits reviewed for this audit	□ N/A		



Audit attendance	Management	Worker Representation	ves
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	⊠ Yes □ No	⊠ Yes □ No	☐ Yes ⊠ No
B: Present at the audit?	⊠ Yes □ No	⊠ Yes □ No	☐ Yes ⊠ No
C: Present at the closing meeting?	⊠ Yes □ No	⊠ Yes □ No	☐ Yes ⊠ No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Not applicable.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	No union exists in the f place.	acility. Further facility	has committee in



Worker Analysis

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

			Worker	Worker Analysis				
		Local			Migrant*			Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	20	0	0	0	0	0	0	20
Worker numbers – female	22	0	0	0	0	0	0	22
Total	42	0	0	0	0	0	0	42
Number of Workers interviewed – male	4	0	0	0	0	0	0	4
Number of Workers interviewed – female	9	0	0	0	0	0	0	9
Total – interviewed sample size	10	0	0	0	0	0	0	10



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7.0

A: Nationality of Management	Indian	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. Please add more nationalities as applicable to site. Add more rows if required.	Nationalities: B1: Nationality 1: <u>Indian</u> B2: Nationality 2: B3: Nationality 3:	Was the list completed during peak season? ☐ Yes ☒ No If no, please describe how this may vary during peak periods: There is no peak season in the facility production
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 100% C1: approx % total workforce: Nationality 2 C2: approx % total workforce: Nationality 3	
D: Worker remuneration (management information)	D:	

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Worker Interview Summary		
A: Were workers aware of the audit?	∑ Yes □ No	
B: Were workers aware of the code?	∑ Yes □ No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	01 group of 04 employe	ees
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 04	D2: Female: 02
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	Yes No If no, please give details	S
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	∑ Yes □ No	
G: In general, what was the attitude of the workers towards their workplace?	☐ Favourable☐ Non favourable☐ Indifferent	
H: What was the most common worker complaint?	Employees do not have	any complaints.
I: What did the workers like the most about working at this site?	Nice Working Environme Management.	ent & Supportive
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	Good	
L. Is there any worker survey information available?		
Yes No L1: If yes, please give details:		
M: Attitude of workers: (Include their attitude to management, workplace, and the interview pro included) Note: Do not document any information that could put workers		e information should be



10 workers (04 Male & 06 Female) were selected for interview, they were interviewed as 01 group of 04 employees and balance 06 workers were interviewed individually. The workers were assured of confidentiality, and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory and that they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors who treated them with respect. They were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used. They felt able to complain directly to their supervisors but also felt free to give their general concerns to their grievance representative who would take it to the management.

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

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

Based on the interaction with worker's committee representative, it was noted that workers committee representative are not discriminated, and their grievances stated by the workers were effectively solved by the facility management. Further no negative comments were received

O: Attitude of managers:

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

The facility management was found to be cooperative throughout the audit and accepted to take necessary corrective action for the non-compliances noted.



Audit Results by Clause

0A: Universal Rights covering UNGP

(Click here to return to summary of findings)

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- 1. Based on review of records facility had established a policy covering human rights impacts and issues and communicated to all appropriate parties, including its own suppliers.
- 2. Ms. Malarvizhi A HR & Admin is responsible for implementing standards concerning Human rights
- 3. Based on review of records facility have a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter

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

Details:

- Facility Policies & Procedures
- Interaction with Management and Interview with employees

Any other comments: None

A: Policy statement that expresses commitment to respect human rights?	 ∑ Yes ☐ No A1: Please give details: Facility had established a policy covering human rights impacts and issues and communicated to all appropriate parties, including its own suppliers.
--	--



⊠Yes □ No Please give details: Name: Ms. Malarvizhi A – HR	R & Admin	
	fidentially reporting and impacts without fear of	
Yes No D1: If no, please give details	; - 	
Findings		
Finding: Observation Description of observation: None observed Additional elements: Not Applicable Comments: Not Applicable		
_		
Good examples observed:		
Description of Good Example (GE):		
	Not Applicable	
	No Please give details: Name: Ms. Malarvizhi A – HR Yes No C1: Please give details: For system in place for confidealing with human rights reprisals towards the reported Yes No D1: If no, please give details: Yes No E1: Please give details: Faci implemented the data privatinformation.	



Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 15 %	A2: This year 18 %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	5 %	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(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	C1: Last year: 23 %	C2: This year 20 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	21 %	
E: Are accidents recorded?	Yes No E1: Please describe: Facility had maintained Form–26 & 26A, however no accidents have occurred till date.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: Number: No accidents and injuries have occurred till date.	F2: This year: Number: No accidents and injuries have occurred till date.
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	No accidents and injuries have occurred till date.	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: No accidents and injuries have occurred till date.	H2: This year: No accidents and injuries have occurred till date.
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 monthsNil% workers	I2: 12 monthsNil% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 monthsNil% workers	J2: 12 monthsNil% workers



0B: Management system and Code Implementation

(Click here to return to summary of findings)

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

Current Systems and Evidence Examined

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

Current systems:

- 1. Based on facility tour and review of records, facility has implemented the ETI base code, and the code has been displayed in notice board and communicated to all the employees during induction training.
- 2. Ms. Malarvizhi A HR & Admin is responsible for compliance with the code.
- 3. Based on review of records and interaction with management facility has communicated the ETI base code to their suppliers and obtained a commitment from them to comply with this code requirement.
- 4. Based on review of records that facility had obtained legally required Business license from the concerned authority.

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

Details:

- Facility Policy and Procedures.
- Facility License is valid till 31/12/2022.
- ETI base code.
- Interaction with Management and Interview with employees

Any other comments: None

Management Systems:		
A: In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	Yes No A1: Please give details: No such fine imposed on the site till date.	
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	Yes No B1: Please give details: The facility has established the policies and procedure with respect to social compliance.	
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Facility had effectively implemented the social compliance system and ensuring the same by conducting an audit in a periodic manner,	



	necessary corrective and preventive action has been taken by the facility for the non- compliance raised during the audit. Further the report of the same was maintained by the facility.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	Yes No D1: Please give details: All the employees have undergone an induction training where the social compliance policies and procedures were explained.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	Yes No E1: Please give details: Based on interaction with the employees, the training provided found effective.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	Yes No F1: Please give details: Not applicable
G: Is there a Human Resources manager/department? If Yes, please detail.	Yes No G1: Please give details: Facility had dedicated HR department to take care of HR activities.
H: Is there a senior person / manager responsible for implementation of the code	Yes No H1: Please give details: Ms. Malarvizhi A – HR & Admin for compliance with the code.
I: Is there a policy to ensure all worker information is confidential?	Yes No I1: Please give details: Facility had established Data Privacy policy to ensure all worker, supplier and customer information is confidential.
J: Is there an effective procedure to ensure confidential information is kept confidential?	Yes No J1: Please give details: Facility had a system to ensure the same and the information was shared on a need-to-know basis only.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	Yes No K1: Please give details: Facility had a system of conducting internal audit to evaluate the effectiveness of policy and procedures and update the same if required.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	



	L1Please give details: Based on the review of records it was noted that the facility had conducted health & safety risk assessment in their facility to identify the workplace risk
M: Does the facility have a policy/code which require labour standards of its own suppliers?	Yes No M1: Please give details: Facility had a policy which requires labour standards of its own suppliers.
Land rigi	hts
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	Yes No N1: Please give details: Facility had obtained "Business License" from the concerned authority which is found valid.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	Yes No O1: Please give details: Facility have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	Yes No P1: If yes, how does the company obtain FPIC: Facility has written policy and procedures specific to land rights.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	Yes No Q1: Please give details: Facility had compensated the owner for the land prior to the facility being built.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	Yes No R1: Please give details: Facility had converted non-agriculture land to the facility which does not adhere to any adverse effect.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	Yes No S1: Please give details: Not applicable



Non-compliance:		
1. Description of non-compliance: NC against ETI NC against Local Law: NC against customer code: None Observed Local law and/or ETI requirement Not applicable	Objective evidence observed: (where relevant please add photo numbers) Not applicable	
Recommended corrective action: Not applicable		
Observation:		
Description of observation:	Objective evidence observed:	
None Observed	Not applicable	
Cood Evermoles observed:		
Good Examples observed:		
Description of Good Example (GE):	Objective Evidence Observed:	
None Observed	Not applicable	



1: Freely Chosen Employment

(Click here to return to summary of findings)

FTI

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

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

Current Systems and Evidence Examined

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

Current systems:

- 1. Based on employees' interview, the facility does not require any deposit or deposit of employee's identification such as education certificates, passport etc.,
- 2. Based on employee's interview, the facility does not limit the employee's freedom in any way.
- 3. Based on the facility tour and interview with employees, there are no evidence of involuntary labour.
- 4. Based on employee's interview, all are free to leave their employment by giving reasonable notice.

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

Details:

- Facility Policy and Procedures.
- Appointment Letter of 10 out of 10 selected samples and Payroll records.
- Interaction with Management and Interview with employees.

Any other comments: None

A: Is there any evidence of retention of original documents, e.g. passports/ID's	Yes No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	Yes No B1: If yes, please give details and category of worker affected:
C: Is there any evidence of retention of wages /deposits	Yes No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	Yes No D1: Please describe finding: Employees are free to leave their job by giving one-month notice period.
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	Yes No Not applicable E1: Please describe finding: Facility had not done any part of business with UK



	<u> </u>	
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	Yes No F1: Please describe finding: Employees of workplace without any restriction at the end	
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain Yes No No Not applicable G1: If yes, please give details and category of workers affected: Not applicable		of workers affected:
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	Yes No H1: Please describe finding: Not applicable Facility does not involve on any forced / tra	fficked labour.
	Non-compliance:	
□ NC against ETI□ NC against Local Law:□ NC against customerobserved:(where relevant pled)		(where relevant please add photo numbers)
Observation:		
Description of observation: None Observed		Objective evidence observed: Not applicable
Good Examples observed:		
Description of Good Example (GE): None Observed		Objective Evidence Observed: Not applicable
Description of observation: None Observed Good Examples observed: Description of Good Example (GE): Objective evidence observed: Not applicable Objective Evidence Observed:		



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

(Click here to return to summary of findings) (Click here to return to Key Information)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 1. Based on employee's interview, employees can approach top management directly to report their grievances and necessary corrective action is taken by the management.
- 2. Facility has formed a Workers Committee and Grievance committee and conducted meetings once in two months and the minutes of meetings are recorded for verification and future reference.
- 3. Based on employee's interview, the facility does not restrict employees from organizing trade unions and has an open mind approach towards the activities of trade unions and their organizational activities.
- 4. Based on the employee's interview and interaction with facility management, works committee employee representatives are not discriminated and they are free to carry out their functions like meetings on periodical basis.

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

Details:

- Facility Policy and Procedures
- Suggestion Box
- Works Committee Minutes dated 06/01/2022
- Grievance Committee Minutes dated 16/11/2021
- Interaction with Management and Interview with employees

Any other comments: None

A: What form of worker representation/union is there on site?	☐ Union (name) ☐ Worker Committee ☐ Other (Grievance Committee) ☐ None
B: Is it a legal requirement to have a union?	☐ Yes ☐ No

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C: Is it a legal requirement to have a worker's committee?	☐ Yes ☑ No		
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	Yes No D1: Please give details: Facility has provided suggestion box, where employees are free to express their problems / suggestions / complaints for any grievances. While interviewing, all employees reported that they are free to approach the management for any problem.		
	D2: Is there evidence of free elections? Yes No		
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	Yes No E1: Please give details: Based on the employee's interview and review of records that, works committee employee representatives are free to carry out their functions like meetings with adequate facilities on periodical basis and the record of the same was maintained.		
F: Name of union and union representative, if applicable:	No union exists in the facility.	F1: Is there evidence of free elections? Yes No N/A	
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Works Committee and Grievance committee	G1: Is there evidence of free elections? Yes No N/A	
H: Are all workers aware of who their representatives are?	⊠ Yes □ No	Based on interaction with employees that all of them are aware of their workers representative, the same was displayed in the notice board also.	
I: Were worker representatives freely elected?	⊠ Yes □ No	I1: Date of last election: 08/07/2021	
J: Do workers know what topics can be raised with their representatives?	Yes No Based on interaction with employees that all of them know about the topics.		
K: Were worker representatives/union representatives interviewed?	∑ Yes □ No If Yes, please state how many: 05		
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Facility had conducted last meeting on 06/01/2022. Topics discussed during the committee meeting was regarding ESI & EPF Benefits awareness, Covid-19 precautionary measures.		



M: Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ⊠ No			
If Yes , what percentage by trade Union/worker representation	M1:_0% workers covered by Union CBA	M2: _0% workers covered by worker rep CBA		
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	Yes No Not applicable			
	Non-compliance:			
1. Description of non–compliance: NC against ETI NC against code: None Observed Local law and/or ETI requirement Not applicable Recommended corrective action: Not applicable	ot Local Law: NC against custome	Objective evidence observed: (where relevant please add photo numbers) Not applicable		
	Observation:			
Description of observation:		Description of observation:		
None Observed		None Observed		
		ı		
Good Examples observed:				
Description of Good Example (GE) : None Observed		Description of Good Example (GE):		
1.0.10 0.001100		None Observed		



3: Working Conditions are Safe and Hygienic

(Click here to return to summary of findings)
(Click here to return to Key Information)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. General Health and Safety management

- 1. Ms. Malarvizhi A HR & Admin is responsible for Health & Safety aspects for the site
- 2. Potable water was freely available in all areas and test certificates were up to date
- 3. Sufficient toilets were available at all times to workers
- 4. Ventilation, temperature and lighting were adequate for the production processes

2. Fire Safety

- 1. There were at least 2 exits from each work area and these were clearly marked
- 2. Firefighting equipment such as 07 fire extinguishers, 03 fire alarm call points, 10 Emergency lights, 02 smoke detectors and 04 Fire buckets were provided in the facility which was found enough.
- 3. Evacuation diagrams were posted in all areas and understood by all workers interviewed
- 4. Fire drills were organized and recorded every 2 months as per the law and the last drill was conducted on 03/01/2022.
- 5. Firefighting training has been given by the external agency and 10 numbers of employees were trained on 03/01/2022.
- 6. Facility has marked most exits and emergency exits in a language understood by majority of the employees.

3. Machine & Electrical safety

- 1. All machine and electrical equipment was maintained in good condition
- 2. There were competent mechanic & electricians at the site to do the electrical work
- 3. Facility had obtained periodic inspection certificate for all the machineries used

4. Chemical safety

- 1. All chemicals were labelled or identified properly
- 2. Material Safety Data Sheets were available for the chemicals used by the facility

5. Medical services

1. Facility has provided well equipped first aid boxes (03).



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

Details:

- Health and Safety Policy
- Factory License Valid till 31/12/2022
- Fire License Valid till 01/09/2022
- Industrial accident records Updated till December 2021
- Health & Safety Committee meeting minutes dated 19/11/2021
- Last Potability Drinking Water Test report dated 31/08/2021
- Interaction with Management and Interview with employees

Any other comments: None

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	Yes No A1: Please give details: Facility had established general Health & Safety, occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers during induction training.
B: Are the policies included in workers' manuals?	Yes No B1: Please give details: Facility had included the social compliance policies in worker's manual.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	Yes No C1: Please give details: Facility has installed 6 sewing machines on the ground floor which is not reflected in the current building layout plan.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	Yes No D1: Please give details: Facility visitors are informed on H&S and provided with appropriate personal protective equipment.
E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	Yes No E1: Please give details: Facility had not provided medical room, further the same was not required by law.
F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?	Yes No F1: Please give details: Facility has 3 first aiders through St. John Ambulance.
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	Yes No G1: Please give details: Facility has provided transportation and it is fit for purpose, safe, maintained and operated by competent persons.



H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	☐ Yes ☐ No H1: Please give details: Facility had no storage area to their employees.	t provided personal
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	Yes No II: Please give details: Facility had conducted risk assessment in the facility on 01/12/2021.	
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	Yes No J1: Please give details: Facility is meeti on environmental requirements includ use and disposal of natural resources. height found low for the installed 40 KV	ing required permits for However, stack emission
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	Yes No K1: Please give details: Based on intercommanagement that the facility does not chemicals and meet all the environment customer requirement.	ot use any banned
	Non-compliance: 01	
1. Description of non-compliance: NC against ETI NC against Local Law: NC against customer code: It was noted from facility tour that 06 out of 09 exit & emergency exits were not		Objective evidence observed: (where relevant please
It was noted from facility tour that 06 out		add photo numbers)
	y sign board. ype emergency lights in First floor	add photo numbers) Based on facility tour Non-compliance photo 1
It was noted from facility tour that 06 out installed with illuminated type emergence. And facility had not provided industrial ty	y sign board. The emergency lights in First floor frons). Rules 1950, Chapter IV, Rule 61 (9) (e) inated with suitable arrangement, and for this purpose, to maintain the	Based on facility tour
It was noted from facility tour that 06 out installed with illuminated type emergence. And facility had not provided industrial ty emergency exit (packing, checking section Local law requirement: In accordance with Tamil Nadu Factories The exits shall be visible and suitably illuminate whatever artificial lighting is to be adopted.	y sign board. The emergency lights in First floor fons). Rules 1950, Chapter IV, Rule 61 (9) (e) inated with suitable arrangement, ed for this purpose, to maintain the the normal source of electric supply.	Based on facility tour
It was noted from facility tour that 06 out installed with illuminated type emergence. And facility had not provided industrial ty emergency exit (packing, checking sections accordance with Tamil Nadu Factories. The exits shall be visible and suitably illuminate whatever artificial lighting is to be adopted required illumination in case of failure of the Recommended corrective action: It is recommended the facility to illumination.	y sign board. The emergency lights in First floor fons). Rules 1950, Chapter IV, Rule 61 (9) (e) inated with suitable arrangement, and for this purpose, to maintain the the normal source of electric supply. The exit and emergency signs with	Based on facility tour
It was noted from facility tour that 06 out installed with illuminated type emergence. And facility had not provided industrial ty emergency exit (packing, checking sections) Local law requirement: In accordance with Tamil Nadu Factories. The exits shall be visible and suitably illuminated illumination in case of failure of the Recommended corrective action: It is recommended the facility to illumination in currently t	y sign board. The emergency lights in First floor fons). Rules 1950, Chapter IV, Rule 61 (9) (e) inated with suitable arrangement, and for this purpose, to maintain the the normal source of electric supply. The exit and emergency signs with	Based on facility tour



Non-compliance: 02			
1. Description of non-compliance: NC against ETI NC against Local Law: NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)		
It was noted from the facility tour that 02 out of 02 ironing operator were not worn the provided ear plugs.	Based on facility tour Non-compliance photo		
Local Law requirement: In accordance with Factories Act 1948, Section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.	2		
Recommended corrective action: It is recommended the facility to provide training to employees about usage of personal protective equipment and same to ensure that all the employees are using effectively.			
Action by : Ms. Malarvizhi A – HR & Admin			
Time Scale: 30 days			
Verification Method: Desktop			
Non–compliance: 03			

Non-compliance: 03		
Description of non-compliance:	Objective evidence observed: (where relevant please add photo numbers)	
It was noted from the facility tour that 20% of the sewing operators tampered their finger protection guard.	Based on facility tour Non-compliance photo	
Local Law requirement: In accordance with Factories Act 1948, Section 26 (1) (a), every set screw, bolt or key on any revolving shaft, spindle, wheel or pinion shall be so sunk, encased or otherwise effectively guarded as to prevent danger.	3	
Recommended corrective action: It is recommended the facility to train their employees about usage of personal protective equipment and same to ensure that all the employees are used effectively.		
Action by: Ms. Malarvizhi A – HR & Admin		
Time Scale: 30 days		
Verification Method: Desktop		



Non–compliance: 04			
1. Description of non-compliance: \[\text{NC against ETI} \] \[\text{NC against Local Law:} \] \[\text{NC against customer code:} \] It was noted from the facility tour that toilets were found to be in Unhygienic Condition. Local Law requirement: In accordance with Factories Act. 1948 section 19 (1) In every factory (a) sufficient latrine and urinal accommodation of prescribed type shall be provided conveniently situated and easily accessible to workers at all times while they are at the factory; (b) separate enclosed accommodation shall be provided for male and female employees; (c) such accommodation shall be adequately lighted and ventilated and no latrine or urinal shall, unless specially exempted in writing by the Chief Inspector, communicate with any work room except through an intervening open space or ventilated passages; (d) all such accommodation shall be maintained in a clean and sanitary conditions at all times. (e) Sweepers shall be employed whose primary duty it would be to keep clean latrines, urinals and washing places. Recommended corrective action: It is recommended the facility to ensure that the toilets and urinal stations are maintained in hygienic condition. Action by: Ms. Malarvizhi A – HR & Admin Time Scale: 30 days	Objective evidence observed: (where relevant please add photo numbers) Based on facility tour Non-compliance photo 4		
Verification Method: Desktop			

Non-compliance: 05	
Description of non-compliance:	Objective evidence observed: (where relevant please add photo numbers)
It was noted from facility tour that stain removal machine was found near to checking section without any closure.	Based on facility tour Non-compliance photo 5
Local Law requirement: In accordance with Factories Act 1948, Section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.	3
Recommended corrective action: It is recommended the facility to provide closure to stain removal machine.	
Action by : Ms. Malarvizhi A – HR & Admin	
Time Scale: 30 days	



Verification Method: Desktop	
Non–compliance: 06	
1. Description of non-compliance: NC against ETI NC against Local Law: NC against customer code: It was noted from facility tour that aisle markings were found to be faded in packing section. Local law requirement: In accordance with Factories Act 1948, Chapter IV, Section 38 (1), in every factory all practicable measures shall be taken to prevent outbreak of fire and its spread both internally and externally and to provide and maintain – (a) safe means of escape in all persons in the event of a fire and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory, all the employees are familiar with means of escape in case of fire and have been adequately trained in the routine to be followed in such case. Recommended corrective action: It is recommended the facility to mark aisle markings properly. Action by: Ms. Malarvizhi A – HR & Admin Time Scale: 30 days Verification Method: Desktop	Objective evidence observed: (where relevant please add photo numbers) Based on facility tour Non-compliance photo 6
Non–compliance: 07	
1. Description of non-compliance: NC against ETI NC against Local Law: NC against customer code: It was noted from the facility tour and document review that the facility has installed 6 sewing machines on the ground floor which is not reflected in the current building layout plan.	Objective evidence observed: (where relevant please add photo numbers) Based on facility tour and document review



Local Law requirement:

In accordance to Section 12B (3) of the Tamil nadu Factories Rules, 1950 - After the date of the commencement of the act, no manufacturing process shall be carried on in any factory constructed, extended or taken into use as a factory or part of a factory until a certificate of stability in respect of the buildings in the form below has been sent by the occupier or management of the factory to the inspector. Provided that the certificate of stability sent by the occupier or management of the factory to the inspector as required in this rule shall be valid only for a period of three years from the date of its issue and within thirty days after the expiry of the said period, a fresh certificate of stability shall be sent to the inspector.

Recommended corrective action:

It is recommended to the facility to obtain the approved building layout plan as per the current setup from the concerned authority.

Action by: Ms. Malarvizhi A – HR & Admin

Time Scale: 60 days

Verification Method: Desktop

Non-compliance: 08		
Description of non-compliance:	Objective evidence observed: (where relevant please add photo numbers)	
It was noted from facility tour that fencing was not provided for staircases leading from 2nd to 3rd Floor.	Based on facility tour Non-compliance photo	
Local Law requirement: In accordance with Factories Act 1948, Section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.	7	
Recommended corrective action: It is recommended the facility to provide fencing for staircases leading from 2nd to 3rd Floor.		
Action by: Ms. Malarvizhi A – HR & Admin		
Time Scale: 30 days		
Verification Method: Desktop		

Audit company: Intertek Report reference: IDA-27613-01 Date: 10/01/2022 Sedexglobal.com

Non-compliance: 09



Description of non-compliance:	Objective evidence observed: (where relevant please add photo numbers)
It was noted from the facility tour that 02 out of 03 exits and 03 out of 06 emergency exits were found to be inward opening doors.	Based on facility tour Non-compliance photo
Facility has provided latches for 01 out of 02 exit and 01 out of 03 emergency exit inward opening door to keep the door opened during working hours.	8
However, facility had not provided latches for 01 out of 02 exit and 01 out of 03 emergency exit inward opening doors.	
Local law requirement: In accordance with Tamil Nadu Factories Rules 1950, Chapter IV, Rule 61 (9): (u), exit doorways shall open outwards, that is away from the room but shall not obstruct the travel along any exit. No door when opened shall reduce the required width of stairway or landing to less than 90 centimeters. Overhead or sliding doors shall not be installed for this purpose	
Recommended corrective action: It is recommended the facility to provide all Exits and Emergency exit doors to open outward direction.	
Action by: Ms. Malarvizhi A – HR & Admin	
Time Scale: 30 days	

Observation: 0	1
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Description of observation:

Verification Method: Desktop

It was noted from document review that 03 out of 03 first aid trained person certificate validity has expired on 31/03/2020. The facility has applied for refresher training continuously and recent communication dated on 08/09/2021 to the concerned agency, however authorized authority (St. John Ambulance Association) was not providing training due to COVID-19 situation.

Local law requirement:

Tamil Nadu Factories Rules 1950, Chapter IV, Rule 63 (b), First Aid - Persons who are in charge of first-aid box shall be persons who possess the certificate granted by the Saint John's Ambulance Association for rendering first-aid.

It is recommended the facility to arrange and provide first aid training through authorized authority and obtain training certificate.

Objective evidence observed:

Based on audit process

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

Report reference: IDA-27613-01 Date: 10/01/2022 Audit company: Intertek Sedexglobal.com



None observed	
	Not applicable

4: Child Labour Shall Not Be Used

(Click here to return to summary of findings)
(Click here to return to Key Information)

ETI

- 4.1 There shall be no new recruitment of child labour.
- 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined

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

Current systems:

- 1. Based on interaction with HR Manager, all employees are hired by the Human Resource Department only.
- 2. Based on review of hiring policy documents, employee's ID for age proof such as Voter ID and Aadhaar Card were checked by HR department prior to hiring. The employees without valid ID certificates are not being hired.
- 3. Based on the policy review, the minimum hiring age of the facility is 18 years old.
- 4. Based on employees' interview, any suspect of child labour can be reported to facility management.
- 5. Based on the employee interviews, review of facility's Child Labour & Hiring Policy and age proof documents, the facility has complied with ILO Standards for Child Labour. Youngest employee found within the sample is 18 years old.

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

Details:

• Child Labor and Child Labor Remediation Policy.



Age Proof records of 10 out of 10 s Interaction with Management and			
Any other comments: None			
A: Legal age of employment:	14 Years old for young employees and 18 years old for adultworkers		
B: Age of youngest worker found:	18 years old	18 years old	
C: Are there children present on the work floor but not working at the time of audit?	☐ Yes ☐ No		
D: % of under 18's at this site (of total workers)	0 %		
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	Yes No Not applicable If Y give details		
	Non–compliance:		
1. Description of non-compliance: NC against ETI NC against Local Law: NC against customer code: None Observed Local law and/or ETI requirement: Not applicable Recommended corrective action:		Objective evidence observed: (where relevant please add photo numbers) Not applicable	
Not applicable			
	Observation:		
Description of observation: None Observed		Objective evidence observed: Not applicable	
Good Examples observed:			
Description of Good Example (GE):		Objective Evidence Observed:	
None Observed		Not applicable	



5: Living Wages are Paid

(Click here to return to summary of findings)
(Click here to return to Key information)

ETI

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Current Systems and Evidence Examined

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

Current systems:

- 1. Based on review of wage records, the facility had paid the applicable minimum wages to all the employees.
- 2. Based on employee's interview, wages are fixed on daily rate, calculated, and paid on monthly basis on or before 7th of every month by cash (100%).
- 3. Based on employee's interview, wage slips are provided to all the employees and employees are aware of their wage calculations.
- 4. Based on wage record review, all employees are covered under social security benefit of Employee state Insurance and Employee provident fund.
- 5. Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules.
- 6. 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.
- 7. Based on record review and from employee's interview overtime hours are compensated at 200% of the normal rate of wages for all employees.



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

Details:

- Facility Policy.
- Salary register Pay slip and Time records for 10 selected samples for 3 Random months.
- Leave with wage records (Form No: 15) and Leave encashment records.
- Bonus paid records.
- List of National and Festival Holidays.

Action by: Ms. Malarvizhi A – HR & Admin

• Interaction with management and employees.

Any other comments: None

Non-compliance: 01		
1. Description of non-compliance: NC against ETI NC against Local Law: NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)	
It was noted from review of records that the facility has delayed the provident fund from 01 – 02 days remittance to the authority in month of February 2021 to October 2021.and employee state insurance from 01 – 35 days remittance to the authority in month of June 2021 to November 2021.	Based on wage records review	
Local Law requirement: In accordance with Employee State Insurance Regulations 1950, Section 31, an employer who is liable to pay contributions in respect of any employee shall pay those contributions within 21 days of the last day of the calendar month in which the contributions fall due. Latest amendment on June 2017 is to pay the remittance on or before 15th day of every month.		
In accordance with The Employees Provident Funds Scheme, 1952, Section 38 (1), the employer shall, before paying the member his wages in respect of any period or part of period for which contributions are payable, deduct the employee's contribution from his wages which together with his own contributions as well as an administrative charge of such percentage (of the pay (basic wages, dearness allowance, retaining allowance, if any, and cash value of food concession admissible thereon) for the time being payable to the employees other than an excluded employee, and in respect of which provident fund contributions are payable as the Central Government may fix, he shall within fifteen days of the close of every month pay the same to the Fund by separate bank drafts or cheques on account of contributions and administrative charge.		
Recommended corrective action: It is recommended to the facility to remit Employees Provident Fund and Employee state insurance as timely manner to the concerned authority.		



Time Scale: 60 days Verification Method: Desktop		
Observation:		
Description of observation: None Observed	Objective evidence observed:	
Local law or ETI requirement: Not applicable	Not applicable	
Comments: Not applicable		
Good Examples observed:		
Description of Good Example (GE):	Objective Evidence Observed:	
None Observed		

Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 8 hours per day / 48 hours per week	8 hours per day / 48 hours per week	☐ Yes ☑ No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 2 hours per day / 12 hours per week / 50 hours per quarter	No overtime performed during selected months	☐ Yes ☑ No
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: INR 215.77 per day	INR 320 per day	☐ Yes ☑ No
D: Overtime wage:	Legal minimum:200%	200% of normal rate of wages	☐ Yes ☑ No



(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)

of normal rate of wages

Wages analysis: [Click here to return to Key Information]					
A: Were accurate records shown at the first request?	∑ Yes □ No				
A1: If No , why not?	Not applic	able			
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	A total of 10 employees were interviewed and the same numbers of records were reviewed for the months of December 2021 (Current month), April 2021 (Random Month) and January 2021 (Random Month).				
C: Are there different legal minimum wage grades? If Yes , please specify all.	⊠ Yes □ No	C1: If Yes, please give details: Cutter, Tailor, Ironer, Packer–INR 308.08 per Checker – INR 238.85 per day Labelling – INR 227.31 per day Helper – INR 215.77 per day		Ironer, Packer– INR 308.08 per day R 238.85 per day R 227.31 per day	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	Yes No N/A			ase give details:	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	Below legal min Meet Above E1: Lowest actual wages found: Note: full time employees and please state hour / week / month etc. Helpers – INR 320 per day			olease state hour / week / month etc.	
F: Please indicate the breakdown of workforce per earnings:	F1:% of workforce earning under minimum wage F2:% of workforce earning minimum wage F3: 100% of workforce earning above minimum wage				
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: Yes Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week/month etc. Facility had paid bonus for the period of October 2020 to September 2021 with 12% on 01/11/2021.				
H: What deductions are required by law e.g. social insurance? Please state all types:	Employee State Insurance Employee Provident Fund				
I: Have these deductions been made?	Yes I1: Please list all deductions that have been made. 1. Employee State Insurance 2. Employee Provident Fund			Insurance 2. Employee Provident	



				Please describe: Facility is deducting as per the state laws requirements.
		l2: Please I deduction have not b made.	is that	1. 2. Please describe: Not applicable
J: Were appropriate records available to verify hours of work and wages?	⊠ Yes □ No			
K: Were any inconsistencies found? (if yes describe nature)	☐ Yes K1: Type ☐ Poor record keeping ☐ Isolated incident ☐ Repeated occurrence:		ed incident	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	Yes No L1: Please give details: Facility has maintained the time record which reflect all time worked by employees.			
M: Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	Yes No M1: Please specify amount/time: Facility did not define any living wages. At present facility is following the applicable minimum wages as notified by the State Government.			
M2: If yes, what was the calculation method used.	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage ☐ Figures provided by Unions ☐ Living Wage Foundation UK ☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation Other – please give details: NA			
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	Yes NoN1: Please give details: Tamil Nadu Government will revise the minimum wages on the month of April every year and the same will be paid to the employees accordingly.			
O: Are workers paid in a timely manner in line with local law?	⊠ Yes □ No			
P: Is there evidence that equal rates are being paid for equal work:	Yes No P1: Please give details: Based on review of wage records, equal rates are being paid for equal work			
Q: How are workers paid:	Cash − 100% Cheque Bank Transfer Other			



Q1: If other, please explain:

6: Working Hours are not Excessive
(Click here to return to summary of findings)
(Click here to return to Key Information)



ETI

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub–clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where <u>all</u> of the following are met:
 - this is allowed by national law;
 - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
 - appropriate safeguards are taken to protect the workers' health and safety; and
 - The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined

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

Current systems:

- 1. A total of 10 employees were interviewed and the same numbers of records were reviewed for the months of December 2021 (Current month), April 2021 (Random month) and January 2021 (Random month).
- 2. Facility has restricted normal working hours to 8 hours per day and 48 hours per week.
- 3. Based on tour of the facility, it was noted that the working hours and weekly rest day are displayed on notice board.
- 4. The facility has implemented manual paper timecard system to record IN/OUT time recording.

Based on review of time records, the working hours could be summarized as follows:

- For December 2021 (Current month), the average total working hours of 10 selected samples were 43.29 hours/week.
- For April 2021 (Random month), the average total working hours of 10 selected samples were 27.69 hours/week.
- For January 2021 (Random month), the average total working hours of 10 selected samples were 27.32 hours/week.

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

Details:

Facility Policy.



In/Out time records and Salary register for 10 selected samples for 03 Random months.

•	Interaction	with	management	and	emplo	vees.

Any other comments: None

Non–compliance:				
1. Description of non-compliance: NC against ETI NC against Local Law: NC against customer code: None Observed	Objective evidence observed: (where relevant please add photo numbers)			
Local law and/or ETI requirement Not applicable	Not applicable			
Recommended corrective action: Not applicable				
Observation:				
Description of observation: None Observed	Objective evidence observed:			
Local law or ETI requirement: Not applicable	Not applicable			
Comments: Not applicable				
	•			
Good Examples observed:				
Description of Good Example (GE):	Objective Evidence Observed:			
None Observed	Not applicable			

Working hours' analysis

Please include time e.g. hour/week/month (Go back to Key information)

Systems & Processes

Audit company: Intertek Report reference: IDA-27613-01 Date: 10/01/2022



A. What timekeeping systems are used: time card etc.	Describe: Manual Paper Timecard System				
B: Is sample size same as in wages section?	Yes No B1: If no, please give details				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	⊠ Yes □ No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: Not applicable			
D: Are there any other types of	☐ Yes ☑ No	D1: If YES	, please complete	e as appropriate:	
contracts/employment agreements used?		0 hrs	☐ Part time	☐ Variable hrs	Other
		If "Other", Please define:			
		Not applicable			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	☐ Yes ☑ No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details:			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: 1 in 7 days 2 in 14 days No If 'No', please explain:	Yes No In accord 52 (1), No in a facto to as the (a) He ho the three (b) The n the subst (i) Delive intention of the do (ii) Displa that no s worker w a holiday	o adult worker sho bry on the first day said day) unless- as or will have a had days immediately nanager of the fa- ituted day under of the red a notice at a to require the wo yed a notice to the substitution shall be orking for more the orking for more the	ries Act 1948, Chap all be required or an of the week (herein noliday for a whole by before or after the actory has, before the clause (a) whicheve the office of the Intervention of the properties on the pubstituted, and that effect in the fact the made which we an ten days consect	llowed to work nafter referred day on one of a said day, and the said day or er is earlier, - a spector of his a said day and actory: Provided all result in any autively without
	Maximum numbe	er of days	worked without a	day off (in sample)	:



	6 days			
Standard/Contracted Ho	ours worked			
G: Were standard	Yes	G1: If yes, % of workers & frequency:		
working hours over 48 hours per week found?	⊠ No	Not Applicable		
H: Any local waivers/local law or	☐ Yes ⊠ No	H1: If yes, please give details:		
permissions which allow averaging/annualised hours for this site?	∑ 140	Not Applicable		
Overtime Hours worked				
I: Actual overtime hours	Highest OT hours:			
worked in sample (State per day/week/month)	No overtime perf	formed during selected sampled months.		
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	☐ Yes ☑ No			
K: Approximate percentage of total workers on highest overtime hours:	% - NA			
L: Is overtime voluntary?	Yes No Conflicting	L1: Please detail evidence e.g. Wording of contract/employment agreement/handbook/worker interviews/refusal arrangements:		
	momanon	Based on interview with employees' overtime is engaged on voluntary basis.		
Overtime Premiums				
M: Are the correct legal overtime premiums paid?	Yes No N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of <u>standard</u> wages: 200 %		
N: Is overtime paid at a premium?	∑ Yes □ No	N1: If yes, please describe % of workers & frequency: All the employees are paid with 200% of normal rate of wages as overtime premium as per the legal requirement which was paid along with salary.		



O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes	No □ Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) □ Collective Bargaining agreements □ Other		
where relevant.	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other		
	Not applicable		
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please	 ○ Overtime is voluntary ○ Onsite Collective bargaining allows 60+ hours/week ○ Safeguards are in place to protect worker's health and safety ○ Site can demonstrate exceptional circumstances ○ Other reasons (please specify) 		
complete the boxes where relevant.	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:		
	Not applicable		
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	Yes No Q1: If yes, please give details: Facility had recruited adequate number of workers according to their order volumes and restricts the overtime hours within legal limit		
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	☐ Yes ☐ No		

7: No Discrimination is Practiced (Click here to return to summary of findings)	
ETI	



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

Current Systems and Evidence Examined

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

Current systems:

- 1. Based on review of wage records and employees' interview, no discrimination was noted in hiring, compensation, access to training, promotion, and termination or retirement.
- 2. Ms. Malarvizhi A HR & Admin is responsible for the investigation and disposal of discrimination case.
- 3. Based on wage records review, the facility provides the same pay for male/female employees for same work of similar nature.

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

Details:

- Facility Policy.
- Appointment letter with terms and conditions for 10 out 10 selected samples.
- Salary and other benefit records.
- Interaction with management and employees

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male:40 % A2: Female60 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	02
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	Hiring □ Compensation □ Access to training □ Promotion □ Termination or retirement □ No evidence of discrimination found C1: Please give details: None

Professional Development	
A: What type of training and development are available for workers?	Please give details: Facility had a system of professional development of their employees & staff based on character,



	attendance, any disciplinary action program etc.	n, involvement in training			
B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	∑ Yes	ole			
	Non-compliance:				
1. Description of non-compliance: NC against ETI NC against Locade: None Observed Local law and/or ETI requirement Not applicable Recommended corrective action: Not applicable	cal Law: NC against customer	Objective evidence observed: (where relevant please add photo numbers) Not applicable			
Observation:					
Description of observation: None Observed Local law or ETI requirement: Not applicable		Objective evidence observed: Not applicable			
Comments: Not applicable					
Good Examples observed:					
Description of Good Example (GE): None Observed		Objective Evidence Observed:			
Notie Observed		Not applicable			



8: Regular Employment Is Provided

[Click here to return to summary of findings]
[Click here to return to Key Information]

ETI

- 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Additional Elements: Responsible Recruitment

- 8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.
- 8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.
- 8.5 Employment agencies must only supply workers registered with them.
- 8.6 Workers pay no recruitment fee at any stage of the recruitment process.
- 8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined

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

Current systems:

- 1. Based on record review and employee's interview appointment letters issued to all 10 out of 10 selected employees
- 2. Based on interaction with the facility management, it was noted that all employees are employed on regular basis; and no casual, contract, agency, and apprentice employees were engaged
- 3. Facility does not employ any migrant workers
- 4. Based on interaction with employees, no recruitment fees are required at any stage of the recruitment process

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

Details:

- Facility Policy
- Appointment letter with terms and conditions for 10 out 10 selected samples
- Salary and other benefit records
- Interaction with management and employees

Any other comments: None



Non-compliance:		
1. Description of non-compliance: NC against ETI NC against Local Law: NC against customer code: None Observed Local law and/or ETI requirement Not applicable Recommended corrective action: Not applicable		Objective evidence observed: (where relevant please add photo numbers) Not applicable
	Observation:	
Description of observation: None Observed		Objective evidence observed:
Local law or ETI requirement: Not applicable		Not applicable
Comments: Not applicable		
	Good Examples observed:	
Description of Good Example (GE):		Objective Evidence Observed:
None Observed		Not applicable
Responsible Recruitment		
All Workers		
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions? A: Were all workers presented \[\sum \text{Understood by workers} \] \[\sum \text{Same as actual conditions} \] A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:		nding and specific
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? Yes No B1: If yes, please describe details and specific category(ies) of worker affected:		c category(ies) of workers



	Any transport costs betv	d or processing fees lodging costs after employment offer veen workplace and home er commencement of employment tation fees deposits y assets	
Migrant Workers: The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity			
A: Type of work undertaken by migrant workers:	Facility does not empl	Facility does not employ any migrant workers.	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: 0 B2: Total number of (outside of local country) recruitment agencies used: Not applicable		
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?		C2: Observations: None	
D: Are Any migrant workers in skilled, technical, or management roles Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)	Yes No D1: If yes, number and	d example of roles:	



NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	Yes
	No
B: If yes, check all that	Recruitment / hiring fees
apply:	☐ Service fees
	Application costs
	Recommendation fees
	☐ Placement fees
	Administrative, overhead or processing fees
	☐ Skills tests
	☐ Certifications
	Medical screenings
	Passports/ID's
	Work / resident permits □ Birth certificates
	Police clearance fees
	Any transportation and lodging costs after employment offer
	Any transportation and loaging costs after employment offer the state of the state
	Any relocation costs after commencement of employment
	New hire training / orientation fees
	Medical exam fees
	Deposit bonds or other deposits
	Any other non-monetary assets
	Other
	B1 – If other, please give details: Not Applicable
C: If any checked, give	Not applicable
details:	

Agency Workers (if applicable) (workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)		
A: Number of agencies used (average):	A1: Names if available: Not Applicable	
B: Were agency workers' age / pay / hours included within the scope of this audit?	Yes No Not Applicable	
C: Were sufficient documents for agency workers available for review?	Yes No Not Applicable	
D: Is there a legal contract / agreement with all agencies?	Yes No D1: Please give details: Not Applicable	
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	Yes No E1: Please give details: Not Applicable	



Contractors: Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,			
A: Any contractors on site?	Yes No A1: If yes, how many contractors are present, please give details: Not Applicable		
B: If Yes , how many workers supplied by contractors?	Not Applicable		
C: Do all contractor workers understand their terms of employment?	Yes No C1: Please describe finding: Not Applicable		
D: If Yes , please give evidence for contractor workers being paid per law:	Not Applicable		

Audit company: Intertek Report reference: IDA-27613-01 Date: 10/01/2022



8A: Sub-Contracting and Homeworking

(Click here to return to summary of findings) (Click here to return to Key Information)

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

- 1. Based on the interaction with the facility management and employees' interview, it was noted that the facility had used 2 subcontractors for their production process of Printing & Embroidery and the remaining production is carried out in the audited facility
- 2. Facility is not using any home workers.

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

- Facility Policy.
- Inward and outward material register.
- Production records.
- Interaction with management.

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

Process Subcontracted	PRINTING
Name of factory	M/s. Saran Print Park
Address	SF No 353/2A, Kaikalan kody, Thaneerpandhal Colony, East Extension, Anuparpalayam, Tirupur.
Contact	Mr. Vignesh - +91 95859 937225

Process Subcontracted	Embroidery
Name of factory	M/s. Sri Thambiratty Embroidery
Address	23-1, Mariamman Kovil, Padmavathi Puram, Gandhi Nagar (po), Near Srinivasa Theatre, Tirupur.
Contact	Mr. Shakthi - +91 95859 66288

Details: None



Non-compliance:		
Description of non-compliance: NC against ETI NC against Code:	inst Local Law: 🗌 NC against customer	Objective evidence observed: (where relevant please add photo numbers)
None Observed		Not applicable
Local law and/or ETI requirement Not applicable		''
Recommended corrective action: Not applicable		
	Observations.	
	Observation:	Т
Description of observation: None Observed		Objective evidence observed:
Local law or ETI requirement: Not applicable		Not applicable
Comments: Not applicable		
	Good Examples observed:	
Description of Good Example (GE):		Objective Evidence Observed:
None Observed		Not applicable
Sun	nmary of sub-contracting – if applicable Not Applicable please x	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	Yes No Please describe: Based on review of production records, the workload found balanced, hence no challours.	
B: If sub–contractors are used, is there evidence this has been agreed with the main client?	Yes No If Yes , summarise details: Not applicable: Self-reference audit.	
C: Number of sub– contractors/agents used:	02	



D: Is there a site policy on sub- contracting?	 ∑ Yes ☐ No If Yes, summarise details: The facility has a policy that all the subcontractor of the facility should comply with the local legal regulation as well as the Clients Code of Conduct. 			
E: What checks are in place to ensure no child labour is being used and work is safe?	The facility representative visits the subcontracting unit in a regular time interval to ensure no child labour is being used.			
Summary of homeworking – if applicable Not Applicable please x				
A: If homeworking is being used, is there evidence this has been agreed with the main client?	Yes No A1: If Yes , summarise details: Not applicable – Facility is not using any Home workers.			
B: Number of homeworkers	B1: Male: Nil	B2: Female	: Nil	Total: Nil
C: Are homeworkers employed direct or through agents?			C1: If throu agents:	ugh agents, number of
			Not applicable	
D: Is there a site policy on homeworking?	☐ Yes ☐ No Not applicable			
E: How does the site ensure worker hours and pay meet local laws for homeworkers?	Not applicable			
F: What processes are carried out by homeworkers?	Not applicable			
G: Do any contracts exist for homeworkers?	Yes No G1: Please give details: Not applicable			
H: Are full records of homeworkers available at the site?	☐ Yes ☐ No			

Audit company: Intertek Report reference: IDA-27613-01 Date: 10/01/2022 Sedexglobal.com

Not applicable



9: No Harsh or Inhumane Treatment is Allowed (Click here to return to summary of findings)

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	Yes No A1: Please give details: Facility had invited NGO in Anti sexual harassment committee and the grievance was directly communicated to them if any.
B: If Yes , are workers aware of these channels and have access? Please give details.	Facility Anti sexual harassment committee representative will communicate the details to their employees in their respective section and workers are aware of these channels and have access to the same.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Direct communication during meeting
D: Which of the following groups is there a grievance mechanism in place for?	☐ Workers ☐ Communities ☐ Suppliers ☐ Other D1: Details: Facility had effective grievance mechanism in place where workers, communities & suppliers can express their grievance through Suggestion box, Hot line, Committee meetings etc.,
E: Are there any open disputes?	Yes No E1: If yes, please give details - Not applicable
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	☐ Yes☐ NoF1: If No Please give details - Not applicable
G: Is there a published and transparent disciplinary procedure?	
H: If yes, are workers aware of these the disciplinary procedure?	∑ Yes □ No H1: If no please give details - Not applicable
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	☐ Yes ☐ No ☐ I1: If Yes please give details - Not applicable



Current Systems and Evidence Examined

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

Current systems:

Based on the interaction with the facility management and employee's interview, it was 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.

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

Details:

- Facility Policy
- Last Anti-Sexual Harassment Committee Meeting was conducted on 16/11/2021
- Interaction with management and employees

Any other comments: None

Non-compliance:		
1. Description of non-compliance: NC against ETI NC against Local Law: NC against customer code: None Observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: (where relevant please add photo numbers) Not applicable	
Observation:		
Description of observation: None Observed	Objective evidence observed:	
Local law or ETI requirement: Not applicable	Not applicable	
Comments: Not applicable		
	_	
Good Examples observed:		
Description of Good Example (GE):	Objective Evidence	
None Observed	Observed: Not applicable	



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

(Click here to return to NC-table)

Additional Elements

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.
10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined

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

Current systems:

- 1. Based on the review of employee attendance records and employee's interview, the facility has not employed any foreign nationals.
- 2. Based on the review of employee personal files, all the employees are holding the legal rights to work.

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

Details:

Interaction with Management and Employees

Any other comments: None

Non–compliance:	
1. Description of non-compliance: NC against ETI NC against Local Law: NC against customer code: None Observed	Objective evidence observed: (where relevant please add photo numbers) Not applicable
Local law and/or ETI requirement: Not applicable	
Recommended corrective action: Not applicable	
Observation:	
Description of observation: None Observed Local law or ETI requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable



Good examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:
None Observed	Not applicable



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

(Click here to return to summary of findings)

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- 1. The facility has established and maintained environmental policy & Ms. Malarvizhi A HR & Admin is responsible for environmental aspects.
- 2. Based on management interaction, facility and their suppliers are aware of the environmental requirements.

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

Details:

- Facility Policy.
- Air Ambient, Illumination & Noise test conducted 31/08/2021.

Report reference: IDA-27613-01

- Stack monitoring test for Generator conducted on 31/08/2021.
- Interaction with management and employees.

Any other comments: None

Non-compliance: 01		
1. Description of non-compliance: NC against ETI NC against Local Law: NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)	
It was noted from facility tour that stack emission height found low for the installed 40 KVA diesel generator.	Based on facility tour Non-compliance photo	
Local Law requirement:	9	
In accordance with Environment Protection Law, Chapter XIII, the minimum		
height of stack provided with each Generator set can be worked out using the		
following formula:		
H = h + 0.2 (x) under root KVA		
H = Total height of stack in meter		
h = height of the building in meter where the generator set is installed.		
KVA = Total capacity of generator used in KVA		
Based on above formula the minimum stack height to be provided with		
different range of generator sets may be categorized as follows:		
For generator sets Total Height of stack in meter		
50 KVA height of building + 1.5 meter		

Date: 10/01/2022

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50-100 KVA height of building + 2 meter

150 – 200 KVA height of building + 2.5 meter and so on.

Recommended corrective action:

It is recommended the facility to ensure that stack height is above the building height as per law requirements.

Action by: Ms. Malarvizhi A - HR & Admin

Time Scale: 30 days

Verification Method: Desktop

Observation:	
Description of observation: None Observed	Objective evidence observed:
Local law or ETI/additional elements requirement: Not applicable	Not applicable
Comments: Not applicable	

Good examples observed:	
Description of Good Example (GE):	Objective Evidence
None Observed	Objective Evidence Observed: Not applicable

Other findings

Other Findings	Outside th	e Scone	of the Code
	Ouiside III	E OCODE	or life code

None Observed

Community Benefits

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

None Observed



Appendix 1

Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."

Not Applicable please x

NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.

Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.

protection.	
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
O.A. Guidance for Observations O.A. 1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers. O.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights O.A.3 Businesses shall identify their stakeholders and salient issues. O.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights. O.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation. O.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.	
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation
0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.	



O.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code. O.3 Suppliers are expected to communicate this Code to all employees. O.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain. ETI 1. Forced Labour	ETI 1. Forced Labour
1.1 There is no forced, bonded or involuntary prison labour. 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.	
ETI 2. Freedom of association and the right to collective bargaining are respected	ETI 2. Freedom of association and the right to collective bargaining are respected
2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities. 2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace. 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.	
ETI 3. Working conditions are safe and hygienic	ETI 3. Working conditions are safe and hygienic
3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers. 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.	



3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.	
ETI 4. Child labour shall not be used	ETI 4. Child labour shall not be used
 4.1 There shall be no new recruitment of child labour. 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child. 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions. 4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards. 	
ETI 5. Living wages are paid	ETI 5. Living wages are paid
5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income. 5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.	
ETI 6. Working Hours are not excessive	ETI 6. Working Hours are not excessive
 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards. 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. 	



- 6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where <u>all</u> of the following are met:
 - this is allowed by national law;
 - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
 - appropriate safeguards are taken to protect the workers' health and safety; and
 The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.

ETI 7. No discrimination is practised

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

ETI 8. Regular employment is provided

- 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour–only contracting, sub–contracting, or home–working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or

ETI 7. No discrimination is practised

ETI 8. Regular employment is provided



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



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

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

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

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



10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers. 10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented.



Photo Form

Non-compliance Photos



Illuminated type
 emergency sign board
 and Light not provided



2. Ear plug not worn



3. Needle guard tampered



4. Unhygienic toilet



5. Stain removal without any closure



6. Aisle marking faded



7. Fencing not provided



8. Inward opening door



9. Stack height low

Observation Photos		
NA	NA	NA



General Photos







Facility name board

Facility entrance

Facility overview







Security at entrance

First aid box

Notice board







Laws & Abstracts

Drinking water point

Suggestion box







Fabric Storage area

Cutting Section

Sewing section









Checking Section

Ironing Section

Packing Section & Finished Goods Storage Area







Sample section

Working hours displayed

Emergency contacts displayed







Fire buckets

Fire extinguisher

Fire hooter







Exit marking with Emergency light

Compressor

Evacuation plan board









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

You can leave feedback by following the appropriate link to our questionnaire:

Click here for Buyer (A) & Buyer/Supplier (A/B) members:

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5Iw_3d_3d

Click here for Supplier (B) members:

 $http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d$

Click here for Auditors:

https://www.surveymonkey.co.uk/r/BRTVCKP