



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: (only available on Sedex System)	ZC: 4555785	Sedex Site Reference: (only available on Sedex System)	ZS: 4646994	
Business name (Company name):	Chorka Textile Ltd.			
Site name:	Chorka Textile Ltd.			
Site address: (Please include full address)	Kazirchor, Dangabazar, Palash, Narshigndi.	Country:	Bangladesh	
Site contact and job title:	Md. Javed Hossain- Compliance Manager			
Site phone:	+88 01704158501	Site e-mail:	javed@chorkatextile.com	
SMETA Audit Pillars:	☒ Labour Standards	☒ Health & Safety (plus Environment 2-Pillar)	☐ Environment 4-pillar	☐ Business Ethics
Date of Audit:	08 December 2019			

Audit Company Name & Logo: ITS Labtest Bangladesh Ltd. 	Report Owner (payer): Chorka Textile Ltd.
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Audit Conducted By					
Affiliate Audit Company	☒	Purchaser	☐	Retailer	☐
Brand owner	☐	NGO	☐	Trade Union	☐
Multi-stakeholder	☐	Combined Audit (select all that apply)			

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): The audit duration took less time than expected as the support of facility management was very prompt, very transparent and no discrepancies found during the audit process.

Auditor Team (s) (please list all including all interviewers): Md. Kamrul Hasan (RA 21700579) Asst. Supervisor, Fatema Johora (RA 21703824) Auditor, Khadiza Parvin (ASCA 21701361) Auditor, Nusrat Hossain Trisha (ASCA 21704282) Auditor & Md. Mynul Hasan, (ASCA 21704283) Auditor.

Lead auditor: Md. Kamrul Hasan – Asst. Supervisor APSCA number: RA 21700579
Lead auditor APSCA status: In Good Standing

Team auditor: Fatema Johora – Auditor, Khadiza Parvin – Auditor, Nusrat Hossain Trisha – Auditor & Md. Mynul Hasan – Auditor
APSCA number: RA 21703824, ASCA 21701361, ASCA 21704282, ASCA 21704283

Interviewers: Md. Kamrul Hasan – Asst. Supervisor, Fatema Johora – Auditor, Khadiza Parvin – Auditor & Nusrat Hossain Trisha – Auditor
APSCA number: RA 21700579, RA 21703824, ASCA 21701361, ASCA 21704282

Report writer: Nusrat Hossain Trisha (Auditor)
Report reviewer: Shahida Akhtar (Senior Report Reviewer)

Date of declaration: 08 December 2019

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

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

Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) <i>Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			☐	☐				
0B Management systems and code implementation		☐	☐	☐				
1. Freely chosen Employment	☐	☐		☐				
2. Freedom of Association	☐	☐		☐				
3. Safety and Hygienic Conditions	☒	☒		☐	05			Non-Compliance: 1. Interconnected Smoke detection system was missing in dormitory. 2. Eye guard was found displaced in approximately 40% of over lock, kansai, bar tack and flat lock machine. 3. Aisles mark was faded in some production areas. 4. Some employees were not using face mask in sewing section & cutting section. 5. Sufficient first aid kits were not found in some of the first aid boxes.
4. Child Labour	☐	☐		☐				

5	<u>Living Wages and Benefits</u>	☐	☐		☐			03	1. Facility provides attendance bonus to the employee as per company policy. 2. Facility provides free transport facility to the employee as per company policy. 3. Facility provides subsidy lunch at BDT 15 per meal to the employee as per company policy.
6	<u>Working Hours</u>	☐	☐		☐				
7	<u>Discrimination</u>	☐	☐		☐				
8	<u>Regular Employment</u>	☒	☒	☐	☐	01			1. The information of Identity Card of few employees were not as per rule.
8A	<u>Sub-Contracting and Homeworking</u>		☐	☐	☐				
9	<u>Harsh or Inhumane Treatment</u>	☐	☐	☐	☐				
10A	<u>Entitlement to Work</u>		☐	☐	☐				
10B2	<u>Environment 2-Pillar</u>		☐	☐	☐				
10B4	<u>Environment 4-Pillar</u>		☐	☐	☐				
10C	<u>Business Ethics</u>		☐	☐	☐				
General observations and summary of the site:									
- The product manufactured at this site is Under Garments/ Lingerie. - Overall responsibility for meeting the standards is taken by Md. Javed Hossain- Compliance Manager.									

- Total 4838 employees are working in the facility, among them 4453 are production employees and 385 are non-production employees. Out of 4838 employees, 2322 are male and 2516 are female.
- All the employees are local (Bangladeshi).
- Site has completed SAQ.
- The youngest worker on site was 23-year-old.
- Facility has a Worker Participation committee. Participation committee member was present during the audit. Moreover, management informed that they would communicate the outcome of the audit to the workers through notice board and would discuss at next committee meeting.
- There is no union and collective bargaining at this factory. It is also not mandatory by Local Law.
- There is evidence of both male and female in management and among supervisors.
- Site has no peak season.
- Site uses no sub-contractors.
- Facility has all permanent employees.
- The general working hour of the facility is 8:00 am to 5:00 pm including one hour lunch break from 1:00 pm to 2:00 pm, 1.20 pm to 2.20 pm, 01:40 pm to 02:40 pm, 2:00 pm to 3:00 pm.
- Facility has one day weekly holiday on Friday.
- Standard working hours on site was in average 208 hours/month with 1 day off in every 7-day-period.
- Legal minimum pays (BDT 8000.00) was paid to all employees and facility provides minimum wage as per Bangladesh Government Gazette, 24th January 2019.
- Correct Overtime hours were paid; employees were paid 200% of minimum hourly wage for overtime.
- Employee's wages are calculated monthly. The payment method of the salary is 48% of the workers in Bank, rest of this is in Cash and the payment is paid within 7 working days of following month and the payment cycle is 1-30/31.
- Audit scope is 01 year (from December 2018 to November 2019).
- Audit sample is 80 according to the man power of the facility.
- 80 Records to show wages and hours were taken from November 2019 (Current paid month), June 2019 (Random Month) and January 2019 (Random Month)
- 80 employees were selected for interview including 38 male and 42 female employees; they were interviewed as 10 groups of 04 including some mixed groups and 40 employees were interviewed individually.

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

Site Details

Site Details		
A: Company Name:	Chorka Textile Ltd.	
B: Site name:	Chorka Textile Ltd.	
C: GPS location: (If available)	GPS Address: Kazirchor, Dangabazar, Palash, Narshigndi.	Latitude: 23°53'50.7"N Longitude: 90°34'26.6"E
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Trade License: Trade License No: 7/ 19-20, issued by Danga Union Parishad, which is valid till 30th June 2020. Fire License: Chorka Textile Ltd. Fire License No: DD/ Dhaka /23941/2013 issued by Bangladesh Fire Service & Civil Defense Authority which is valid till 30th June 2020. Chorka Textile Ltd. (Warehouse) Fire License No: DD/ Dhaka /24477/2013 issued by Bangladesh Fire Service & Civil Defense Authority which is valid till 30th June 2020. Factory license: 16688/ Narshingdi 'L' category, issued by Deputy Inspector General of Industries, (Govt. Of the People's Republic of Bangladesh), which is valid till 30th June 2020	
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Under Garments/ Lingerie	
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	Chorka Textile Ltd. is located at Kazirchor, Dangabazar, Palash, Narshigndi. The facility has started its operation in 2013. Total land area of the facility is 609840.11 Square feet, production area for the requested facility is 261993.62 Square feet and warehouse area is 48007 Square feet for the requested facility. The facility premises consist of only requested facility; no other sister concern or entity was found during audit. Total 4838 employees are working in the facility, among them 4453 are production employees and 385 are non-production employees. Out of 4838 employees, 2322 are male and 2516 are female. The facility premises consist of total 13 sheds & 02 Buildings. The facility is made up of steel structure. Details description provided as below:	

	Production Building /shed	Description	Remark, if any
	Shed 01	Floor 01: Sewing Section, Finishing Section, Iron Section, Finishing-quality Section, packing Section, Metal Free Room, Spot removing room, Receive Counter, and Accessories' Store.	None
	Shed 02	Floor 02: Sewing section, Spot removing Room, Production office, Inspection Room and Conference Room 1 & 2. Mezzanine floor: Office, Display Room, Inspection Room.	None
	Shed 03	Floor 03: Cutting Section, Sewing Section, Idle Machine Room, Maintenance Section, CAD Room, Male prayer Room and Female prayer Room.	None
	Shed 04	Facility shed 01: Dining room 01, Merchandising Office, Childcare Room, Doctor's Room, Accounts Section.	None
	Building 1 (WH & BRA)	Warehouse: Fabrics Store, Printing section, accessories store 1 and 2, Finished goods store, Fabrics inspection Room, Accessories inspection Room, warehouse Office. Production floor 4(1st floor): Bra Unit Sewing Section, Cutting Section, Finishing Section, and Sample Section (R&D).	None
	Shed 06	Substation: Electric powerhouse, Generator Room	None
	Shed 07	Compressor Room	None
	Shed 08	WTP (Water treatment plant)	None
	Shed 09	Common Service Shed: Mechanical and Stationary Store, Dry Canteen.	None
	Shed 10	Boiler Room	None
	Shed 11	Fire Control Room and Pump Room.	None
	Shed 12	Security post (Gate 01)	None
	Shed 13	Security post (Gate 02)	None

	Shed 14	Facility Shed 02: Administrative Office, Conference Room, Training Room, Dining Room 02.	None
	Building 2	New building (sewing, cutting, finishing, warehouse, moulding embroidery)	None
	Ground Floor	Warehouse: Finish Goods Store, moulding & embroidery section.	None
	Mezzanine Floor	Inspection Rooms, Lab & Conference Room	None
	1st Floor	Sewing Section, Production Office & Spot Removing Room and Needle Control Room	None
	2nd Floor	Cutting, Finishing, Iron & Packing	None
	3rd Floor	Production Office, Sewing Section, Needle Control Room	None
For below, please add any extra rows if appropriate. Visible structural integrity issues (large cracks) observed? ☐ Yes ☒ No Please give details: No such cracks were found during audit. Does the site have a structural engineer evaluation? ☒ Yes ☐ No Please give details: Site have a structural engineer evaluation.			
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)	Round the year same		
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Main products: Under Garments/ Lingerie Production process: Cutting- Sewing -Finishing- Packing Monthly production capacity: 6.5 million pieces Yearly production turnover: 60 million USD		

	Peak season: Round the year same Machines used: Single Needle M/C, Single Needle, Vertical M/C, Single Needle Chain Stitch, Two Needle M/C, Zig Zag M/C, Zig Zag M/C 1 Step, Zig Zag M/C Edge Cutter, Kansai, Picoting, Bartek M/C, Button Hole M/C, Eyelet Hole, Button Stitch M/C, Velcro Attach M/C, Over Lock M/C 3, Thread, Over Lock M/C 4 Thread Chemical used: Premium Rubber White, Aqua sole NK Fixer SF-120, Pigment, Eco Oxal Fixer, Florescent pigment, Aqua sole table glue, Solflex Aquadis, Accton, Pulimak, Oxygen Scavenger, Auto treat, Machine oil, Silicon oil, Hot melt adhesive, Vinyl-acetate ethylene-copolymer emulsion, Sodium hypochlorite, Diesel
J: What form of worker representation / union is there on site?	☐ Union (name) ☒ Worker Committee ☐ Other (specify) ☐ 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: 01 dormitory (140 people stay there) outside the boundary but attached. Approx. 2.89% of workers in off-site accommodation
N: Were all site-provided accommodation buildings included in this audit	☒ Yes ☐ No N1: If no, please give details

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 11:40 hrs. A2: Day 1 Time out: 18:10 hrs.	A3: Day 2 Time in: NA A4: Day 2 Time out: NA	A5: Day 3 Time in: NA A6: Day 3 Time out: NA
B: Number of auditor days used:	5.0 Man Days (05 Auditors in one 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: Window detail: 04 weeks ☐ Unannounced		
E: Was the Sedex SAQ available for review?	☒ Yes ☐ No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes ☒ No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Md. Javed Hossain- Compliance Manager		
H: Is further information available (if yes, please contact audit company for details)	☐ Yes ☒ No		
I: Previous audit date:	19 & 20 February 2018		
J: Previous audit type:	Periodic		
K: Were any previous audits reviewed for this audit	☐ Yes ☒ No ☐ N/A		

Audit attendance	Management	Worker Representatives	
	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 <i>(only complete if no worker reps present)</i>	Not applicable.		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	There is no trade union at this facility, and it is not mandated by law.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	2322	0	0	0	0	0	0	2322
Worker numbers – female	2516	0	0	0	0	0	0	2516
Total	4838	0	0	0	0	0	0	4838
Number of Workers interviewed – male	38	0	0	0	0	0	0	38
Number of Workers interviewed – female	42	0	0	0	0	0	0	42
Total – interviewed sample size	80	0	0	0	0	0	0	80

A: Nationality of Management	Bangladeshi	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i>	Nationalities: Bangladeshi B1: Nationality 1: __100%____ B2: Nationality 2: __None____ B3: Nationality 3: __None____	Was the list completed during peak season? ☐ Yes ☒ No If no, please describe how this may vary during peak periods: The facility did not have any peak season.
C: Please provide more information for the three most common nationalities.	C: approx. 100%____ % total workforce: Nationality __ Bangladeshi C1: approx % total workforce: Nationality 2 ____NA____ C2: approx % total workforce: Nationality 3 ____NA____	
D: Worker remuneration (management information)	D: __NA__% workers on piece rate D1: __NA__% hourly paid workers D2: __100__% salaried workers Payment cycle: D3: __NA__% daily paid D4: __NA__% weekly paid D5: __100__% monthly paid D6: __NA__% other D7: If other, please give details	

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)	10 groups of 04	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 19	D2: Female: 21
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	☒ Yes ☐ No If no, please give details	
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?	None.	
I: What did the workers like the most about working at this site?	Overtime is fully voluntary, Wages are paid on time, working condition is hygienic, Benefits are provided more than law requirement and management are very supportive and well behaved.	
J: Any additional comment(s) regarding interviews:	Most employees enjoyed working at this facility, they felt they had sufficient wage and had a good relationship with management in general.	
K: Attitude of workers to hours worked:	Very favourable as total working hour is within their limit and overtime is fully voluntary.	
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 process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk

The employees were generally positive about their work place; they got on well with workers and managers. They found management team positive and approachable.

The employees were assured of confidentiality and they spoke freely of their views of the factory. All employees said they were satisfied with their employment at the factory and they are provided wages as per their agreement. They felt free to leave this employer and understood the notice period required. The facility management treated them with respect.

Employees are able to complain directly to their welfare officer, compliance responsible person or line manager and also felt free to give their general concerns to their management representative.

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

Workers committee member interviews were conducted privately in a separate place. They replied naturally regarding their responsibilities as workers committee member and they also informed that they can easily carryout their daily job without any difficulties. Participation committee meeting are held on regular basis. They also stated that they could give suggestions on all parts of the site's practices).

O: Attitude of managers:

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

The facility management showed a positive attitude to this audit and during the whole audit process Md. Javed Hossain- Compliance Manager along with their team was present through the audit process and co-operated the whole audit. Facility management respected clients' requirement and allowed auditors to take photographs of all production process, best practices and also non-conformities. They also provided photocopy of required documents and allowed auditors to interact with the employees confidentially. At the closing meeting, the facility management agreed with all the findings and suggested corrective actions. The factory management had a system in place to check their current practices against their clients' requirements and the local law, and they took notice of the findings of the internal audit team and also have a Health & Safety committee to take care of health and safety concerns.

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:

- The responsible person for implementation and monitoring is Md. Javed Hossain- Compliance Manager. The facility has policy and procedures for human rights.
- The facility communicates this code of conduct to the employees through notice board and orientation training.
- It is communicated to all appropriate parties, including suppliers through the responsible person.

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

Details:

- Facility code of conduct.
- Written policies and procedure that being provided individually to employees.
- Management, employee training / meeting records.

Any other comments: None.

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

☒ Yes
☐ No

	A1: Please give details: (mainly applicable for the parent company): The facility has a social compliance policy which is a commitment to respect human rights.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	☒ Yes ☐ No Please give details: Name: Md. Javed Hossain Job Title: Compliance Manager
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	☒ Yes ☐ No C1: Please give details: The facility has an independent compliance team for reporting and dealing with human rights impact without fear and it is a completely transparent system.
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	☒ Yes ☐ No D1: If no, please give details
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	☒ Yes ☐ No E1: Please give details: The facility uses software for keeping privacy of workers information. Moreover, facility has an IT policy for data safety.

Findings		
Finding: Observation ☐ Company NC ☐ Description of observation: None Observed. Local law or ETI/Additional elements / customer specific requirement: Not Applicable. Comments: None		Objective evidence observed: None observed.

Good examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: None observed.

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: December-17 to November-18: 3.6 %	A2: This year: December-18 to November-19: 2.9 %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	October-19 to December-19: 2.73 %	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: December-17 to November-18: 4 %	C2: This year: December-18 to November-19: 3.6 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	September-18 to November-18: 3.8 %	September-19 to November-19: 3.35 %
E: Are accidents recorded?	☒ Yes ☐ No E1: Please describe: All the injuries are recorded in an injury register.	
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: December-17 to November-18: Number: 2.5 %	F2: This year: December-18 to November-19: Number: 1.2 %
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]	September- 18 to November-18: 0 %	September- 19 to November-19: 0 %
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: December-17 to November-18: 0 %	H2: This year: December-18 to November-19: 0 %
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0 % workers	I2: 12 months 0 % workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 0 % workers	J2: 12 months 0 % workers
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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:

- Responsibility for meeting the legal and client code requirements is taken by Md. Javed Hossain- Compliance Manager
- The facility communicates this Code to all employees by training as confirmed by training records and employee interviews.
- The ETI based code was posted on-site for employee's review.
- The facility had set up policy and pointed one staff to update labour law requirements.
- Implementation of any necessary changes is then given to the individual department heads after agreement with the facility manager.
- Social compliance policy statement appropriate for the nature of the facility's operation and aligned with the company's vision and an integral part of the company's strategy.
- Facility conducts periodic assessments of its social compliance system to identify improvement opportunities.
- The facility conducts orientation training for all new employees.

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

Details:

- Employee handbook.
- Facility Code of Conduct (COC).
- All policies of facility.
- Legal license (Factory, Fire, Trade)
- Internal audit records.
- Meeting records.
- Internal audit records
- Management, employee training / meeting records

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: The site has not been subject to any fines/prosecutions for non-compliance to any regulations in the last 12 months.
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: It was noted through documentation review that facility has policies and procedures for forced labour, child labour, discrimination, harassment & abuse.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Facility provides training on forced labour, child labour, discrimination, harassment & abuse on monthly basis to the management level employees. Moreover, no forced labour, child labour, discrimination, harassment & abuse was found during facility tour and employee interview.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	☒ Yes ☐ No D1: Please give details: Managers were provided training for forced labour, child labour, discrimination, harassment & abuse on Mid-level Management training. Last orientation training was held on 26 November 2019 with 26 participants and conducted by Sub-Assistant Manager.
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: Training records were found including picture and attendance sheet.
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: Facility has no such certifications.
G: Is there a Human Resources manager/department? If Yes, please detail.	☒ Yes ☐ No G1: Please give details: There is 14 members team in Human Resources department which is headed by Md. Javed Hossain- Compliance Manager.
H: Is there a senior person / manager responsible for implementation of the code	☒ Yes ☐ No

	H1: Please give details: Md. Javed Hossain- Compliance Manager
I: Is there a policy to ensure all worker information is confidential?	☒ Yes ☐ No I1: Please give details: The facility has an IT security policy which ensures worker information is confidential.
J: Is there an effective procedure to ensure confidential information is kept confidential?	☒ Yes ☐ No J1: Please give details: The facility has an effective key control procedure to keep the information confidential.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	☒ Yes ☐ No K1: Please give details: Facility conducts risk assessment on every six months which evaluates effectiveness of every policy and procedure department wise.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	☒ Yes ☐ No L1: Please give details: The facility has an internal system to raise the issue found in risk assessment and to implement the way of reducing it.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	☒ Yes ☐ No M1: Please give details: Facility has a supplier selection policy which ensures labour standard of its own supplier.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	☒ Yes ☐ No N1: Please give details: The facility has all the required licenses and permissions as per legal requirements.
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: the facility has anti-corruption committee, anti-bribery policy to support due diligence in applying 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:

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: The facility has ownership of the building maintaining all legal procedure and no expansion was conducted.
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: The facility maintaining all legal procedure and specific land acquisition were considered to avoid or minimize adverse impacts.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	☐ Yes ☒ No S1: Please give details: No illegal appropriation of land for facility building or expansion of footprint.

Non-compliance:

1. Description of non-compliance: ☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: None	Objective evidence observed: None observed
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Observation:

Description of observation: None observed. Local law or ETI requirement: Not applicable Comments: None.	Objective evidence observed: None observed.
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Good Examples observed:

Description of Good Example (GE): None observed.	Objective evidence observed: None observed.
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1: Freely Chosen Employment

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

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

- The facility has a policy which prohibits forced labour and this was also available for review.
- Age verification documents (National ID card copy, educational certificate, nationality certificates) were available in employee personal files.
- Service book is provided to every employee.
- Overtime is voluntary.
- The terms and conditions of employment state that the employees are free to leave the workplace outside of their working hours. Facility also has a written policy regarding this.
- Work tools, PPE, IC/staff card, training, etc. are provided without payment.
- The facility does not implement prison labour.
- The above was confirmed in management and employee interview.

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

Details:

- Facility policy and procedure
- Sample employee personal files.
- Service book
- Employee hand book

Any other comments: None

A: Is there any evidence of retention of original documents, e.g. passports/ID's	☐ Yes ☒ No If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	☐ Yes ☒ No If yes, please give details and category of workers affected:
C: Is there any evidence of retention of wages /deposits	☐ Yes ☒ No If yes, please give details and category of workers affected:

D: Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ☒ No Please describe finding: Facility has a policy mentioning Workers are free to terminate employment from the facility.
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there is a published 'modern day slavery statement.	☐ Yes ☐ No Please describe finding: ☒ Not applicable Yearly production turnover 60 Million USD
G: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	☐ Yes ☒ No Please describe finding: Not Applicable
H: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	☐ Yes ☐ No If yes, please give details and category of workers affected: Facility has established forced labour and bonded labour policy; even though they have no such type of labour. ☒ Not applicable
I: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	☐ Yes ☐ No Please describe finding: Not Applicable The facility has policy on forced/trafficked labour to raises awareness among employees. The facility communicates it through notice board on production floor. Overtime is totally voluntary. Employees can leave their workplace freely after their respective jobs.

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: None

Objective evidence observed:

None observed

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

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: None 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:

- All the employees are allowed to form or join the trade union of their own choice.
- There is no trade union in the facility but there is a participation committee formed by election.
- Participation committee was last formed by election on 24 November 2019.
- There are 22 members in participation committee, among them 15 are from employees and 07 are from management who arrange meeting in every two months interval as per legal requirement.
- PC members are not treated less favourably than other workers and are allowed to carry out their duties within working hours without affecting their remuneration.

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

Details:

- Freedom of association policy review.
- PC formation records
- PC member list
- PC meeting register
- PC meeting minutes
- PC meeting attendance register.

Any other comments: None

A: What form of worker representation/union is there on site?

- ☐ Union (name)
- ☒ Worker Committee
- ☐ Other (specify)
- ☐ None

B: Is it a legal requirement to have a union?

- ☐ Yes
- ☒ No

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 an effective grievance handling procedure. Workers can submit their grievance verbally or in written through welfare officer or complaint box. 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: Facility has a policy regarding Freedom of Association. The committee members are involved in the development part of the facility. Besides, facility conducts regular meeting with the members of Worker Committee (Participation Committee) and the meeting minutes were communicated with the workers through notice board.	
F: Name of union and union representative, if applicable:	Not applicable	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?	A participation committee consists of 22 members, where 15 members are employees and 07 are from the facility management	G1: Is there evidence of free elections? ☒ Yes ☐ No ☐ N/A
H: Are all workers aware of who their representatives are?	☒ Yes ☐ No	H1: Participation committee members name with picture are posted in the notice board.
I: Were worker representatives freely elected?	☒ Yes ☐ No	I1: Date of last election: 24 November 2019
J: Do workers know what topics can be raised with their representatives?	☒ Yes ☐ No	J1: Meeting minutes are posted on notice board.
K: Were worker representatives/ union representatives interviewed?	☒ Yes ☐ No If Yes , please state how many: 02	
L: Please describe any evidence that union/worker's committee is effective?	The election of the participation committee held on 24 November 2019. Each meeting of participation committee will conduct with two-month interval as per Bangladesh local law, in consequence,	

Specify date of last meeting; topics covered; how minutes were communicated etc.	Last meeting was happened on 07 December 2019, wherein the agenda were- 1. Safety committee has been formed with the opinion of PC committee member. 2. Others.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ☒ No	
If Yes , what percentage by trade Union/worker representation	M1: ____% workers covered by Union CBA Not applicable	M2: ____% workers covered by worker rep CBA Not applicable
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/Additional Elements ☐ NC against Local Law ☐ NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: None	Objective evidence observed: None observed

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

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: 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

- Md. Javed Hossain- Compliance Manager looks after Health & Safety issues for the site.
- Potable water was freely available in all areas.
- Sufficient clean toilets segregated by gender were available at all times for workers.
- Ventilation, temperature and lighting were adequate for the production processes.
- Minutes of meetings show that there are monthly H&S committee held.

2. Fire Safety

- There are 02 or more exit in each room.
- Firefighting equipment was adequate and checks were up-to-date. Facility checked all fire equipment monthly schedules wise.
- The facility management posted the evacuation plans on every production floors/ shed with local language.
- Public Address system, fire hose and fire alarm found active throughout the facility.
- Facility installed addressable smoke detection system in the production building.
- Facility has one responsible Fire Safety Officer.
- Facility has a firefighting team of 1080 members, all of them are trained by Fire Service & Civil Defence authority. Among them 20 members are trained by BGMEA & 2464 employees had internal training from facility management as well.

Fire drill Information:

Last fire drill	Date	Announced /Unannounced	Time took	Employee was present	Fire drill monitored by
Day (internal)	18.11.2019	Unannounced	01 min 35 Sec	1459	Fire safety officer

Night (internal)	04.12.2019	Unannounced	2 min 30 sec	4197	Fire safety officer and Sr. Station officer of FS&CD
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Total fire equipment's were mentioned in below:

Fire Equipment name		Total	Fire Equipment name	Total
Fire extinguisher	CO ₂	206	Fire Blanket	55
	DCP	393	Bitter	140
	Foam (10 Ltr)	22	Sand & water bucket	129
Emergency Light		567	Fire Hook	140
Smoke detector		1351	Manual Call Point	96
Gas mask		120	Hand Gloves	78
Lock cutter		17	Stretcher	29
Helmet		150	Public Address system	01 Set
Water drum		30	Fire alarm with visual	107
Fire hose reel		69		

3. Electrical, Machine & fire safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- Facility has 08 certified electricians who check and do inspection, roster wise for whole facility.
- Facility checks all electric channels, electrical distribution board and electric connection daily and monthly schedule wise.

Electrical equipment checking information:

(Name) Inspection record	Last inspection date	Done by (designation)	Frequency of inspection
DB/SDB/MDB	02 December 2019	Asst. Engineer	As required
Machine maintenance	20 November 2019	Mechanic	As required
Generator Maintenance	24 October 2019	Asst. Operation engineer	As required
Compressor Maintenance	08 October 2019	Compressor operator	As required
Boiler Maintenance	01 December 2019	Boiler Operator	As required

4. Chemical safety

- Facility does not use any hazardous chemical for their production process.
- Material Safety Data Sheets and labelling were found for all chemicals

5. Medical services

- There were 50 first aid boxes.
- There were 332 internal first aid certified responders.
- Facility has appointed 02 doctors who sit in the facility six days in a week, 01 sister and 04 assistants who are available all the time. They also arranged monthly first aid training with first aider.
- In the medical room they have more than 02 beds segregated for male and female.

6. Dormitory

01 dormitory (140 people stay there) outside the boundary but attached. Approx. 2.89% of workers in off-site accommodation.

7. Facility provide bellow training to employees:

Training Type	Last Date of training	Participant	Trainer Designation	Frequency of training
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Orientation Training to factory rules	26.11.2019	26	Sub-Assistant Manager	Every 02 Month
Fire Fighting Training (Internal)	14.11.2019	20	Fire Safety Officer	Every 02 Month
Fire Fighting Training (External)	08.12.2019	40	Senior Station Officer (FS&CD)	As per requirement
First Aid Training	14.11.2019	27	Medical Officer	Every 02 Month
PPE Training	10.11.2019	30	Welfare Officer	Every 02 Month
Mid-level management Training	30.11.2019	26	Manager, Compliance	Every 02 Month
Health & Safety Training	16.11.2019	26	Medical Officer	Every 02 Month
Chemical Handling Procedure Training	18.11.2019	20	Manager, Compliance	Every 02 Month
Electrical Safety Training	20.11.2019	34	Manager, Compliance	Every 02 Month

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

Details:

- License review: Fire license
- Building approval plan
- Group insurance
- Water test report
- Injury record and analysis report
- Machine and electric maintenance record
- Risk assessment report
- Training record: Fire training, First aid training, PPE training, MSDS training, Health and safety training
- Fire drill record
- Health and safety committee record
- Electric installation checking record
- Training records and certificates
- Fire equipment maintenance records
- Fire drill records
- Accident reports
- Chemical list and MSDS for each chemical
- Health and safety policy
- Potable water testing certificates

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

Details: The facility has general health & safety and Occupational health & safety policy and procedures which are fit for purposes and these policies are communicated through orientation training.

B: Are the policies included in workers' manuals?	☒ Yes ☐ No Details: The facility provide workers manual to the workers where all the policies and applicable govt. law are included.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	☐ Yes ☒ No Details: No additional structures were found with building construction approval.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	☒ Yes ☐ No Details: All the visitors to the site are informed on H&S and provided with personal protective equipment where necessary.
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 Please give details: The facility has medical facility for the employees. Equipment's are provided as per legal requirements.
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	☒ Yes ☐ No Please give details: The facility has 02 Doctors, 1 Sister and 04 Assistants for medical treatment of the employees.
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 Please give details: Facility provides free transport facility to the employee as per company policy.
H: Is secure personal storage space provided for workers in their living space and is it fit for purpose?	☒ Yes ☐ No Details: The facility provides personal storage space for all the employees and they are fit for purposes.
I: Are H&S Risk assessments 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 Details: The facility conduct risk assessment on every six month and people are in control to reduce identified risk.

J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	☒ Yes ☐ No Please describe: The facility management has conducted noise and air quality assessment as required by law. The assessments were done by ITS Labtest Bangladesh Ltd. on 03 February 2019.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	☒ Yes ☐ No Please describe: The facility meets all legal obligations on environmental requirements including required permits for use and disposal of natural resources like gas, water etc.

Non-compliance:	
01. Description of non-compliance: ☒ NC against ETI ☒ NC against Local Law ☐ NC against customer code: It was noted through facility visit and management interview that interconnected Smoke Detection system was missing in dormitory (140 employees were living in that dormitory) shed. Note that facility installed manual call point in the dormitory. Local law and/or ETI requirement Working condition 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. Bangladesh National Building Code 2006, Part 4, Section 4.4: The installation of automatic fire and smoke detection system shall be a necessity when the size, arrangement and occupancy of a building become such that a fire itself cannot provide adequate warning to its occupants. Recommended corrective action: It is recommended that facility should install interconnected fire detection system to the mentioned area. Verification Method: Desktop Action By: Md. Javed Hossain- Compliance Manager Timescale: 30 Days 02. Description of non-compliance: ☒ NC against ETI ☒ NC against Local Law ☐ NC against customer code:	Objective evidence observed: 01. Through Site Tour

It was noted through facility visit that, eye guard was found displaced with approximately 40% of over lock, kansai, bar tack and flat lock machine in sewing section located at 1st & 3rd floor of building-02, ground floor of shed-03 & 1st floor of building-01.

Local law and/or ETI requirement

Working condition 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.

Bangladesh Labour Law 2006, Section 63(1) D (3):

Every dangerous part of any machinery:

Provided that, for the purpose of determining whether any part of machinery is safe as aforesaid, account shall not be taken of any occasion when it being necessary to make an examination of the machinery while it is in motion, such examination or operation is made or carried in accordance with the provisions of section 64.

Recommended corrective action:

It is recommended that the facility should ensure the usage of machine safety guards for mentioned area.

Verification Method: Desktop

Action By: Md. Javed Hossain- Compliance Manager

Timescale: 30 Days

03.Description of non-compliance:

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

It was noted through facility visit and management representative interview that 04 out of 05 aisles in Finishing section located at 2nd floor of building-02, were faded.

Local law and/or ETI requirement

Working condition 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.

Bangladesh Labour law 2006, Section 62(4):

In every establishment every window, or other exit affording means of escape in case of fire, other than the means of exit in ordinary use, shall be distinctively marked in Bangla and in red letters of adequate size or by some other effective and clearly understood sign.

Recommended corrective action:

02. Through Site Tour
NC Photo- 01

03. Through Site
Tour,
management
interview
NC Photo- 02

It is recommended that facility should ensure visible aisles marking in the mention area.

Verification Method: Desktop

Action By: Md. Javed Hossain- Compliance Manager

Timescale: 30 Days

04. Description of non-compliance:

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

It was noted through facility visit that personal protective equipment were not used in the following areas-

- Around 40% overlock machine operator were not using face mask in sewing section at 1st and 3rd floor of building-02 and sewing section shed-02 & 03.
- Around 10% employee of cutting section were not using face mask in cutting section at 1st floor of building-01.

Local law and/or ETI requirement

Working condition 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.

Bangladesh Labor Rules, 2015 Rule 67 (2):

In addition to the arrangement of safety and health protection measures mentioned in Sub-section (1), the concerned manufacturing institute must provide necessary equipment, including safety shoes, helmets, goggles, masks, hand gloves, ear muffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage.

Recommended corrective action:

It is recommended that the facility should ensure using personal protective equipment (PPE) for all the employees.

Verification Method: Desktop

Action By: Md. Javed Hossain- Compliance Manager

Timescale: 30 Days

05. Description of non-compliance:

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

It was noted through facility tour and management interview that sufficient first aid kits were not found in the randomly checked 03 out of 04 first aid boxes in 3rd, 2nd and 1st floor of building -02 and 03 out of 05 first aid box in the shed-03. Such as 1 bottle of rectified spirit, 3 packs of oral saline, analgesic, Tunicate, Eye drop and antacid type of tablets etc were missing in the first aid box.

Local law and/or ETI requirement

Working condition are safe and hygienic: 3.1:

04. Through Facility Tour
NC Photo- 03

05. Through Facility tour
NC Photo-04

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.

Bangladesh Labour Rules 2015, Section- 76(2):

If the number of workers/employees is not more than 10 in the concerned institute, department, section and floor where mechanical power is used or if the number of workers/employees is not more than 50 in the workplace where mechanical power is not used, the following equipments must be each cupboard or almirah of those workplaces: a) 6 small sterile bandages; b) 3 packets of disinfected cotton, weighing 0.5 ounce each; c) 3 medium sized disinfected bandages; d) 3 large sized sterile bandages; e) 3 large sized sterile bandages that are used in case of burns; f) 1 bottle of Hibisol or Hexasol, weighing 1 ounce; g) 1 bottle of rectified Spirit, weighing 1 ounce; h) 1 pair of scissors; i) 1 copy of leaflet regarding primary aid; j) Analgesic and antacid type of tablets, ointments used for burnt parts, ointments for eyes and antiseptic solution appropriate for surgery and k) 3 packs of edible saline.

Recommended corrective action:

It is recommended that facility management should provide sufficient first aid kits as per rules.

Verification Method: Desktop

Action By: Md. Javed Hossain- Compliance Manager

Timescale: 30 Days

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Recommended corrective action: None

Objective evidence observed:

None observed

Good Examples observed:

Description of Good Example (GE): None observed

Objective Evidence Observed:

None observed

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:

- The facility has established a practice that they will never employ and use any child labour.
- The facility verifies all workers' original national ID card, birth certificate, school certificate etc. at the time of recruitment and keeps the photocopies of workers' ID cards, birth certificate in their personal files.
- Factory verifies the workers age through registered doctors.
- Sampling basis employees' personal files were taken for review. Each employee file included a bio-data sheet, recent photo, birth registration certificate / photo copied national identification card and other documents.
- There was no child or young employee observed in the facility.

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

Details:

- Recruitment policy.
- Policy on No-Child labour.
- Personal file including Birth certificate, primary/secondary education certificate, National ID card, etc. of sample employees.
- Age verification documents.

Any other comments: None

A: Legal age of employment:	18 year
B: Age of youngest worker found:	23 year
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 If yes, please give details: Not applicable

Non-compliance:	
1. Description of non-compliance: ☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: None	Objective evidence observed: None observed

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

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: None observed

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:

- The facility is providing local legal minimum wage BDT 8000/month for all the employees.
- Time keeping system is Electronic (Finger Punch).
- All workers are 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.
- Benefits of paid, annual leave; maternity benefit to appropriate workers.
- All social insurance payments were passed on to the relevant authorities in a timely manner.
- All employees were paid on 07 working days of each month, 48% of the workers in Bank, rest of this is in Cash
- Each employee was given a pay slip and signed for their wages.
- Employees are aware of their minimum wage.
- Wages have been recorded according to documents checked.
- There are some good practices by the facility; see below GE section.
- Salary sheet and time card review: December 2018 – November 2019.

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

Details:

- Salary sheet review
- Overtime payment record review
- Payslip review
- Attendance register review
- Production record review
- Maintenance register review
- Maternity benefit register review
- Leave record review
- Final settlement record review

Any other comments: None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: None

Objective evidence observed:

None observed

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: None

Objective evidence observed:

None observed

Good Examples observed:

Description of Good Example (GE):

1. Facility provides attendance bonus to the employee as per company policy.
2. Facility provides free transport facility to the employee as per company policy.
3. Facility provides subsidy lunch at BDT 15 per meal to the employee as per company policy.

Objective Evidence Observed:

Documents review, management and employees' interview

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: 08 hours per day 48 hours per week 208 hours per month	A1: 08 hours per day 48 hours per week 208 hours per month (For all sample months)	A2: ☐ Yes ☒ No (Not mandatory by Local Law)
B: Overtime hours:	Legal maximum: 04 hours per day	B1:	B2:

(Maximum legal and actual overtime hours, please state if possible per day, week, and month)	24 hours per week 104 hours per month (With legal waiver of 02 hours per day)	-2 hours/day, 12 hours/week, 54 hours/month in November 2019 (Current paid Month) -2 hours/day, 12 hours/week, 38 hours/month in June 2019 (Random Month) -2 hours/day, 12 hours/week, 48 hours/month in January 2019 (Random Month)	☐ Yes ☒ No (Not mandatory by Local Law)
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: BDT 8000.00 per month	C1: BDT 8000 in the month of November 2019 (From sample employees)	C2: ☐ Yes ☒ No (Not mandatory by Local Law)
D: overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: Per hour 200% of basic hourly rate	D1: Per hour 200% of basic hourly rate	D2: ☐ Yes ☒ No (Not mandatory by Local Law)

Wages analysis:

Wages analysis: <i>(Click here to return to Key Information)</i>	
A: Were accurate records shown at the first request?	☒ Yes ☐ No
If No , why not?	Not applicable
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)	80 samples from November 2019 (Currently Paid Month), 80 samples from June 2019 (Random Month) 80 samples from January 2019 (Random Month)

and Measurement Criteria)																																																																	
C: Are there different legal minimum wage grades? If Yes , please specify all.	☒ Yes ☐ No	C1: If Yes, please give details: The Government announced pay structure on 24th January 2019 for the workers of the Garments Industries with effect from December 2018. <table border="1"> <thead> <tr> <th>Grades</th> <th>Basic wage (BDT)</th> <th>House rent (50% × basic) (BDT)</th> <th>Meal (BDT)</th> <th>Medical (BDT)</th> <th>Travel (BDT)</th> <th>Gross monthly wage (BDT)</th> </tr> </thead> <tbody> <tr> <td>Grade 1</td> <td>10938</td> <td>5469</td> <td>900</td> <td>600</td> <td>350</td> <td>18257</td> </tr> <tr> <td>Grade 2</td> <td>9044</td> <td>5422</td> <td>900</td> <td>600</td> <td>350</td> <td>15416</td> </tr> <tr> <td>Grade 3</td> <td>5330</td> <td>2665</td> <td>900</td> <td>600</td> <td>350</td> <td>9845</td> </tr> <tr> <td>Grade 4</td> <td>4998</td> <td>2499</td> <td>900</td> <td>600</td> <td>350</td> <td>9347</td> </tr> <tr> <td>Grade 5</td> <td>4683</td> <td>2342</td> <td>900</td> <td>600</td> <td>350</td> <td>8875</td> </tr> <tr> <td>Grade 6</td> <td>4380</td> <td>2190</td> <td>900</td> <td>600</td> <td>350</td> <td>8420</td> </tr> <tr> <td>Grade 7</td> <td>4100</td> <td>2050</td> <td>900</td> <td>600</td> <td>350</td> <td>8000</td> </tr> <tr> <td>Apprentice</td> <td>2750</td> <td>1375</td> <td>900</td> <td>600</td> <td>350</td> <td>5975</td> </tr> </tbody> </table>	Grades	Basic wage (BDT)	House rent (50% × basic) (BDT)	Meal (BDT)	Medical (BDT)	Travel (BDT)	Gross monthly wage (BDT)	Grade 1	10938	5469	900	600	350	18257	Grade 2	9044	5422	900	600	350	15416	Grade 3	5330	2665	900	600	350	9845	Grade 4	4998	2499	900	600	350	9347	Grade 5	4683	2342	900	600	350	8875	Grade 6	4380	2190	900	600	350	8420	Grade 7	4100	2050	900	600	350	8000	Apprentice	2750	1375	900	600	350	5975
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Grade 7	4100	2050	900	600	350	8000																																																											
Apprentice	2750	1375	900	600	350	5975																																																											
D: If there are different legal minimum grades, are all workers graded and paid correctly?	☒ Yes ☐ No ☐ N/A	D1: If No , please give details:																																																															
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	☐ Below legal min ☒ Meet ☒ Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> Lowest gross salary is 8000.00 BDT In the Month of November 2019. This is minimum legal wage.																																																															
F: Please indicate the breakdown of workforce per earnings:		F1: 0 % of workforce earning under min wage F2: 20 % of workforce earning min wage F3: 80 % of workforce earning above min wage																																																															
F: Bonus scheme found: Please specify details:		Bonus Scheme found: <i>Note: full time employees and please state hour / week / month etc.</i> Facility management provides attendance bonus as per company policy.																																																															
H: What deductions are required by law e.g. social insurance? Please state all types:		As per section 125 of the Bangladesh Labour Law, 2006, facility may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc. As per Bangladesh Stamp Act 1899 (Amendment 2010) factory may deduct BDT 10 for Government Revenue Stamp.																																																															

I: Have these deductions been made? Please list all deductions that have/have not been made.	☒ Yes ☐ No	Please list all deductions that have been made.	1. Deduction is only made for un-authorized absent 2. Advance payments,		
		Please list all deductions that have not been made.	1. Housing facility, 2. Loans, 3. Income tax, 3. Fines, 4. Provident fund which is done as per law. etc.		
J: Were appropriate records available to verify hours of work and wages?	☒ Yes ☐ No				
K: Were any inconsistencies found? (if yes describe nature)	☐ Yes ☒ No	K1: Type ☐ Poor record keeping ☐ Isolated incident ☐ Repeated occurrence:			
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	☒ Yes ☐ No L1: Please give details: The facility shows all real records which reflect all scenarios.				
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info:</i> <i>Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	☐ Yes ☒ No M1: Please specify amount/time: Facility did not define living wages as it is not required by law. However, facility is providing the minimum wage as per published Government Minimum Wages on 24th January 2019.				
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: Not applicable				

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 ☒ No N1: Please give details: There are no periodic reviews of wages.
O: Are workers paid in a timely manner in line with local law?	☒ Yes ☐ No All employees are paid within 07 working day of the following month.
P: Is there evidence that equal rates are being paid for equal work:	☒ Yes ☐ No P1: Please give details: Through payroll records review and employee's interviews' interview, it was confirmed that equal rates are being paid for equal work.
Q: How are workers paid:	☒ Cash ☐ Cheque ☒ Bank Transfer ☐ Other Q1: If other, please explain: Workers are paid 48% of the workers in Bank, rest of this is in Cash

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where **all** of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined

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

Current systems:

- Through employees' interview, overtime is voluntary.
- Time keeping system is Electronic Finger Print
- All overtime is compensated at a premium rate for all employees.
- Facility holiday is Friday
- Salary sheet and time card review: December 2018 – November 2019

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

Details:

- Employees' interviews
- Management interview
- Local laws
- Facility policy on working hours

- Salary sheet
- Payslip
- Job card
- Attendance register
- Production record
- Quality and production records to cross check hours

Any other comments: None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: None

Objective evidence observed:

None observed

Observation:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: None

Objective evidence observed:

None observed

Good Examples observed:

Description of Good Example (GE): None observed

Objective evidence observed:

None observed

Working hours' analysis

Please include time e.g. hour/week/month

[\(Go back to Key information\)](#)

Systems & Processes

A. What timekeeping systems are used: time card etc.

Describe: Electronic Finger Print

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:	
D: Are there any other types of contracts/employment agreements used?	☐ Yes ☒ No	D1: If YES, please complete as appropriate:	
		☐ 0 hrs	☐ 0 hrs
		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: Not applicable	
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:	F3: Is this allowed by local law? ☒ Yes ☐ No	
	Maximum number of days worked without a day off (in sample):		
	06 Days		
Standard/Contracted Hours worked			
G: Were standard working hours over 48 hours per week found?	☐ Yes ☒ No	G1: If yes, % of workers & frequency:	
		Not applicable	
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	☒ Yes ☐ No	H1: If yes, please give details:	
		As per Circular from Bangladesh Labour and Circular dated 14 October 2019 from labour ministry: Facility can do 04 (Four) hours overtime in a day with the consent of the employees up to 06 (Six) months starting from 17 October 2019 to 16 April 2020.	

		•OT should be paid at the rate of 200% of regular WH. •Overtime should be voluntary. •Weekly day off to be ensured. •BLR 2006, Amendment 2018 and BLR 2015 should be followed.
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 2 hours/day, 12 hours/week, 54 hours/month in November 2019 (Current paid Month) -2 hours/day, 12 hours/week, 38 hours/month in June 2019 (Random Month) -2 hours/day, 12 hours/week, 48 hours/month in January 2019 (Random Month)	
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:	05 %	
L: Is overtime voluntary?	☒ Yes ☐ No ☐ Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Based on employees' interviews, employee can do overtime as per their willingness and it's not mandatory. Facility management never forces employees to do overtime.
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 standard wages: 200% of Standard wages.
N: Is overtime paid at a premium?	☒ Yes ☐ No	N1: If yes, please describe % of workers & frequency: Overtime payments for employees are as per legal requirement

O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	☐ No ☐ Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) ☐ Collective Bargaining agreements ☐ Other 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 complete the boxes where relevant.	☐ 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) 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: Not Applicable
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:

- 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.
- Gender discrimination was also absent in the facility; both female and male workers were distributed in all types of work.
- There was no evidence of sexual harassment.
- There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
- The factory provides the same wage amount to male/ female employees of the same rank.
- There is no restriction for formation of trade union in the factory.

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

Details:

- Policy of Anti-Discrimination.
- Recruitment policy.
- Training record.
- Termination records.
- Female employee rights

Any other comments: None.

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: _47___ % A2: Female _53___ %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	0 No such women is present in this facility.

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: No such evidence found.
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Professional Development	
A: What type of training and development are available for workers?	Orientation Training First Aid Training PPE Training Chemical Handling Training Fire Fighting Training Health & Safety training Mid-level management Training Aids/HIV Training etc.

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	☒ Yes ☐ No If no, please give details:
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Non-compliance:	
1. Description of non-compliance: ☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: None	Objective evidence observed: None observed

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

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed:

	None observed
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8: Regular Employment Is Provided

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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:

- All employees were recruited by the factory directly.
- No labour agency was used to hire workers. No temporary worker, apprenticeship schemes or home worker was identified by the auditors.
- No subcontractors were used.
- All employees are getting signed labour contract and ID card during their recruitment.
- Facility maintains service books for all employees.

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

Details:

- Recruitment policy.
- Employees personal file.
- Appointment letter.
- Employee service book.
- New employee joining register.

Any other comments: None.

Non-compliance:	
01. Description of non-compliance: ☒ NC against ETI ☒ NC against Local Law ☐ NC against customer code: It was noted through employee's ID card review and management interview that facility issued ID card to the employees but the information of Identity Card of 30% employee was not as per rule. Few required information / criteria were missing & not mentioned in the employee's ID card like national ID, blood group and emergency contact no. Local law and/or ETI requirement 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. Bangladesh Labor Rules 2015, Section 19(5): Each owner will provide identity card with the photograph to each worker working in the firm at the costs of the owner as per Form-6. Recommended corrective action: It is recommended that facility should update all the ID cards as per rules. Verification Method: Desktop Action By: Md. Javed Hossain- Compliance Manager Timescale: 30 Days	Objective evidence observed: 01. Through Site Tour NC Photo- 05

Observation:	
Description of observation: None observed. Local law or ETI requirement: Not applicable. Comments: None.	Objective evidence observed: None observed.

Good Examples observed:	
Description of Good Example (GE): None observed.	Objective Evidence Observed: None observed.

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?	☒ Terms & Conditions presented ☒ Understood by workers ☒ Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:

B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	☐ Yes ☒ No B1: If yes, please describe details and specific category(ies) of workers affected:
C: If yes, check all that apply:	☐ Recruitment / hiring fees ☐ 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 transport costs between work place and home ☐ 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 – C1: If other, please give details: Not applicable.
D: If any checked, give details:	Not applicable.

Migrant Workers: <i>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</i>			
A: Type of work undertaken by migrant workers:	There are no migrant workers in the facility.		
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: Not Applicable. 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?	<table border="1"> <tr> <td> ☐ Yes ☐ No C1: Please describe finding: </td> <td> ☐ Yes ☐ No C1: Please describe finding: </td> </tr> </table>	☐ Yes ☐ No C1: Please describe finding:	☐ Yes ☐ No C1: Please describe finding:
☐ Yes ☐ No C1: Please describe finding:	☐ Yes ☐ No C1: Please describe finding:		
D: Are Any migrant workers in skilled, technical, or management roles <i>Migrant Workers (this should include all migrant workers including permanent</i>	☐ Yes ☐ No D1: If yes number and example of roles: Not Applicable.		

workers, temporary and/or seasonal workers)

NON-EMPLOYEE WORKERS

Recruitment Fees:

A: Are there any fees?

- ☐ Yes
☒ No

B: If yes, check all that apply:

- ☐ Recruitment / hiring fees
☐ 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 transport costs between work place and home
☐ 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 – please give details

B1 - Not applicable, no fees required

C: If any checked, give details:

Not applicable, no fees required

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: There is no agency worker in the facility.
And 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, site does not use agencies.

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, site does not use agencies.
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Contractors: <i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	☐ Yes ☒ No A1: If yes, how many contractors are present, please give details:
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:
D: If Yes, please give evidence for contractor workers being paid per law:	Not applicable

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:

- No Sub-contracting and Home-working was used by this facility.

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

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

Not applicable

Details:

- Shipment record
- Goods in and out register
- Production record
- Goods in and out gate pass / records

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: None

Objective evidence observed:

None observed

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Objective evidence observed:

None observed

Comments: None	
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Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: None observed

Summary 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 A1: Please describe:
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	☐ Yes ☐ No B1: If Yes , summarise details:
C: Number of sub-contractors/agents used:	
D: Is there a site policy on sub-contracting?	☐ Yes ☐ No D1: If Yes , summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	

Summary of homeworking – if applicable			
☒ 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:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	☐ Directly ☐ Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	☐ Yes ☐ No		

E: How does the site ensure worker hours and pay meet local laws for homeworkers?	
F: What processes are carried out by homeworkers?	
G: Do any contracts exist for homeworkers?	☐ Yes ☐ No G1: Please give details:
H: Are full records of homeworkers available at the site?	☐ Yes ☐ No

9: No Harsh or Inhumane Treatment is Allowed

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

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	☒ Yes ☐ No A1: Please describe: Facility has an open channel for reporting any violations of labour standard which is posted in the notice board. The facility has a designated channel to conduct grievance handling procedure.
B: If Yes , are workers aware of these channels and have access? Please give details.	All the workers are aware of these channels and have full access to these channels. Facility also has a grievance handling procedure posted with every complaint box.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Facility has posted hotline & provided grievance box in wash room.
D: Which of the following groups is there a grievance mechanism in place for?	☒ Workers ☐ Communities ☐ Suppliers ☐ Other D1: Please give details: Employee can place their grievance verbally or in written. Employee can also keep their identity confidential if required.
E: Are there any open disputes?	☐ Yes ☒ No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	☒ Yes ☐ No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	☒ Yes ☐ No G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	☒ Yes ☐ No H1: If no, please give details

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

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:

- The facility has established anti-harassment or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- Through the factory management and employees' interviews, it was noted that no physical abuse happened in the factory.
- There is an internal process for grievance, which is through grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, any received complaint will be handled by management, without any reprisal for the worker in question.

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

Details:

- Anti-Harassment policy
- Grievance box open register
- Orientation training record

Any other comments: None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: None

Objective evidence observed:

None observed

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: None

Objective evidence observed:

None observed

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: None observed

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

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

Additional Elements

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

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

Current Systems and Evidence Examined

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

Current systems:

- Only employees with a legal right to work shall be employed or used by the factory.
- The youngest age was 23 years old.

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

Details:

- Factory recruitment policy.
- Employees personal file.

Any other comments: None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: None

Objective evidence observed:

None observed

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: None

Objective evidence observed:

None observed

Good examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: None observed

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The facility prepared an environmental policy and procedure.
- The facility disposes all solid waste in a segregated area with proper level and identification.
- The facility also provides awareness training to all related personnel.
- Solid waste has been handover to licensee vendor as per local legislation who recycled that wastage.
- Facility conduct air emission and noise level test 03 February 2019 from ITS Labtest Bangladesh Ltd.

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

Details:

- Environment policy
- Wastage management policy.
- Air emission and noise level test reports
- Environmental clearance certificate

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: None

Objective evidence observed:

(where relevant please add photo numbers)

None Observed

Observation:

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Objective evidence observed:

None Observed

Comments: None	
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Good examples observed:	
Description of Good Example (GE): None Observed	Objective evidence observed: None Observed

Other findings

Other Findings Outside the Scope of the Code
None observed

Community Benefits <i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
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.
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
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.	
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.	

0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code. 0.3 Suppliers are expected to communicate this Code to all employees. 0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.	
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.	

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay. 6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below. 6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met: – this is allowed by national law; – this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; – appropriate safeguards are taken to protect the workers' health and safety; and – The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies. 6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.	
ETI 7. No discrimination is practised	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	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	

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

Photo Form

General Site Tour Photos:

		
Facility Name Plate	Lateral View of the Building	Security Check Post
		
Assembly Area	Accessories Store	Fabrics Store
		
Finished Goods Store	Cutting Section	Sewing Section



Ironing Section



Finishing Section



Packing Section



Printing Area



Eye Wash Station



Dining Area



Canteen



Public Address System



Toilet Area

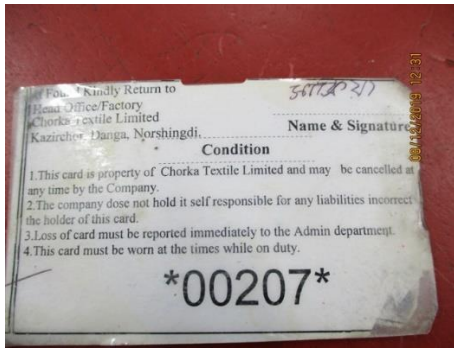
		
Grievance Box	Hose Pipe Cabinet	Emergency Light
		
Fog Light	Fire Call Point	Fire Alarm
		
Exhaust Fan	Smoke Detector	Fire Extinguishers

		
Attendance Reording Machine	Personal Locker	Exit Sign
		
Fire Fighter	First Aider	No Smoking Sign
		
Drinking Water Station	Fire Fighting Equipment	Evacuation Plan

		
Gong Bell	Chemical Store	First Aid Kit
		
Medical Room	Child Care Room	Hose Pipe Pressure Check
		
Fire Pump Room	Generator	Boiler

		
Fire Alarm Control Panel	Transformer	Sub Station

Non-Compliance Photos:

		
NC Photo- 01: Few Eye Guards were displaced	NC Photo- 02: Some aisles mark found faded	NC Photo- 03: Some employees were not using face masks
		Nil
NC Photo- 04: Insufficient first aid kits	NC Photo- 05: Some ID cards not updated	Nil

DISCLAIMER:

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End of report.



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[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5Iw_3d_3d)

https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5Iw_3d_3d

[Click here for Supplier \(B\) members:](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

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

[Click here for Auditors:](https://www.surveymonkey.co.uk/r/BRTVCKP)

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