

SMETA Corrective Action Plan Report (CAPR)

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 nam	Chorka	Chorka Textile Ltd.									
Site name:		Chorka	Textile Ltd.								
Site address: (Please include ful	ll address)	Kazirchor, Dangabazar, Palash, Narshigndi.		h,	Country:			Bangl	adesh	1	
Site contact and job title:		Md. Jak	oed Hossain	- Com	npliance Man	ager					
Site phone:		+88029881792, +8801704158501		Site e-mail:			jabed@chorkatextile.com				
SMETA Audit Pillars:		Standards Safe Env		Safe	lealth & Senviron 4-pillar ronment 2-			nment Business Ethic		usiness Ethics	
Date of Audit:		28 Dece	ember 2020		•						
	ngladesh Ltd.		Report Owner (payer): Chorka Textile Ltd.			:					
	Audit Conducted By										
Affiliate Audit Company			Purchaser				Retail	ler			
Brand owner			NGO				Trade Union				_
Multi-			Combined Audit (select all that apply)								

stakeholder



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 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.
- (2) The audit scope was against the following reference documents

2-Pillar SMETA Audit

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

4-Pillar SMETA

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



SMETA Declaration

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

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

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

Auditor Team (s) (please list all including all interviewers): Nasrin Sultana Munny -Auditor (RA-21703703), Mazharul Anwar- Auditor (RA-21703702), Khadiza Parvin- Auditor (ASCA-21701361), Md. Fazlay Rabby Anabil- Auditor (ASCA-21703698), Musfic Hossain- Auditor (ASCA-21703878), Mamun Mollah – Auditor (ASCA-21705082)

Lead auditor: Nasrin Sultana Munny

Team auditor: Mazharul Anwar, Khadiza Parvin, Md. Fazlay Rabby Anabil, Musfic Hossain,

Mamun Mollah

Interviewers: Nasrin Sultana Munny, Mazharul Anwar, Khadiza Parvin, Md. Fazlay Rabby Anabil, Musfic Hossain, Mamun Mollah

Report writer: Nasrin Sultana Munny Report reviewer: Mazharul Anwar

Date of declaration: 28 December 2020.

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.



Audit Parameters

Audit Parameters							
A: Time in and time out	Day 1 Time in: 9.49 Hrs Day 1 Time out: 17.30 Hrs	Day 2 Time in: NA Day 2 Time out: NA	Day 3 Time in: NA Day 3 Time out: NA				
B: Number of auditor days used:	5.7 Man days (6 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: Wind Unannounced	dow detail: 4 weeks					
E: Was the Sedex SAQ available for review?	ilable for ☐ Yes ☐ No ☐ If No, why not ☐ Due to some technical issue's facility could not fill up SAQ.						
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)	Mr. Md. Jabed Hossain- Compliance Manager						
H: Is further information available (if yes, please contact audit company for details)	☐ Yes ☑ No						
I: Previous audit date:	8 December 2019						
J: Previous audit type:	Periodic						
K: Were any previous audits reviewed for this audit	☐ Yes ☐ No ☐ N/A						
	I						

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



Guidance

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

N.B. observations and good practice examples should be pointed out at the closing meeting as well as discussing non-compliances and corrective actions.

To ensure that good practice examples are highlighted to the supplier and to give a more 'balanced' audit a section to record these has been provided on the CAPR document (see following pages) which will remain with the supplier. They will be further confirmed on receipt of the audit report.

Root cause (see column 4)

Root cause refers to the specific procedure or lack of procedure which caused the issue to arise. Before a corrective action can sustainably rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

See SMETA BPG Chapter 7 'Audit Execution' for more explanation of "root cause".

Next Steps:

- 1. The site shall request, via Sedex, that the audit body upload the audit report, non-compliances, observations and good examples. If you have not already received instructions on how to do this then please visit the web site www.sedexglobal.com.
- 2. Sites shall action its non-compliances and document its progress via Sedex.
- 3. Once the site has effectively progressed through its actions then it shall request via Sedex that the audit body verify its actions. Please visit www.sedexglobal.com web site for information on how to do this.
- 4. The audit body shall verify corrective actions taken by the site by either a "Desk-Top" review process via Sedex or by Follow-up Audit (see point 5).
- 5. Some non-compliances that cannot be closed off by "Desk-Top" review may need to be closed off via a "1 Day Follow Up Audit" charged at normal fee rates. If this is the case, then the site will be notified after its submission of documentary evidence relating to that non-compliance. Any follow-up audit must take place within twelve months of the initial audit and the information from the initial audit must be available for sign off of corrective action.
- 6. For changes to wages and hours to be correctly verified it will normally require a follow up site visit. Auditors will generally require to see a minimum of two months wages and hours records, showing new rates in order to confirm changes (note some clients may ask for a longer period, if in doubt please check with the client).



Corrective Action Plan

	Corrective Action Plan – non-compliances								
Non- Compliance Number The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7	New or Carried Over Is this a new non- compliance identified at the follow-up or one carried over (C) that is still outstanding	Details of Non- Compliance Details of Non-Compliance	Root cause (completed by the site)	Preventative and Corrective Actions Details of actions to be taken to clear non-compliance, and the system change to prevent re- occurrence (agreed between site and auditor)	Timescale (Immediate, 30, 60, 90,180,365)	Verification Method Desktop / Follow-Up [D/F]	Agreed by Management and Name of Responsible Person: Note if management agree to the non- compliance, and document name of responsible person	Verification Evidence and Comments Details on corrective action evidence	Status Open/Closed or comment
Working condition are safe and hygienic ETI Base Code, point: 3.1 & Bangladesh Labour Law 2006, Section-62(6) and 72(c)	New	It was noted through facility visit that following aisles way was found partially blocked: -03 out of 13 aisles ways were found partially blocked by plastic boxes in sewing section located at ground floor of shed 0303 out of 12 aisles ways were found partially blocked by plastic buckets in cutting section located at ground floor of shed 0303 out of 9 aisles ways were found partially blocked by plastic buckets in cutting section located at ground floor of shed 0303 out of 9 aisles ways were found partially blocked by	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details: Lack of awareness	It is recommended that facility should ensure obstacle free in all areas of facility.	60 Days	Desktop	Yes - Mr. Md. Jabed Hossain- Compliance Manager		

Working condition are safe and hygienic ETI base code 3.1 & Bangladesh Labour law 2006, Section 62(4):	New	Cartons in sewing section at ground floor of shed 1. It was noted through facility visit that, 05 out of 09 aisles mark and arrow mark were faded at finishing and packing section located at Shed-1	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☑ Other – please give details: Lack of awareness	It is recommended that facility should ensure clearly marked aisles as per local law.	60 Days	Desktop	Yes - Mr. Md. Jabed Hossain- Compliance Manager	
Working Conditions are Safe and Hygienic ETI base code 3.1 & Bangladesh Labour Rules 2015, Rule 64(2)	New	1)It was noted through facility visit that Eye guard was found displaced with approximately 30% of over lock machines in sewing section located at ground floor of shed 3. As per the statement of facility management, there were 151 over lock machines in operation in the mentioned area. 2) It was noted through facility tour that around 20% needle guard of sewing machine	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☑ Other – please give details: Lack of awareness	It is recommended that the facility management should ensure awareness to the employees, careful using of related machine guards.	60 Days	Desktop	Yes - Mr. Md. Jabed Hossain- Compliance Manager	



found missing at sewing section located at 1st floor of the four storied production building. New ☐ Training It is Working It was noted through 60 Days Desktop Yes Training facility tour that condition recommended are safe and ☐ Systems randomly checked 10 that the facility Mr. Md. hygienic 3.1 □ Costs out of 23 heat seal should ensure Jabed ☐ lack of workers & and machine operators proper PPE is Hossain-Other – please Bangladesh were found without equipped with Compliance give details: Lack Labour Rules hand gloves while each machinery Manager of awareness 2015, Rule 67 operating the (2)machine. Regular ☐ Training It is New It was noted through 60 Days Desktop Yes ☐ Systems Employment employee's ID card recommended Costs Is Provided review, employee that facility Mr. Md. ☐ lack of workers Jabed 8.1 and and management should provide Other - please updated ID card Bangladesh interview that Hossainaive details: Lack Compliance Labor Ruleinformation around to all workers as 15% ID cards of the 2015. Ruleof awareness per law Manager 19(5): employees were found not updated as per legally prescribed format (e.g. Emergency contact, National ID, and Blood group information were missing).



Regular Employment Is Provided 8.1 and Bangladesh Labour Rules, 2015, Rule 108(1):	New	It was noted through document review and management interview it was found that the facility management did not provide leave book to all employees.	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details: Lack of awareness	It recommended that facility should provide leave book to the employees as per law.	60 Days	Desktop	Yes - Mr. Md. Jabed Hossain- Compliance Manager	
Regular Employment Is Provided 8.1 and Bangladesh Labour Rule- 2015, Rule- 118 (Form- 41):	New	It was noted through employee personal file review and management representative interview that, randomly checked 35 out of 86 files were found not updated with employee's nominee information's form-41.	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details: Lack of awareness	It is recommended that facility management should update personal files with nominee information form-41.	60 Days	Desktop	Yes - Mr. Md. Jabed Hossain- Compliance Manager	
Environment 4–Pillar: ETI base code 10B4.1 Bangladesh Labor rules 2015, Rule 40(1), (2)	New	It was noted through facility visit that the wastages such as plastics, Papers, were not segregated and keep under open sky beside the four storied building production building wastage store as per types and hazard.	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☑ Other – please give details: Lack of awareness	It is recommended that the facility should ensure proper segregation for all wastages.	60 Days	Desktop	Yes - Mr. Md. Jabed Hossain- Compliance Manager	



	Corrective Action Plan – Observations							
Observation Number The reference number of the observation from the Audit Report, for example, Discrimination No.7	New or Carried Over Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding	Details of Observation Details of Observation	Root cause (completed by the site)	Any improvement actions discussed (Not uploaded on to SEDEX)				
NA	NA	None	NA	NA				

	Good examples					
Good example Number The reference number of the good example from the Audit Report, for example, Discrimination No.7	Details of good example noted	Any relevant Evidence and Comments				
Living wages are paid 5.1	Facility provides attendance bonus to the employee as per company policy.	Documents review, management and employees' interviews				
Living wages are paid 5.1	Facility provides free transport facility to the employee as per company policy.	Documents review, management and employees' interviews				
Living wages are paid 5.1	Facility provides subsidy lunch at BDT 15 per meal to the employee as per company policy.	Documents review, management and employees' interviews				
Living wages are paid 5.1	Facility provides super shop facility for all employee.	Documents review, management and employees' interviews				



Confirmation

Please sign this document confirming that the above findings have been discussed with and understood by you: (site management) If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.						
A: Site Representative Signature:		Title: Compliance Manager				
	Md. Jabed Hossain	Date: 28 December 2020				
B: Auditor Signature:		Title: Lead Auditor & Team Auditors				
		Date: 28 December 2020				
	Nasrin Sultana Munny, Mazharul Anwar, Khadiza Parvin, Md. Fazlay Rabby Anabil, Musfic Hossain,Md. Mamun Mollah					
C: Please indicate below if you, the site	management, dispute any of the findings. No need to complete L	D-E, if no disputes.				
D: I dispute the following numbered non	-compliances: None					
E: Signed:		Title				
(If <u>any</u> entry in box D, please complete a signature on this line)		Date				

F: Any other site Comments: None

Guidance on Root Cause

Explanation of the Root Cause Column

If a non-compliance is to be rectified by a corrective action which will also prevent the non-compliance re-occurring, it is necessary to consider whether a system change is required.

Understanding the root cause of the non-compliance is essential if a site is to prevent the issue reoccurring.

The root cause refers to the specific activity/ procedure or lack of activity/procedure which caused the non-compliance to arise. Before a corrective action can rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

Since this is a new addition, it is not a mandatory requirement to complete this column at this time. We hope to encourage auditors and sites to think about Root Causes and where they are able to agree, this column may be used to describe their discussion.

Some examples of finding a "root cause"

Example 1

Where excessive hours have been noted the real reason for these needs to be understood, whether due to production planning, bottle necks in the operation, insufficient training of operators, delays in receiving trims, etc.

Example 2

A non-compliance may be found where workers are not using PPE that has been provided to them. This could be the result of insufficient training for workers to understand the need for its use; a lack of follow-up by supervisors aligned to a proper set of factory rules or the fact that workers feel their productivity (and thus potential earnings) is affected by use of items such as metal gloves.

Example 3

A site uses fines to control unacceptable behaviour of workers.

International standards (and often local laws) may require that workers should not be fined for disciplinary reasons.

It may be difficult to stop fines immediately as the site rules may have been in place for some time, but to prevent the non-compliance re-occurring it will be necessary to make a system change.

The symptom is fines, but the root cause is a management system which may break the law. To prevent the problem re-occurring it will be necessary to make a system change for example the site could consider a system which rewards for good behaviour

Only by understanding the underlying cause can effective corrective actions be taken to ensure continuous compliance.

The site is encouraged to complete this section so as to indicate their understanding of the issues raised and the actions to be taken.

Disclaimer

Any proposed Corrective Action Plan (CAP) closed utilizing a Desktop Review is limited by the evidential documentation provided by the facility in order to correct the non-compliance. The intent of this service is to provide assurance that the facility is on the correct path with its proposed or completed corrective actions. Intertek cannot be held responsible for the falsification of evidence or the effective implementation of the proposed corrective actions, which in many instances may only be truly validated by an onsite Audit visit owing to the limitations of the desktop review process. The facilities shall be wholly responsible for the correct and effective implementation of their proposed CAP.

Intertek nor any of its affiliates shall be held liable for any direct, indirect, threatened, consequential, special, exemplary or other damages that may result including but not limited to economic loss, injury, illness, or death arising from the inability of a facility to implement its CAP.



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

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

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

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

Click here for Supplier (B) members:

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

Click here for Auditors:

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