




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 1040190	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 1054957
Business name (Company name):	Dress World Limited, Vertex Wear Ltd., Neo Fashion Limited		
Site name:	Dress World Limited, Vertex Wear Ltd., Neo Fashion Limited		
Site address: <i>(Please include full address)</i>	Varari, Rajfulbaria, Savar, Dhaka	Country:	Bangladesh
Site contact and job title:	Mr. Shaymal Kumar Sarker – Deputy General Manager (Admin & Compliance)		
Site phone:	+8801727291486	Site e-mail:	shaymal.sarker@vertexgroup.com.bd
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	27 & 28 February 2023		

Audit Company Name & Logo: ITS Labtest Bangladesh Ltd. 	Report Owner (payer): Dress World Limited
--	--

Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

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

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

Audit Content:

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

(2) The audit scope was against the following reference documents

2-Pillar SMETA Audit

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

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)

(3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.

(4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size): The audit scope was from April 2022 to January 2023 (10 months) as the facility last audit was conducted on 21 March 2022.

Auditor Team (s) (please list all including all interviewers): Md. Kamrul Hasan – Assistant Supervisor (RA 21700579), Md. Soharab Hossain- Asst. Manager (RA 21700583) and Davit Tripura (ASCA 21700945).

Lead auditor: Md. Kamrul Hasan APSCA number: RA 21700579
Lead auditor APSCA status: In good standing

Team auditor: Md. Soharab Hossain & Davit Tripura
APSCA number: RA 21700583 & ASCA 21700945

Interviewers: Md. Soharab Hossain, Md. Kamrul Hasan & Davit Tripura
APSCA number: RA 21700583, RA 21700579 & ASCA 21700945

Report writer: Davit Tripura

Report reviewer: Mazharul Anwar

Date of declaration: 28 February 2023

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 <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		0	0	<ul style="list-style-type: none"> None Observed
0B Management systems and code implementation		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	01	0	01	<p>NC</p> <ul style="list-style-type: none"> The category of the facility license was found 'I' instead of 'J'. <p>GE</p> <ul style="list-style-type: none"> Facility posted Supplier Protector Line.
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> None Observed
2. Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> None Observed
3. Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	06	0	0	<p>NC</p> <ul style="list-style-type: none"> The evacuation plan was not found in the miscellaneous materials storage area. Emergency light was not found in the miscellaneous items store. The aisles marking was not drawn at the miscellaneous Machine guard displaced. Employees not using PPE. The facility did not have a CPP license for its newly installed generator.

4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> None Observed
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	03	GE <ul style="list-style-type: none"> Attendance bonus to the employees. Facility has a fair price shop for all the employees. Facility arranges free medical camps for the workers' family members every week.
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> None Observed
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> None Observed
8	<u>Regular Employment</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	01	0	0	NC <ul style="list-style-type: none"> Prescribed information was not available in provided employee ID card.
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> None Observed
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> None Observed
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> None Observed
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	<ul style="list-style-type: none"> Not Applicable
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> None Observed
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> None Observed

General observations and summary of the site:

- Dress World Limited, Vertex Wear Ltd., Neo Fashion Limited. are located at Varari, Rajfulbaria, Savar, Dhaka, Bangladesh.
- The product manufactured at this site is woven items (tops and bottom).
- The main production processes are Cutting, Sewing, Washing, Quality, Finishing & Packing.

- Overall responsibility for meeting the standards is taken by Mr. Shaymal Kumar Sarker – Deputy General Manager (Admin & Compliance)
- The youngest worker on site was 20 years old.
- A total of 6240 employees are currently working in the facility where 3608 are female employees and 2632 are male employees. There are 668 management employees in the facilities. All the employees are local (Bangladeshi).
- There are three Worker Participation Committees on sites. Members of the Worker Participation Committee were present during the audit. Moreover, management informed that they communicate the outcome of the audit to the workers through notice board and would discuss at next PC 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. The distribution was Male 95%, Female 5%.
- Site has no defined peak season.
- Site uses no sub-contractors.
- 100% employees are fixed rated.
- Generally, the employees work for 06 days (Saturday to Thursday) in a week. Friday is the facility weekly holiday.
- Generally, facility operates in one shift starting from 8:00 am to 5:00 pm including one-hour interval for meal and rest in 3 batches starting from 12:00 pm to 02:00 pm. However, for washing section facility operates in two shifts. Shift 1 starting from 8:00 am to 5:00 pm and shift 2 starting from 8:00 pm to 5:00 am including one-hour interval for meal and rest.
- Time Recording System is electronic card punch.
- Employee's wages are calculated on monthly basis following calendar month. The payment is settled through mobile banking.
- Facility provide wages to the employees within 7 working days of following month and the calendar month is followed for payment cycle.
- Audit scope was from April 2022 to January 2023.
- 86 employees were selected for interview including 36 male and 50 female employees, they were interviewed in 10 Groups of 05 and 36 employees were interviewed individually. Employees from washing section were not included in the audit sample as the facility included the washing process in February 2023.
- 86 employees' wages and working hour records were reviewed from January 2023 (1st current paid month), December 2022 (2nd current paid month) & May 2022 (Random paid month). Note that attendance record of the month of February 2023 was also reviewed.
- Legal minimum pay (BDT 8000) was paid to all employees. Correct Over Time hours were paid; Employees were paid 200% of minimum hourly wage for Over Time hours.

Audit Process:

This periodic 4-Pillar audit was conducted by ITS Labtest Bangladesh Ltd. 3 auditors in 2 Days (5.7 auditor days) assessed and verified the facility's operations based on the ETI Base Code, local legislations and client's code of conduct. The whole process of the audit was sample based.

Overview of opening meeting, facility management responses:

Audit team entered the facility first day at 9:05 am and then started an opening meeting according to the SMETA best practice guideline with the facility management. The facility management representatives Mr. Shaymal Kumar Sarker – Deputy General Manager (Admin & Compliance) along with his team were present at the opening meeting. They agreed with ETI requirement and Intertek policy and informed that they would be cooperative with this audit.

Summary of Findings:

Positive: No non-compliance was found in the areas of Employment is freely chosen, Freedom of Association and Right to Collective Bargaining are Respected, Child Labour, Wages and benefits, and working hours are not excessive Discrimination, harsh or Inhumane Treatment, Sub-contracting and Environment.

Negative: Non-compliance was found in the area of Management systems and code implementation, working conditions are safe and hygienic & Regular Employment.

**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:	Dress World Limited, Vertex Wear Ltd., Neo Fashion Limited		
B: Site name:	Dress World Limited, Vertex Wear Ltd., Neo Fashion Limited		
C: GPS location: (If available)	<table border="1"> <tr> <td>GPS Address: Varari, Rajfulbaria, Savar, Dhaka.</td> <td>Latitude: 23.8009057 Longitude: 90.2504446</td> </tr> </table>	GPS Address: Varari, Rajfulbaria, Savar, Dhaka.	Latitude: 23.8009057 Longitude: 90.2504446
GPS Address: Varari, Rajfulbaria, Savar, Dhaka.	Latitude: 23.8009057 Longitude: 90.2504446		
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Factory License No: Dress World Limited: 10414/Dhaka, bearing 'I' category, issued by Chief Inspector of Factories; valid till 30 June 2023.</p> <p>Vertex Wear Ltd.: 13875/Dhaka; bearing 'I' category, issued by Chief Inspector of Factories; valid till 30 June 2023.</p> <p>Neo Fashion Limited: 14502/Dhaka; bearing 'I' category, issued by Chief Inspector of Factories; valid till 30 June 2023.</p> <p>Fire License: Dress World Limited: DD/Dhaka/21376/2009; issued by Fire Service and Civil Defence; valid till 30 June 2023.</p> <p>Vertex Wear Ltd.: DD/Dhaka/20761/2008 issued by Fire Service and Civil Defence; valid till 30 June 2023.</p> <p>Neo Fashion Limited: DD/Dhaka/22298/2010 issued by Fire Service and Civil Defence; valid till 30 June 2023.</p> <p>Trade License: Dress World Limited: 000048; issued by Tetuljhora Union Parishad; valid till 30 June 2023.</p> <p>Vertex Wear Ltd.: 000047; issued by Tetuljhora Union Parishad; valid till 30 June 2023.</p> <p>Neo Fashion Limited: 000046; issued by Tetuljhora Union Parishad; valid till 30 June 2023.</p>		
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Woven Tops and bottoms		
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Dress World Limited, Vertex Wear Ltd., Neo Fashion Limited are located at Varari, Rajfulbaria, Savar, Dhaka, Bangladesh. The facility has started its operation in 2008. Total land area of the facility premises 283140 square feet, production and warehouse area 310000 square feet and 119573 square feet respectively.</p> <p>There are three separate sister concern facility named Dress World Limited, Vertex Wear Ltd., Neo Fashion Limited located in the facility compound under same owner & same</p>		

management. Note that, all the facilities were within full audit scope. During audit assigned auditors visited the full premises including all the common areas.

A total of 6240 employees are currently working in the facility where 3608 are female employees and 2632 are male employees. There are 668 management employees in the facilities. All the employees are local (Bangladeshi).

The facility premises consist of total 15 buildings and 03 sheds and underground reservoir. Details description provided as below.

Building no 01 (04 storied)		
Ground floor	Distribution area, Main store, Fabric storage area, Lab, Fabric inspection room, Dice cutting room	Common
Mezzanine floor	QC inspection & Accessories inspection room.	Common
1 st floor	Accessories and general items	Common
2 nd floor	Finished goods area	Common
3 rd floor	Finished goods area	Common
Building no 02 (2 storied)		
Ground floor	Reception, Security, Medical & Childcare room.	Common
1 st floor	Medical center	Common
Roof top	Vacant	Common
Building no 03 (03 storied)		
Ground Floor	Chemical store, Indoor substation, DG room	Common
1 st Floor	Electrical Control room	Common
2 nd Floor	Compressor	Common
Roof top	Solar inverter room	Common
Building 04 (07 storied)		
Ground Floor	General store, Dehumidifier room, Inspection room, Badhon (Fair price shop), Fire control room.	Common
Mezzanine Floor	Miscellaneous	Common
1 st Floor	Sewing Section, Finishing section, Packing Section, Maintenance room, Sub-store accessories, Inspection and spot removing room, Wash garments waiting room, Needle issue room, Electrical office, Boiler room, HR office and other office	Vertex Wear Ltd.
2 nd Floor	Sewing Section, Finishing section, Packing Section, Maintenance room, Sub-store accessories, Inspection and spot removing room, Wash garments waiting	Dress World Limited

	room, Needle issue room, Electrical office, Boiler room, HR office and other office	
3 rd Floor	Central - Sample Section, Cutting Section, CAD & Pattern Room, Fusing Section, Office Room, IT section, Management office, HR and Admin Office, Display room.	Vertex Wear Ltd.
4 th Floor	Sewing Section, Finishing section, Packing Section, Maintenance room, Sub-store accessories, Inspection and spot removing room.	Neo Fashion Limited
5 th Floor	New production floor of Vertex Wear Limited extension (Cutting, Sewing, Finishing, Needle Issue room, SDC (Skill Development centre).	Vertex Wear Ltd.
6 th floor	Officers and workers dining, Prayer area, Canteen.	Common
Roof top	Vacant	Common
Building 05 (06 Storied)		
Ground Floor	Auditorium	Common
Mezzanine Floor	Merchandising office	Common
1 st Floor	Sample Display room	Common
2 nd Floor	Conference and office room	Vertex Wear Limited
3 rd Floor	Staff office	Common
4 th Floor	Recreation room and suits	Common
5 th Floor	Running goods	Common
Roof top	Vacant	Common
Building 06: (Six storied Washing Plant)		
Ground floor	Washing machine, chemical room, vacant area	Vertex Wear Limited
1 st Floor	Dry process hand brushing, dryer, vacant area.	Vertex Wear Limited
2 nd Floor	Vacant area	Vertex Wear Limited
3 rd Floor	Miscellaneous item storage (construction material, record, leftover and idle machine store	Vertex Wear Limited
4 th Floor	Vacant	Vertex Wear Limited
5 th Floor	Vacant	Vertex Wear Limited

	Rooftop	Vacant	Vertex Wear Limited
Building 07: Effluent Treatment Plant.			
	Ground floor	ETP area	Vertex Wear Limited
	1 st Floor	Dry process including hand brushing, quality, PP spray room	Vertex Wear Limited
	2 nd Floor	R & D	Vertex Wear Limited
	3 rd Floor	Vacant	Vertex Wear Limited
	4 th Floor	Vacant	Vertex Wear Limited
	5 th Floor	Vacant	Vertex Wear Limited
	Rooftop	Vacant	Vertex Wear Limited
Building 08: Water Treatment Plant			
Building 09: (02 Storied)			
	Ground Floor	Generator	Common
	1 st Floor	Boiler	Common
	Building 10	Sub Station	Common
	Building 11	Workshop	Common
	Building 12	Sub Station	Common
	Building 13	Fire Pump Room	Common
	Building 14	Security post,	Common
	Building 15	RMS room	Common
	Shed 01	Wastage area	Common
	Shed 02	Guard post	Common
	Shed 03	Guard post	Common
	Underground reserve	Diesel Tank	Common
<p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: No visual cracks were found on audit day</p> <p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>			

	<p>F4: Please give details: The site had a structural engineer evaluation and evaluated by engineering department of from RAJUK on 09 November 2006 and Facility also had the machine layout approval from Department of Inspection for Factory & Establishment dated on 05 May 2019 & 30 November 2022.</p>
<p>G: Site function:</p>	<p> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input checked="" type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor </p>
<p>H: Month(s) of peak season: (if applicable)</p>	<p>Round the year same production</p>
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>Main production process: Cutting, Sewing, Washing, Quality, Finishing and Packing.</p> <p>Monthly production capacity: 1300000 pieces</p> <p>Production Line: 60 lines</p> <p>Machines used: Single needle lock stitch, two needle lock stitch, Two needle feed of the arm, over lock machine, Flat lock machine, bar tack machine, multi needle chain stitch machine, button hole machine, eyelet hole machine, snap attaching machine, button stitch machine, pull testing machine, tape cutting, Velcro attaching machine, shaping machine, thread re conning machine, zig zag machine, blind stitch machine, strapping machine, Printing machine, heat seal machine, lockstitch zigzag, collar tuning machine, fusing machine, cutting machine, end cutting, auto cutting machine spreading machine, fabric inspection machine, air compressor, needle detector, Schulte stitch, template cutter, pattern sewing, generator, boiler, compressor. Washing & Dyeing Machine. Centrifugal Hydro Extractor (Production) Sample Centrifugal Hydro Extractor Dryer Machine (Production) Rotary Dryer (Production) Dryer Machine (Sample) Washing Machine (Sample) Ozone Machine, Sustainable Air Drying System (Conveyor Dryer) Belly Wash M/C Front Loading Washing Machine Front Loading Dryer Machine (Steam Heated) Hydro Extractor (Sample) Hydro Extractor (Sample) Belly Machine (Sample) Oven Balk Oven Sample PP spray booth Laser Laser 3D machine 4 head 8 legs 3D machine 2 head 2 legs Brushing Machine Grinding Machine-8 head Grinding machine-02 Head, etc.</p> <p>Chemical used: Lube Oil Coolant Diesel Mobil Machine Oil Hydraulic Oil Spot Lifter # 833 Sodium Sulphate Potassium Chloride Potassium Carbonate Sodium Phosphate (Dihydrate)</p>

	<p>Lactic Acid Sodium Hydroxide Sodium Dihydrogen Orthophosphate Sodium Chloride L-Histidine Monohydrochloride Buffer solution ph 7.00 Persil Powder Harpic Detergent Liquid Soap WD-40 Buffer solution Ph 4.00 Glue (Super Glue) Solution Gum Envirohib Microbiocide PQ Microbiocide WT3 Multitreat 25 TC OS-100 Magnesium Chloride Hexahydrate Calcium Chloride (Dihydrate), EVO SOFT MEC-01 LAVA WASH MTK DYEX DPH DISPERSOL MAX CPX NOAMIN WHI/Z LAVA SOFT EPS NEW LAVA CELL NHC COLD LAVA CELL NDF LAVA CELL NLG NEW LAVA CELL NSY NEW etc.</p>
<p>J: What form of worker representation / union is there on site?</p>	<p> <input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee (Participation Committee) <input type="checkbox"/> Other (specify) <input type="checkbox"/> None </p>
<p>K: Is there any night production work at the site?</p>	<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation </p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers </p>
<p>N: Were all site-provided accommodation buildings included in this audit</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details: Not Applicable as the site do not provide accommodation for workers. </p>

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 09:05 PM A2: Day 1 Time out: 05:20 PM	A3: Day 2 Time in: 09:45 PM A4: Day 2 Time out: 05:25 PM	A5: Day 3 Time in: NA A6: Day 3 Time out: NA
B: Number of auditor days used:	5.7 Auditor Days Day 01: 03 Auditors (3 auditor Days) Day 02: 03 Auditors (2.7 auditor Days)		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 4 weeks. <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Shaymal Kumar Sarker – Deputy General Manager (Admin & Compliance)		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	21 March 2022		
J: Previous audit type:	Periodic		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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. However, facility has formed participation committee through election process.		

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	2004	0	0	0	0	0	0	2004
Worker numbers – female	3568	0	0	0	0	0	0	3568
Total	5572	0	0	0	0	0	0	5572
Number of Workers interviewed – male	36	0	0	0	0	0	0	36
Number of Workers interviewed – female	50	0	0	0	0	0	0	50
Total – interviewed sample size	86	0	0	0	0	0	0	86

A: Nationality of Management	Bangladeshi	
B: Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationalities: B1: Nationality 1: _ Bangladeshi _____ B2: Nationality 2: _____	Was the list completed during peak season? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<p>Please add more nationalities as applicable to site. Add more rows if required.</p>	<p>B3: Nationality 3: _____</p>	<p>If no, please describe how this may vary during peak periods: Facility did not have any defined peak season. Production of the facility is round the year same.</p>
<p>C: Please provide more information for the three most common nationalities.</p>	<p>C: approx 100 % total workforce: Nationality 1 _ Bangladeshi_ C1: approx % total workforce: Nationality 2 _____ C2: approx % total workforce: Nationality 3 _____</p>	
<p>D: Worker remuneration (management information)</p>	<p>D: __0_% workers on piece rate D1: _0_% hourly paid workers D2: __100__% salaried workers</p> <p>Payment cycle: D3: __0__% daily paid D4: __0__% weekly paid D5: __100__% monthly paid D6: __0__% other D7: If other, please give details Not Applicable</p>	

Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(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)</i>	10 groups of 5
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 16 D2: Female: 20
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>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	None
I: What did the workers like the most about working at this site?	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 enough 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?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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 workplace; they got on well with workers and managers. They found management team positive and approachable. 86 employees were selected for interview including 36 male and 50 female employees, they were interviewed as 10 groups of 5 and the balances of 36 workers were interviewed individually.

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. They facility management treated them with respect.

They can complain directly to their 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

The Participation Committee members were positive about the facility and looking forward to developing relationships with the management team.

The Participation Committee member's interview was conducted privately in a separate place. The Participation Committee members replied naturally regarding their responsibilities as Participation Committee member, and they also informed that they can easily carryout their daily job without any difficulties.

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, Mr. Shaymal Kumar Sarker – Deputy General Manager (Admin & Compliance) along with his team was present throughout the audit process and co-operated the whole audit. Facility management respected Audit requirements and allowed auditor(s) to take photographs of all production process, best practices and non-conformities. They also provided the required documents' photocopy 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 client's requirements and the local law, and they took notice of the findings of the internal audit team and 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 facility had a policy, endorsed at the highest level, covering human rights impacts and issues, and it is communicated to all appropriate parties, including its own suppliers.
- The responsible person for implementation and monitoring is Mr. Shaymal Kumar Sarker – Deputy General Manager (Admin & Compliance).
- The facility measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- Where businesses have an adverse impact on human rights within any of their stakeholders, they address these issues and enable effective remediation.
- The facility had a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the report.
- 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:

- Written policies and procedure that being provided individually to employees.
- Facility code of conduct.
- All policies of facility.

- Employees' training records showed the facility conducted training for employees about the social compliance when they enter the facility.

Any other comments: None

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility has a social compliance policy which is a commitment to respect human rights.</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has a designated person who responsible for implementing standards concerning Human Rights. Name: Mr. Shaymal Kumar Sarker Job title: Deputy General Manager (Admin & Compliance)</p>
<p>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?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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.</p>
<p>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)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility uses worker register and software for keeping privacy of workers information. Moreover, facility has an IT policy for data safety.</p>

Findings	
<p>Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/></p> <p>Description of observation: None Observed</p> <p>Local law or ETI/Additional elements / customer specific requirement: Not Applicable</p> <p>Comments: None</p>	<p>Objective evidence observed: None observed</p>

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: __2.5__ %	A2: This year: __2.5__ %
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]	2.44%	
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: __2.66__ %	C2: This year: __3__ %
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	2.88%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Last injury was noted on 26 January 2023 which was a minor needle prick in left hand finger.	
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: __0.30__ %	F2: This year: __0.28__ %
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]	0.2%	
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: __0__ %	H2: This year: __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 __85__% workers	J2: 12 months __80__% workers

0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

- Responsibility for meeting the legal and client code requirements is taken by Mr. Shaymal Kumar Sarker – Deputy General Manager.
- The facility communicates this code of conduct (COC) to the employees through notice board and orientation training.
- The facility management is conducting internal social compliance audit regularly and take necessary corrective action based on report.
- The facility conducts orientation training for all new employees.
- Supplier communicates ETI code of conduct to their suppliers and where reasonably practicable extends the principles of this ethical code through their supply chain.
- The facility arranged mid-level management training for all mid-level management employees such as supervisors, quality in charge, production officers, etc.
- Supplier communicates ETI code of conduct to their suppliers and where reasonably practicable extends the principles of this ethical code through their supply chain.
- Implementation of any necessary changes is then given to the individual department heads after agreement with the facility manager.
- Facility conducts periodic assessments of its social compliance system to identify improvement opportunities.

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.
- All policies of facility.
- Internal audit records
- Management, employee training / meeting records

Any other comments: None

Management Systems:	
<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>A1: Please give details: In the last 12 months the site has not been subjected to any fines or prosecutions for non-compliance to any regulations.</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>B1: Please give details: It was noted through documentation review, facility has policies and procedures for forced labour, child labour, discrimination, harassment & abuse.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>It was noted through the management and workers interview that overtime is voluntary for all employees. No child labour was found in the facility during the facility tour and age verification certificate found in all the reviewed personal files.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: Please give details: All the employees in the facility have received orientation training where standards for forced labour, child labour, discrimination, harassment & abuse are covered.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details: Training records were found including picture and attendance sheet.</p>
<p>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).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F1: Please give details: There was no such certifications at the site, such as ISO 14000, ISO 9000 etc. However, the sites have other social audit like BSCI conducted by 3rd party audit company.</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>G1: Please give details: Facility has a dedicated Human Resources department consisting of 30 members and is headed by Mr. Abdullah Al Mamun – General Manager (HR & Admin).</p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

	H1: Please give details: Responsibility for meeting the legal and client code requirements is taken by Mr. Shaymal Kumar Sarker – Deputy General Manager (Admin & Compliance).
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility conducts risk assessment 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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 reduction it. Facility conducts periodic risk assessment.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The facility has all required land rights licenses and permissions from local authority.
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC:

consent, (FPIC) even if national/local law does not require it	
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: Not Applicable.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: The facility has 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.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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:

It was noted that through facility license review & management interview that, the category of the facility license was found 'I' instead of 'J'. Note that, the total manpower of Vertex Wear Ltd., was 2998.

Additional elements and Local law:

Additional elements:

In accordance with Management system and Code Implementation 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.

Local law:

In accordance with Bangladesh Labor Rules-2015, Schedule-7 (1)

For Factory:

Category	Maximum Number of Workers or Employees Employable in Any Day of the Year.	License Fee (Taka)	License Renewal Fee (Taka)
a	5-30	500	300
b	31-50	1000	700
c	51-100	1500	1000
d	101-200	2500	1800
e	101-200	3000	2200
f	301-500	5000	3500
g	501-750	6000	4800
h	751-1000	8000	5000
i	1001-2000	10000	7000
j	2001-3000	12000	8400

Objective evidence observed:

(where relevant please add photo numbers)

1. Facility license review & management interview

k	3001-5000	15000	10000
l	5001- Above	18000	12000

Recommended corrective action:
It is recommended that the facility should maintain the category of the factory license as per law.

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

Good Examples observed:	
<p>Description of Good Example (GE): It was noted from facility tour and management interview that the facility has posted Supplier Protector Line in a common place for easy visualization of the employees.</p>	<p>Objective evidence observed: Facility visits and management interview.</p>

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.
- The facility did not require any payment for work tools, PPE, IC/staff card, training, etc.
- The facility does not use any 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 rules.
- Policy on No-Forced labour and prison labour.
- Sample employee personal files.
- Service book.
- Time record.

Any other comments: None

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

	C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: The facility does not practise this kind of culture to violate the rights of employees.
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding: overall turnover of the facility is 48.5 million USD. However, the turnover of the facility for UK based business is not over £36m.
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: The employees can leave their workplace after their respective duties.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: The facility has its policy and procedures on forced labour, bonded labour, trafficked labour and the facility provides a sharp idea about all those things on internal audit, orientation training and notice board.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: The facility has policy on forced /trafficked labour. The facility maintains it through notice board on production floor. Overtime is totally voluntary. Employees can leave their workplace freely after their respective jobs.

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code: None observed.</p> <p>Local law and/or ETI requirement Not Applicable</p> <p>Recommended corrective action: None.</p>	<p>Objective evidence observed: (where relevant please add photo numbers) None observed.</p>

Observation:	
<p>Description of observation: None observed.</p> <p>Local law or ETI requirement: Not Applicable</p> <p>Comments: None.</p>	<p>Objective evidence observed:</p> <p>None observed.</p>

Good Examples observed:	
<p>Description of Good Example (GE):</p> <p>None observed.</p>	<p>Objective evidence observed:</p> <p>None observed.</p>

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 can form or join the trade union of their choice.
- There is no trade union in the facility but there are three individual Worker's Participation Committee formed by Election. Last election was held on 13 October 2022 for all three facilities.
- Participation Committee meeting is held every two months. Last meeting was held on 04 February 2023.
- They also stated that they could give suggestions on all parts of the site's practices.
- Meeting minutes are posted in notice board and informed through public address system.
- There are a total of 18 members in each participation committee (18+18+18) where 9 were from worker side and 9 were from management side.
- Participation committee members are not treated less favourably than other workers.
- Participation committee members can carry out their duties within working hours without affecting their pay.

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

Details:

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

Any other comments: None

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

- Union (name)
- Worker Committee (Participation 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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 complain box. D2: Is there evidence of free elections? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility has a policy regarding Freedom of Association.	
F: Name of union and union representative, if applicable:	Not Applicable	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	There are a total of 18 members (18+18+18) in each participation committee where 9 were from worker side and 9 were from management side. G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Employees are well of their representative and in occasions they discuss with them.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 13 October 2022
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: 2 (1 Male and 1 Female)	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	Participation committee meeting held in every two months. Participation Committee meeting is held every two months. Last meeting was held on 04 February 2023. Last meeting topics were: <ol style="list-style-type: none"> 1. Addressing the mission and vision of the facility. 2. Ensuring 100% safety of the employees. 3. Discussion on the formation of the fire committee. 4. Discussion on providing soap, sandal, etc in the toilet. 5. Others. 	

M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes , what percentage by trade Union/worker representation	M1: ____% workers covered by Union CBA	M2: ____% workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable	

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> 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. 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

- Mr. Abdullah Al Mamun – General Manager (HR & Admin) looks after Health & Safety issues for the site.
- Potable water was freely available in all areas and last drinking water test was done on 30 June 2022 by the department of public health engineering.
- Enough clean toilets (95 for male and 159 for female) segregated by gender were always available for workers.
- Ventilation, temperature and lighting were adequate for the production processes.
- Minutes of meetings show that there are monthly Health and Safety meeting held.

2. Fire Safety

- Enough assembly area was found in front of the facility building.
- Firefighting equipment was adequate, and checks were up to date. Fire equipment last checking was done on 27 February 2023.
- The facility management posted the evacuation plans on every production floors/shed with local language.
- Public Address System and fire alarm were available in all areas.
- Aisles exit way and employees were found free from any blockage.
- Facility has a combined 1327 trained emergency response team members. They were trained by Fire Service and Civil Defence and internally.

Fire Drill information:

Last fire drill	Date	Time took	Employee was present	Fire drill monitored by
Day	29 January 2023	3 Minutes 8 Seconds	6029	Fire & safety officer
Night	30 October 2022	3 Minutes 10 Seconds	5894	Fire & safety officer
External	24 December 2022	3 Minutes 9 Seconds	5965	Warehouse inspector – FS & CD

Facility's firefighting equipment:

Facility had sufficient fire detecting and firefighting equipment's combined list is provided below:

DCP, CO2, foam, hose cabinet, lock cutter, helmet, fire hook, fire beater, fire alarm, fire alarm switch, fire gong bell, lock cutter, fire bitter, fire axe, fire hook, fire helmet, fire belcha, smoke detector, sprinkler system, Gasmask, fire blanket, hand gloves, stretcher, first aid box, emergency light, PA system box, exit sign and fog light, sprinkler system, etc.

Facility provide bellow training to employees:

Training Type	Last Date of training	Participant	Trainer Designation	Frequency of training
Orientation Training to factory rules	16 February 2023	09	Welfare Officer	As required
Fire Fighting Training (External)	26 & 27 October 2022	40	Wearhouse Inspector – FS & CD	As required
Fire Fighting Training (Internal)	23 November 2022	30	Fire Safety Officer	6 Months
First Aid Training	25 January 2023	54	Medical Officer	2 months
PPE Training	16 January 2023	168	Sr. Welfare Offer	2 months
Mid-level management	06 February 2023	169	DGM (Admin & Compliance)	Monthly
Health & Safety Training	04 February 2023	207	Sr. Welfare Offer	Monthly
Chemical Handling	22 January 2023	12	Jr. Store officer	Monthly
Environment	21 January 2023	65	Welfare Officer	2 months
Anti-Bribery	15 December 2022	33	DGM (Admin & Compliance)	6 Months

3. Electrical, Machine & fire safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- Facility has 13 licensed electricians who check and do inspection, roster wise for whole facility.
- Facility checks all electric channels, distribution board and electric connection daily and monthly schedule wise.
- Facility maintains a scheduled maintenance plan for doing maintenance of all machines.

(Name) Inspection record	Last inspection date	Done by (designation)	Frequency of inspection
DB/SDB/MDB	02 February 2023	Electrician	Monthly
Machine maintenance	28 January 2023	Manager – Maintenance	Monthly
Generator Maintenance (Internal)	02 February 2023	Supervisor - Utility	Monthly
Generator Maintenance (External)	04 September 2022	Bangla CAT	1000 Hours
Compressor	01 February 2023	Supervisor - Boiler	Weekly
Boiler Maintenance	01 February 2023	Supervisor - Boiler	Monthly
Lift	16 February 2023	Maan Bangladesh Ltd.	Monthly

4. Chemical safety

- Facility has chemical store for the keeping chemical and use the MSDS, Levelling and secondary containment appropriately.

5. Medical services

- There were 58 first aid boxes in the facility and there are 116 assigned first aiders.
- Facility has appointed 2 doctors, 2 Nurses, 1 medical assistant who are available in working time of the facility. They also arranged monthly first aid training with first aider.
- Facility has a medical room.

6. Building safety

- Facility building was constructed for industrial purpose and approved by engineering department of from RAJUK on 09 November 2006 and Facility also had the machine layout approval from Department of Inspection for Factory & Establishment dated on 05 May 2019 & 30 November 2022.

7. Dormitory

- Facility didn't provide dormitory facilities to any employees.

8. Covid 19 Precautions

- Facility measures temperature of all employees and visitors at the entrance.
- Facility set up a hand washing arear in the facility.
- Social distancing marks were given in the entrance.
- With disinfecting spray is used for vehicles before entering into the premises.

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 records 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 records
- Health and safety committee records
- Electric installation checking records
- Training records and certificates
- Fire equipment maintenance 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

A1: Please give 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. The Health and Safety Committee each facility consists of equal members where from employee

	side and management site as per legal requirement. It is headed by Mr. Abdul Al Mamun – GM (HR & Admin).
B: Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility provides 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)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give 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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: All the visitors to the site are informed on Health and Safety 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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility has a medical room for the employees.
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: The facility management has appointed 02 Registered Physician and 02 Nurses & 1 Medical Assistant 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Provided transports were fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: No living space provide by facility.
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: It was noted through documentation review, facility conducts internal audit. They also conducted risk assessment periodically
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The facility meets all legal obligations on environmental requirements including required permits for use and disposal of natural resources like gas, water etc.

<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>K1: Please give details: The facility does not use banned chemicals and follows all the customer requirement on environmental standard.</p>
--	--

Non-compliance:	
<p>1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>It was noted through the facility visit that the evacuation plan was not found in the miscellaneous materials storage area (construction material, official documents, leftover belongings, and idle machines store) located on the 3rd floor of the washing building (building-06). Note, during the facility visit 5 employees were working there. Besides, there were 3 aisles on the ground floor of the washing building, but two aisles were drawn in the evacuation of that floor.</p> <p>Local law and/or ETI requirement In accordance with 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.</p> <p>In accordance with Bangladesh Labor rules 2015, Rule 55(8) The arrangement should be made to show evacuation plan of exit in one or more places easily visible in each floor of each floor of the factory.</p> <p>Recommended corrective action: It is recommended facility should install actual evacuation in the mentioned area properly.</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>1. Facility Visit</p>
<p>2. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>It was noted through the facility visit that emergency light was not found in the miscellaneous items store (construction material, official documents, leftover belongings, and idle machine) located on the 3rd floor of the washing building (Building 6). Note, during the facility visit 5 employees were working there. Besides, emergency lights were not found on the western stair of 1st floor of the washing building (building-06).</p> <p>Local law and/or ETI requirement In accordance with 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</p>	<p>2. Facility visit</p>

reasonably practicable, the causes of hazards inherent in the working environment.

In accordance with Bangladesh Labor law 2006, Section 57 (1):

In every part of an establishment where workers are working or passing, there shall be provided and maintained sufficient and suitable lighting, natural or artificial, or both.

Recommended corrective action:

It is recommended facility should install emergency lights in the mentioned area.

3. Description of non-compliance:

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

It was noted through facility visit that aisles marking were not drawn at the miscellaneous item store (construction material, official documents, leftover belongings and idle machine) located at the 3rd floor of the washing building (building-06) which is approximately 30,450 square feet.

3. Facility visit
NC Photo: 1

Local law and/or ETI requirement

In accordance with 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.

In accordance with Bangladesh Labor 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:

It is recommended that facility should draw aisles mark at the mentioned area.

4. Description of non-compliance:

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

It was noted through facility visit that-

a) Randomly checked around 10% of needle guards of sewing machines were displaced from their position in the sewing section located at the 1st floor, 2nd floor, 3rd floor, 4th floor and 5th floor of facility building 4.

b) Randomly checked around 10% eye guard of overlock, flatlock machines were displaced from their position in the sewing section located at the 1st floor, 2nd floor and 4th floor of the facility building 4.

4. Facility visit
NC Photo: 2

Local law and/or ETI requirement

In accordance with 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.

In accordance with Bangladesh Labour Law 2006, Section 63(1) D (iii)

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 management should have a monitoring system so that employees use the machine guards properly.

5. Description of non-compliance:

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

It was noted through the facility visit and management as well as employee interview that, randomly checked 03 out of 06 employees working in the fusing area were not using hand gloves located on the 3rd floor of building 04.

Local law and/or ETI requirement

In accordance with 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.

In accordance with Bangladesh Labour 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 equipments, including safety shoes, helmets, goggles, masks, hand gloves, earmuffs, 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 management should ensure proper usage of PPE at the mentioned areas to avoid potential health hazards.

6. Description of non-compliance:

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

It was noted through facility visits, document review and management interviews that the facility did not have a CPP license for its newly installed 1 MW generator. However, the facility applied for their amended capacity (1 MW) on 30 October 2022 to the concerned authority but did not get yet.

5. Facility visit
NC Photo: 3

6. Facility visit

Note that, the facility used 04 generators with a total capacity of 3.34 MW (1030 KW +1030 KW+ 1000 KW+ 280 KW) & later added 1 MW capacity by installing another generator in August 2022 whereas, the facility has a CPP (Captive Power Plant) license only for 3.34 MW which is valid until 03 July 2024.

Local law and/or ETI requirement

In accordance with 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.

In accordance with Bangladesh Energy Regulatory Commission Act, 2003, Section 27 (1):

No person shall engage himself in the following business unless he is empowered by a license or exempted from having it under this Act or any other Act, such as:
- (a) power generation;

Recommended corrective action:

It is recommended that the facility should obtain an updated CPP license from the concerned authority.

Observation:	
<p>Description of observation: None Observed</p> <p>Local law or ETI requirement: Not Applicable.</p> <p>Recommended corrective action: None</p>	<p>Objective evidence observed: None Observed</p>

Good Examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p>Objective Evidence Observed: None Observed</p>

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.
- Facility verifies the workers age through registered doctors.
- Sampling basis employees' personal files was 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
B: Age of youngest worker found:	20
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0%

<p>E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details</p>
---	---

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed.</p> <p>Local law and/or ETI requirement: Not applicable</p> <p>Recommended corrective action: None.</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>None observed.</p>

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

Good Examples observed:	
<p>Description of Good Example (GE):</p> <p>None observed.</p>	<p>Objective Evidence Observed:</p> <p>None observed.</p>

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 card 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.
- All social insurance payments were passed on to the relevant authorities in a timely manner.
- Each employee was given a pay slip and signed for their wages.
- Generally, employees were paid within 7 working days of the following month by Mobile Banking.
- Employees are aware of their minimum wage.
- Wages have been recorded according to documents checked.
- All employees are getting 200% premium rate/ overtime rate based on basic wage.
- Based on documents review (salary sheet, employee appointment letter) facility ensured minimum wage to all employees as per grade/ job description.
- Facility deducted from wage for unauthorised purpose e.g. deduction was found for absent from work, Fair shop. No illegal deduction was found.
- Wages have been recorded according to documents checked.
- There are some good practices by the facility; see below GE section.

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 registers review
- Production record review
- Maintenance register review
- Maternity benefit register review
- Leave record review.
- Final settlement record review

Any other comments: None

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed</p> <p>Local law and/or ETI requirement: Not applicable</p> <p>Recommended corrective action: None</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>None Observed</p>

Observation:	
<p>Description of observation: None Observed</p> <p>Local law or ETI requirement: Not applicable</p> <p>Comments: None</p>	<p>Objective evidence observed: None Observed</p>

Good Examples observed:	
<p>Description of Good Example (GE):</p> <ul style="list-style-type: none"> - Facility provides attendance bonus to all employees as per company policy. - Facility has a fair price shop for all the employees. - The facility arranges free medical camps for the workers' family members every week. 	<p>Objective Evidence Observed: Documents review, management, and employees' interview</p>

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 08 hours per day 48 hours per week	A1: 08 hours per day 48 hours per week (For all sample months)	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 04 hours per day 24 hours per week	B1: 4 hours/day, 24 hours/Week in January 2023 (1 st Current paid Month) 4 hours/day,	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	(With legal waiver of 02 hours per day)	24 hours/Week in December 2022 (2 nd Current paid Month) 4 hours/day, 24 hours/Week in May 2022 (Random Month).	
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: BDT 8000.00 per month	C1: BDT 8000.00 per month (From sample employees)	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: Per hour 200% of basic hourly rate	D1: Per hour 200% of basic hourly rate	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																																			
A1: If No , why not?	Not applicable																																			
B: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	86 samples from January 2023 (1 st Current paid month). 86 samples from December 2022 (2 nd Current paid month). 86 samples from May 2022 (Random paid month). Note that 86 Employees' attendance record of February 2023 was also reviewed.																																			
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>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. For the worker level employees:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <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>4522</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> </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	4522	900	600	350	15416	Grade 3	5330	2665	900	600	350	9845	Grade 4	4998	2499	900	600	350	9347
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	4522	900	600	350	15416																														
Grade 3	5330	2665	900	600	350	9845																														
Grade 4	4998	2499	900	600	350	9347																														

		<table border="1"> <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> </table>	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
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																								
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> 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 which Meets minimum legal wage (As per new pay structure announced on 24th January 2019)																												
F: Please indicate the breakdown of workforce per earnings:	F1: ___% of workforce earning under minimum wage. F2: _10_% of workforce earning minimum wage. F3: _90_% of workforce earning above minimum wage.																													
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i> <ul style="list-style-type: none"> • Festival bonus: twice per year (basic wage). • Attendance Bonus: Facility provides attendance bonus to all employees as per company policy. 																													
H: What deductions are required by law e.g. social insurance? Please state all types:	<ul style="list-style-type: none"> • 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 Finance Act 2022 factory may deduct BDT 20 for Government Revenue Stamp. 																													
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made.	1. Un-authorized absence 2. Fair shop Please describe: As per section 125 of the Bangladesh Labour Law, 2006,																											
		I2: Please list all deductions that have not been made.	1. For fines, 2. housing facility 3. Advance payments 4. loans, 5. income tax 2. Revenue Stamp Please describe: Facility does not deduct the above as they are not required.																											

J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> 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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: Facility did not define living wages as it is not required by law.
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> 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).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Annual 5% of the basic wage.
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Through payroll records review and employees' interviews, it was confirmed that equal rates are being paid for equal work.
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer

	<input checked="" type="checkbox"/> Other Q1: If other, please explain: Mobile Banking
--	---

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:

- In this audit, auditor had randomly selected production record, such as: Material in/out records, daily production reports, and crosschecked these records with payroll records and attendance records, no inconsistency was noted. In addition, through employees' interviews, no inconsistency was noted either.
- Through employees' interview, overtime is voluntary.
- Time record system is maintained by electronic card punch.
- All overtime is compensated at a premium rate for all employees.
- Facility remains closed on Friday as weekly holiday.

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
- Job card
- Attendance register
- Production record
- Quality and production records to cross check hours
- Salary sheet
- Payslip
- 86 Records to show wages and hours were taken from April 2022 to January 2023 as below:
 - 86 samples from January 2023 (1st Current paid month)
 - 86 samples from December 2022 (2nd Current month)
 - 86 samples from May 2022 (Random month)

Any other comments:

Working section	No. of workers in the section	No. of Sampled workers in the section	Records of which month	% of workers worked continuously 7 days without rest day	Highest number of days worked consecutively	Highest number of OVERTIME hours worked in a day	Highest number of total hours worked in a day
Cutting	354	06	January 2023	0%	6 Days	4 hours	12 hours
Sewing	3444	50	January 2023	0%	6 Days	4 hours	12 hours
Washing	133	0	January 2023	NA	NA	NA	NA
Quality	589	10	January 2023	0%	6 Days	4 hours	12 hours
Finishing	538	10	January 2023	0%	6 Days	4 hours	12 hours
Packing	104	05	January 2023	0%	6 Days	4 hours	12 hours
Others	410	05	January 2023	0%	6 Days	4 hours	12 hours
Cutting	354	06	December 2022	0%	6 Days	4 hours	12 hours
Sewing	3444	50	December 2022	0%	6 Days	4 hours	12 hours
Washing	133	0	December 2022	NA	NA	NA	NA
Quality	589	10	December 2022	0%	6 Days	4 hours	12 hours
Finishing	538	10	December 2022	0%	6 Days	4 hours	12 hours
Packing	104	05	December 2022	0%	6 Days	4 hours	12 hours
Others	410	05	December 2022	0%	6 Days	4 hours	12 hours
Cutting	354	06	May 2022	0%	6 Days	4 hours	12 hours
Sewing	3444	50	May 2022	0%	6 Days	4 hours	12 hours
Washing	133	0	May 2022	NA	NA	NA	NA
Quality	589	10	May 2022	0%	6 Days	4 hours	12 hours
Finishing	538	10	May 2022	0%	6 Days	4 hours	12 hours
Packing	104	05	May 2022	0%	6 Days	4 hours	12 hours
Others	410	05	May 2022	0%	6 Days	4 hours	12 hours

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 Comments: 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 card punch.
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: If YES, please complete as appropriate:
	<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other
	If "Other", Please define:
	Not applicable

<p>E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>E1: If yes, please detail hours, %, types of workers affected and frequency Please give details: Not applicable</p>
<p>F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?</p>	<p>F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:</p>	<p>F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>Maximum number of days worked without a day off (in sample):</p>	
	<p>6 Days</p>	
<p>Standard/Contracted Hours worked</p>		
<p>G: Were standard working hours over 48 hours per week found?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>G1: If yes, % of workers & frequency:</p>
<p>H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>H1: If yes, please give details:</p>
<p>Overtime Hours worked</p>		
<p>I: Actual overtime hours worked in sample (State per day/week/month)</p>	<p>Highest OT hours: 4 hours in a day, 24 hours in a week in January 2023 (1st Current paid Month) 4 hours in a day, 24 hours in a week in December 2022 (2nd Current paid Month) 4 hours in a day, 24 hours in a week in May 2022 (Random Month).</p>	
<p>J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>K: Approximate percentage of total workers on highest overtime hours:</p>	<p>__60__%</p>	

<p>L: Is overtime voluntary?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	<p>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.</p>
<p>Overtime Premiums</p>		
<p>M: Are the correct legal overtime premiums paid?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	<p>M1: Please give details of normal day overtime premium as a % of standard wages: 200%</p>
<p>N: Is overtime paid at a premium?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>N1: If yes, please describe % of workers & frequency: Overtime payments for employees are as per legal requirement</p>
<p>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.</p>	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	
	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>	
	<p>Not applicable</p>	
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input checked="" type="checkbox"/> Safeguards are in place to protect worker's health and safety <input checked="" type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)	
	<p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p>	
	<p>Following the legal requirement employees worked over 60 hours per week.</p>	
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details:	

increased order volumes?	
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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: _95_ % A2: Female_05_ %
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 women found who are in skilled or technical roles.
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?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found.

	C1: Please give details: No such evidence was found
--	--

Professional Development	
A: What type of training and development are available for workers?	The facility provides on job training for the selected workers in their training section. After completion of training the workers are evaluated through exams.

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details:
--	---

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> 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 Comments: None	Objective evidence observed: None observed

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

8: Regular Employment Is Provided

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

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

ETI

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Additional Elements: Responsible Recruitment

8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.

8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.

8.5 Employment agencies must only supply workers registered with them.

8.6 Workers pay no recruitment fee at any stage of the recruitment process.

8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined

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

Current systems:

- 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 workers getting signed labour contract and ID card during their recruitment.
- Factory maintains service books for all workers.

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

As below:

Details:

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

Any other comments: None

Non-compliance:

<p>1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>It was noted through Employee Identity Card (ID) review and management interview that all prescribed information was not available in provided employee ID card of the facility. Note that the information of Blood group, Nature of work, Emergency contact number, National ID No etc. Note that the facility has provided 15% ID cards as per the rules.</p> <p>Local law and/or ETI requirement: In accordance with 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.</p> <p>In accordance with Bangladesh Labour 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.</p> <p>Recommended corrective action: It is recommended that the facility should maintain the ID card of employees as per the prescribed format.</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>1. Employee Identity Card (ID) review and management interview.</p> <p>NC Photo: 4</p>
---	--

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

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective Evidence Observed: None observed</p>

Responsible Recruitment

All Workers	
<p>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?</p>	<p><input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:</p>
<p>B: Did workers' pay any fees, taxes, deposits or bonds for the</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

purpose of recruitment/placement?	B1: If yes, please describe details and specific category(ies) of workers affected:
C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> 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:	Not Applicable
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?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not Applicable
D: Are Any migrant workers in skilled, technical, or management roles	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, number and example of roles: Not Applicable

Migrant Workers (this should include all migrant workers including permanent 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

B1 – If other, please give details:
Not Applicable

C: If any checked, give details:

Not Applicable

Agency Workers (if applicable)

(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)

A: Number of agencies used (average):

A1: Names if available: Not Applicable

B: Were agency workers' age / pay / hours included within the scope of this audit?

- Yes
- No
- Not Applicable

C: Were sufficient documents for agency workers available for review?

- Yes
- No
- Not Applicable

<p>D: Is there a legal contract / agreement with all agencies?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: Please give details: Not applicable, site does not use agencies</p>
<p>E: Does the site have a system for checking labour standards of agencies? If yes, please give details.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details: Not applicable, site does not use agencies</p>

<p style="text-align: center;">Contractors:</p> <p style="text-align: center;"><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></p>	
<p>A: Any contractors on site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>A1: If yes, how many contractors are present, please give details:</p>
<p>B: If Yes, how many workers supplied by contractors?</p>	<p>Not applicable. There are no contractors in the facility.</p>
<p>C: Do all contractor workers understand their terms of employment?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please describe finding: Not applicable. There are no contractors in the facility.</p>
<p>D: If Yes, please give evidence for contractor workers being paid per law:</p>	<p>Not applicable. There are no contractors in the facility.</p>

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 Homeworking were used by this facility.

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

Details:

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

If any processes are sub-contracted – please populate below boxes: Not applicable

Details: 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 /Additional Elements 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/Additional elements 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

Summary of sub-contracting – if applicable	
<input checked="" type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe:
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: If Yes , summarise details:
C: Number of sub-contractors/agents used:	
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> 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			
<input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If Yes , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:

<p>C: Are homeworkers employed direct or through agents?</p>	<p><input type="checkbox"/> Directly <input type="checkbox"/> Through Agents</p>	<p>C1: If through agents, number of agents:</p>
<p>D: Is there a site policy on homeworking?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>E: How does the site ensure worker hours and pay meet local laws for homeworkers?</p>		
<p>F: What processes are carried out by homeworkers?</p>		
<p>G: Do any contracts exist for homeworkers?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>G1: Please give details:</p>	
<p>H: Are full records of homeworkers available at the site?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility has an open channel for reporting any violations of labour standard which is posted in the notice board. Facility provided complain box in every washroom for receiving complain. Workers can report any violations directly to the compliance manager. Facility also has a grievance handling procedure in place.</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>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 complain box.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Facility has posted hotline & provided complain box in washroom.</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: Workers can place their grievance verbally or in written. Workers can also keep their identity confidential if required.</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details</p>
<p>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)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain</p>

<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>H1: If no, please give details</p>
<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>I1: If yes, please give details</p>

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' interview, 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):
 As below:
 Details:

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

Any other comments: None

Non-compliance:

<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>None observed.</p> <p>Local law and/or ETI requirement: Not applicable</p> <p>Recommended corrective action: None</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i> None observed.</p>
--	--

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

Good Examples observed:	
<p>Description of Good Example (GE): None observed.</p>	<p>Objective Evidence Observed: None observed.</p>

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 20 years old.

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

As below:

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 /Additional Elements 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/Additional Elements 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 10B4: Environment 4–Pillar

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

To be completed for a 4–Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar

B.4. Compliance Requirements

10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.

10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.

10B4.3 Businesses shall be aware of their end client’s environmental standards/code requirements

10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.

10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details).

10B4.7 Businesses shall make continuous improvements in their environmental performance.

10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation

10B4.9 Businesses should have a nominated individual responsible for co–ordinating the site's efforts to improve environmental performance.

B4. Guidance for Observations

10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.

10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in place. Following this assessment, the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)

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 conducted air emission and noise level test.

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:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>None observed</p> <p>Local law and/or ETI requirement: Not applicable</p> <p>Recommended corrective action: None</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>None observed</p>

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

Good examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective evidence observed:</p> <p>None observed</p>

Environmental Analysis <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Name: Md. Kamal Pasha Position: Sr. Manager, Utility & EMS.
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Facility identify aspect & impact on our activities. Then we set 6 questionnaires to find out its significant value. And finally, we set control plan if is significant.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: Facility has no environmental system certification such as ISO 14000 or equivalent. However, facility is involved with HiGG platform.
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? The site has an Environmental policy which was publicly available. In This Policy facility set Goal to reduce GHG Emission. In this policy we use 3R policy and PDCA Cycle. Air, Noise, Water, Wastage, Energy and Transportation management system are including in this policy.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility has an organogram to reach our policy goal. For this, they regularly participate in improvement training and got significant improvement.
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please gives details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: Facility followed Higg FEM, Rules & Regulations for developing sustainable system as per requirement of various brand like, H&M, PVH etc.
H: Have all legally required permits been shown? Please gives details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Facility had all legal permits, Like: DOE Permits, Environment Clearance Certificate Factory License.
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: Facility identify whether newly purchased chemicals are hazardous or non-hazardous. Then, facility traces all hazardous

	chemicals which are used in the process by maintaining a register/sheet/ERP.
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility had all legal system for environmental procedures and managing system for managing clients. Facility also has the legislative & regulatory requirements for significant environmental impacts.
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: The facility set a baseline and fixed a long-term target to reduce water, Air, Energy & GHG Emission.
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: Please give details: Facility has not evidence of waste recycling and is monitoring volume of waste that is recycled.
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The facility has a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards.
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The facility checked that their business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility. By conducting audits as per facility policy, they ensure their permits and licenses. We also ask to share of HiGG score (if have).

Usage/Discharge analysis

Criteria	Previous year: Please state period: February 2021 January 2022	Current Year: Please state period: February 2022 January 2023
Electricity Usage: Kw/hrs	2915616 kWh	3505640.9 kWh
Renewable Energy Usage: Kw/hrs	22038.7 kWh	22534 kWh
Gas Usage: Kw/hrs	1784833 kWh	1010906 kWh
Has site completed any carbon Footprint Analysis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes , please state result	3.310e^6 CO2e	3.3796e^6 CO2e

Water Sources: <i>Please list all sources e.g. lake, river, and local water authority.</i>	<ul style="list-style-type: none"> • Under Ground • Rain Water 	<ul style="list-style-type: none"> • Under Ground • Rainwater
Water Volume Used: <i>(m³)</i>	97352 m3	117530 m3
Water Discharged: <i>Please list all receiving waters/recipients.</i>	<ul style="list-style-type: none"> • Lake (Domestic) 	<ul style="list-style-type: none"> • Lake (Domestic) • ETP + Lake (Process Water)
Water Volume Discharged: <i>(m³)</i>	77719 m3 (approx.)	93828 m3 (approx.)
Water Volume Recycled: <i>(m³)</i>	N/A	N/A
Total waste Produced <i>(please state units)</i>	82382.1 kG	750813 kG
Total hazardous waste Produced: <i>(please state units)</i>	1819.1 kG	1472.8 kG
Waste to Recycling: <i>(please state units)</i>	N/A	N/A
Waste to Landfill: <i>(please state units)</i>	N/A	N/A
Waste to other: <i>(please give details and state units)</i>	N/A	N/A
Total Product Produced <i>(please state units)</i>	10875521 Pcs	11838268 Pcs

10C: Business Ethics – 4-Pillar Audit

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

To be completed for a 4-Pillar SMETA Audit

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.

10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

Note for auditors and readers. This Business Ethics section is intended to take not more than 0.25 auditor days. It is an assessment not an audit.

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 integrity policy of Intertek was given to the facility prior to start the audit. The management acknowledged this, signed it and kept a photocopy.
- The company manual contains the details of Business Ethics; moreover, they have anti-bribery and anti-corruption policy. The Business integrity policy was established and communicated to all employees by company manual, employee handbook and orientation and regular training.
- Based on facility's management interview, the facility was familiar on local regulations/laws concerning business integrity standards.
- Mr. Shaymal Kumar Sarker – Deputy General Manager (Admin & Compliance) is the responsible person for business integrity.
- The employees have their orientation training on business ethics when they first start their job. The Admin and Compliance department determines all job roles and responsibility categorized by section.

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

<p>Details:</p> <ul style="list-style-type: none"> The company business ethics policy including bribery, corruption. Training records.
--

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>None observed</p> <p>Local law and/or ETI requirement: Not applicable</p> <p>Recommended corrective action: None</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>None observed</p>

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

Good examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective evidence observed: None observed</p>

<p>A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy <input checked="" type="checkbox"/> Policy for third parties including suppliers</p> <p>A1: Please give details: The site gives training to relevant personnel (e.g. sales and logistics) on business ethics issues. Also, they have supplier selection and monitoring policy procedure.</p>
<p>B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>B1: Please give details: Facility provides training on business ethics issues to relevant personnel.</p>
<p>C: Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

	<p>C1: Please give details: The policy gets updated on a regular basis.</p>
<p>D: Does the site require third parties including suppliers to complete their own business ethics training</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </p> <p>D1: Please give details: The site does not require third parties including suppliers to complete their own business ethics training however, they have supplier selection and monitoring policy procedure.</p>

Other findings

Other Findings Outside the Scope of the Code

--

Community Benefits

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

--

Appendix 1

<p>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."</p> <p><input checked="" type="checkbox"/> Not Applicable please x</p>	
<p>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.</p>	<p>Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
<p>0.A. Guidance for Observations</p> <p>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.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>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.</p> <p>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.</p>	
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p>	

<p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>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.</p>	
<p>ETI 1. Forced Labour</p>	<p>ETI 1. Forced Labour</p>
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>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.</p>	
<p>ETI 2. Freedom of association and the right to collective bargaining are respected</p>	<p>ETI 2. Freedom of association and the right to collective bargaining are respected</p>
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>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.</p>	
<p>ETI 3. Working conditions are safe and hygienic</p>	<p>ETI 3. Working conditions are safe and hygienic</p>
<p>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.</p> <p>3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p>	

<p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.</p>	
<p>ETI 4. Child labour shall not be used</p>	<p>ETI 4. Child labour shall not be used</p>
<p>4.1 There shall be no new recruitment of child labour.</p> <p>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.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	
<p>ETI 5. Living wages are paid</p>	<p>ETI 5. Living wages are paid</p>
<p>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.</p> <p>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.</p> <p>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.</p>	
<p>ETI 6. Working Hours are not excessive</p>	<p>ETI 6. Working Hours are not excessive</p>
<p>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.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p>	

<p>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.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:</p> <ul style="list-style-type: none"> - 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. <p>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.</p>	
<p>ETI 7. No discrimination is practised</p>	<p>ETI 7. No discrimination is practised</p>
<p>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.</p>	
<p>ETI 8. Regular employment is provided</p>	<p>ETI 8. Regular employment is provided</p>
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>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</p>	

<p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p>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.</p>	
<p>8A: Sub-Contracting and Homeworking</p>	<p>8A: Sub-Contracting and Homeworking</p>
<p>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.</p>	
<p>ETI 9. No harsh or inhumane treatment is allowed</p>	<p>ETI 9. No harsh or inhumane treatment is allowed</p>
<p>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</p>	
<p>10. Other Issue areas: 10A: Entitlement to Work and Immigration</p>	
<p>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.</p>	
<p>10. Other issue areas 10B2: Environment 2-Pillar</p>	

<p>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. <i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	
---	--

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

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.

10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented.

Photo Form

Non-Compliance Photos:

<p>NC Photo 1: Aisles were not marked</p>	<p>NC Photo 2: Machine guard displaced</p>	<p>NC Photo 3: Employees not using hand gloves</p>
	<p>Nil</p>	<p>Nil</p>
<p>NC Photo 4: ID card was not updated</p>	<p>NA</p>	<p>NA</p>

Good example photos:

	<p>Nil</p>	<p>Nil</p>
<p>Supplier protector line</p>	<p>NA</p>	<p>NA</p>

General Site Tour Photos:

<p>Facility name</p>	<p>Facility building</p>	<p>Facility gate</p>
<p>Rooftop</p>	<p>Security check post</p>	<p>Assembly area</p>
<p>Staircase</p>	<p>Cutting section</p>	<p>Washing section</p>
<p>Sewing section</p>	<p>Finishing section</p>	<p>Packing section</p>

<p>Eye wash station</p>	<p>Fabric store</p>	<p>Finished goods store</p>
<p>Accessories store</p>	<p>Chemical store</p>	<p>Drinking water station</p>
<p>Exhaust fan</p>	<p>No smoking sign posted</p>	<p>First aid box</p>
<p>Firefighter</p>	<p>Fire alarm sounder</p>	<p>Fire alarm call point</p>

<p>Rescuer</p>	<p>Complaint box</p>	<p>Toilet area</p>
<p>Fire extinguisher</p>	<p>Evacuation plan</p>	<p>Public address system</p>
<p>Attendance recording system</p>	<p>Industrial emergency light</p>	<p>Smoke detector</p>
<p>Exit sign</p>	<p>Emergency exit door</p>	<p>Notice board</p>

<p>Firefighting equipment</p>	<p>Sprinkler system</p>	<p>Fire hose cabinet</p>
<p>Canteen</p>	<p>Dining area</p>	<p>Fire hose checked</p>
<p>Personal locker</p>	<p>Fire detection control panel</p>	<p>Electrical distribution board</p>
<p>Generator</p>	<p>Boiler</p>	<p>Compressor</p>

<p>Medical room</p>	<p>Childcare room</p>	<p>Effluent treatment plant</p>
<p>Fire hydrant pump</p>	<p>Electrical sub-station</p>	<p>COVID-19 Handwash facility</p>
<p>COVID-19 Awareness poster</p>	<p>COVID-19 Social distancing mark</p>	<p>COVID-19 Disinfect spray</p>



For more information visit: [Sedexglobal.com](https://www.sedexglobal.com)

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:](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw_3d_3d)

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw_3d_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw_3d_3d)

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

[http://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)

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