



# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC1012156	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS1008228	
Business name (Company name):	Rupy Fashions			
Site name:	Rupy Fashion			
Site address:	B-139,OKHLA INDUSTRIAL AREA PHASE -1 New Delhi 110 020 IN	Country:	IN	
Site contact and job title:	Vikram Singh Bhandari / Manager - HR & Accounts			
Site phone:	+919810045022	Site e-mail:	rupyfashions@gmail.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2023-08-14			

Audit Company Name:
DQS CFS GmbH

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)			

## Audit Content:

**(1)** A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

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

### **2-Pillar SMETA Audit**

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

### **4-Pillar SMETA**

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

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

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

## SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Anil Chaudhary	APSCA Number:	21705147
Additional Auditors:	Kaushik Laha		21701571
Date of declaration:	2023-08-14		

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.

Site Representation	
Full Name:	Vikram Singh Bhandari
Title:	Manager - HR & Accounts
Date of declaration:	2023-08-14
<b>Comments:</b> <i>Any exceptions to this must be recorded here (e.g. different sample size):  Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).  The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i>	

## Summary of Findings

Issue <small>(please click on the issue title to go direct to the appropriate audit results by clause)</small>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>0A - Universal rights covering UNGP</u>			0	0	0	
<u>0B - Management systems and code implementation</u>	0.B.1 0.B.3		2	0	0	NC - ZAF600141614 NC - ZAF600141615
<u>1 - Freely chosen employment</u>			0	0	0	
<u>2 - Freedom of association and right to collective bargaining are respected</u>			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.3		4	0	0	NC - ZAF600141616 NC - ZAF600141617 NC - ZAF600141618 NC - ZAF600141619
<u>4 - Child labour shall not be used</u>			0	0	0	
<u>5 - Living wages are paid</u>			0	0	0	
<u>6 - Working hours are not excessive</u>			0	0	0	
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>			0	0	0	
<u>8A - Subcontracting and homeworking</u>			0	0	0	
<u>9 - No harsh or inhumane treatment is allowed</u>			0	0	0	
<u>10A - Entitlement to work and immigration</u>			0	0	0	
<u>10B2 - Environment 2-pillar</u>			0	0	0	
<u>10B4 - Environment 4-pillar</u>			0	0	0	
<u>10C - Business ethics 4-pillar</u>			0	0	0	

## Site Details

Site Details			
Company Name	Rupy Fashions		
Site Name	Rupy Fashion		
GPS location (if available)	GPS Address:	B -139, Okhla Industrial Area, Phase -1, New Delhi - 110020	
	Coordinates:	28° 31' 38" N, 77° 16' 49" E	
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	1. Factory License: - DLF- 10326 issued from Labor Department for 145 Persons & 133.38 HP Valid Till 31/12/2024. 2. Fire NOC: - No. F.6/DFS/WS/EH/2021/934 Issue date: 09/09/2021 Valid for 03 years from the date of issue 3. Approved Building Layout plan: - Approved by Director (IHS) Dated: 16/01/2019 4. Building Stability Certificate: - Dated: 08/09/2018 -Obtained from Mr. Shiv Kumar B.E. (Civil) Structural Engineer. 5. Consent for Air Pollution & Water Pollution -: DPCC/CMC/2022/8861719 Dated: 07/12/2022 Valid till 06/12/2027 6. Waste management: Reg. no. A TO ZWMD/3952/23 Valid until 30.08.2024. 7. Certified Standing order-SO/07/SD/DLC/09/3339 Approved by Certifying officer/DLC (South) 23/03/2011 8. ESIC No. 20000603820000199 9. EPF No. DSNHP0025843000		
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturing of home furnishing items, handicraft. The main production process is listed as follows, In coming raw material - Cutting — sewing –washing– finishing – packing – dispatch. The main equipment used by the facility for production are sewing machines -09, Cutting machine -1, Washing machine - 1, Overlock Machine - 01, Embroidery Machine -01, Compressor - 02, Diesel Generator - 01 (Not in Use). There are 2 production lines.		
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The facility has started operations in the existing location since August'2005. The total land area occupied was approx. 594.4 SQ. Mtrs. and Build up area was 1486.44 SQ. Mtrs. The duty hours from 9:30 am to 18:00 hours. The lunch break 1300 hours to 1330 hours, tea break 1100-1115am , 1600-1615 pm. The weekly off is Sunday. The nearest airport is 26 - km from the location. There are 43 employees of which 30 are in Production and 13 in non production. The age of youngest worker is 27 years. The capacity is 3000 Pcs. per day, presently it 1000 Pcs. per day.		
Structure and number of buildings	Building Name:		1
	Floor	Description	Remark
	Basement	Store ( Accessory + Fabric )	None
	Ground Floor	Cutting, Inspection	None
	First Floor	Office, showroom	None
	Second Floor	Finishing, Packing, Sampling, Sewing	None
	Third Floor	Final Packed Material Store, Washing, Chemical store	None

Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There are no cracks.
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Building Stability Certificate: - Dated: 08/09/2018 -Obtained from Mr. Shiv Kumar B.E. (Civil) Structural Engineer.
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input 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
Months of peak season	September to November
Process overview	Manufacturing of home furnishing items, handicraft. The main production process is listed as follows, In coming raw material - Cutting — sewing –washing– finishing – packing – dispatch. The main equipment used by the facility for production are sewing machines -09, Cutting machine -1, Washing machine - 1, Overlock Machine - 01, Embroidery Machine -01, Compressor - 02, Diesel Generator - 01 (Not in Use). There are 2 production lines.
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None
Please give details:	Worker committee
Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A

Audit Parameters			
Time in and time out	Day 1		
	In	09:16	
	Out	18:19	
Audit type:	FULL_INITIAL		
Was the audit announced?	SEMI_ANNOUNCED		
Was the Sedex SAQ available for review?	Yes		
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No		
Who signed and agreed CAPR	Vikram Singh Bhandari / Manager - HR & Accounts		
Is further information available	No		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	No union present in the facility.		
<i>Reason for absence during the audit</i>	No union present in the facility.		
<i>Reason for absence at the closing meeting</i>	No union present in the facility.		

## 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*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – male	31	0	3	0	0	0	0	34
Worker numbers – female	9	0	0	0	0	0	0	9
Total	40	0	3	0	0	0	0	43
Number of Workers interviewed – male	6	0	1	0	0	0	0	7
Number of Workers interviewed – female	3	0	0	0	0	0	0	3
Total – interviewed sample size	9	0	1	0	0	0	0	10

Nationalities Structure		
Nationality of Management	Indian	
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: INDIAN	approx %: 100%
Was this list completed during peak season?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:	
Worker remuneration	Workers on piece rate:	0%
	Paid hourly:	0%
	Salaried:	100%
Payment cycle	Paid daily:	0%
	Paid weekly:	0%
	Paid monthly:	100%
	Other:	0%
	Details for other:	N/A

Worker Interview Summary	
Were workers aware of the audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were workers aware of the code?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Number of group interviews:	01 group of 04 employees
Number of individual interviews:	Male: 03 Female: 03
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
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
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	Employees do not have any complaints.
What did the workers like the most about working at this site?	Timely salary, no health and safety issues, positive Management-easily approachable, clean working place, no abusive language, no case of any harassment.
Any additional comment(s) regarding interviews:	None
Attitude of workers to hours worked:	There are no Overtime since the work is not much. The workers vouched that the overtime is voluntary and if there is any need for overtime, permission is sought from them and the working hours are noted for overtime and the payment is made for the overtime work hours @ 200% of the basic salary. Interview of slow work especially after COVID-19, the work is absolutely minimal.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:

10 workers were selected for interview, they were interviewed as 1 group of 4 employees and balance 06 workers were interviewed individually. The workers were assured of confidentiality and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory and that they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors who treated them with respect. They were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used. They felt able to complain directly to their supervisors but also felt free to give their general concerns of their grievance representative who would take it to the management.

Attitude of worker's committee/union reps:

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

Attitude of managers:

During the audit day, the management of establishment was very cooperative and very transparent to share the issues & information, Attitude of the management was found positive towards the audit and the audit process. The establishment was found aware of the requirements of a social audit & its applicable ETI and local law. The management was receptive to the findings and was very keen to implement all the measures to achieve compliance in their facility.

**0A - Universal Rights covering UNGP**  
**[Summary of Findings]**

**0A: Compliance Requirements**

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

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

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

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

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

0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

**Current Systems and Evidence Examined**

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

**Current Systems:**

1. Based on review of records facility has established a policy covering human rights Policy No. RF/HRP/26 dated 04.03.2023 impacts and issues and it is displayed.
2. Mr. Shashi Prakash Chopra – Proprietor is responsible for implementing standards concerning Human rights.
3. Facility has established a policy endorsed at the highest level, covering human rights impacts and issues, and ensures it is communicated to all appropriate parties, including its own suppliers.
4. Facility has identified their stakeholders and salient issues.
5. Facility has measured direct, in-direct and potential impacts on stack holder's human rights.
6. The Whistle blowing policy number RF/WBP/28 dated 04.02.2023 is available

**Evidence examined:**

1. Interaction with Management and Interview with employees
2. Employee Handbook was reviewed. It stipulates complying with ETI Code, written policies and procedure that being provided individually to employees.
3. Company Manual contains details of Code and Business Ethics with the commitment of being compliant in all aspects of business and integrity aligned with the client's requirement and local law.
4. Employees' training records showed the facility conducted training for employees about the social compliance when they enter the facility.

**Any other comments:**

None

Policy statement that expresses commitment to respect human rights?

☒ Yes ☐ No

Please give details:

Facility has a policy on Universal Rights covering UNGP-RF/HRP/26

Are the policies included in workers' manuals?

☒ Yes ☐ No

Please give details:

The polices are included in worker manual.

Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Mr. Shashi Prakash Chopra – Proprietor
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has provided a following grievance mechanism for confidential reporting anonymously without fear of retaliation and any breaches of policies and procedures. 1. Workforce Representative 2. Works committee. 3. Grievance Committee 4. Suggestion and Complaint Box
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Seen the data privacy policy vide RF/DPP/29 dated 04.02.2023. The data privacy are for the personal files, which are kept under lock and key in HR's room, the salary of the employees, since all the salary are bank transfer, the computers are password protected. The health checkup reports are kept Confidential
<b>Measuring Workplace Impact</b>	
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))	Last year                      1.0% This year                        0.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	0.0%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year                      2.0% This year                        2.0%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	2.0%

Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  Seen the accident incident record vide form 11 and form 26 of Government registers. There are no reportable accidents during the last one year. The first aid boxes are kept and the usage register seen, there are small finger cuts. Interviewed the workers and they also confirmed of no accident.	
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year	0.0%
	This year	0.0%
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)	0.0%	
Lost day work cases per 100 workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year	0.0%
	This year	0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

0B - Management Systems and code Implementation [Summary of Findings]
<p>0B: Compliance Requirements</p> <p>0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>0.B.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.B.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.B.4 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.</p> <p>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.</p>

Current Systems and Evidence Examined
<p><i>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.</i></p>
<p><b>Current Systems:</b></p> <ol style="list-style-type: none"> <li>1. Based from facility tour and review of records, facility has implemented the ETI base code and the code has been displayed in notice board and communicated to all the employees during induction training.</li> <li>2. Mr. Shashi Prakash Chopra - Proprietor is responsible for compliance with the code.</li> <li>3. Based on review of records that facility had obtained legally required Business license and approved plant layout.</li> <li>4. The facility communicates this Code to all employees by training as confirmed by training records and employee interviews.</li> <li>5. The ETI based code was posted on-site for employee review.</li> <li>6. The facility had setup policy and appointed one staff to update labor law requirements</li> <li>7. The Social Risk Assessment has not been done.</li> </ol>
<p><b>Evidence examined:</b></p> <ol style="list-style-type: none"> <li>1. Facility Policy and Procedures</li> <li>2. Employee Handbook was reviewed. It stipulates complying with ETI Code, written policies and procedure that being provided individually to employees.</li> <li>3. Company Manual contains details of Code and Business Ethics with the commitment of being compliant in all aspects of business and integrity aligned with the client's requirement and local law.</li> <li>4. Employees' training records showed the facility conducted training for employees about the social compliance when they enter the facility.</li> </ol>
<p><b>Any other comments:</b></p> <p>None</p>

Management Systems	
In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no prosecution.
Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The child labour policy RF/CLP/1, Child remediation policy RF/CRP/2, Young Workers policy RF/YWP/6, Forced Labour Policy RF/FLP/3, Anti-Harassment Policy, RF/AHP/24, Zero Abuse Policy RF/ZAP/28, Ethical policy RF/BEP/15, Anti - Discrimination policy RF/ADP/5, Anti-Bribery Policy RF/ABP/23 seen and the policies are displayed in the local language

If Yes, is there evidence (an indication) of effective implementation? Please give details.	The policies are displayed. The personal files of 10 employees on sample basis seen. The age proof is there. There is no evidence of forced labour in the files. No part of salary is withheld as inferred from the salary record. Interview with 10 employee's shows there is no discrimination, nor there are no cases of any harassment.
Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All the employees have undergone induction training where the social compliance policies and procedures were explained.
If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The workers could not explain the ETI code properly.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Is there a Human Resources manager/department?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Mr. Vikram Singh Bhandari - Manager HR is taking care of the HR activities
Is there a senior person /manager responsible for implementation of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Mr. Shashi Prakash Chopra - Proprietor
Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The policy of confidentiality vide RF/POC/32 dated 04.02.2023 available.
Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All the information about the personal files are kept confidential. The salaries are transferred to the banks and the individual notifications are sent by the bank to the respective mobile phones. The health checkup is kept confidential.
Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Social risk assessment not done.
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 Please give details: Based on the interaction with the management and review of record that effective action has been taken for the risk identified during internal audit. The internal audit RF/IA was conducted on 24.06.2023 by Mr. Shashi Prakash Chopra there were 4 NCRS raised and all are closed from 29.06.2023. The MRM is conducted on 03.07.2023.

Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The code of ETI is signed off with the suppliers
<b>Land Rights</b>	
Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has copy of building occupation certificate with land registry papers as required by law. All approvals were verified.
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 Please give details: Facility has systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.
Does the site have a written policy and procedures specific to land rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has written policy and procedures specific to land rights.
Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has compensated the owner for the land prior to the facility being built.
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 Please give details: Facility has written policy to check all legal aspects before taking any land. Facility has taken legal opinion before taking the land.
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 Please give details: N/A

Non-Compliance		Evidence																												
<a href="#">[Back to findings summary]</a>																														
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## 1 - Freely chosen Employment [Summary of Findings]

### 1: Compliance Requirements

- 1.1 There is no forced, bonded or involuntary prison labour.  
1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

## Current Systems and Evidence Examined

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

### Current Systems:

1. The factory has a policy which prohibits forced labour and this was available for review.
2. There was a non-formalised application procedure which states that workers must present their ID's for proof of age but that only copies must be kept in the personnel files and the original given back to the workers.
3. The employee handbook – given to all workers on joining, states that workers within their probation period are free to leave without any notice and once a worker is permanent (this is out of probation) they can resign from the factory with one month's prior written notice, given to their supervisor or the personnel office. The handbook also states that they will be given their full wages on their last day of work.
4. The terms and conditions of employment in the handbook state that the workers are free to leave the workplace outside of their working hours.
5. The factory did not require any payment for work tools, IC/staff card, training, etc.
6. The factory did not use prison labour.
7. The above was confirmed in management and employee interview

### Evidence examined:

1. Personnel files (all were checked)
2. Resignation records of recent 3 months
3. Factory rules
4. Employee handbook
5. Management and employee interview

### Any other comments:

None

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)

☐ Yes ☒ No

Please give details:

Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)

☐ Yes ☒ No

Please give details:

Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)

☐ Yes ☒ No

Please give details:

Are there any restrictions on workers' freedom to terminate employment?

☐ Yes ☒ No

Please give details:

There are no restrictions on workers' freedom to terminate employment as both parties can give 1 month's notice.

<p>If any part of the business is UK based or registered there &amp; has a turnover over £36m, is there a published a 'modern day slavery statement'?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p> <p>Please give details: N/A</p>
<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: There is no evidence of any restrictions on workers' freedoms to leave the site at the end of the work day as inferred from the workers interview.</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please give details: The human trafficking policy RF/HRP/26 and Forced Labour Policy RF/HRP/26 seen.</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Background Verification done.</p>

## 2 - Freedom of Association and Right to Collective Bargaining are Respected

### [Summary of Findings]

#### 2: Compliance Requirements

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

### Current Systems and Evidence Examined

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

#### Current Systems:

1. There is no Union at the site
2. There is workers committee at the site, worker representatives were elected by employees.
3. Based from employee's interview, employees can approach top management directly to report Their grievances and necessary corrective action is taken by the management.
4. Facility has formed a Workers Committee and Grievance committee and conducted meetings once in two months and the minutes of meetings are recorded for verification and future reference.
5. Based from employee's interview, the facility does not restrict employees from organizing trade Workers and has an open mind approach towards the activities of trade Workers and their organizational activities.
6. Based from the employee's interview and interaction with facility management, works committee employee representatives are not discriminated and they are free to carry out their functions like meetings on periodical basis.

#### Evidence examined:

1. Social compliance system program and procedure
2. Suggestion box complain feedback
3. Worker Election Records dated 04.04.2023
4. Meeting minutes
5. Works Committee Minutes dated 28/06/2023
6. Employee interview and management interview

#### Any other comments:

None

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)

- ☐ Union
 ☒ Worker Committee
 ☐ Other
 ☐ None

Other details:

Worker committee

Is it a legal requirement to have a union?

- ☒ Yes
 ☐ No

Is it a legal requirement to have a worker's committee?

- ☐ Yes
 ☒ No

Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)

- ☒ Yes
 ☐ No

Please give details:

Facility has provided suggestion box, where employees are free to express their problems / suggestions / complaints for any grievances. While interviewing, all employees reported that they are free to approach the management for any problem.

Is there evidence of free elections?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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 Please give details: Based from the employee's interview and review of records that, works committee employee representatives are free to carry out their functions like meetings with adequate facilities on periodical basis and the record of the same was maintained
Name of union and union representative, if applicable:	Not applicable. No union existed in facility.
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Worker committees existed in facility
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Based on workers interview it was noted that all workers are aware about the workers representative.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2022-04-04
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The Participation Committee is arranging meeting within three months and gathering problems coming from workers' end and approaching them to the management. Last meeting was conducted on 28.6.2023. Minutes of works committee was continued 41 minutes.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

### 3 - Working Conditions are Safe and Hygienic [Summary of Findings]

#### 3: Compliance Requirements

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. Veer Pal- HSE Representative is responsible for Health & Safety aspects for the site
- Potable water was freely available in all areas and test certificates were up to date.
- Adequate clean toilets segregated by gender were always available to employees.
- Ventilation, temperature and lighting were adequate for the production processes.
- Minutes of meetings show that there are monthly meetings between the workers and the Facility management, and each point is acted on.
- Male seat - 3, Female washroom -3
- There is no divider in the male urinal.

##### 2.Fire Safety

- There were at least 2 exits from each work area and these were clearly marked
- Firefighting equipment 36 fire extinguishers, 05 fire alarm call point, 25 Emergency Lights, Hydrant – 1, Hose Reel - 04, Sprinklers -20, Evacuation plan - 05 and Smoke Detector -10 were provided in the facility which was found adequate.
- Evacuation diagrams were posted in all areas and understood by all workers interviewed
- Fire drills were organized and recorded every 2 months as per the law. The last mock drill was conducted 11.07.2023 and 15.05.2023. The time taken is 02 min 34 sec by External agency Paramount Safety Alliance (P) Ltd.
- Facility has marked all the exits and emergency exits in a language understood by majority of the employees
- The number of fire trained persons is 24 trained by Paramount Safety Alliance (P) Ltd.
- 02 out of 36 fire extinguishers were found to be blocked in finishing area at second floor & checking area at ground floor on the day of the audit
- There is no instructions for the use of the fire alarm in the Store.
- Fire extinguisher were mounted 3.9 feet above the ground level as against the local law requirement of 750 mm above the ground level.

##### 3.Machine & Electrical Safety

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

##### 4.Medical Services

- Facility has provided well equipped first aid boxes in each production area (Total 08 first aid box) and they were well stocked.
- There were 4 first aiders and they had been trained through St. John Ambulance on 18/09/2020 valid for Three year.

#### Evidence examined:



- Health and Safety Policy No. RF/HSP/07 Dated 04.02.2023
- Health and safety manual
- Building Stability Certificate: - Dated: 08/09/2018 -Obtained from Mr. Shiv Kumar B.E. (Civil) Structural Engineer is valid until no change in structure.
- Industrial accident records – updated till July' 2023
- First aid training was provided to 4 employees and obtained the certificate on 18/09/2020 from St. John Ambulance
- Health & Safety Committee meeting minutes dated 30/05/2023
- Drinking Water Test report dated 26.07.2023 report No. STRL WQT -20230721001 by Sanguine Testing & Research Laboratory Pvt. Ltd.
- Fire Drill conducted once in 2 months. Last drill was conducted on 11.07.2023.
- Interaction with Management and Interview with employees.
- Verified Ambient Air Quality 26.07.2023 report No. STRL ENV - 20230702102 by Sanguine Testing & Research Laboratory Pvt. Ltd.
- Ambient Noise 26.07.2023 report No. STRL ENV - 20230702103 by Sanguine Testing & Research Laboratory Pvt. Ltd.
- DG Stack 26.07.2023 report No. STRL ENV - 20230702105 by Sanguine Testing & Research Laboratory Pvt. Ltd.
- Lux Intensity 26.07.2023 report No. STRL ENV - 202307021015 by Sanguine Testing & Research Laboratory Pvt. Ltd.
- Indoor Air Quality 26.07.2023 report No. STRL ENV - 20230702102 by Sanguine Testing & Research Laboratory Pvt. Ltd.
- DG Noise 26.07.2023 report No. STRL ENV - 20230702104 by Sanguine Testing & Research Laboratory Pvt. Ltd.
- Steam Boiler Form No. – 8 dated 23.03.2023 report No. BTS/M/SJ -17 by Boss Technical Services.


Any other comments:


None


Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  Facility had established general Health& Safety, occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers during induction training.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  Facility had included the social compliance policies in worker's manual.
Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:  Facility had maintained the approved plant lay out as per the current setup.
Are visitors to the site informed on H&S and provided with personal protective equipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  Briefing to all visitors about H&S, prior to visit in the production areas and they have provided PPE's, i.e. Face mask, Hand Gloves, Ear Plug & etc.

Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  First Aid boxes have been provided by the facility as requirement by local law requirement. After that refer to the multispecialty hospital ESI hospital, if there is any serious.
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  Please give details:  The first aid certificates of the trained persons from St. John's ambulance trained on 18.09.2020.
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:  All workers come from nearby places.
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  Please give details:  No living space required
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  Please give details:  The risk assessment vide RF/RA/HIRA/01 dated 04.02.2023.Factory has developed risk assessment analysis for all areas and functions and takes effective steps to reduce the associated risks. The risks identified on 04.02.2023 are burn injury, electric shock, Fire, Gangway block, emergency gate closed. There is no overtime and all the workers come from nearby places
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  Please give details:  Facility has obtained required permits.
Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:  Based on the interaction with facility management it was noted that they do not use any banned chemical.

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Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit																														
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#### 4 - Child Labour Shall Not Be Used [Summary of Findings]

##### 4: Compliance Requirements

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

#### Current Systems and Evidence Examined

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

##### Current Systems:

1. Based from interaction with the factory management, all employees are hired by the Human Resource Department only.
2. Based from review of hiring policy documents, employee's ID for age proof such as Voter ID, Aadhar Card, PAN Card and School Certificate was checked by HR department prior to hiring. The employees without valid ID certificates are not being hired.
3. Based from the policy review, the minimum hiring age of the facility is above 18 years old.
4. Based from employees' interview, any suspect of child labor can be reported to facility management.
5. Based on the employee interviews, review of facility's Anti Child Labor & Hiring Policy and age proof documents, the facility has complied with ILO Standards for Child Labor.

##### Evidence examined:

1. Child Labor and Child Labor Remediation Policy.
2. Age Proof records of 10 out of 10 selected samples.
3. Interaction with Management and Interview with employees

##### Any other comments:

None

Legal age of employment:	15
Age of youngest worker found:	27
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
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A

## 5 - Living Wages are Paid [Summary of Findings]

### 5: Compliance Requirements

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:

Based on review of wage records, the facility has paid the applicable minimum wages to all the employees. Based on employee's interview, wages are fixed on daily rated, calculated and paid on monthly basis on or before 7th of respective month. Based on employee's interview, wage slips are provided to all the employees and employees are aware of their wage calculations. Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules. Based on employee's interview and record review all the employees are received appointment letter with written and understandable information about their employment conditions in respect to wages

### Evidence examined:

Salary register pay slip and Time records for 10 selected samples for 03 months of September' 2022 (Peak month) February' 2023 (Random month) and July'2023 (Current month).  
Employees Provident Fund Remittance and challans.  
Leave with wage records (Form No: 15) and Leave encashment records. Settlement and Gratuity paid records.  
List of National and Festival Holidays.  
Pay Slip, PF & ESI Chalan Interaction with management and Employees

### Any other comments:

None

## Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 12.0 Per Month: null	Actual Per Day: 2.0 Per Week: 12.0 Per Month: 0.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 663.0 Per Week: null Per Month: 17234.0	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 17234.0	NO

Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 12.0 Per Month: null	Actual Per Day: 2.0 Per Week: 12.0 Per Month: 0.0	NO
<b>Wages Analysis:</b>			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	Salary register pay slip and Time records for 10 selected samples for 03 months of September' 2022 (Peak month) February' 2023 (Random month) and July'2023 (Current month).		
Are there different legal minimum wage grades? If Yes, please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Minimum wage as per notification Effective from 1st April 2023 (Monthly wages rate) Unskilled: INR 17234/- per month Semi-Skilled: INR 18993/- per month Skilled: INR 20903 per month.		
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"/> Not Applicable Please give details:		
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		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	Basic Salary 17234.00 Working Day 29.5 Salary 16400, ESIC 123, PF - 1713, Advance 3000, Net Pay - 11564.00.		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 100.0% of workforce earning minimum wage 0.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found:he bonus is given @ 8.33% of the salary earned given on 15.10.2022. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	EPF ad ESI		
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Please list all deductions that have been made.	EPF ad ESI		
Please list all deductions that have not been made.	N/A		
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
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 Please give details: In out record of the worker maintained.		

Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
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 <input type="checkbox"/> Other – please give details:
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 Please give details: Facility is located in Delhi. Where government revise applicable minimum wage rate twice per after consideration to basic needs of workers plus discretionary income and issue minimum wage notification for the factories to follow. Facility revises wages of the employees accordingly.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Based on employee's interview and record review all the employees irrespective of caste creed, sex is receiving equal rates for equal work
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

## 6 - Working Hours are not Excessive [Summary of Findings]

### 6: Compliance Requirements

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:

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

## Current Systems and Evidence Examined

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

### Current Systems:

1. 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 employee interview, no inconsistency was noted either.

2. Based on provided attendance records, the working hours analysis as below:

a) During employee interview, all the 10 randomly selected employees stated that they worked overtime on voluntary basis.

b) The facility has implemented electronic system to record IN/OUT time recording for all the employees.

3. Based on the provided attendance records, the no overtime hours worked

### Evidence examined:

- Facility Policy.

- In/Out time records and Pay slip and Time records for 10 selected samples for 03 months September' 2022 (Peak month) February' 2023 (Random month) and July'2023 (Current month).

- Interaction with management and Employees.

- Employees contracts

- Production Records

### Any other comments:

None

## Working hours' analysis

### Systems & Processes

What timekeeping systems are used?

Card Punching Machine

Is sample size same as in wages section?

☒ Yes ☐ No

Please give details:

Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)

☒ Yes ☐ No

Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	6
<b>Standard/Contracted Hours worked</b>	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Overtime Hours worked</b>	
Actual overtime hours worked in sample (State per day/week/month)	None Observed
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: None observed
Approximate percentage of total workers on highest overtime hours:	0.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: Based on documents review, workers and management interview, the factory has the policy that the overtime is be voluntary.
<b>Overtime premium</b>	
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium Please give details: Based on documents review, workers and management interview, the factory has the policy that the overtime is being paid @200%.
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Based on documents review, workers and management interview, the factory has the policy that the overtime is being paid @200%

<p>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>	<p><input checked="" type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements</p> <p><input type="checkbox"/> Other</p>
<p>Please give details</p>	<p>N/A</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. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)</p>	<p><input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input type="checkbox"/> Safeguards are in place to protect worker's health and safety</p> <p><input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)</p>
<p>Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other</p>	<p>N/A</p>
<p>Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

## 7 - No Discrimination is Practiced [Summary of Findings]

### 7: Compliance Requirements

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

### Current Systems and Evidence Examined

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

#### Current Systems:

1. Based from review of wage records and employees' interview, no discrimination was noted in hiring, compensation, access to training, promotion, termination or retirement.
2. Partner is responsible for the investigation and disposal of discrimination case.
3. Based from wage records review, the facility provides the same pay for male/female employees for same work of similar nature.
4. No employee was required to do the examination of the Pregnancy, hepatitis B virus and HIV.
5. Anti-discrimination procedure on hiring, compensation, promotion and access to training is available during the audit.
6. Gender divisions did not exist in the facility; both female and male employees were distributed in all types of work.
7. There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
8. There was no evidence of sexual harassment.

#### Evidence examined:

- Facility Policy.
- The hiring and termination procedure leave application records and employee handbook.
- Time in and out records, full and final settlement records and training records.
- Appointment letter with terms and conditions for 10 out of 10 selected samples.
- Salary and other benefit records.
- Interaction with management and Employees

#### Any other comments:

None

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 100.0%	Female: 0.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	0	
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"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement <input type="checkbox"/> Access to training <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	N/A	
Professional Development		

What type of training and development are available for workers?	The training imparted are, Training on ETI code on 24.06.2023, Training on health and safety on 30.05.2023, training on PPE on 24.06.2023, training on Environmental on 15.07.2023, Training on Salary Calculation and OT on 23.05.2023, training on anti-bribery on 08.07.2023
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

## 8 - Regular Employment Is Provided

### [Summary of Findings]

#### 8: Compliance Requirements

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:

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

### Evidence examined:

Facility Policy.

Appointment letter with terms and conditions for 10 out of 10 selected samples.

Salary and other benefit records.

Interaction with management and Employees

### Any other comments:

None

## Responsible Recruitment

### All Workers

Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?

- ☒ Terms & Conditions presented ☒ Understood by workers
- ☒ Same as actual conditions

Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)

- ☐ Yes ☒ No

### Migrant Workers

Type of work undertaken by migrant workers:	None observed
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
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 checked="" type="checkbox"/> No Please give details: N/A
Is there any observation on this finding?	None observed
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Non-employee workers</b>	
<b>Recruitment Fees</b>	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>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.)</b>	
Number of agencies used (average):	1
Please provide the names of agencies if applicable	Krishna Security & Services
Were agency workers' age / pay / hours included within the scope of this audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Seen the contract with the manpower provider.
Does the site have a system for checking labour standards of agencies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The salary records, Personal files , attendance records are checked
<b>Contractors (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.)</b>	
Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A



### 8A - Sub-Contracting and Homeworking [Summary of Findings]

#### 8A: Compliance Requirements

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

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

### Current Systems and Evidence Examined

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

#### Current Systems:

Through the management interview, workers interview; facility is doing all production process in factory Premises. Verified through document review, factory tour, management interview and employee interview that no subcontracting & Home-working was used by this factory

#### Evidence examined:

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

#### Any other comments:

None

### Summary of sub-contracting – if applicable

Is there any sub-contracting at this site? ☐ Yes ☒ No

### Summary of homeworking – if applicable

Is homeworking used at this site? ☐ Yes ☒ No

## 9 - No Harsh or Inhumane Treatment is Allowed

### [Summary of Findings]

#### 9: Compliance Requirements

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.

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

Based from the interaction with the facility management and employee's interview, it is noted that no case of abuse or discipline has happened in the facility and the facility has a written disciplinary procedure that is displayed in the notice board of the facility.

According to the documentation, the facility management had established a disciplinary procedure for employees' misbehavior which included oral warning, written warning and finally termination and the site, had developed a training program for all employees on the procedure. Employee interview confirmed that employees were aware of the disciplinary procedure.

As per management interview, document review and employees' interview, there was a policy on Harsh Treatment.

There is an internal process for grievance and suggestion box has been provided, where employees can report a grievance (harassment, bullying, discrimination etc.), any received complaint will be handled by management, without any reprisal for the employee in question. All sampled employees were aware this system.

#### Evidence examined:

Facility Policy  
The relevant policy on prevention of harassment and abuse  
Internal grievance procedure documentation.  
Training records  
Interaction with management and Employees  
Policy on equal opportunity

#### Any other comments:

None

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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  Facility had Grievance committee, Health and Safety committee and the Works Committee.
If yes, are workers aware of these channels and have access? Please give details.	The workers are aware of the suggestion box, communicating to the Management and the whistle blowing policies
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion box which is opened every fortnight in presence of the WR and whistle blowing policies.
Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Worker <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other
Please provide grievance mechanism details	Facility had effective grievance mechanism in place where workers, communities & suppliers can express their grievance through Suggestion box, Hot line, committee meetings etc.

Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

**10A - Entitlement to Work and Immigration**  
**[Summary of Findings]**

**10A: Compliance Requirements**

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

1. Based from the review of employee attendance records and employee's interview, the facility has not employed any foreign nationals.

2. Based from the review of employee personal files, all the employees are holding the legal rights to work.

**Evidence examined:**

Hiring procedure  
Personnel files  
Employee handbook  
Interaction with Management and Employee

**Any other comments:**

None

### 10B4 - Environment 4-Pillar [Summary of Findings]

#### 10B4: Compliance Requirements

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

10.B4.2 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.

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

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

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

10.B4.6 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).

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

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

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

#### 10B4: Guidance for Observations

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

10.B4.11 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:

Consent for Air Pollution & Water Pollution –: DPCC/CMC/2022/8861719 Dated: 07/12/2022 Valid till 06/12/2027.

- Drinking Water Test report dated 26.07.2023 report No. STRL WQT -20230721001 by Sanguine Testing & Research Laboratory Pvt. Ltd.

- Verified Ambient Air Quality 26.07.2023 report No. STRL ENV - 20230702102 by Sanguine Testing & Research Laboratory Pvt. Ltd.

- Ambient Noise 26.07.2023 report No. STRL ENV - 20230702103 by Sanguine Testing & Research Laboratory Pvt. Ltd.

- DG Stack 26.07.2023 report No. STRL ENV - 20230702105 by Sanguine Testing & Research Laboratory Pvt. Ltd.

- Lux Intensity 26.07.2023 report No. STRL ENV - 202307021015 by Sanguine Testing & Research Laboratory Pvt. Ltd.

- Indoor Air Quality 26.07.2023 report No. STRL ENV - 20230702102 by Sanguine Testing & Research Laboratory Pvt. Ltd.

- DG Noise 26.07.2023 report No. STRL ENV - 20230702104 by Sanguine Testing & Research Laboratory Pvt. Ltd.

#### Evidence examined:

DPCC  
Test Report

#### Any other comments:

None

Environmental Analysis	
Is there a manager responsible for Environmental issues (Name and Position):	Mr. Rahul Kumar - Asstt. Manager - HR
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 Please give details: The site has conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks-05/06/2023
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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 Please give details: Key impacts from their operations and their commitment to improvement is addressed.
Does the site have a Biodiversity policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Have all legally required permits been shown?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Consent for Air Pollution & Water Pollution –: DPCC/CMC/2022/8861719 Dated: 07/12/2022 Valid till 06/12/2027.
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details: No Hazardous chemicals are being used
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No such requirement
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 Please give details: Facility has conducted an impact and aspect analysis for the environment impact of the site to reduce water consumption and discharge, waste and energy. The reduction targets were maintained. Last was done dated 12/08/2023.

Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: Water reduction -5% Energy reduction -2% Paper Consumption – 2%	
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  Please give details: The ETP monitoring is done, The plant is running on Zero Liquid Discharge	
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details: N/A	
Usage/Discharge analysis		
Criteria	Previous year: 2022	Current year: 2023
Electricity Usage: Kw/hrs	127435	74088
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	0	0
Has site completed any carbon Footprint Analysis?	No	No
If Yes, please state result		
Water Sources	Third Party	Third Party
Water Volume Used	264	73
Water Discharged	259	68
Water Volume Discharged	259	68
Water Volume Recycled	211	56
Total waste produced	6720 Kgs	3836 Kgs
Total hazardous waste produced	7 Kgs	3.7 Kgs.
Waste to recycling	0	0
Waste to landfill	0	0
Waste to other	0	0
Total Product Produced	1200000	5500

**10C - Business Ethics – 4-Pillar Audit**  
**[Summary of Findings]**

**10C: Compliance Requirements**

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

10.C.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.

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

10.C.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.

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

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

10.C.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**

10.C.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.

10.C.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 company manager was the designated person responsible for implementing standards concerning Business Ethics and it was observed that the site does not indulge in corrupt and discriminative practices. The company has established a business ethics policy which was communicated to workers through posters and training. The site had received and read the business ethics policy of the auditor/audit company

**Evidence examined:**

The company business ethics policy including Anti –Company Ethical Policy Anti Bribery Policy Anti-Corruption Policy Training records.

**Any other comments:**

None

Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?

☒ Internal Policy

☐ Policy for third parties including suppliers

Please give details:

Factory has developed and communicated business ethic policy.

Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?

☒ Yes ☐ No

Please give details:

The site provided training records about sales and logistics member on business ethics for review.

Is the policy updated on a regular (as needed) basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Policy is being reviewed once in a year last review done on dated 04.02.2023
Does the site require third parties including suppliers to complete their own business ethics training	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Factory provide training to their own suppliers.

## Attachments



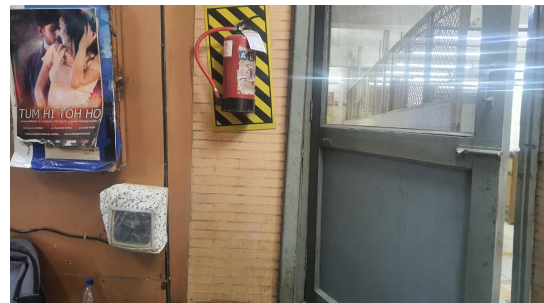
Factory Front View.jpg



Factory Name & Address.jpg



Assembly Area.jpg



Attendance Punching Machine.jpg



Attendance Card.jpg



Asseccory Store.jpg



Fire Hydrant.jpg



Smoke Detector.jpg



Eye Wash Station.jpg



Fire Alarm.jpg



Suggetion Box.jpg



Febric Checking.jpg



Evacuation Map.jpg



Fire Extinguisher.jpg



Displayed Factory Timing.jpg



Pressing.jpg



Displayed ETI Base Code.jpg



Tumbler.jpg



Sprinklers.jpg



Hose Reel.jpg



Emergency Light.jpg



Boilers.jpg



Folding Section.jpg



NC Photo - Fire Extinguisher More Height.jpg



Electric Panel.jpg



First Aid Box.jpg



Initial Checking.jpg



Displayed Emergency & PPE Instruction.jpg



Nc Photo - No Partition.jpg



Generator Room.jpg



Ladies Toilets.jpg



Chemical Room.jpg



Metal Detector Machine.jpg



Checking Department.jpg



Displayed Emergency Numbers.jpg



Notice Board.jpg



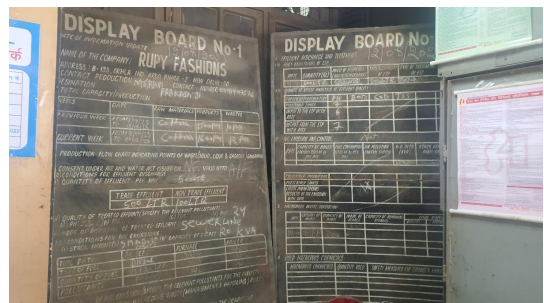
Packing.jpg



Hazarous Wate Storage Room.jpg



ETP Plant.jpg



Displayed Envionment Board.jpg



Final Checking.jpg



Washing Section.jpg



Fabric Store.jpg



Drinking Water.jpg



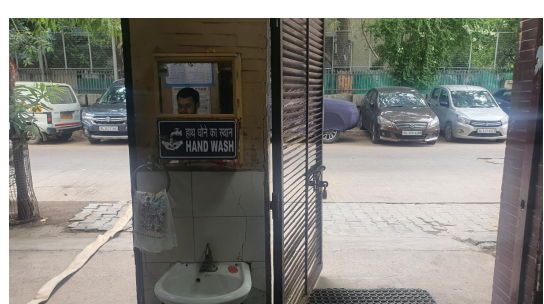
Stitching Section.jpg



Cutting Section.jpg



NC Photo - Fire Extinguisher Block in Checking Department.jpg



Hand Wash Area.jpg



Spotting.jpg



NC - No Instruction for use of Fire Alarm.jpg



NC Photo - Fire Extinguisher Block in Production Department.jpg



Sampling.jpg



Final Packed Storage Area.jpg



Hand Work.jpg



Displayed Factory Abstracts.jpg



SIGNED CAPR.pdf



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

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

**[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)**

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw\\_3d\\_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

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