



# Sedex Members Ethical Trade Audit Report

**Version 6.1**



### Audit Details

Sedex Company Reference: (only available on Sedex System)	ZC: 402434555	Sedex Site Reference: (only available on Sedex System)	ZS: 402491671
Business name (Company name):	Sagacious Fashions Ltd		
Site name:	Sagacious Fashions Ltd		
Site address: (Please include full address)	74/1,Degerchala Main Road, National University, Gazipur Sadar, Gazipur-1705, Bangladesh  <b>Head Office</b> :Plot # 19, Road # 15 ,Sector # 04, Uttara Commercial Area, Dhaka-1230,Bangladesh	Country:	Bangladesh
Site contact and job title:	Md. Dulal Shaikh (Manager Admin & HR)		
Site phone:	+880708143304	Site e-mail:	info@ sagaciousfashion.com <a href="mailto:admin@sagaciousfashion.com">admin@sagaciousfashion.com</a> <a href="mailto:hr@sagaciousfashion.com">hr@sagaciousfashion.com</a>
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	19/12/2019		

### Audit Company Name & Logo:

Hong Kong Q.C. Center Ltd



Be Certain To Thrive

### Report Owner (payer):

(If paid for by the customer of the site please remove for Sedex upload)

Sagacious Fashions Ltd.

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

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

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size):

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

Lead auditor: Md. Zabeed Kayser

APSCA number:

Lead auditor APSCA status:

Team auditor: Sadia Asma Suchana

APSCA number:

Interviewers: Sadia Asma Suchana

APSCA number:

Report writer: Md. Zabeed Kayser

Report reviewer: Keeley Lam

Date of declaration: 19-12-2019

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

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

## Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.		Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
		ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	<u>Universal Rights covering UNGP</u>			<input type="checkbox"/>	<input type="checkbox"/>				None observed
0B	<u>Management systems and code implementation</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	01			-Based on document review and management interview it was noted that factory did not communicate ETI Base Code through their supply chain
1.	<u>Freely chosen Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed.
2	<u>Freedom of Association</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed.
3	<u>Safety and Hygienic Conditions</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	04			-Facility has child care room but it was found non-functional --Wastage kept without segregation - Wastes like Jute, Carton, and Poly were not segregated by type of in wastage storage area. - During plant tour it was noted that there's no identify risk assessment at Yarn storage area located ground floor, Accessories store material store house.

									- During floor visit It was noted that First Aider is have no sound knowledge about the First Aid items
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed.
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed.
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed.
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed.
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed.
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed.
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed.
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed.
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed.
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed.
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed.

General observations and summary of the site:

**Site Summary:**

◊The Product manufactured at this site is all kinds of Knit and Oven Item

◊Overall responsibility for meeting the standards is taken by the facility Md. Dulal Shaikh (Manager Admin & HR)

◊A Total of 490 employees are currently working in the facility as production employee including around 52 non production employees.

Site has been completed SAQ



- ◊ The Youngest worker on site was 19 years old
- ◊ Workers participation committee member were present during the audit. However, Management informed that they communicate the outcome of the audit to the workers through notice board and would discuss at next workers participation committee meeting.
- ◊ There is no union and collective bargaining at this factory. It is also not mandatory by local law
- ◊ There is evidence of both male and female in Management and among supervisor
- ◊ Facility has Only one shift (8AM to 5PM including one-hour lunch break 1PM to 2 PM)
- ◊ Facility has all fixed rated employees
- ◊ 26 employees were selected for interview including 04 male and 08 female employees, they were interviewed as 4 groups of 5 some mixed groups and some single sex and the balance of 06 employees were interviewed individually
- ◊ 26 Records to show wages and hours were taken from January 18 My 2019, November 2019
- ◊ Standing Working hours on site was in average 48 hours/moth with 1 day off in every 7-day period.
- ◊ Legal minimum pay (BDT8, 000.00) was paid to all employees. Correct OT hours were paid, Employees were paid 200% of minimum hourly wage for OT hours

#### Summary of Findings:

**Positive:** No non-compliance was found in the areas of Human Rights, Living Wages and Benefits, Employment is Freely chosen, Child labour, Working Hours, Freedom of Association Discrimination, Harsh or Inhumane Treatment" Sub-Contracting and Home working, 10A: Entitlement to Work, 10 B2: Environment 2-Pillar, 10b4: Environment 4-Pillar, 10C: Business Ethics

**Negative:** below non compliances were found in the area of "Management systems and code implementation & Safety and Hygienic Conditions:"

#### NCs:

- Based on document review and management interview it was noted that factory did not communicate ETI Base Code through their supply chain.
- Facility has child care room but it was found non-functional.
- Wastage kept without segregation -Wastes like Jute, Carton, Poly were not segregated by type of in wastage storage area.
- During plant tour it was noted that there's no identify risk assessment at Yarn storage area located ground floor, Accessories store material store house.
- During floor visit It was noted that First Aider is have no sound knowledge about the First Aid items.

**Observation:** Site has been completed SAQ

#### Good Examples:

- Factory provide attendance bonus accordingly Helper Loader & Cleaner Tk 300 And rest of designated workers are getting 500 Tk.
- Provide 2 festival bonuses on Eid Festival (Religious festival).
- Factory Providing Monthly Salary to the worker by 7<sup>th</sup> Working Day.

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



## Site Details

Site Details		
A: Company Name:	Sagacious Fashions Ltd	
B: Site name:	Sagacious Fashions Ltd	
C: GPS location: (If available)	GPS Address: X97M+79	Latitude: 23.9631847 Longitude: 90.381287
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Trade license: 140 Gazipur City Corporation 2019-2020</p> <p>Factory license: 18043/Gazipur, "F" Type Valid up to 30th June, 2020</p> <p>Fire license No: DD/Dhaka/25594/2015 Valid Up to 30th June, 2020</p> <p>BGMEA Membership Certificate: 6126 Valid Up to 31<sup>st</sup> December 2019</p>	
E: Products/Activities at site, for example, garment manufacture, electrical, toys, grower, cutting, sewing, packing etc	All types of Knit & Woven Items	

<p>F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)</p>	<p>Sagacious Fashions Ltd. 74/1,Degerchala Main Road, National University, Gazipur Sadar, Gazipur-1705, Bangladesh</p> <p>Which is only 40 minutes distance from Hazrat Shahjalal International Airport Dhaka, the total area of the factory is about 32740sqft. The facility has started its operation at existing location since 2017</p> <table border="1" data-bbox="643 510 1469 1207"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground Floor</td> <td>General Store, Fabric Store, Finished Goods Area, Child Care Room, Doctor Room, Time Section, Security Post, Parking Area, Assembly Point.</td> <td></td> </tr> <tr> <td>Floor 1</td> <td>Finishing and Packing Section</td> <td></td> </tr> <tr> <td>Floor 2</td> <td>Sewing Section</td> <td></td> </tr> <tr> <td>Floor 3</td> <td>Sewing Section</td> <td></td> </tr> <tr> <td>Floor 4</td> <td>Office and Cutting Section</td> <td></td> </tr> <tr> <td>Floor 5</td> <td>Inspection Room, Sample Section, Dining, Prayer Room,</td> <td></td> </tr> <tr> <td>Roof Top</td> <td>25% is Free Space</td> <td></td> </tr> <tr> <td>Shed 1</td> <td>Sub-station, Boiler, Generator, Compressor, Knitting Section</td> <td></td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td></td> </tr> </tbody> </table> <p>The facility compound consists of Knitting, Cutting, Sewing, Finishing, The detail layout is as follow:</p> <p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F2: Please give details:</p> <p>F3: Does the site have a structural engineer evaluation?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F4: Please give details:</p>			Production Building no	Description	Remark, if any	Ground Floor	General Store, Fabric Store, Finished Goods Area, Child Care Room, Doctor Room, Time Section, Security Post, Parking Area, Assembly Point.		Floor 1	Finishing and Packing Section		Floor 2	Sewing Section		Floor 3	Sewing Section		Floor 4	Office and Cutting Section		Floor 5	Inspection Room, Sample Section, Dining, Prayer Room,		Roof Top	25% is Free Space		Shed 1	Sub-station, Boiler, Generator, Compressor, Knitting Section		Is this a shared building?	No	
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Is this a shared building?	No																																
<p>G: Site function:</p>	<p> <input type="checkbox"/> Agent  <input type="checkbox"/> Factory Processing/Manufacturer  <input type="checkbox"/> Finished Product Supplier  <input type="checkbox"/> Grower         </p>																																

	<input type="checkbox"/> Home worker <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
H: Month(s) of peak season: (if applicable)	In Average Round the Year
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<p>Product: All types of Knit Items          Main Operations: Knitting→ Cutting →Sewing → Packing          Production lines &amp; Production Capacity: 12 lines and 850000/Pieces finished products per month</p> <p>Machine list:  <b>Knitting Machine:</b> 10 Sets, Collar and Cuff Machine: 04 Sets          Sewing Machine ;<b>Sewing Machine</b> :Plain Machine (Single Needle) 150 Sets, Over lock 4 Thread 120 Sets, Flat Lock Flat Bed 25 Sets, Flat Lock Flat Bed With tap binding 30 Sets, Flat Bed Cylinder Bed 32 Sets, Flat Bed Cylinder Bed with Fabric Trimmer 22 Sets, Feed of the Arm 18 Sets , Bar tack Machine 10 Sets , Computerized Lockstitch Button Hole 10 Sets, Button Stitch 08 Sets, 4 thread Elastic Inserted Machine 09 Sets, Small Cylinder Flat lock Machine 10 Sets, Small Cylinder 4 Thread Over lock Machine 08 Sets, Two Needle Lock Stitch 10 Sets, Bas Machine 04 Set, Re Coning of Sewing Thread 01 Sets, Pneumatic snap Fastening Machine08 Sets, <b>Total Machines : 475 Sets</b>  <b>Cutting Machines:</b> End Cutter 02 Sets, Cutting Machine 8" 02 Sets, Cutting Machine 10" 04 Sets , Rib Cutting Machine 04 Sets ,<b>Total Machines 12 set</b>, <b>Fusing Machine</b> : Top Fusing Machine 01 Sets, <b>Finishing Machines:</b> Steam Iron 35 Sets, Vacuum Table 30 Sets , Thread Sucker Machine 01 Set, Needle Detector 01 Set, <b>Total Machines 67 Set</b> , <b>Generator, Boiler, Compressor:</b> Perkins Generator (270 Kva) 1 Set, Perkins Generator (125 Kva)1 Set, Vertical Smoke Tube Boiler (350kg/Hr) 1 Sets , Vortex Air Compressor (88,33 L/S) 1 Sets, Priston Air Compressor (60,00 L/S)1 Sets, <b>Total Machines : 05 Set, Grand Total Machines : 574 Set</b></p> <p>Auto - 02, Compressor, Boiler : 01 ,Machine 02, Generator: 02</p>
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation Only 13 Staffs are living around

M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details Factory doesn't provide any living accommodation for the workers as all workers live in nearby areas and is no legal requirement as well.

### Audit Parameters

A: Time in and time out	A1: Day 1 Time in: 09 Am A2: Day 1 Time out: 05 PM	A3: Day 2 Time in: N/A A4: Day 2 Time out: N/A	A5: Day 3 Time in: N/A A6: Day 3 Time out: N/A
B: Number of auditor days used:	Day 1 (19 <sup>th</sup> , December 2019) X2 Auditors for Total Manpower 490 (Male – 175 & Female 315)		
C: Audit type:	<input type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input checked="" type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other  If other, please define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail:    weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Md. Dulal Shaikh ( Manager Admin & HR)		
H: Is further information available (If yes, please contact audit company for details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
I: Previous audit date:	16 <sup>th</sup> , September 2019		
J: Previous audit type:	2 pillar		
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives

A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Participation committee members were present during the audit. However, The Management informed that they communicate the outcome of the audit to the workers through notice board, and would discuss at the next meeting.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	In Bangladesh, there is no obligation to join trade union and freedom of association and collective bargaining. For an establishment where there is no trade union, until a trade union is formed, the workers 'representatives to the Participation Committee shall run activities related to workers' interests in the establishment concerned and workers representative should be elected by direct vote of workers (amendment 22nd of July 2013, Labour Law 2006)		

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	175(Including Management)	0	0	0	0	0	0	175(Including Management)
Worker numbers – female	315(Including Management)	0	0	0	0	0	0	315(Including Management)
Total	490 (Including Management)	0	0	0	0	0	0	490 (Including Management)
Number of Workers interviewed – male	10	0	0	0	0	0	0	10
Number of Workers interviewed – female	16	0	0	0	0	0	0	16
Total – interviewed sample size	26	0	0	0	0	0	0	2





A: Nationality of Management		
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: <u>Bangladesh 100%</u></p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p>	<p>Was the list completed during peak season?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods:</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 <u>Bangladesh 100%</u></p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: _____% workers on piece rate</p> <p>D1: _____% hourly paid workers</p> <p>D2: _____% salaried workers</p> <p>Payment cycle:</p> <p>D3: _____% daily paid</p> <p>D4: _____% weekly paid</p> <p>D5: <u>100%</u> monthly paid</p> <p>D6: _____% other</p> <p>D7: If other, please give details</p>	



## Worker Interview Summary

Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	(4 Groups of 5 Employees)	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 4	D2: Female: 8
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	No complaint raised by the worker in the interview process.	
I: What did the workers like the most about working at this site?	Good and clean working environment On time payment Regular Health and Safety Training.	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	Comfortable	
L. Is there any worker survey information available?		
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: If yes, please give details:		
M: Attitude of workers: (Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk		

26 employees were selected from different work process and randomly from payroll sheet. All the interviews were confidentially conducted. All the interviewees were favourable with the management and factory environment. No negative information was raised from the interview.

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

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

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

O: Attitude of managers:

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

The factory management Showed a positive attitude in this audit and during the whole audit procedures. Md. Dulal Shaikh (Manager Admin & HR) along with his team was present through the audit process and co-operated the whole audit. Facility management respect client's requirement and allowed auditors to take photographs of productions process, best practices and also non conformities. They also provide required documents photocopy and allowed auditors to interact with the employees confidently. At the closing meeting, the facility management agreed with all the findings and suggested corrective actions

# Audit Results by Clause

## 0A: Universal Rights covering UNGP

### 0A: Universal Rights covering UNGP

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

#### 0.A. Guidance for Observations

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

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

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

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

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

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

Note for auditors and readers. This is not 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' Auditorsexaminepoliciesandwrittenproceduresinconjunction withrelevantmanagers, 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 implements and maintains systems for delivering compliance to this Code.
2. Md. Dulal Shaikh (Manager Admin & HR) responsible for compliance with the Code.
3. The factory communicates their code of conduct through notice board and regularly company own COC training.

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

##### Details:

1. Facility Management Interview
2. Document review (Training Register Review)
3. Workers Interview

Any other comments N/A

A: Policy statement that expresses commitment to

☒ Yes

respect human rights?	<input type="checkbox"/> No A1: Please give details:
B: 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: Name: Md. Dulal Shaikh Job title: Manager Admin & HR
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Factory has install suggestion box inside the factory and have a procedure to deal with this.
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details:

Findings		
<b>Finding: Observation</b> <input type="checkbox"/> <b>Company NC</b> <input type="checkbox"/> <b>Description of observation:</b> None Observed  <b>Local law or ETI/Additional elements / customer specific requirement:</b> N/A  <b>Comments:</b> N/A	<b>Objective evidence observed:</b> N/A	

Good examples observed:	
Description of Good Example (GE): None Observed	<b>Objective Evidence Observed:</b> N/A

## Measuring Workplace Impact

### Measuring Workplace Impact Table

Workplace Impact
------------------

A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: ___3___ %	A2: This year ___2___ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]		
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: ___4___ %	C2: This year ___4___ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	2%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: All the minor and major injuries are recorded in an injury register. Last injury was occurred on the 17 /11/2019 which was a cutting injury by cutter while working in cutting section	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: Number: 25	F2: This year: Number: 30
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	5%	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year:8	H2: This year: 7
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months ___24___% workers	I2: 12 months ___35___% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ___10___% workers	J2: 12 months ___25___% workers

## 0: Management systems and Code Implementation

### 0B: Management system and Code Implementation

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

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.  
0.B.2 Suppliers are expected to be operating legally in premises with the correct business licenses and

permissions and to have systems to ensure that all relevant land rights have been complied with

0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.

0.B.4 Suppliers are expected to communicate this Code to all employees.

0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

### Current Systems and Evidence Examined

*To complete 'current systems' Auditorsexaminepoliciesandwrittenproceduresinconjunction withrelevantmanagers, 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 implements and maintains systems for delivering compliance to this Code.
2. Md. Dulal Shaikh (Manager Admin & HR) is responsible for compliance with the Code.
3. The facility management is conducting internal social compliance audit regularly and take necessary corrective action based on report
4. The facility conduct orientation training for all new employees
5. Implementation of any necessary changes is then given to the individual department heads offer agreement with the facility manager

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

##### Details:

1. Details: Facility Management Interview
2. Document review (Training Register Review)
3. Workers Interview
4. Meeting records
5. All facility policy

Any other comments: Nil

### Management Systems:

A: 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 A1: Please give details: In the last 12 months the site has not been subjected to any fines or prosecutions for non-compliance to any regulations
B: 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 B1: Please give details: It was noted through documentation review, facility has policies and procedures for forced labour, child labour, discrimination, harassment & abuse
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Factory has written policies for recruitment. Head of HR & Compliance department is periodically



	reviewing the policies and keep up to date in accordance with local law with concern of top management
D: 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 D1: Please give details: All the employees in the facility have received orientation training where standards for forced labour, child labour, discrimination, harassment & abuse are covered
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Company has provided training on forced labour, child labour, discrimination, harassment & abuse etc. and found records of the trainings during the documents review
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details:
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Md. Dulal Shaikh (Manager Admin & HR) is responsible for Human Resources Department.
H: Is there a senior person /manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details Md. Dulal Shaikh (Manager Admin & HR) is responsible for Implementation of the code.
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The company has a confidential policy which is posted in the notice board
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The company has a confidential policy which is posted in the notice board. And management is communicating with all workers including management.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Please give details: The factory has an effective risk assessment

	policy and procedure
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1 Please give details: The facility has an internal system to raise the issue found in risk assessment and to implement the way of reduction it
M: Does the facility have a policy/code which requires labour standards of its own suppliers?	<input type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Facility has a supplier selection policy which ensures labour standard of its own supplier
<b>Land rights</b>	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Facility has approved lay out plan and building approval from Local government Authority.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: The facility has anti-corruption committee, anti-bribery policy to support due diligence in applying national laws and practices relating to land title
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC:
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: Please give details:
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No R1: Please give details: Please give details: The facility is the own building maintaining all legal procedures and specific land acquisition were considered to avoid or minimize adverse impacts
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: No Illegal appropriation of land for facility building.

### Non-compliance:

#### 1. Description of non-compliance:

- ☒ NC against ETI/Additional Elements  
☐ NC against customer code:

☐ NC against Local Law

In accordance with ETI Code 0.4:

Based on document review and management interview it was noted that factory did not communicate ETI Base Code through their supply chain.

#### Local law and/or ETI requirement:

0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

#### Recommended corrective action:

It is recommended that factory management should communicate ETI Base Code through their supply chain

#### Objective evidence observed:

(where relevant please add photo numbers)

### Observation:

**Description of observation:** None observed

**Local law or ETI requirement:** Not applicable

**Comments:** Not applicable

#### Objective evidence observed:

Not applicable

### Good Examples observed:

Description of Good Example (GE): None observed

**Objective evidence observed:** Not applicable

## 1: Employment is Freely Chosen

### 1: Freely Chosen Employment

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

#### ETI

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

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

### Current Systems and Evidence Examined

To complete 'current systems' Auditorsexaminepoliciesandwrittenproceduresin conjunction withrelevantmanagers, 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 does not hold main copy of any legal document of the workers during recruitment. The factory maintains only copies of all hiring documents such application, ID proof, date of birth certificates, school certificates etc.
2. The workers are free to leave the work place If workers want to leave their job, they are free to do so, as long as they are fulfilled their obligations agreed under their appointment letter/agreement.
3. The facility has displayed overtime policy stating that over time work is voluntary
4. Overtime is voluntary
5. The facility do not use any prison labour

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

##### Details:

1. Facility Management Interview
2. Document review (Recruitment policy, working hour policy, workers' personal file, copy of national ID, date of birth certificates, school certificates, security guard's job description etc.)
3. Workers Interview

Any other comments: Nil

A: Is there any evidence of retention of original documents, e.g. passports/ID's	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:
C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding:
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding:
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding:
G: Does the site understand the	<input type="checkbox"/> Yes

risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected:
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please describe finding:

### Non-compliance:

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

<b>Description of observation:</b> None observed  <b>Local law or ETI requirement:</b> Not applicable  <b>Comments:</b> Not applicable	<b>Objective evidence observed:</b> Not applicable
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### Good Examples observed:

<b>Description of Good Example (GE):</b> None observed	<b>Objective evidence observed:</b> Not applicable
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## 2: Freedom of Association and Right to Collective Bargaining are Respected

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

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#### ETI

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

### Current Systems and Evidence Examined

To complete 'current systems' Auditorsexaminepoliciesandwrittenproceduresin conjunction withrelevantmanagers, 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:

- Workers can raise their concerns through workers' representatives, telephone, complain box, meeting and their team leader or above.
- There is Workers Participation Committee (WPC) as parallel means for PC committee
- Verified and confirmed through records review and interview process that the facility does not discriminate any of the workers such as workers representatives also.
- Factory has a policy where is no restriction imposed to the workers formation of trade union.

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

##### Details:

- Management interview
- Worker interview
- Complain box register (Suggestions from the complaint box and actions taken)
- WPC formation and meeting records
- Grievance handling procedure

Any other comments: Nil

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No PC has policy to site a meeting one time in every two month and all meeting notes sends to local labour office.	
D: Is there any other form of effective worker/management communication channel?(Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: PC has policy to site a meeting one time in every two month and all meeting notes sends to local labour office. D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility has a policy regarding freedom of association	
F: Name of union and union representative, if applicable:	WPC	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	NA	G1: Is there evidence of free elections? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	All workers are aware about their representative
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election:15 September 2018
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many:04	
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	WPC Committee	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA	
If <b>Yes</b> , what percentage by trade Union/worker representation	M1: ____0% workers covered by Union CBA	M2: ____0% workers covered by worker rep CBA
M3: If <b>Yes</b> , does the Collective	<input type="checkbox"/> Yes	



Bargaining Agreement (CBA) include rates of pay?	<input checked="" type="checkbox"/> No
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### Non-compliance:

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

<b>Description of observation:</b> None observed  <b>Local law or ETI requirement:</b> Not applicable  <b>Recommended corrective action:</b> Not applicable	<b>Objective evidence observed:</b> Not applicable
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### Good Examples observed:

<b>Description of Good Example (GE):</b> None observed	<b>Objective Evidence Observed:</b> Not applicable
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### 3: Working Conditions are Safe and Hygienic

#### 3: Working Conditions are Safe and Hygienic

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##### ETI

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

#### Current Systems and Evidence Examined

To complete 'current systems' Auditor 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 production floor was well ventilated.
2. Sufficient emergency exit, ventilation, temperature and lighting were adequate for the production process
3. Sufficient first aid kits stocked with necessary supplies are provided in workshops.
4. Workers toilet segregate male and female, adequate number as per law, wash facility provided.
5. The facility has done maintenance of the machines on regular basis confirmed through the documents reviewed.
6. Risk assessment done by the factory and injury register maintain properly.
7. Md. Dulal Shaikh (Manager Admin & HR) is responsible to look after the health and safety issues.

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

##### Details:

1. Factory tour
2. Document review
3. Worker interview
4. Management interview

Any other comments: Nil

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?

- ☒ Yes  
☐ No

A1: Please give details: The company has general Health and safety policy & procedure which are fit for purposes and these policies are communicated through orientation training.

B: Are the policies included in workers' manuals?

- ☒ Yes  
☐ No

	B1: Please give details: The facility provides workers manual to the workers where all the policies and applicable govt. law are included.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details:
D: Are visitors to the site informed on H&S and provided with personal protective equipment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Ear Plug
E: Is a medical room or medical facility provided for workers?  If yes, do the rooms meet legal requirements and is the size/number of rooms suitable for the number of workers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The company has provided Medical Facility to all workers
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: The company has appointed a doctors and Nurse for the workers
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details:
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: The company does not provide living place for workers
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The company is conducting risk assessment on H&S.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No J1: Please give details:
K: 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 K1: Please give details:

**Non-compliance:**

### 1. Description of non-compliance:

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

Facility Has child care room but it was found non-functional.

### Local law and/or ETI requirement:

In accordance with ETI Base Code: 3.1

A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

In accordance with Section 94 of Bangladesh Labour Rules 2015:

- 1) The layout, quality and position of the Children's Room or the separate Children Building or the adapted building must be approved by the Inspector General or the Inspector authorized by him/her.
- 2) A separate and screen covered area must be kept preserved for the breastfeeding mothers so that they can lactate their babies maintaining secrecy and modesty.
- 3) The floor of the Children's Room and the internal walls thereof with a height of 1.22 meters must be made smooth and impervious.
- 4) 0.25 liters of milk for each child and nutritious foods must be supplied for the children staying in Children's Room.
- 5) Neat and clean clothes must be provided for the employees working in Children's Room.
- 6) Females must be prioritized while recruiting employees for the Children's Room.

### Recommended corrective action:

It is recommended to the factory management to ensure functional child care room.

### 2. Description of non-compliance:

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

Wastage kept without segregation -

Wastes like Jute, Carton, and Poly were not segregated by type of in wastage storage area.

### Local law and/or ETI requirement:

In accordance with Bangladesh Labor Law 2006, Section-79(C)

Where the Government is satisfied that any operation carried on in an establishment exposes any person employed in it to a serious risk of bodily injury, poisoning, or disease, it may make rules applicable to such establishment or class of establishments in which such operation is carried on-

- (c) providing for the periodical medical examination of persons employed in the operation and prohibiting the employment of persons not certified as fit for such employment;

### Objective evidence observed:

(where relevant please add photo numbers)

#### Recommended corrective action:

It is recommended that the facility management should keep wastage with proper segregated and safe condition.

#### 3. Description of non-compliance:

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

During plant tour it was noted that there's no identify risk assessment at Yarn storage area located ground floor, Accessories store material store house.

#### Local law and/or ETI requirement:

In accordance with ETI Base Code: 3.1

A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment

In accordance with ETI Base Code 3.1 and Bangladesh labour law 2006 Section and amendment 2013 of section-78(a-3)

Bangladesh labor law 2006 Section and amendment 2013 of section-78(a-3) for ensuring professional health and safety for workers at workplace, each of workers shall have to be aware on the risk of the work through trainings.

#### Recommended corrective action:

It is recommended to the factory management to conduct risk assessment in the mentioned area.

#### 3. Description of non-compliance:

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

During floor visit It was noted that First Aider is have no sound knowledge about the First Aid items.

#### Local law and/or ETI requirement:

In accordance with ETI Base Code: 3.1

A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment

In accordance with Bangladesh Labour Law 2006 Amendment 2013 Section 2 Clause (35a)

"(35a) Trained in Primary Health Care" means any person who has training in primary health care for a duration of minimum of six months;

It is agreed by the facility management that factory will well aware the first aider

accordingly.

#### Observation:

**Description of observation:** None observed

**Local law or ETI requirement:** Not applicable

**Recommended corrective action:** Not applicable

**Objective evidence observed:**  
Not applicable

#### Good Examples observed:

Description of Good Example (GE): None observed

**Objective Evidence Observed:**  
Not applicable

#### 4: Child Labour Shall Not Be Used

##### 4: Child Labour Shall Not Be Used

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##### ETI

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

##### Current Systems and Evidence Examined

To complete 'current systems' Auditorsexaminepoliciesandwrittenproceduresin 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 establishes a policy that will never employ and use any child labour.
2. The factory will verify all workers' original national ID cards, birth certificate, school certificate etc at the time of recruitment and keep the photocopies of workers' ID cards, birth certificate in the personnel files.
3. Factory verify the workers age through registered doctors.
4. Sampling basis 10 employees' personal files has taken for reviewed. Each employee file includes a bio-data sheet, recent photo, birth registration certificate / photo copied national identification card.

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

Details:

1. Policy review
2. Document review
3. Management interview
4. Worker interview
5. Factory tour

Any other comments: Nil

A: Legal age of employment:	14 years
B: Age of youngest worker found:	19 years
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0%
E: Are workers under 18 subjects to hazardous work assignments? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details



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**Non-compliance:**

**1. Description of non-compliance:**

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

None observed

**Local law and/or ETI requirement:** Not applicable

**Recommended corrective action:** Not applicable

**Objective evidence observed:**

(where relevant please add photo numbers)

Not applicable

**Observation:**

**Description of observation:** None observed

**Local law or ETI requirement:** Not applicable

**Comments:** Not applicable

**Objective evidence observed:**

Not applicable

**Good Examples observed:**

Description of Good Example (GE): None observed

**Objective Evidence Observed:**

Not applicable

## 5: Living Wages are paid

### 5: Living Wages are Paid

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

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

#### ETI

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

### Current Systems and Evidence Examined

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

#### Current systems:

1. The workers are enjoying benefits such as social insurance, casual leave, sick leave and maternity leave as per law.
2. Wages being paid within 7 working days of the next month.
3. Factory provides cash directly to the workers.
4. No illegal deduction from employees has been identified through document reviewed and confirmed workers during the interviewed.

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

##### Details:

1. Details: Document review
2. Worker interview
3. Management interview

Any other comments: Nil

### Non-compliance:

#### 1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:  
None observed

**Local law and/or ETI requirement:** Not applicable

**Recommended corrective action:** Not applicable

#### Objective evidence observed:

(where relevant please add photo numbers)

Not applicable

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

Good Examples observed:	
<b>Description of Good Example (GE):</b> None observed	<b>Objective Evidence Observed:</b> Not applicable

## Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
<b>A:</b> Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible, per day, week, and month)	Legal maximum: 8 hours and 48 hours	A1: 8 hours and 48 hours	A2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>B:</b> Overtime hours: (Maximum legal and actual overtime hours, please state if possible, per day, week, and month)	Legal maximum: 2 hours per day and 12 hours per week. However, an adult worker may work for more than 8 (eight) hours in a day or 48 (forty-eight) hours in a week, provided that the total hours of work of an adult worker shall not exceed 60 (sixty) hours in any week and on the average 56 (fifty-six) hours per week in any year. <u>Exception for 6 months:</u> Government has exempted section 100 and 102 of the Bangladesh Labour Law-2006. publishing a Gazette notification in August 2011 as per section 324 Bangladesh Labour Law-2006 for 06 months relaxing daily overtime hours. In accordance with the Clause/Condition No. – 3 of this notification, no worker shall work more than 04 hours of overtime in any day without his/her consent.	B1: 2 hours/day 12 hours/week	B2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	This exemption has been extended several times in last few years and latest extension was on September 23, 2014 and it will be in effect from October 17, 2014 to April 16, 2015."		
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible, per hr, day, week, and month)	Legal minimum: BDT. 5,300 per month (Basic BDT. 3000, House rent 40% of the Basic which is BDT. 1,200, Medical allowance BDT. 250, Food allowance BDT. 650 & Transportation Allowance BDT. 200).	C1: Actual minimum wage:  BDT 5300/ month	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible, per hr, day, week, and month)	Legal minimum: 200% of the basic wage rate.	D1: 200% of the basic wage rate	D2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

#### Wages analysis:

#### Wages analysis:

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

A: Were accurate records shown at the first request?	<div><input checked="" type="checkbox"/> Yes</div> <div><input type="checkbox"/> No</div> <p>The Government has announced the new pay structure which was implemented for the workers of the Garments Industries. The Gazette Notification has been published on 24th January, 2019. There are two separate pay structures; for the garment workers (Schedule A) 1. For the workers (Schedule A)</p> <table><tr><th>Grade</th><th>Monthly basic wage</th><th>House rent 50% of the basic</th><th>Medical allowance</th><th>Conveyance allowance</th><th>Food subsidy</th><th>Gross monthly wage</th></tr><tr><td>Grade 1</td><td>Tk.10938</td><td>Tk.5469</td><td>Tk.600</td><td>Tk.350</td><td>Tk.900</td><td>Tk. 18257</td></tr><tr><td>Grade 2</td><td>Tk.9044</td><td>Tk.4522</td><td>Tk.600</td><td>Tk.350</td><td>Tk.900</td><td>Tk. 15416</td></tr><tr><td>Grade 3</td><td>Tk.5330</td><td>Tk.2665</td><td>Tk.600</td><td>Tk.350</td><td>Tk.900</td><td>Tk. 9845</td></tr><tr><td>Grade 4</td><td>Tk.4998</td><td>Tk.2499</td><td>Tk.600</td><td>Tk.350</td><td>Tk.900</td><td>Tk. 9347</td></tr><tr><td>Grade 5</td><td>Tk.4683</td><td>Tk.23</td><td>Tk.600</td><td>Tk.350</td><td>Tk.900</td><td>Tk.8875</td></tr><tr><td>Grade 6</td><td>Tk. 4380</td><td>Tk. 2190</td><td>Tk.600</td><td>Tk.350</td><td>Tk.900</td><td>Tk.80</td></tr><tr><td>Grade 7</td><td>Tk. 4100</td><td>Tk. 2050</td><td>Tk.600</td><td>Tk.350</td><td>Tk.900</td><td>Tk.8000</td></tr><tr><td>Apprentice</td><td>Tk. 2750</td><td>Tk.1375</td><td>Tk.600</td><td>Tk.350</td><td>Tk.900</td><td>Tk. 5975</td></tr></table>	Grade	Monthly basic wage	House rent 50% of the basic	Medical allowance	Conveyance allowance	Food subsidy	Gross monthly wage	Grade 1	Tk.10938	Tk.5469	Tk.600	Tk.350	Tk.900	Tk. 18257	Grade 2	Tk.9044	Tk.4522	Tk.600	Tk.350	Tk.900	Tk. 15416	Grade 3	Tk.5330	Tk.2665	Tk.600	Tk.350	Tk.900	Tk. 9845	Grade 4	Tk.4998	Tk.2499	Tk.600	Tk.350	Tk.900	Tk. 9347	Grade 5	Tk.4683	Tk.23	Tk.600	Tk.350	Tk.900	Tk.8875	Grade 6	Tk. 4380	Tk. 2190	Tk.600	Tk.350	Tk.900	Tk.80	Grade 7	Tk. 4100	Tk. 2050	Tk.600	Tk.350	Tk.900	Tk.8000	Apprentice	Tk. 2750	Tk.1375	Tk.600	Tk.350	Tk.900	Tk. 5975
Grade	Monthly basic wage	House rent 50% of the basic	Medical allowance	Conveyance allowance	Food subsidy	Gross monthly wage																																																										
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Apprentice	Tk. 2750	Tk.1375	Tk.600	Tk.350	Tk.900	Tk. 5975																																																										
A1: If <b>No</b> , why not?																																																																
B: Sample Size Checked (State number of worker records checked and from	26 attendance records and payroll records from January– 2019 26 attendance records and payroll records from May – 2019 26 attendance records and payroll records from November - 2019																																																															

<p>which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</p>					
<p>C: Are there different legal minimum wage grades? If <b>Yes</b>, please specify all.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>C1: If <b>Yes</b>, please give details:            The Government has announced the new pay structure which was implemented from 1st December, 2013 for the workers of the Garments Industries. The Gazette Notification has been published on 5th December, 2013. There are two separate pay structures; for the garment workers (Schedule A) 1. For the workers (Schedule A)</p>			
<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>D1: If <b>No</b>, please give details:            Please indicate the breakdown of workforce per earnings: Lowest gross salary: BDT 8000.00 in sep 2018 which meets minimum legal wage.  <i>Note: full time employees and please state hour / week / month etc.</i></p>			
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i></p>			
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: <u>0%</u> of workforce earning under minimum wage            F2: <u>70%</u> of workforce earning minimum wage            F3: <u>30%</u> of workforce earning above minimum wage</p>				
<p>G: Bonus Scheme found:            Please specify details:</p>	<p>Bonus Scheme found:  <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week/month etc.</i>   <i>Note: full time employees and please state hour / week/month etc.</i>            Factory provide 2 (two) festival bonus in every year.  <i>Note: full time employees and please state hour / week/month etc.</i></p>				
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>As per section 125 of the Bangladesh Labour Law, 2006, factory may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc. However, factory is deducting only for revenue stamp</p>				
<p>I: Have these deductions been made?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Please list all deductions that <b>have</b> been made.</p>	<p>1. Based on document review it was noted that facility management deducts for below issues-            a. Revenue stamp.             Please describe:</p>		

		I2: Please list all deductions that <b>have not</b> been made.	1. punishment 2. Leave  Please describe:
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Company is maintaining wage record in the paper to where is it mention all working hours		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: Please give details: The company has electronic time keeping system and all working hours were shown in the time records		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please specify amount/time: Please specify amount/time: Factory did not define living wages as it is not required by law. However, factory is providing the minimum wage as Minimum Wages Gazette for Readymade Garments Sector published on December 5, 2013.		
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fair-trade Foundation Other – please give details:		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details:		
O: Are workers paid in a timely manner in line	<input checked="" type="checkbox"/> Yes, Within 7 working days of the following month. <input type="checkbox"/> No		

with local law?	
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Through factory policy review, payroll records review and employees' interview, it is confirmed that equal rates are being paid for equal work.
Q: How are workers paid:	<input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:

## 6: Working Hours are not Excessive

### 6: Working Hours are not Excessive

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

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

#### ETI

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

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

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

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

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

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

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

### Current Systems and Evidence Examined

To complete 'current systems' Auditorsexaminepoliciesandwrittenproceduresin conjunction withrelevantmanagers, 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 general, the employees work for 6 days in a week (Saturday to Thursday). Friday is weekly holiday. Regular working hour is from 8:00 am to 5:00 pm including 1-hour lunch break from 01.00 pm to 2.00 pm and the Dyeing section and security has three shifts from 8:00 am to 4:00 pm, 4:00 pm to 12:00 am and from 12:00 am to 8:00 am. Security sections also have three shifts from 6:00 am to 2:00 pm, 2:00 pm to 10:00 pm and from 10:00 pm to 6:00 am.
2. Standard working hours found 48 hours in the facility.
3. Through employees' interview it was noted that they were aware about voluntary overtime policy.
4. Facility weekly holiday is Friday.
5. Casual leave, sick leave, festival leave was provided as per local Law

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

Details:



Employee interview  
2. Payroll records  
3. Job card records  
4. Production records  
5. Working hour and Overtime Hours Policies & procedures etc.  
6. Management interview

Any other comments: Nil

#### Non-compliance:

##### 1. Description of non-compliance:

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

None observed

**Local law and/or ETI requirement:** Not Applicable

**Recommended corrective action:** Not Applicable

**Objective evidence observed:**  
(where relevant please add photo numbers)

Not Applicable

#### Observation:

**Description of observation:** None observed

**Local law or ETI requirement:** Not Applicable

**Comments:** Not Applicable

**Objective evidence observed:**  
Not Applicable

#### Good Examples observed:

Description of Good Example (GE): None observed

**Objective Evidence Observed:**  
Not Applicable

## Working hours' analysis

<b>Working hours' analysis</b> Please include time e.g. hour/week/month <a href="#">(Go back to Key information)</a>					
<b>Systems &amp; Processes</b>					
A. What timekeeping systems are used: time card etc.	Describe: Attendance and work timings (including OT) record was maintained by (Punch Card) time recording system.				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details				
C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:			
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:			
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If <b>yes</b> , please detail hours, %, types of workers affected and frequency Please give details:			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input type="checkbox"/> Yes <input type="checkbox"/> No			
	Maximum number of days worked without a day off (in sample):				
<b>Standard/Contracted Hours worked</b>					

G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	H1: If yes, please give details:  Government has exempted section 100 and 102 of the Bangladesh Labour Law-2006 publishing a Gazette notification in August 2011 as per section 324 Bangladesh Labour Law-2006 for 06 months relaxing daily overtime hours. In accordance with the Clause/Condition No. – 3 of this notification, no worker shall work more than 04 hours of overtime in any day without his/her consent.  Exception for 06 months: This exemption has been extended several times in last few years and latest extension was on April 05, 2018 and it will be in effect from April 17, 2018 to October 18, 2018.
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 49 hours in January – 2019 (state per month) 51 hours in May– 2019 (state per month) 48 hours in November - 2019 (state per month)	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	25%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract/employment agreement/handbook/worker interviews/refusal arrangements:
<b>Overtime Premiums</b>		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages:
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: Monthly paid to 100% workers who work overtime

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

## 7: No Discrimination is practiced

### 7: No Discrimination is Practiced

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

#### ETI

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

### Current Systems and Evidence Examined

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

#### Current systems:

1. 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.
2. Gender discrimination was also absent in the facility; both female and male employees were distributed in all types of work.
3. The facility provides the same wage amount to male/female employees of the same rank.
4. No complain or records found for pregnancy test. 5. There is no restriction for formation of trade union in the facility.

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

Details:

1. Management interview
2. Worker interview
3. Local and national law
4. Personal files
5. Compensation records
6. Termination & retirement records
7. Training records
8. Complain register

Any other comments: Nil

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: __30__ % A2: Female __70__ %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	Nil
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability,	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training

gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input type="checkbox"/> No evidence of discrimination found  C1: Please give details: Nil
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Professional Development	
A: What type of training and development are available for workers?	<p>A. Workers receive regular and recorded health &amp; safety training. Last Health &amp; Safety training was provided on 2 February 2019.</p> <p>B. Fire-fighting training provided as per law. Last fire-fighting training was provided on 24 December 2018.</p> <p>C. First aid, PPE training provides regularly. Last first aid &amp; PPE training was provided on 11 March 2019 &amp; 2 April 2019.</p> <p>D. Chemical handling training was provided on 1 April 2019.</p> <p>E. Mid-Level management training was provided on 17 March 2019</p>

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

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

Observation:
--------------

<b>Description of observation:</b> None observed <b>Local law or ETI requirement:</b> Not applicable <b>Comments:</b> Not applicable	<b>Objective evidence observed:</b> Not applicable
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Good Examples observed:	
Description of Good Example (GE): None observed	<b>Objective Evidence Observed:</b> Not applicable

## 8: Regular Employment Is Provided

### 8: Regular Employment Is Provided

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

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

#### ETI

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

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

#### Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

### Current Systems and Evidence Examined

To complete 'current systems' Auditorsexaminepoliciesandwrittenproceduresin conjunction withrelevantmanagers, 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. All workers are getting ID card during their recruitment.
2. Factory maintains service books for all workers.
3. There is no home working from the site.
4. All workers are getting appointment letter.

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

##### Details:

1. Management interview
2. Worker interview
3. Local and national law
4. Workers' personal files and service books
5. Policies and procedures
6. Wage sheets

Any other comments: Nil

### Non-compliance:



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

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

Good Examples observed:	
<b>Description of Good Example (GE):</b> None observed	<b>Objective Evidence Observed:</b> Not Applicable

## Responsible Recruitment

All Workers	
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions  A1: If any are unchecked, please describe finding and specific category (ies) of workers affected:
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category (ies) of workers affected:

C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details:
D: If any checked, give details:	No

<b>Migrant Workers:</b> <i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>		
A: Type of work undertaken by migrant workers:	There are no Migrant Worker in facility	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used:  B2: Total number of (outside of local country) recruitment agencies used:	
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please describe finding:	C2: Observations:
D: Are Any migrant workers in skilled, technical, or management roles  <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  D1: If yes, number and example of roles:	

## NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other  B1– If other, please give details:
C: If any checked, give details:	

Agency Workers (if applicable) <i>(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.)</i>	
A: Number of agencies used (average):	A1: Names if available: Not Applicable
B: Were agency workers' age/pay/hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	D1: Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  E1: Please give details:

<p align="center"><b>Contractors:</b></p> <p><i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i></p>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details:
B: If <b>Yes</b> , how many workers supplied by contractors?	
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please describe finding:
D: If <b>Yes</b> , please give evidence for contractor workers being paid per law:	

## 8A: Sub-Contracting and Home working:

### 8A: Sub-Contracting and Homeworking

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

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

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

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

*Note to auditor on home working:*

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

1. Production Records are maintaining
2. Process Flow and Production planning
3. Sub-contract like out sourcing data.

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

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

Process Subcontracted	Process 1: Accessories
Name of factory	Rainbow Accessories
Address	191, fakirapul, Motijheel, Dhaka-1000

Process Subcontracted	Process 2: Dyeing
Name of factory	Pakiza Knit Composite Ltd.
Address	A, 1/5, majedpur, Savar, Dhaka

Process Subcontracted	Process 3 : Print
Name of factory	Compliance Fashion & Design
Address	C-146, BSCIC Industrial Estate, Tongi Gazipur

#### Details:

1. Management interview
2. Worker interview
3. Documents Review
4. Production Records & Orders Files
5. Policies and procedures of Sub-con

### Non-compliance:

#### 1. Description of non-compliance:

- ☐ NC against ETI/Additional Elements  
☐ NC against customer code:

☐ NC against Local Law

None observed

**Local law and/or ETI /Additional Elements requirement:** Not applicable

**Recommended corrective action:** Not applicable

**Objective evidence observed:**  
 (where relevant please add photo numbers)

Not applicable

### Observation:

**Description of observation:** None observed

**Local law or ETI/Additional elements requirement:** Not applicable

**Comments:** Not applicable

**Objective evidence observed:**  
 Not applicable

### Good Examples observed:

Description of Good Example (GE): None observed

**Objective Evidence Observed:**  
 Not applicable

### Summary of sub-contracting – if applicable

☒ Not Applicable please x

A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting

- ☐ Yes  
☒ No  
 A1: Please describe:

B: If sub-contractors are used, is there evidence this has been agreed with the main client?

- ☐ Yes  
☒ No  
 B1: If **Yes**, summarise details:

C: Number of sub-contractors/agents used:	NA
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: If <b>Yes</b> , summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	NA

Summary of home working – if applicable			
<input checked="" type="checkbox"/> Not Applicable please x			
A: If home working is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If <b>Yes</b> , summarise details:		
B: Number of home workers	B1: Male:	B2: Female:	Total:
C: Are home workers employed direct or through agents?	<input type="checkbox"/> Directly <input checked="" type="checkbox"/> Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on home working?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
E: How does the site ensure worker hours and pay meet local laws for home workers?	NA		
F: What processes are carried out by home workers?	NA		
G: Do any contracts exist for home workers?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details:		
H: Are full records of home workers available at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

## 9: No Harsh or Inhumane Treatment is allowed

### 9: No Harsh or Inhumane Treatment is Allowed

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

#### ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 <sup>rd</sup> party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: There is an open channel for all at the facility which anybody can report to management about any act properly or corruptly, or to accept or give a bribe or gift and health & safety issues.
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	Factory has communicated this procedure through orientation training confirmed from worker interview
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Factory has fixed some complaint boxes in workers toilet area. No complaint records found regarding physical abuse or harassment.
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details:
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details



<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>II: If yes, please give details</p>
--	--

### Current Systems and Evidence Examined

To complete 'current systems' Auditorsexaminepoliciesandwrittenproceduresin conjunction withrelevantmanagers, 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 factory established anti-harsh or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Through the factory management and workers' interview, it was noted that no physical abuse or discipline happened in the factory. Factory install complain box in workers toilet area. No complain records found regarding physical abuse or harassment.

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

Details:

1. Management interview
2. Worker interview
3. Complaint register
4. Policies and procedures

Any other comments: Nil

### Non-compliance:

#### 1. Description of non-compliance:

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

None observed

**Local law and/or ETI requirement:** Not applicable

**Recommended corrective action:** Not applicable

#### Objective evidence observed:

(where relevant please add photo numbers)

Not applicable

### Observation:

**Description of observation:** None observed

**Local law or ETI requirement:** Not applicable

**Comments:** Not applicable

#### Objective evidence observed:

Not applicable

### Good Examples observed:

Description of Good Example (GE): None observed

#### Objective Evidence Observed:

Not applicable

## 10 A: Entitlement to Work and Immigration

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

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

#### Additional Elements

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

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

#### Current Systems and Evidence Examined

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

#### Current systems:

Only workers with a legal right to work shall be employed or used by the factory. It was noted through documents review and workers interview that there is no immigrant worker in the factory.

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

Details:

1. Management interview
2. Worker interview
3. Employment records
4. Appointment letter
5. Personal files

Any other comments: Nil

#### Non-compliance:

##### 1. Description of non-compliance:

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

None observed

**Local law and/or ETI /Additional Elements requirement:** Not Applicable

**Recommended corrective action:** Not Applicable

##### Objective evidence observed:

(where relevant please add photo numbers)

Not Applicable

**Observation:**

**Description of observation:** None observed

**Local law or ETI/Additional Elements requirement:** Not Applicable

**Comments:** Not Applicable

**Objective evidence observed:**

Not Applicable

**Good examples observed:**

Description of Good Example (GE): None observed

**Objective Evidence Observed:**

Not Applicable

## 10 B 2: Environment 2-pillar

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

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

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

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

1. The facility prepared an environmental policy and procedure.
2. The facility also provides awareness training to all related personnel.
3. Solid waste has been handover to licensee vendor as per local legislation who recycle that wastage

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

Details:

- 1.Document review
- 2.Factory tour
- 3.Management interview

Any other comments: Nil

### Non-compliance:

#### 1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

None observed

**Local law and/or ETI/Additional Elements requirement:** Not Applicable

**Recommended corrective action:** Not Applicable

#### Objective evidence observed:

(where relevant please add photo numbers)

Not Applicable

### Observation:

**Description of observation:** None observed

**Local law or ETI/additional elements requirement:**

**Comments:**

#### Objective evidence observed:

Not Applicable

### Good examples observed:

**Description of Good Example (GE):** None observed

#### Objective Evidence Observed:

Not Applicable

## 10 B 2: Environment 10B4: Environment 4–Pillar

### 10. Other issue areas 10B4: Environment 4–Pillar

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

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

#### B.4. Compliance Requirements

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

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

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

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

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

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

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

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

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

#### B4. Guidance for Observations

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

1. The facility prepared an environmental policy and procedure.
2. The facility also provides awareness training to all related personnel.
3. Solid waste has been handover to licensee vendor as per local legislation who recycle that wastage

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

##### Details:

1. Document review
2. Factory tour
3. Management interview

Any other comments: Nil

### Non-compliance:

#### 1. Description of non-compliance:

- ☐ NC against ETI/Additional Elements  
☐ NC against customer code:

☐ NC against Local

None observed

**Local law and/or ETI/Additional Elements requirement:** Not Applicable

**Recommended corrective action:** Not Applicable

#### Objective evidence observed:

(where relevant please add photo numbers)

Not Applicable

### Observation:

**Description of observation:** None observed

**Local law or ETI/Additional elements requirements:** Not Applicable

**Comments:** Not Applicable

#### Objective evidence observed:

Not Applicable

### Good examples observed:

Description of Good Example (GE): None observed

#### Objective Evidence Observed:

Not Applicable



## Environmental Analysis

Environmental Analysis	
(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)	
A: Is there a manager responsible for Environmental issues (Name and Position):	Yes , There is Responsible Person Mr. Nuruzzaman
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details:
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Sagacious Fashions Ltd is ISO 14001: 2015 Certified.
D: Does the site have an Environmental policy? (For guidance, please see Measurement criteria)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available?  Yes Environment Policy is available in the factory and posted in the Factory premises.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details:
F: Does the site have a Biodiversity policy? (For guidance, please see Measurement criteria)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Factory is Located Industrial area.
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), and Marine Stewardship Council (MSC) etc.? Please give details. (For guidance, please see Measurement criteria)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: Factory is Located Industrial area.
H: Have all legally required permits been shown? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: It's not Applicable for the them however They has Applied to the Authority for NOC
I: 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"/> N/A I1: Please give details: They are not Using Hazardous Chemical thus they don't have Dyeing and Printing Operation in the Factory Premises.
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: A list of chemical and their consumption record are maintaining by the facility.
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: They has established Policy and Procedure how to reduction more than last year. Comparatively found already decreased more

	than last year.	
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Their solid waste Jute is using by the Handicrafts Factory and they are making diversified products and exporting. In addition it can be considered as recycled product.	
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Yes they have. Water, GAS, Electricity there are meter has for counting how much unit has used.	
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details:	
<b>Usage/Discharge analysis</b>		
Criteria	Previous year: Please state period: ____ 2018 _____	Current Year: Please state period: 2019 _____
Electricity Usage: Kw/hrs	Unit (Kw-HR): 66543kw-hr	Unit (Kw-HR): 62320 kw-hr
Renewable Energy Usage: Kw/hrs	Not Applicable	Not Applicable
Gas Usage: Kw/hrs	M <sup>3</sup> : 54433 Nm <sup>3</sup>	M <sup>3</sup> : 49543 Nm <sup>3</sup>
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If <b>Yes</b> , please state result	Not Applicable	Not Applicable
Water Sources: Please list all sources e.g. lake, river, and local water authority.	<ul style="list-style-type: none"> <li>Deep Well</li> </ul>	<ul style="list-style-type: none"> <li>Deep Well</li> </ul>
Water Volume Used: (m <sup>3</sup> )	55432 (m <sup>3</sup> )	50139(m <sup>3</sup> )
Water Discharged: Please list all receiving waters/recipients.	Not Applicable	Not Applicable
Water Volume Discharged: (m <sup>3</sup> )	Not Applicable	Not Applicable
Water Volume Recycled: (m <sup>3</sup> )	Nil	Nil
Total waste Produced (please state units)	KGs : 250000 KGs	KGs : 2483,00 KGs

Total hazardous waste Produced: (please state units)	Nil	Nil
Waste to Recycling: (please state units)	Nil	Nil
Waste to Landfill: (please state units)	Nil	Nil
Waste to other: (please give details and state units)	Nil	Nil
Total Product Produced (please state units)	103,20,000 pieces	10,5,60,000 pieces

## 10C: Business Ethics – 4-Pillar Audit

### 10C: Business Ethics – 4-Pillar Audit

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

To be completed for a 4-Pillar SMETA Audit

#### 10C. Compliance Requirements

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

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

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

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

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

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

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

#### 10C. Guidance for Observations

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

Company has established the environmental policy. They have environment responsible person to look after the environmental issues. They are maintaining all data through documentary. Regularly environment related training being conducted and monitoring. They are trying how to consume less water, energy, diesel etc comparatively more than last year. For that regularly monitoring and awareness already been started. Last date of training program was 30 November 2019.

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

Details:

Documents Review

Policy procedure

Management Interview

Any other comments: Nil

### Non-compliance:

#### 1. Description of non-compliance:

- ☐ NC against ETI/Additional Elements  
☐ NC against customer code:

None observed

☐ NC against Local

**Objective evidence observed:**  
 (where relevant please add photo numbers)

Not Applicable

**Local law and/or ETI/Additional Elements requirement:** Not Applicable

**Recommended corrective action:** Not Applicable

### Observation

**Description of observation:** None observed

**Objective evidence observed:**

Not Applicable

**Local law or ETI/Additional elements requirement:** Not Applicable

**Comments:** Not Applicable

### Good examples observed:

Description of Good Example (GE): None observed

**Objective Evidence Observed:**  
 Not Applicable

A: 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

A1: Please give details:

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

- ☒ Yes  
☐ No

B1: Please give details:

C: Is the policy updated on a regular (as needed) basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  C1: Please give details:
D: Does the site require third parties including suppliers to complete their own business ethics training	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  D1: Please give details:

Other findings

Other Findings Outside the Scope of the Code

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

## Appendix 1

<p><b>Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."</b></p> <p><input checked="" type="checkbox"/> Not Applicable please x</p>	
<p><b>NOTE:</b> The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p><b>Instruction to Audit Company:</b> fill in the relevant clauses from the Customer Supplier Code - where applicable.</p> <p>Not Applicable.</p>
ETI Code / Additional Elements	Customer's Supplier Code equivalent
<b>0.A. Universal Rights covering UNGP</b>	<b>0.A. Universal Rights covering UNGP</b>
<p><b>0.A. Guidance for Observations</b></p> <p>0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning</p>	Not Applicable.

<p>Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.</p> <p>0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.</p>	
<b>0.B. Management Systems &amp; Code Implementation</b>	<b>0.B. Management Systems &amp; Code Implementation</b>
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	Not Applicable.
<b>ETI 1. Forced Labour</b>	<b>ETI 1. Forced Labour</b>
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.</p>	Not Applicable.
<b>ETI 2. Freedom of association and the right to collective bargaining are respected</b>	<b>ETI 2. Freedom of association and the right to collective bargaining are respected</b>
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>2.4 Where the right to freedom of association and collective bargaining is restricted under law, the</p>	Not Applicable.

employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.	
<b>ETI 3. Working conditions are safe and hygienic</b>	<b>ETI 3. Working conditions are safe and hygienic</b>
<p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>3.2 Workers shall receive regular and recorded Health &amp; Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p> <p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health &amp; Safety to a senior management representative.</p>	Not Applicable.
<b>ETI 4. Child labour shall not be used</b>	<b>ETI 4. Child labour shall not be used</b>
<p>4.1 There shall be no new recruitment of child labour.</p> <p>4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	Not Applicable.
<b>ETI 5. Living wages are paid</b>	<b>ETI 5. Living wages are paid</b>
<p>5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</p> <p>5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars</p>	Not Applicable.



<p>of their wages for the pay period concerned each time that they are paid.</p> <p>5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.</p>	
<b>ETI 6. Working Hours are not excessive</b>	<b>ETI 6. Working Hours are not excessive</b>
<p>6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p> <p>6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where <b>all</b> of the following are met:</p> <ul style="list-style-type: none"> <li>– this is allowed by national law;</li> <li>– this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;</li> <li>– appropriate safeguards are taken to protect the workers' health and safety; and</li> <li>– The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.</li> </ul> <p>6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.</p>	<p>Not Applicable.</p>
<b>ETI 7. No discrimination is practised</b>	<b>ETI 7. No discrimination is practised</b>

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.	Not Applicable.
<b>ETI 8. Regular employment is provided</b>	<b>ETI 8. Regular employment is provided</b>
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p><b>Additional Elements: Responsible Recruitment</b></p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p> <p>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.</p> <p>8.5 Employment agencies must only supply workers registered with them.</p> <p>8.6 Workers pay no recruitment fee at any stage of the recruitment process.</p> <p>8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	Not Applicable.
<b>8A: Sub-Contracting and Home working</b>	<b>8A: Sub-Contracting and Home working</b>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.</p> <p>8A.2 Systems and processes should be in place to manage sub-contracting, home working b79 yhuw55qq3 6 and external processing.</p>	Not Applicable.
<b>ETI 9. No harsh or inhumane treatment is allowed</b>	<b>ETI 9. No harsh or inhumane treatment is allowed</b>

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Additional elements: 9.2 companies should provide access to a confidential grievance mechanism for all workers	Not Applicable.
<b>10. Other Issue areas: 10A: Entitlement to Work and Immigration</b>	Not Applicable
<b>Additional Elements</b> 10A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.	Not Applicable.
<b>10. Other issue areas 10B2: Environment 2–Pillar</b>	Not Applicable.
10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits. 10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. <i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i>	Not Applicable.

<b>SMETA Extra Sections for 4 Pillar Audit:</b>	<b>SMETA Extra Sections for 4 Pillar Audit:</b>
<b>Environment Section</b>	<b>Environment Section</b>
<b>B.4. Compliance Requirements</b> 10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards. 10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc. 10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements 10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers. 10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 10B4.6 The site should measure its impacts, including continuous recording and regular reviews	Sagacious Fashions Ltd has met the requirements of local and national laws related to environmental standards.  Sagacious Fashions Ltd has significant environmental impact of their site and its processes. They have policy and procedure and has responsible person to look after the issues.  They are maintaining proper data and monitoring system like energy- GAS/Electricity, Diesel and Water as well.

<p>of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).</p> <p>10B4.7 Businesses shall make continuous improvements in their environmental performance.</p> <p>10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation</p> <p>10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.</p> <p><b>B4. Guidance for Observations</b></p> <p>10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.</p> <p>10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p>	
<b>Business Practices Section</b>	Not Applicable
<p><b>10C. Compliance Requirements</b></p> <p>10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.</p> <p>10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.</p> <p>10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.</p> <p>10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.</p> <p>10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,</p> <p>10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics</p> <p>10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.</p> <p><b>10C. Guidance for Observations</b></p> <p>10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all</p>	Not Applicable


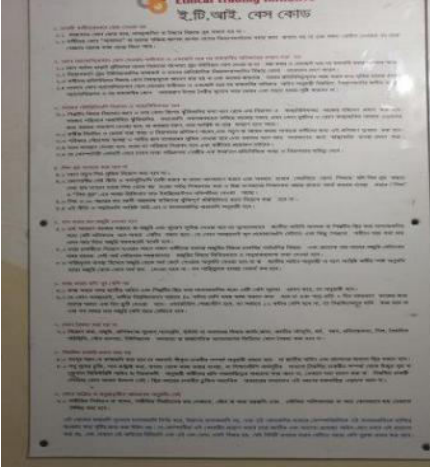




<p>appropriate parties, including its own suppliers. 10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented.</p>	
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## Photo Form

**Adding Images** To help keep the size of the Report as small as possible for ease of sending and saving the document we recommend that you use Microsoft Paint to resize your photos. To do so please follow these instructions:

- 1) To start Microsoft Paint, click 'Start', 'Programs', 'Accessories', then 'Paint'.
  - 2) Open the image file you wish to edit.
  - 3) Click the 'Image' Menu at the top and select "Stretch/Skew Image".
  - 4) Choose a percentage figure to resize the image: to avoid distortion, choose the same percentage for horizontal and vertical stretch. Click OK.
  - 5) Once you have the desired size, click File > Save As... (To prevent overwriting the original image).
- Save As jpeg (this provides compression to make the file smaller).
- 6) Please delete this text once complete.

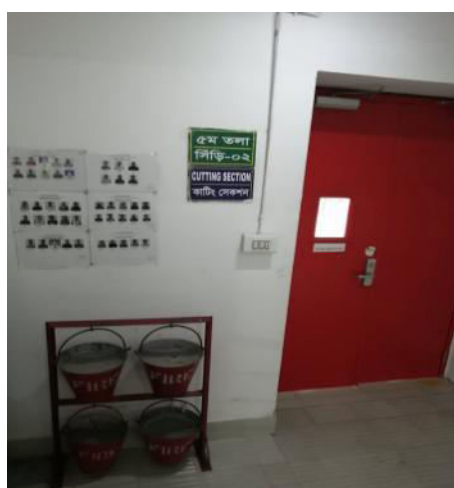
		
Factory Outside Overview	ETI Base Code	Notice Board
		
Emergency Contact Number	Fire Equipments (Picture 01 out of 02)	Fire Extinguishers (Picture 02 out of 02)

<p>Fire Alarm Switch</p>	<p>Fire Fighter</p>	<p>DB Board with Sign and Mats</p>
<p>Fire Alarm with Visual Light</p>	<p>Fire Hose Reel</p>	<p>Exit light</p>
<p>Smoke Detector</p>	<p>Emergency Light with IPS Backup</p>	<p>Fog Light</p>





## Evacuation Plan



### Fire Bucket and Fire Door



Stair with both sides hand rail



PA System



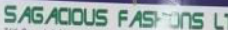
## Payroll Attendance System




Diesel drum with MSDS



## Product Inventory system

<div style="text-align: center;">              7471, Durgacherra Main Road, National University, Ranchi, Jharkhand - 834005, India. Contact: 94329 7725         </div>																														
(ISO – 9001: 2015) (MS) QUALITY MANAGEMENT SYSTEM QUALITY OBJECTIVE																														
SL	Objectives		Action Plans	How to Implementation	Responsible	Target																								
1.	To improve ISO 9001:2015 quality management system		1. To take and document incoming inspection 2. To take and document outgoing inspection 3. To implement, implement and maintain the document and work as per ISO 9001:2015	1. We will arrange meeting once in a week. 2. 100% meeting with effective action	CRM MR	December 2021																								
	<b>Current situation of Allocation, Retention &amp; Retention Rights table</b>  <table border="1"> <thead> <tr> <th>Category</th> <th>Allocation</th> <th>Retaining</th> <th>Retaining</th> <th>Retaining</th> <th>Retaining</th> </tr> </thead> <tbody> <tr> <td>Allocation</td> <td>20%</td> <td>70%</td> <td>70%</td> <td>70%</td> <td>70%</td> </tr> <tr> <td>Retention</td> <td>100%</td> <td>100%</td> <td>100%</td> <td>100%</td> <td>100%</td> </tr> <tr> <td>Retention</td> <td>70%</td> <td>70%</td> <td>70%</td> <td>70%</td> <td>70%</td> </tr> </tbody> </table>		Category	Allocation	Retaining	Retaining	Retaining	Retaining	Allocation	20%	70%	70%	70%	70%	Retention	100%	100%	100%	100%	100%	Retention	70%	70%	70%	70%	70%	1. Identify 7 major issues in high allocation 2. 100% Allocation 3. 100% Retention which comes from the 4. 100% Retention of allocation 5. 100% Retention of allocation 6. 100% Retention of allocation 7. 100% Retention of allocation	1. We have to close the flow to regular basis and use the old and new use regularly. 2. 100% Retention of allocation 3. 100% Retention of allocation 4. 100% Retention of allocation 5. 100% Retention of allocation 6. 100% Retention of allocation 7. 100% Retention of allocation	CRM MR	December 2021
Category	Allocation	Retaining	Retaining	Retaining	Retaining																									
Allocation	20%	70%	70%	70%	70%																									
Retention	100%	100%	100%	100%	100%																									
Retention	70%	70%	70%	70%	70%																									
	<b>Allocation, Retention, Retention &amp; Retention Rights will be reduced by 70%</b> All personnel will be maintain records of Allocation, Retention & Retention		1. Identify actions need to be taken to improve these areas	1. We have to close the flow to regular basis and use the old and new use regularly. 2. 100% Retention of allocation 3. 100% Retention of allocation 4. 100% Retention of allocation 5. 100% Retention of allocation 6. 100% Retention of allocation 7. 100% Retention of allocation	CRM MR	December 2021																								
	<b>Current probability is 1000000 of the supply based on work study</b> Work: 70000 Pcs		1. Identify actions need to be taken to improve these areas	1. We have to close the flow to regular basis and use the old and new use regularly. 2. 100% Retention of allocation 3. 100% Retention of allocation 4. 100% Retention of allocation 5. 100% Retention of allocation 6. 100% Retention of allocation 7. 100% Retention of allocation	CRM MR	December 2021																								
4.	<b>Marketing</b> To create market by following our marketing and promotional strategy through our website, social media, physical visits and meetings. This includes our activities in all our products.		1. Communication and lead buying 2. Market and buyers search 3. Market and buyers search 4. Market and buyers search 5. Market and buyers search 6. Market and buyers search 7. Market and buyers search	1. We have to close the flow to regular basis and use the old and new use regularly. 2. 100% Retention of allocation 3. 100% Retention of allocation 4. 100% Retention of allocation 5. 100% Retention of allocation 6. 100% Retention of allocation 7. 100% Retention of allocation	CRM MR	December 2021																								


  
**Managing Director**

### Quality Objective

# SAGACIOUS FASHIONS LTD.

74/1, Degercherra Main Road, National University, Gazipur Sadar, Gazipur-1705

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## ISO - 9001: 2015 (QMS) QUALITY MANAGEMENT SYSTEM

### QUALITY POLICY

- **Our Vision:** Our vision is to achieve business excellence by exporting world class Knit/Woven Garments products where quality will be the milestone of our achievement.
- **Our Mission:** Our mission is to work by complying with the Land of the law and follows the guidelines of ISO 9001:2015 Quality Management System, Code of Conduct (COC) & Customer requirements.
- **We aim to satisfy our respected buyers** by providing quality products. To reach the desired end, we are always dedicated to put the best endeavors. We work as a team to achieve efficiency & continual improvement of the Quality Management System.
- **The Management** ensures necessary reviews & performance measurement for proper operation and implementation of Quality Policy and QMS. The management authority ensures various benefits to employees along with a good working environment. We provide proper training to improve employee's awareness & efficiency to reach the desired level.

**কিভাবে গুণ: আমাদের মূল দৃষ্টি**

কিভাবে গুণ: আমাদের মূল দৃষ্টি হলো গুণ। গুণই আমাদের প্রধান উদ্দেশ্য। আমরা বিশ্বের সর্বোত্তম মানের কাপড় তৈরি করে, যেখানে গুণই আমাদের মূল মূল্যবোধ।

**কিভাবে গুণ: আমাদের মিশন**

কিভাবে গুণ: আমাদের মিশন হলো আইন ও ISO 9001:2015 মানের সাথে পরিচালনা করতে, স্বাক্ষরিত কোড অব কন্ডাক্ট এবং গ্রাহকের চাহিদা পূরণ করা।

**কিভাবে গুণ: আমাদের লক্ষ্য**

কিভাবে গুণ: আমাদের লক্ষ্য হলো গ্রাহকের চাহিদা পূরণ করা। আমরা গুণের মাধ্যমে গ্রাহকের চাহিদা পূরণ করতে চাই।










**কিভাবে গুণ: আমাদের প্রতিশ্রুতি**

কিভাবে গুণ: আমরা গুণের মাধ্যমে গ্রাহকের চাহিদা পূরণ করতে চাই। আমরা গুণের মাধ্যমে গ্রাহকের চাহিদা পূরণ করতে চাই।

**Managing Director**

## Quality Policy

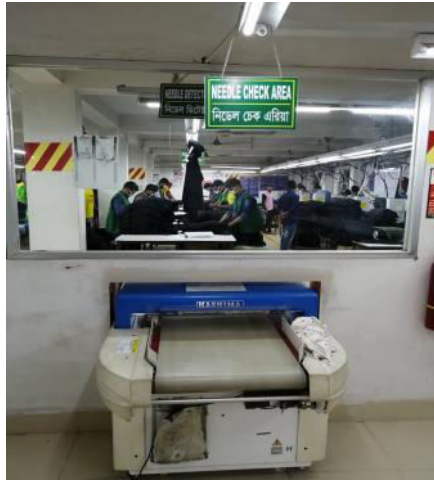


		
Knitting Section (Picture 01 out of 02)	Knitting Section (Picture 02 out of 02)	Cutting Section
		
Sewing Section (Picture 01 out of 03)	Sewing Section (Picture 02 out of 03)	Sewing Section (Picture 03 out of 03)
		
Finishing Section	Measurement Area	Quality Section

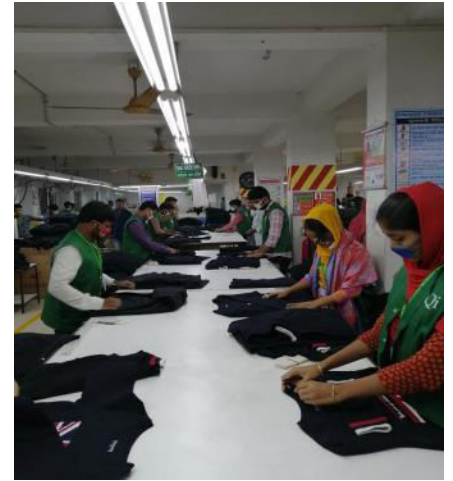




Process Area



Needle Detector Machine



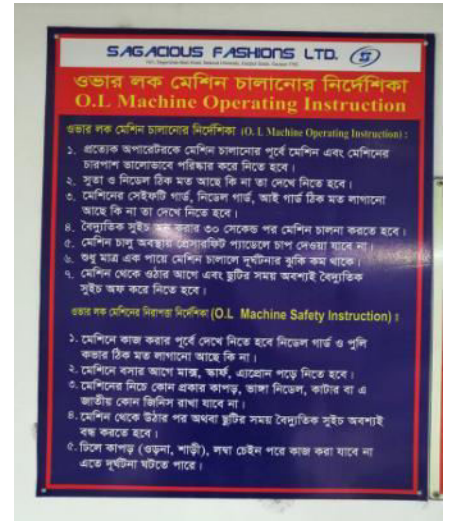
Quality Table



Knitting Section Risk Assessment



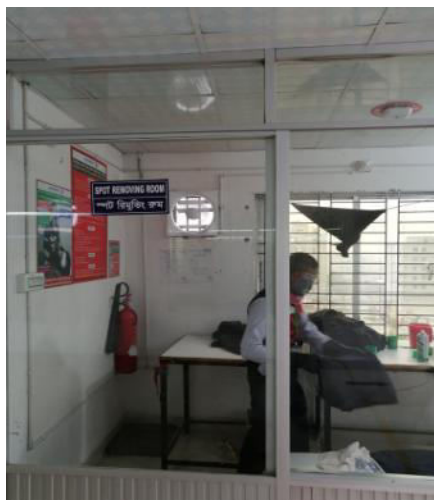
Generator Room Risk Assessment



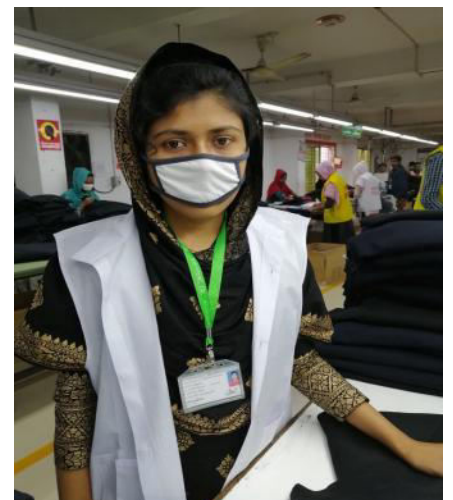
Over lock Machine Risk Assessment



First Aid Procedure for Electric



Spot removing Room



Face Mask with ID Card





Participation Committee



Safety Committee



Canteen Committee



CCTV



First Aid Box



Compressor Room



Boiler Room






Generator Room



Rooftop

## Legal License




 <p>Trade License</p>	 <p>Fire License</p>	 <p>Factory License</p>
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 <p>Generator Waiver Certificate</p>	 <p>Boiler License</p>	 <p>EPB License</p>
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 <p>Tin Certificate</p>	 <p>ERC Certificate</p>	 <p>Membership Certificate</p>
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## Non Compliance Photo

		
Waste Segregation	Risk Assessment	First Aider Sound Knowledge



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

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

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

**[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](#)**

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[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\\_2brg\\_3d\\_3d](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

**[Click here for Auditors:](#)**

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