



# Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC:402434555	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS:402491671
Business name (Company name):	Sagacious Fashions Ltd		
Site name:	Sagacious Fashions Ltd		
Site address: <i>(Please include full address)</i>	4/1, Degerchala Main Road, National University, Gazipur Sadar, Gazipur-1705, Bangladesh	Country:	Bangladesh
Site contact and job title:	Md. Nuruzzaman- Assistant Manager Compliance & HR		
Site phone:	+8801708143302	Site e-mail:	<a href="mailto:sagacious3.apparels@gmail.com">sagacious3.apparels@gmail.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:	January 21, 2021		

<b>Audit Company Name &amp; Logo:</b>  	<b>Report Owner (payer):</b> <i>(If paid for by the customer of the site please remove for Sedex upload)</i>  Sagacious Fashions Ltd
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact [grievance@sedex.com](mailto:grievance@sedex.com).

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

## Audit Content:

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

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

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

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

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

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

Lead auditor: Zahidun Nabi APSCA number: RA 21702554

Lead auditor APSCA status: In Good Standing

Team auditor:

Hassan Prince APSCA number: RA 21702599

Raunak Parvin APSCA number: RA 21702831

Interviewers:

Hassan Prince APSCA number: RA 21702599

Raunak Parvin APSCA number: RA 21702831

Report writer: Zahidun Nabi

APSCA number: RA 21702554

Report reviewer: Dancel Leonardo

Date of declaration: January 21, 2021

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

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

## Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A <a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>				
0B <a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
3. <a href="#">Safety and Hygienic Conditions</a>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	3	0	0	NC <ul style="list-style-type: none"> <li>Lacking of monitoring of inspection system implements regarding ventilation.</li> <li>There is lacking in in monitoring and inspection system of fire equipment</li> <li>No spittoon provided at staircase area.</li> </ul>
4. <a href="#">Child Labour</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
5. <a href="#">Living Wages and Benefits</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
6. <a href="#">Working Hours</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				

7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
8A	<u>Sub-Contracting and Homeworking</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
10A	<u>Entitlement to Work</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
10B2	<u>Environment 2-Pillar</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
10B4	<u>Environment 4-Pillar</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1			NC <ul style="list-style-type: none"> <li>Facility does not have any reduction targets in place for environmental aspects</li> </ul>
10C	<u>Business Ethics</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

General observations and summary of the site:

SMETA 4 pillar Initial audit was conducted announced basis on January 21, 2021 by 3 auditors in 1 day. On January 21, 2021 auditors reached at the factory at morning and conduct an opening meeting with management and workers representative below-

Md. Asgar Ali (Labu)- Director  
 Md. Dulal Shaikh- Manager Admin & HR  
 Md. Nuruzzaman- Assistant Manager Compliance & HR  
 Mst. Rasheda Begum- Workers Participation Committee Vice President  
 Md. Shahjahan Mia- Officer Maintenance

The assessment team describe auditor protocol which includes opening meeting, complete document review, health and safety walk through, and employees interview. The management permit all the audit process including given permission to take photograph. UL Statement of Integrity was also explained to management and Md. Nuruzzaman Signed the same.

Factory is located in Gazipur. The factory produce Knit garments items with production process of Knitting, Cutting, Sewing and Finishing process. All employee are full time and permanent and monthly salary basis. No contracted or daily workers reported.

The assessment team selected a total of 26 sample employees for audit. The interviews were conducted in a private room without management interference or any electronic surveillance. Due to Covid-19 there some interview are short as workers do not want to talk much and not comfortable for long conversation.

The documents were reviewed by the assessor. The payroll of the sampled employees for the month of October, November & December 2020. There was no peak and off peak season reported. The facility management was transparent in showing all the records. During the management interaction and the employee interviews they have informed that the employees are provided with group insurance Benefits.

After the assessment was complete, the assessment team had a discussion and prepared the CAP. The closing meeting was conducted with management and workers association member (Same persons present in opening meeting). The non-compliance issue for the day was made known to the facility. Management was advised to take necessary corrective measures to ensure compliance as per the client's requirements. The management was receptive and agreed to adhere to the suggestions provided by the assessor.

*\*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:	Latitude: 23° 57' 47.86342" N Longitude: 90° 23' 8.12312" E																								
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Trade license: License no 32/140/9/10/18, license is valid up to 30-Jun-21 Factory License: 18043/Gazipur, license is valid up to 30-Jun-31, category F																									
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Garments manufacturing unit (Knit items) Knitting-> Cutting-> Sewing-> Finishing																									
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Main building</td> <td></td> <td></td> </tr> <tr> <td>Floor 1 (Ground floor)</td> <td>General Store, Fabric Store, Child care room, Doctors room, Time section, Security post, Parking area, Assembly point, Idle machine store</td> <td>N/A</td> </tr> <tr> <td>Floor 2</td> <td>Finishing, Packing section, Finished goods store</td> <td>N/A</td> </tr> <tr> <td>Floor 3</td> <td>Sewing section</td> <td>N/A</td> </tr> <tr> <td>Floor 4</td> <td>Sewing section</td> <td>N/A</td> </tr> <tr> <td>Floor 5</td> <td>Office and cutting section</td> <td>N/A</td> </tr> <tr> <td>Floor 6</td> <td>Dining, canteen, open space, pairing production area, spot removing room, female</td> <td>N/A</td> </tr> </tbody> </table>		Production Building no	Description	Remark, if any	Main building			Floor 1 (Ground floor)	General Store, Fabric Store, Child care room, Doctors room, Time section, Security post, Parking area, Assembly point, Idle machine store	N/A	Floor 2	Finishing, Packing section, Finished goods store	N/A	Floor 3	Sewing section	N/A	Floor 4	Sewing section	N/A	Floor 5	Office and cutting section	N/A	Floor 6	Dining, canteen, open space, pairing production area, spot removing room, female	N/A
Production Building no	Description	Remark, if any																								
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Floor 2	Finishing, Packing section, Finished goods store	N/A																								
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Floor 6	Dining, canteen, open space, pairing production area, spot removing room, female	N/A																								

		prayer room, wastage area	
	Is this a shared building?	No	N/A
	Production Building no Shed	Description	Remark, if any
	Floor 1	Staff rest room, dining area	N/A
	Floor 2	Electrical substation, boiler, Generator, compressor, Knitting section, Yarn storage area	N/A
	Is this a shared building?	No	N/A
	<p>Established date of the factory is 27-Jun-200. This factory is located in 74/1, Degerchala Main Road, National University, Gazipur Sadar. The size of the factory is 172353 square feet as approved space 32740 square feet.</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 checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>F4: Please give details: This factory is approved by the chief factory inspector on dated 22-Jul-2018</p>		
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor		
H: Month(s) of peak season: (if applicable)	<p>Round the year same process.            No specific peak season reported by management</p>		

<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>Production Process: Knitting, Cutting, Sewing, Finishing and Packing There are 8 number of sewing line set for knit items manufacturing. Main equipment is used Cutting machines; Sewing machines, Iron machines, Boiler, Generator, Compressor etc.</p>
<p>J: What form of worker representation / union is there on site?</p>	<p><input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None</p>
<p>K: Is there any night production work at the site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation</p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers</p>
<p>N: Were all site-provided accommodation buildings included in this audit</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No N1: If no, please give details This is not applicable as there is no production workers accommodation provided by the factory management</p>

Audit Parameters	
A: Time in and time out	A1: Day 1 Time in: 10.00 am A2: Day 1 Time out: 4.30 pm
B: Number of auditor days used:	2.5 man-day (3 auditors in one day)
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other  If other, please define
D: Was the audit announced?	<input 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. Nuruzzaman- Assistant Manager Compliance & HR
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
I: Previous audit date:	Not available
J: Previous audit type:	Not available
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <input type="checkbox"/> N/A

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

A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	N/A		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	There is no trade union present at the factory. Workers participation committee members are present during the opening and closing meeting.		

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	135	0	0	0	0	0	0	135
Worker numbers – female	255	0	0	0	0	0	0	255
Total	390	0	0	0	0	0	0	390
Number of Workers interviewed – male	9	0	0	0	0	0	0	9
Number of Workers interviewed – female	17	0	0	0	0	0	0	17
Total – interviewed sample size	26	0	0	0	0	0	0	26



A: Nationality of Management	Bangladeshi	
<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>	Nationalities: Bangladeshi 100%	<p>Was the list completed during peak season?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: The facility has no specific peak and off peak period</p>
C: Please provide more information for the three most common nationalities.	C: Not applicable all are Bangladeshi	
D: Worker remuneration (management information)	<p>D: 0% workers on piece rate D1: 0% hourly paid workers D2: 100% salaried workers</p> <p>Payment cycle: D3: 0% daily paid D4: 0% weekly paid D5: 100% monthly paid D6: 0% other D7: If other, please give details: N/A</p>	



Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The factory has given ETI code of conduct training to employees. Last training was given to employee on dated 28-Dec-20 by compliance department
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	4 groups of 5
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 2      D2: Female: 4
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	No such complain raised
I: What did the workers like the most about working at this site?	Ontime salary , management behaviour
J: Any additional comment(s) regarding interviews:	No
K: Attitude of workers to hours worked:	Positive and cooperative
L. Is there any worker survey information available?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: If yes, please give details:	



Grievance Satisfaction survey done by factory as well as living wage survey. Living wage survey is done in the year 2020 and its 16742 BDT/Month.

**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 workers were selected from Knitting, Cutting, sewing & finishing. Both male and female interview is done as per SEDEX guideline. They were interviewed as 4 groups of 5 some mixed groups and some single sex and the balance of 6 workers were interviewed individually.

Attitude to management and worker found friendly and cooperative. Workers found satisfied and secured regarding their workplace Condition. This was revealed through the confidential interview process.

Note that Due to Covid-19 there some interview are short as workers do not want to talk much and not comfortable for long conversation.

**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*

Facility has a worker participation committee which is approved by the labour ministry. Total 2 workers participation committee members are interviewed individually. Committee members are elected. The members found friendly with their worker and both side co-operation was detected.

**O: Attitude of managers:**

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

Management was positive and co-operative. All the management personnel found positive towards the worker as well. Ontime payment and respect to the legal requirement observed throughout the audit.

## Audit Results by Clause

### 0A: Universal Rights covering UNGP

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

#### 0.A. Guidance for Observations

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

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

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

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

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

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

Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

#### Current Systems and Evidence Examined

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

#### Current systems:

Facility has well developed policy on respecting Human Rights in workplace. They have definite policy on child labor, forced labor, freedom of association, discrimination, , and also communicated to all appropriate parties including its own suppliers. Md. Nuruzzaman- Assistant Manager Compliance & HR is designated person responsible for implementing standards concerning Human Rights and other Code of Conducts. Facility has well developed supplier selection policies and have identified their stakeholders, their impact and salient issues. And also measure their direct, indirect and potential impacts on stakeholders' (rights holders) Human Rights. Where there is any adverse impact on Human Rights within any of their stakeholders, they shall address these issues and enable effective remediation through internal audits and monitoring.

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

Details:

Policy and procedure and management system for implementation of the policies.

Policy on Human rights

Health and safety policy

Subcontract selection and monitoring policy

Grievance policy

Forced labour policy

Prohibition of harassment and abuse

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      A1: Please give details: Policy regarding Child labour, forced labour, discrimination, Harassment, Freedom of association, Workplace health and safety condition well developed and well maintained.</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      Please give details:                      Name: Md. Nuruzzaman                      Job title: Assistant Manager Compliance &amp; HR</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      C1: Please give details: Facility has installed complain box or suggestion box at toilet area where worker can report issues confidentially. Besides the facility has formed a worker participation committee for the right of the worker.</p>
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      D1: If no, please give details</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      E1: Please give details: All the information collected from worker are stored in individual worker's personal files and the files are kept in safe condition at the HR office. That information are only used for official purpose and not disclosed to others without authentication from the worker.</p>

Findings	
None	Objective evidence observed: None

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

## Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2020 5 %	A2: This year: 2021 0 %
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]	1%	
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: 2020 4 %	C2: This year: 2021 0%
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	1%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Accident is recorded by the medical assistant. This accident is recorded as this is legal requirement to submit to the factory inspectors. Accident is recorded by the medical assistant. This accident is recorded as this is legal requirement to submit to the factory inspectors. Last minor injury reported on 21-Dec-20, Treatment is given by Doctor. Last minor injury reported to factory inspector on dated 7-Jan-21 for half yearly data.	
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: 15	F2: This year: Number: 0
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 0	H2: This year: 0

I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0% workers	I2: 12 months 0% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 0% workers	J2: 12 months 0% workers

<b>0B: Management system and Code Implementation</b> <a href="#">(Click here to return to summary of findings)</a>
<p>0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>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</p> <p>0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.B.4 Suppliers are expected to communicate this Code to all employees.</p> <p>0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>

<b>Current Systems and Evidence Examined</b> <i>To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.</i>
<p><b>Current systems:</b>          The facility has read and understood the ETI Base Code, both local language (Bengali) and English. This code is communicated with employees through training. It is found that ETI training for employees conducted during the orientation training. Note that the auditor has found the ETI code of conduct is posted in the work floor for workers awareness.</p> <p><b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b>          Details: Notice boards displaying Codes of Conducts, verified through facility walkthrough.          Records pertaining to ETI implementation as like ETI Code Training records, Acknowledgement copy of ETI code communication letter to suppliers, Appointment letter copy of the implementation responsible person has been provided for review.</p> <p>Any other comments: None</p>

<b>Management Systems:</b>	
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:
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: Facility has developed policy and procedure for reduce risk of forced

	labour, child labour, discrimination, harassment & abuse. To identify child labour facility has age verification system, for reduce risk for forced
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Facility has developed policy and procedure for reduce risk of forced labour, child labour, discrimination, harassment & abuse. To identify child labour facility has age verification system, for reduce risk for forced labour overtime is voluntary, leave is permitted, not documents is retained on hard copy.
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: Training was provided to all worker and managers. There was training records available for grievance, Harassment, abuse, Child Labor to the Mid- Level Management.
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: Auditors checked factory's policies and written procedures. These are posted in notice boards. The management team understand policies. Workers interview also revealed they know factory's policies and regulations
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: BSCI Audit conduct on December 30, 2020 and result is B
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 Md. Nuruzzaman- Assistant Manager Compliance & HR
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: Mr. Md. Nuruzzaman 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: All worker information is confidential and maintain in personal file. All personal files are preserve in HR department with restriction.

<p>J: Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      J1: Please give details: All information is retained confidential at Human Resource office in each workers designated personal file</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      K1: Please give details: Facility has internal audit procedure to assess the effectiveness of policy and procedure.</p>
<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      L1: Please give details: Corrective action taken on the internal audit finding. Last internal audit was done on dated 1-Sep-20.</p>
<p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      M1: Please give details: Facility has policy which is align with local law requirement.</p>
<p><b>Land rights</b></p>	
<p>N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      N1: Please give details: Facility has building approval plan, floor layout plan and all other legal permits for operating the facility. It approved by Chief factory inspector on 22-Jul-2018 as per latest update.</p>
<p>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?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      O1: Please give details: Facility is strictly following the local labour law in all aspect</p>
<p>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</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                      P1: If yes, how does the company obtain FPIC:                      Not applicable according to country law.</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      Q1: Please give details: The land is owned by the land owner and building is rented by audited factory management. If any expansion required prior approval is required from Department of Factories and Labour.</p>

<p>R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  R1: Please give details: The factory does not make any extension recently. However last year they set knitting section and this extension is permitted by the factory inspector. They have the legal permission to extension of the factory from the government authority like Commerce ministry, department of labour, Export ministry, Factory inspector and Labour department of Bangladesh.</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  S1: Please give details: The factory does not make any extension recently. However last year they set knitting section and this extension is permitted by the factory inspector. They have the legal permission to extension of the factory from the government authority like Commerce ministry, department of labour, Export ministry, Factory inspector and Labour department of Bangladesh.</p>

Non-compliance:	
None	Objective evidence observed: None

Observation:	
Description of observation: None	Objective evidence observed: None

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



**1: Freely Chosen Employment**

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

**ETI**

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

Through the walkthrough and employee interviews it was noted that facility had no apparent signs of forced, bonded, or involuntary labour, as well as prison subcontracting. All interviewed employees reported they have not paid any deposits to the facility. All employees maintained their own original identity documentation with themselves and were free to leave job from the facility at any time.

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

Details:

Management interview

Complain and Suggestions from the complaint & suggestion box and actions taken

Hiring and employment policy

Contract agreement to check any deductions or recruitment fees

Personnel files (to check for original documentation held by facility or not)

Employee feedback

Any other comments: None

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  A1: If yes, please give details and category of workers affected:</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  B1: If yes, please give details and category of worker affected:</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  C1: If yes, please give details and category of worker affected:</p>
<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  D1: Please describe finding: None</p>
<p>E: If any part of the business is UK based or registered there &amp; has a</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>

turnover over £36m, is there a published a 'modern day slavery statement'?	<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: None observed or reported
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: The factory has policy on forced / trafficked / bonded labour and the factory understood the risk of this in the factory as well as in there supply chain. However, there were no instances of forced, bonded or involuntary prison labour apparent on the day of assessment.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: None

Non-compliance:	
None	Objective evidence observed: <i>None</i>

Observation:	
None	Objective evidence observed: <b>None</b>

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

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

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

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

The facility had no union at the time of the assessment. However, there is reported worker's association onsite. The worker association are formed by election. The election was conduct on September 22, 2020. Total elected member are 10 (workers representatives 6 and management representative 4)and this is approved by the Labour department. Last meeting was conduct on 14-Jan-21 and meeting minutes was sent to the Labor department.

Workers can raise their concerns through workers' representatives, to communicate with their Welfare officer, suggestion box, meeting and their supervisor or above. The facility has also adopted Open Door policy for the employee.

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

Details:

- Management interview
- Worker interview feedback
- Complain and Suggestions from the complaint & suggestion box and actions taken
- Facility written policies

Any other comments: None

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

C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Safety Committee (approved by factory inspector)  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 on allow the Union or committee to conduct related business	
F: Name of union and union representative, if applicable:	None	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Workers Participation Committee	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Workers are aware of who their representative is as per interview comment.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 23-Nov-20
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: 2	
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The facility had no union at the time of the assessment. However, there is reported worker's association onsite. The worker association are formed by election. The election was conduct on September 22, 2020. Total elected member are 10 (workers representatives 6 and management representative 4)and this is approved by the Labour department. Last meeting was conduct on 14-Jan-21 and meeting minutes was sent to the Labor department.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
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 Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A
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Non-compliance:	
None	Objective evidence observed: None

Observation:	
None	Objective evidence observed: None

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

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

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

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

**ETI**

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

**Current Systems and Evidence Examined**

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

**Current systems:**

There is management team to look after the health and safety system for this factory. The team is led by Md. Nuruzzaman- Asst. Manager (HR & Compliance). Md. Dulal Shaikh- Manager Admin & HR and specifically Md. Shahjahan Mia- Officer Maintenance designated to oversee and maintain the health and safety measures and policies of the facility. There is a Health and Safety Committee consisting of managers and employees that meets monthly and addresses any past or possible risks or concerns. However, the committee was not established as per law. Training is conducted during orientation and monthly for each topic. There is no dormitory provided by the facility. All observed restroom and break room facilities appeared sanitary, functional and properly stocked with necessary supplies; water tests showed potable drinking water.

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

Details:

Statutory document

Certificate of incorporation: Established in 27-Jun-2007

Trade license: License no 32/140/9/10/18, license is valid up to 30-Jun-21

Factory License: 18043/Gazipur, license is valid up to 30-Jun-31, category F

Construction approval: This factory is approved by the chief factory inspector on dated 22-Jul-2018.

Fire License: DD/Dhaka/25594/2015, license is valid up to 30-Jun-21

Boiler license: BB#8762, license is valid up to 07-Aug-2021

Competency certificate for boiler operator: Boiler operator license number is 5755

Electrician's license: Electrician license is valid up to 24-Oct-22

Group Insurance Records (Insurance Certificate and Biometric registration Screen shot from web):

Insurance certificate no#6126, valid up to 31-Dec-21

Latest Drinking Water Test Report: Last test conducted on dated 9-Jun-20 and all the parameters are within the limit.

Generator license: LWC- 2264, license is valid up to 15-Jul-21

Wastage contractor: Md. Faruk Enterprise

Non statutory document

Medical room attendant's personal file: Khirun Nahar- Nurse

Doctor's personal file: Dr. Sadia Afrin Banna ; BMDC Reg#80020

Agreement with the Hospital/ clinic: Tairunessa Medical College Hospital, Kunia, Taragacha, Board

Accident & Injury record: Last minor injury reported on dated 21-Dec-20. Last minor injury was reported to labor department on dated 7-Jan-21 for half yearly data of minor injury.

Accident injury analysis report & Diseases analysis report: Reviewed for the month of October, November and December 2020.

Injury awareness training: Last training was done on dated 14-Dec-20.

Fire Drill record: The factory conduct fire drill for day and night.

For general shift last fire drill was done on dated 19-Dec-20, total participant no 360 and evacuation time is 2.30 minutes.

For night fire drill: Last night fire drill was conducted on 14-Jan-21. Total time was reported on 1.10 minutes, total participant was 8 person. This is reported to fire service and civil defence.

Awareness training on transmittable and non-transmittable diseases: Last training was done on 12-Dec-20

Awareness training on Covid-19: Last training was conducted on dated 26-Dec-20

Training for child care attendance: Last training was don on dated 29-Dec-20.

PPE training records: Last training was given on dated 15-Dec-20.

Awareness training on mid-level management: Last training was done on dated 19-Dec-20

Health and safety management meeting: Last meeting was done on dated 22-Dec-20.

Training records for fire fighters: Last firefighting training was done on dated 9&10-Dec-20, training was done by Fire service and civil defence authority of Bangladesh

Training records on First Aider: Last first aid training was done on dated 7-Dec-20.

Workers Participation Committee meeting minutes: Election was done on dated 22-Sep-20 and approved by the Labor ministry. Last meeting was done on 27-Sep-20.

Safety committee meeting minutes: Last meeting of safety committee was done on dated 18-Jan-21. Meeting minutes sent to Labor office over mail.

Any other comments: None

<p>A: Does the facility have general and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  A1: Please give details: Facility has health and safety policy and procedure and it is communicated to workers.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  B1: Please give details: Policy is included in the worker's manual.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  C1: Please give details: Currently all the production structure and set up is approved by the factory inspector and included in documented lay out plan.</p>
<p>D: Are visitors to the site informed on H&amp;S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>

	D1: Please give details: Management has provided PPE to the visitor in the site of facility and informed the evacuation plan in case of any emergency.
E: Is a medical room or medical facility provided for workers?  If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility provide medical room as per law requirement. The facility also has contract with Tairunessa Medical College Hospital, Kunia, Taragacha, Board Bazar, Gazipur, Bangladesh.
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: Medical room attendant's personal file: Khirun Nahar- Nurse Doctor's personal file: Dr. Sadia Afrin Banna ; BMDC Reg#80020
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: No transportation provided for the worker by the facility management.
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: Not applicable No living space is provided for the 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: H&S Risk assessment are conducted on regular basis by the H&S committee.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The factory has done there EIA and have the permit from department of Environment for run the factory with all the required permit for use and disposal of natural resources. They have any clearance certificate from department of Environment up to 15-Jul-21
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: The factory does not use any banned chemicals.



**Non-compliance:**

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

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

Lacking of monitoring of inspection system implements regarding ventilation. Through onsite visit it is observed that exhaust fan found was not working at spot removing area located at 5th floor of the factory building which is corrected during the audit day.

Note: This was found isolated issue as machine maintenance person did not checked this. The management check and later found that it is working.

**Local law and/or ETI requirement**

Local Law: Bangladesh Labor Code (2006), Sec.52(1)- Effective measures shall be undertaken in every establishment for securing and maintaining in every work-room adequate ventilation by the circulation of fresh air.

**Recommended corrective action:**

The factory should ensure ventilation system in the spot removing area

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

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

There is lacking in in monitoring and inspection system of fire equipment (Smoke alarm and fire extinguishers) observed for keeping them fit.

Note: The assigned person reported that he did not checked the 3 fire extinguishers and 4 smoke alarm. After investigating they found that the battery of smoke alarm is out of order and they replace. The fire extinguishers are also replaced as they have spare in stored.

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

Local law: Bangladesh Labor Rules 2015-Sixth Chapter-Safety Rule 55- The factory shall responsible to ensuring the preservation and maintenance of all fire-fighting equipment and keeping them fit.

**Recommended corrective action:**

The factory should have regular maintenance and checking of fire equipment

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

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

No spittoon provided at staircase area.

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

Local Law: Bangladesh Labor Rules 2015-Fifth Chapter-Protection For Health Rule 52(1)]- Number of spittoons is :100 ratio

**Recommended corrective action:**

The factory is advised to put spittoons as per legal requirement

**Objective evidence observed:**

(where relevant please add photo numbers)

1. Factory tour (See NC photo no#1)

2. Factory tour (See NC photo no#2(1)&2(2))

3. Factory tour

**Observation:**

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

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

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

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

All employees in interviews stated they have never seen a child in the facility, nor are there any employees under 18 years old to their knowledge. No minors (less than 18 years of age) are employed at the facility, nor were any observed on the work floor during the health and safety walkthrough. The youngest employee is 18 years of age.

The factory establishes a policy that will never employ and use any child labour under the age of 18 years old.

The factory will verify all workers' original ID cards at the time of recruitment and keep the photocopies of workers' ID cards in the personnel files. Sufficient numbers of employees' personal files were provided for review. Each employee file includes a bio-data sheet, a recent photo and the age documentation, which is in the form of photocopied national, birth, and local chairman identification card. The card lists the employee's name, household address and the date of birth.

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

Details:

- Written policies and procedures;
- Employee handbook
- Personnel files; hiring documents
- Copies of government-issued identification like national identity cards, Birth certificate, Medical age proof certificate from registered physicians.
- Workers interview.

Any other comments:

None

A: Legal age of employment:	14-Below 18 years with restriction 18 Years and above- Without restriction
B: Age of youngest worker found:	18 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 subject to hazardous work assignments? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: If yes, give details Not applicable

Non-compliance:	
None	Objective evidence observed: None

Observation:	
None	Objective evidence observed: None

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

**5: Living Wages are Paid**

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

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

**ETI**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

The auditor asked to present the time attendance and payroll of last one year in this periodic audit and management informed they have all the document. The management informed as they produce garments item, they do not have defined peak and off peak seasons. The auditor choose 3 months of October, November & December 2020.

There were no reports or indications from employees or pay registers of disciplinary deductions. Employees reported receiving their corresponding check stub with their cash amount received, containing all information from their earned wages including all hours worked, rate, deductions, taxes, benefit contributions, etc. Employees' wages matched that which they reported in interviews. All reviewed wages met minimum legal requirements, and all policies and information about the pay is provided in each employee's acceptance letter as well as the employee handbook.

All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the information of their wages for the pay period concerned each time that they are paid. Benefits such as group insurance, annual leave, increment and maternity leave are providing as per country regulation. All employees are monthly salary basis and paid salary usually within 7 days after each pay periods which is compliance with law. There is only fixed salary workers. The overtime is given 200% of basic wage as per regulation for workers. The employees are paid cash.

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

Details:

- Policy
- Time Cards.
- Attendance records
- Payroll Sheets & Overtime Payment Records.
- Maternity Benefit Payment Documents & Register.
- Leave Documents & Register.
- Festival Holiday List

- Production records
- Warehouse records
- Worker interview

Any other comments: None

**Non-compliance:**

None

Objective evidence observed: None

**Observation:**

None

Objective evidence observed: None

**Good Examples observed:**

Description of Good Example (GE): None

Objective Evidence Observed: None

**Summary Information**

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 8 hours/ day 48 hours / week	A1: 8 hours/ day, 48 hours / week, 206 hours/ month	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 2 hours/ day 12 hours / week However waiver for 4 hours/ day, 24 hours / week Up to 16-Apr-21	B1: 2 hours/ day 12 hours / week	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: Grade-1: 18275 BDT/Month Grade-2: 15416 BDT/Month Grade-3: 9845 BDT/Month	C1: Grade-1: 18275 BDT/Month Grade-2: 15416 BDT/Month Grade-3: 9845 BDT/Month	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	Grade-4: 9347 BDT/Month Grade-5: 8875 BDT/Month Grade-6: 8420 BDT/Month Grade-7: 8000 BDT/Month Trainee / Apprentice: 5975 BDT/Month	Grade-4: 9347 BDT/Month Grade-5: 8875 BDT/Month Grade-6: 8420 BDT/Month Grade-7: 8000 BDT/Month Trainee / Apprentice: 5975 BDT/Month	
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 200% of basic wage	D1: 200% of basic wage	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<b>Wages analysis:</b> <a href="#">(Click here to return to Key Information)</a>		
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
A1: If <b>No</b> , why not?	Not applicable	
B: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	26 samples for the month of December 2020 (Most recent) 26 samples for the month of November 2020 26 samples for the month of October 2020 No peak and off peak season reported	
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If <b>Yes</b> , please give details: Grade-1: 18275 BDT/Month Grade-2: 15416 BDT/Month Grade-3: 9845 BDT/Month Grade-4: 9347 BDT/Month Grade-5: 8875 BDT/Month Grade-6: 8420 BDT/Month Grade-7: 8000 BDT/Month Trainee / Apprentice: 5975 BDT/Month
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	D1: If <b>No</b> , please give details: Not applicable
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> 8000 BDT/Month for grade 7 Helper

<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: 0% of workforce earning under minimum wage                  F2: 100% of workforce earning minimum wage                  F3: 80% of workforce earning above minimum wage</p>		
<p>G: Bonus Scheme found:                  Please specify details:</p>	<p>Bonus Scheme found:                  Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</p> <p>Mandatory legal bonus</p> <ul style="list-style-type: none"> <li>o Eid ul Fitr- Mandatory bonus once in year during Muslim festival of Fitr</li> <li>o Eid ul Azha- Mandatory bonus once in year during Muslim festival of Azha</li> </ul>		
<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, facility may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, revenue stamp etc.</p>		
<p>I: Have these deductions been made?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>	<p>I1: Please list all deductions that <b>have</b> been made.</p>	<p>1. Unauthorised absent deduction</p> <p>Please describe: This deductions are ok with the law. If employees are not present at work, employer can deduct salary of hours of work which employee did not conduct</p>
		<p>I2: Please list all deductions that <b>have not</b> been made.</p>	<p>No illegal or unauthorised deduction reported by the employee or in the pay stubs.</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>		
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>	<p>K1: Type</p> <p><input type="checkbox"/> Poor record keeping  <input type="checkbox"/> Isolated incident  <input type="checkbox"/> Repeated occurrence:</p>	
<p>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)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>L1: Please give details: Employee need to start work from 8 am to 5 pm and this working hour is approved by the chief factory inspector. Employee need to record their own time card through Face detection attendance recording system. All the working hours are recorded in the time attendance records.</p>		
<p>M: Is there a defined living wage:</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>		



<p>This is <i>not normally</i> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</p>	<p>M1: Please specify amount/time: 13630 BDT per month Source: The Global Living Wage Coalition- May 2016</p>
<p>M2: If yes, what was the calculation method used.</p>	<p><input checked="" type="checkbox"/> ISEAL/Anker Benchmarks  <input type="checkbox"/> Asia Floor Wage  <input type="checkbox"/> Figures provided by Unions  <input type="checkbox"/> Living Wage Foundation UK  <input type="checkbox"/> Fair Wear Wage Ladder  <input type="checkbox"/> Fairtrade Foundation                  Other – please give details:</p>
<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  N1: Please give details: As per the law minimum 5% increase of basic salary should be done for employee who completed 1 year. This is followed observed in sample records check.</p>
<p>O: Are workers paid in a timely manner in line with local law?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  P1: Please give details: The sample record showing equal rate is provided for the equal work, Confirmed by the employee.</p>
<p>Q: How are workers paid:</p>	<p><input checked="" type="checkbox"/> Cash  <input type="checkbox"/> Cheque  <input type="checkbox"/> Bank Transfer  <input type="checkbox"/> Other                  Q1: If other, please explain: Workers are paid directly</p>

**6: Working Hours are not Excessive**

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

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

**ETI**

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

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

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

Time keeping system is automated system. Knitting and security sections operates in 3 shifts. Rest section cutting, sewing, Finishing and Packing section operates in 1 shift. Working hour is approved by factory inspector. The management informed they do not have defined peak and off peak seasons. The auditor choose recent month of September, October & November 2020.

General working hours start from 8 am to 5 pm with 1 hour lunch break. Working hour is approved up to 8 am to 5 pm with 1 hour lunch break. Lunch break is in one shift, 1 pm to 2 pm. Working hour is approved by factory inspector.

Through checking of 3 months record it is found that regular overtime is 48 hours per week in all 3 months and overtime is highest 2 hours per day or 12 hours per week. Overtime is voluntary as reported by employee.

Including overtime it is found total working hours is not exceeding 60 hours per week in any of the samples. In last 3 months no workers found worked consecutive 7 days. No weekend work reported or observed.

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

Details:

- Working hour policy
- Working hour notice
- Time records.
- Payroll Sheets & Overtime Payment Records.
- Production records
- Warehouse records

Any other comments:  
None

**Non-compliance:**

None

**Objective evidence observed: None**

**Observation:**

None

**Objective evidence observed: None**

**Good Examples observed:**

Description of Good Example (GE): None

**Objective Evidence Observed: None**

**Working hours' analysis**

Please include time e.g. hour/week/month  
[\(Go back to Key information\)](#)

**Systems & Processes**

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

Describe: *Electronic time keeping system*

B: Is sample size same as in wages section?

Yes  
 No  
B1: If no, please give details

<p>C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>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:</p>				
<p>D: Are there any other types of contracts/employment agreements used?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>D1: If YES, please complete as appropriate:</p> <table border="1" data-bbox="694 526 1481 616"> <tr> <td><input type="checkbox"/> 0 hrs</td> <td><input type="checkbox"/> Part time</td> <td><input type="checkbox"/> Variable hrs</td> <td><input type="checkbox"/> Other</td> </tr> </table> <p>If "Other", Please define:</p>	<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other			
<p>E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>E1: If <b>yes</b>, please detail hours, %, types of workers affected and frequency Please give details:</p>				
<p>F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?</p>	<p>F2: Please select all applicable:  <input checked="" type="checkbox"/> 1 in 7 days  <input type="checkbox"/> 2 in 14 days  <input type="checkbox"/> No            If 'No', please explain:</p>	<p>F3: Is this allowed by local law?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>Maximum number of days worked without a day off (in sample):</p> <p>6 Days in a week in all 3 reviewed months</p>				
<p><b>Standard/Contracted Hours worked</b></p>						
<p>G: Were standard working hours over 48 hours per week found?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>G1: If yes, % of workers &amp; frequency:</p>				
<p>H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>H1: If yes, please give details:</p>				
<p><b>Overtime Hours worked</b></p>						

<p>I: Actual overtime hours worked in sample (State per day/week/month)</p>	<p>Highest OT hours:                  2 hours/day &amp; 12 hours/week- October 2020                  2 hours/day &amp; 12 hours/week- November 2020                  2 hours/day &amp; 12 hours/week- December 2020</p>	
<p>J: Combined hours (standard or contracted + overtime hours = total) over 60 found?                  Please give details:</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  60 hours per week maximum in October, November &amp; December 2020.</p>	
<p>K: Approximate percentage of total workers on highest overtime hours:</p>	<p>60%</p>	
<p>L: Is overtime voluntary?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Conflicting Information</p>	<p>L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:                  There is contract agreement that overtime is voluntary and employee can refuse any time.</p>
<p><b>Overtime Premiums</b></p>		
<p>M: Are the correct legal overtime premiums paid?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> N/A – there is no legal requirement to OT premium</p>	<p>M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages:                  200% of basic wage as overtime premium Paid along with regular wage. This is done within 7 working days after end of each pay period. Acceptable as per law.</p>
<p>N: Is overtime paid at a premium?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>	<p>N1: If yes, please describe % of workers &amp; frequency:                  100% workers who conduct overtime are paid at 200% of basic rate as overtime premium. This is acceptable as per law. Overtime is paid along with the regular wage within 7 working day after end of each pay periods. This is acceptable as per law.</p>
<p>O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p>	<p><input type="checkbox"/> No  <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium)  <input type="checkbox"/> Collective Bargaining agreements  <input type="checkbox"/> Other</p>	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>
	<p>Not applicable. Eligible employee paid 200% of basic rate as overtime premium as per law.</p>	

<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<p><input type="checkbox"/> <b>Overtime is voluntary</b></p> <p><input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week</p> <p><input type="checkbox"/> Safeguards are in place to protect worker's health and safety</p> <p><input type="checkbox"/> Site can demonstrate exceptional circumstances</p> <p><input type="checkbox"/> Other reasons (please specify)</p> <hr/> <p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> <hr/> <p>Not applicable as no more than 60 hours per week in the reviewed periods.</p>
<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>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Q1: If yes, please give details:</p>
<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>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Not applicable. There are reported sufficient workers to complete the work order. If required the management request workers to do overtime which is voluntary reported by the workers and management.</p>

**7: No Discrimination is Practiced**

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

There are no apparent or reported concerns regarding discrimination in any form at the facility. The facility has a written Equal Employment Opportunity policy in the employee information guide which describes that they offer opportunities to all employees and qualified applicants without regard to their race, colour, religion, sex, national origin, age or any other characteristic protected by the law. In addition, the company prohibits and has zero tolerance for harassment in all forms and undertakes affirmative action to ensure that employees and qualified applicants are treated without regard to race, gender, disability or veteran status. No employees in interviews reported any form of discrimination.

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement. During the assessment, there is no deviation found in compensation, benefits, hiring procedure, job assignment, retirement provision, and access to service etc. between employees with regards to age, caste, disability, gender, political affiliation, race, religion, social background or other personal characteristics. There is no evidence that women are mistreated or fired because of being pregnant. Moreover, no evidence was found that employees are disciplined, dismissed or otherwise discriminated against because they complain against infringements of their right. Therefore, all the employees are treated equally by the facility at the time of assessment.

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

Details:

- Employee interview
- Management interview
- Documents review - Hiring Policy, Training records, Benefit policy, and Termination policy.
- Equal employment opportunity and anti-discrimination policies.

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 90 % A2: Female: 10 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	150

<p>C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:</p>	<p> <input type="checkbox"/> Hiring  <input type="checkbox"/> Compensation  <input type="checkbox"/> Access to training  <input type="checkbox"/> Promotion  <input type="checkbox"/> Termination or retirement  <input checked="" type="checkbox"/> No evidence of discrimination found         </p> <p>C1: Please give details:          No evidence of discrimination observed based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p>

Professional Development	
<p>A: What type of training and development are available for workers?</p>	<p>Orientation training, Machine operating training, Personal Protective Equipment usage, Fire training, First aid training, Code of conduct training etc.</p>

<p>B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?</p>	<p> <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No         </p> <p>If no, please give details:</p>
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Non-compliance:	
None	Objective evidence observed: None

Observation:	
None	Objective evidence observed: None

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



**8: Regular Employment Is Provided**

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

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

**ETI**

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

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

**Additional Elements: Responsible Recruitment**

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

A review of the employment contracts for workers at the facility was conducted. Each worker has a signed contract and workers are also provided with a copy of their employment contract. All documents appear to be in order. All the employees working at the facility are hired directly. Factory does not engage any home workers and no apprenticeship program have been implemented in the factory. No apparent concern in this clause was observed in the current assessment.

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

Details:

- Document review - Hiring Policy, Worker's Service Book, Personnel files, ID cards/Appointment letter, and Social security documents.
- Worker interview
- Management interview

Any other comments: None

**Non-compliance:**

<b>None</b>	<b>Objective evidence observed: None</b>
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<b>Observation:</b>	
None	<b>Objective evidence observed: None</b>

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

### Responsible Recruitment

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

<p>C: If yes, check all that apply:</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Recruitment / hiring fees</li> <li><input type="checkbox"/> Service fees</li> <li><input type="checkbox"/> Application costs</li> <li><input type="checkbox"/> Recommendation fees</li> <li><input type="checkbox"/> Placement fees</li> <li><input type="checkbox"/> Administrative, overhead or processing fees</li> <li><input type="checkbox"/> Skills tests</li> <li><input type="checkbox"/> Certifications</li> <li><input type="checkbox"/> Medical screenings</li> <li><input type="checkbox"/> Passports/ID's</li> <li><input type="checkbox"/> Work / resident permits</li> <li><input type="checkbox"/> Birth certificates</li> <li><input type="checkbox"/> Police clearance fees</li> <li><input type="checkbox"/> Any transportation and lodging costs after employment offer</li> <li><input type="checkbox"/> Any transport costs between work place and home</li> <li><input type="checkbox"/> Any relocation costs after commencement of employment</li> <li><input type="checkbox"/> New hire training / orientation fees</li> <li><input type="checkbox"/> Medical exam fees</li> <li><input type="checkbox"/> Deposit bonds or other deposits</li> <li><input type="checkbox"/> Any other non-monetary assets</li> <li><input type="checkbox"/> Other –</li> </ul> <p>C1: If other, please give details:</p>
<p>D: If any checked, give details:</p>	<p>Not applicable</p>

<p><b>Migrant Workers:</b></p> <p><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></p>			
<p>A: Type of work undertaken by migrant workers:</p>	<p>Not applicable. No migrant worker recruited</p>		
<p>B: Please give details about recruitment agencies for migrant workers:</p>	<p>B1: Total number of (in country recruitment agencies) used:</p> <p>B2: Total number of (outside of local country) recruitment agencies used:</p>		
<p>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?</p>	<table border="1" style="width: 100%;"> <tr> <td style="width: 60%;"> <ul style="list-style-type: none"> <li><input type="checkbox"/> Yes</li> <li><input type="checkbox"/> No</li> </ul> <p>C1: Please describe finding:</p> </td> <td style="width: 40%;"> <p>C2: Observations:</p> </td> </tr> </table>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Yes</li> <li><input type="checkbox"/> No</li> </ul> <p>C1: Please describe finding:</p>	<p>C2: Observations:</p>
<ul style="list-style-type: none"> <li><input type="checkbox"/> Yes</li> <li><input type="checkbox"/> No</li> </ul> <p>C1: Please describe finding:</p>	<p>C2: Observations:</p>		
<p>D: Are Any migrant workers in skilled, technical, or management roles</p> <p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Yes</li> <li><input type="checkbox"/> No</li> </ul> <p>D1: If yes, number and example of roles:</p>		

### NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input 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:	Not applicable. No migrant worker recruited

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):	Not applicable. No agency worker recruited
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: Please give details:

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

<b>Contractors:</b>	
<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>	
<p>A: Any contractors on site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>A1: If yes, how many contractors are present, please give details:</p>
<p>B: If <b>Yes</b>, how many workers supplied by contractors?</p>	<p>No contracted workers observed</p>
<p>C: Do all contractor workers understand their terms of employment?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please describe finding:</p>
<p>D: If <b>Yes</b>, please give evidence for contractor workers being paid per law:</p>	

**8A: Sub-Contracting and Homeworking**

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

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

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

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

*Note to auditor on homeworking:*

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

It was verified through document review, factory tour, management interview and employee interview that no sub-contracting & Home-working was used by this factory. The management informed that they do not need subcontract generally.

**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**

<i>Process Subcontracted</i>	<i>Embroidery</i>	<i>Dyeing and Printing</i>
<i>Name of factory</i>	<i>M.M Khan Embroidary</i>	<i>Pakiza Knit Composite Ltd</i>
<i>Address</i>	<i>Dolipara, Turag, Uttara, Dhaka, Bangladesh</i>	<i>A, 1/5, Majedpur, Savar, Dhaka, Bangladesh</i>

<i>Process Subcontracted</i>	<i>Print &amp; Embroidery</i>	<i>N/A</i>
<i>Name of factory</i>	<i>Montrims Ltd</i>	
<i>Address</i>	<i>Mouchak, Kaliakoir, Gazipur, Bangladesh</i>	

Details:

- Document Review – Sub-contract Policy, Production records, Warehouse records, Gate pass records
- Factory Tour
- Management interview
- Worker interview

**Non-compliance:**

<b>None</b>	<b>Objective evidence observed:</b> None
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<b>Observation:</b>	
None	<b>Objective evidence observed:</b> None

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

<b>Summary of sub-contracting – if applicable</b>	
<input checked="" type="checkbox"/> Not Applicable please x	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe:
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: If <b>Yes</b> , summarise details:
C: Number of sub-contractors/agents used:	
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If <b>Yes</b> , summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	

<b>Summary of homeworking – if applicable</b>			
<input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If <b>Yes</b> , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:

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



9: No Harsh or Inhumane Treatment is Allowed  
[\(Click here to return to summary of findings\)](#)

**ETI**

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

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&amp;S or any other grievances to a 3<sup>rd</sup> party?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  A1: Please give details: Facility has provided complain or suggestion box at the toilet area where worker can submit their complain or suggestion in the confidential manner. Also the facility has worker representative committee through which worker can raise their voice to the senior management.</p>
<p>B: If <b>Yes</b>, are workers aware of these channels and have access? Please give details.</p>	<p>Workers are aware about complain channels and they have access. Top management, participation committee member and general workers committee's present this box open twice in a month and solved the complaint as reported interview workers. In addition during orientation program facility management made aware about the channels and through worker representative committee members for workers are made aware.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Type of mechanism is used as</p> <ul style="list-style-type: none"> <li>• Hotline number</li> <li>• Confidential grievance mechanism box</li> <li>• Compliant raised by workers participation committee &amp; Welfare officer.</li> <li>• During orientation program facility management made aware about the channels and through worker representative committee members for workers are made aware.</li> </ul>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers  <input checked="" type="checkbox"/> Communities  <input checked="" type="checkbox"/> Suppliers  <input type="checkbox"/> Other</p> <p>D1: Please give details:</p> <ul style="list-style-type: none"> <li>• Workers representative committee and complain box.</li> <li>• Community complaint system</li> <li>• Supplier complaint /Feedback receive over mail.</li> </ul>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>E1: If yes, please give details</p>

<p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>F1: If no, please give details</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>G1: If no, please explain</p>
<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>H1: If no, please give details</p>
<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>I1: If yes, please give details</p>

**Current Systems and Evidence Examined**

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

**Current systems:**

Interviewed employees reported receiving fair and respectful treatment. The HR department is responsible for oversight of these code elements.

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 and the disciplinary procedure of the factory is verbal warning and education. There appears to be no concerns in this area during the assessment.

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

Details:

- Anti-harassment policy
- Threats and violence policy and procedures
- Facility's and company's code of conduct
- Disciplinary action documentation in employee personnel profiles.
- Workers Participation Committee meeting minutes.
- Compliant box register

Any other comments: None

**Non-compliance:**

None	Objective evidence observed: None
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Observation:	
None	Objective evidence observed: None

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

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

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

**Additional Elements**

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

Only workers with a legal right to work is employed or used by the factory. There are no agency staffs, employment agencies and immigration workers in the factory. There appears to be no concerns in this area during the assessment.

No foreign nationals appeared to be employed onsite. All 52 employees in the sample were documented. The facility management reported verifying the original documentation and keep copy of original documents.

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

Details:

- Factory tour
- Document review- Policy
- Worker interview
- Management interview
- Employee-signed wage and job description letters
- Identification photocopies of employment document

Any other comments: None

**Non-compliance:**

None

**Objective evidence observed: None**

**Observation:**

None

**Objective evidence observed: None**

**Good examples observed:**

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Description of Good Example (GE): None	<b>Objective Evidence Observed: None</b>
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**10. Other issue areas 10B4: Environment 4–Pillar**

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

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

**B.4. Compliance Requirements**

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

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

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

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

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

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

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

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

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

**B4. Guidance for Observations**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

The factory is with production process of Knitting, Cutting, Sewing and finishing. The factory has obtained an environmental clearance certificate which is valid up to 15-Jul-21.

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

Details:

- Environmental policy
- Environmental clearance certificate
- Management interview
- Wastages containers checking
- Wastage contractor agreement

- Wastage and natural resource inventory etc.
- Water extraction permit is valid up to 30-Jun-21

Training records

- Training on water use effectively: Last training was done on dated 29-Nov-20
- Training on chemical safety and MSDS: Last training was conducted on dated 20-Dec-20
- Training for waste handlers: Last training was given on dated 18-Jan-21

Any other comments: None

**Non-compliance:**

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

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

Facility does not have any reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions

**Local law and/or ETI requirement**

ETI requirement: 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.

**Recommended corrective action:**

The factory should set target for reduction of water consumption and discharge, waste, energy and green-house gas emissions

**Objective evidence observed:**

1. Document review and management interview

**Observation:**

None

**Objective evidence observed: None**

**Good examples observed:**

Description of Good Example (GE): None

**Objective Evidence Observed: None**

<b>Environmental Analysis</b> <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Md. Nuruzzaman- Assistant Manager Compliance & HR
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: The factory EIA report is done in the year 2018 and the factory has taken steps as per the assessment report. The factory has valid Environmental clearance certificate based on their EIA report
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: The factory does not have any ISO 14001 management system. However they have internal Environmental policy implemented.
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? Policy is available in notice board and available at their website.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The factory has improvement plan for impact they done on environment.
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No This factory located in government allowed commercial area. No such forest or landscape related to bio diversity here in this area.
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: None
H: Have all legally required permits been shown? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: The factory has valid Environmental Clearance certificate. As per the provided document certificate is found valid up to 15-Jul-21.
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: The factory is cut to pack factory and does not use massive volume of chemicals. The main chemicals are given- <ol style="list-style-type: none"> <li>1. Spot removing chemicals like acetone, 833</li> <li>2. Diesel as fuel</li> <li>3. Machine oil</li> </ol>



J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility ensures client's requirements and legislation in the destination countries regarding environmental and chemical issues through third party testing during production. Mostly those are requirement by the client.
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No K1: Please give details: Facility does not have any reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions
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: Facility has waste recycling process. The fabric cut piece is sold to waste recycler.
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: Electricity consumption records are maintained on monthly. Water consumption records are also maintained by water extraction flow meter.
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: Subcontract factory are under monitoring of auditing system.

**Usage/Discharge analysis**

Criteria	Previous year: Please state period: 2019 _____	Current Year: Please state period: 2020
Electricity Usage: <i>Kw/hrs</i>	Not available	2743 Kw/hrs
Renewable Energy Usage: <i>Kw/hrs</i>	0	0
Gas Usage: <i>Kw/hrs</i>	Not available	23753 m3
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	N/A	N/A
Water Sources: <i>Please list all sources e.g. lake, river, and local water authority.</i>	<ul style="list-style-type: none"> <li>Underground water extraction</li> </ul>	<ul style="list-style-type: none"> <li>Underground water extraction</li> </ul>
Water Volume Used: <i>(m<sup>3</sup>)</i>	Not available	4202 m3

Water Discharged: <i>Please list all receiving waters/recipients.</i>	<ul style="list-style-type: none"> <li>City corporation sewage system</li> </ul>	<ul style="list-style-type: none"> <li>City corporation sewage system</li> </ul>
Water Volume Discharged: <i>(m<sup>3</sup>)</i>	Not measured	Not measured
Water Volume Recycled: <i>(m<sup>3</sup>)</i>	None	None
Total waste Produced <i>(please state units)</i>	Not measured	89389 KG
Total hazardous waste Produced: <i>(please state units)</i>	Not available	10 Kg
Waste to Recycling: <i>(please state units)</i>	Not available	83612 KG
Waste to Landfill: <i>(please state units)</i>	0	0
Waste to other: <i>(please give details and state units)</i>	0	0
Total Product Produced <i>(please state units)</i>	Not available	5400000 pcs

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

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

To be completed for a 4-Pillar SMETA Audit

**10C. Compliance Requirements**

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

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

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

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

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

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

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

**10C. Guidance for Observations**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

The facility has conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice. Management ensures all level of transparency in all the way. All the supplier, subcontractor need to agree with the company policy regarding the corruption and bribery. Compliance department is in the overall responsible for overseen the implementation of the policy.

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

Details:

- Policy
- Management interview,
- Worker interview.

Training

- Anti-corruption training: Last training was done on dated 9-Jan-21

Any other comments: None

Non-compliance:	
None	Objective evidence observed: None

Observation	
Description of observation: None	Objective evidence observed: None

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

A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	<input checked="" type="checkbox"/> Internal Policy <input type="checkbox"/> Policy for third parties including suppliers  A1: Please give details: Facility has an anti-corruption and anti-bribery policy.
B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  B1: Please give details: The factory has a system of providing anti-corruption and anti-bribery training to employee and management.
C: Is the policy updated on a regular (as needed) basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  C1: Please give details: The policy is changed and updated as per the local legal requirement
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: All the suppliers and subcontractors have given acknowledgement with the facility's anti-bribery and anti-corruption policy

Other findings

<b>Other Findings Outside the Scope of the Code</b>
None observed on day Assessment

<b>Community Benefits</b> <i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
None observed on day Assessment.

## 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 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>
<b>ETI Code / Additional Elements</b>	<b>Customer's Supplier Code equivalent</b>
<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 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>	
<p><b>ETI 1. Forced Labour</b></p>	<p><b>ETI 1. Forced Labour</b></p>
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.</p>	
<p><b>ETI 2. Freedom of association and the right to collective bargaining are respected</b></p>	<p><b>ETI 2. Freedom of association and the right to collective bargaining are respected</b></p>
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.</p>	
<p><b>ETI 3. Working conditions are safe and hygienic</b></p>	<p><b>ETI 3. Working conditions are safe and hygienic</b></p>
<p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>3.2 Workers shall receive regular and recorded Health &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>	
<p><b>ETI 4. Child labour shall not be used</b></p>	<p><b>ETI 4. Child labour shall not be used</b></p>
<p>4.1 There shall be no new recruitment of child labour.</p> <p>4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	
<p><b>ETI 5. Living wages are paid</b></p>	<p><b>ETI 5. Living wages are paid</b></p>
<p>5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</p> <p>5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.</p> <p>5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.</p>	
<p><b>ETI 6. Working Hours are not excessive</b></p>	<p><b>ETI 6. Working Hours are not excessive</b></p>
<p>6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p>	



<p>6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where <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><b>ETI 7. No discrimination is practised</b></p>	<p><b>ETI 7. No discrimination is practised</b></p>
<p>7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p>	
<p><b>ETI 8. Regular employment is provided</b></p>	<p><b>ETI 8. Regular employment is provided</b></p>
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or</p>	

<p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p><b>Additional Elements: Responsible Recruitment</b>              8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.              8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.              8.5 Employment agencies must only supply workers registered with them.              8.6 Workers pay no recruitment fee at any stage of the recruitment process.              8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
<p><b>8A: Sub-Contracting and Homeworking</b></p>	<p><b>8A: Sub-Contracting and Homeworking</b></p>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.              8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<p><b>ETI 9. No harsh or inhumane treatment is allowed</b></p>	<p><b>ETI 9. No harsh or inhumane treatment is allowed</b></p>
<p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.              Additional elements:              9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<p><b>10. Other Issue areas: 10A: Entitlement to Work and Immigration</b></p>	
<p><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.</p>	
<p><b>10. Other issue areas 10B2: Environment 2-Pillar</b></p>	

<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.          10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.  <i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	
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SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
<p><b>Environment Section</b></p>	<p><b>Environment Section</b></p>
<p><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 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.  <b>B4. Guidance for Observations</b>            10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.            10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p>	
<p><b>Business Practices Section</b></p>	

**10C. Compliance Requirements**

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

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

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

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

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

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

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

**10C. Guidance for Observations**

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

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

## Photo Form

### NC Photo

<p>NC# 1: Exhaust fan is not working which is corrected during audit</p>	<p>NC#2(1) Low pressured fire extinguisher which is replaced</p>	<p>NC#2(2) Smoke detector without battery which is replaced</p>

### GE Photo

<p>1. Facility building outlook</p>	<p>2. Production Area- Knitting section</p>	<p>3. Production Area- Cutting Section</p>
<p>4. Production Area- Sewing section</p>	<p>5. Production Area- Finishing section</p>	<p>6. Production Area- Packing section</p>

<p>7. Child care</p>	<p>8. Drinking water point</p>	<p>9. Employee dining</p>
<p>10. Evacuation plan</p>	<p>11. Eye wash point</p>	<p>12. Firefighting equipment on floor</p>
<p>13. First aid kits</p>	<p>14. Accessories warehouse</p>	<p>15. Finished goods store</p>
<p>16. Toilets</p>	<p>17. Factory Gate</p>	<p>18. Canteen/Food items area</p>



19. Waste storage area



20. Fire exit



21. Electrical SDB board



22. PPE used by workers



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

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

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