




# Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 4303112	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 4338974
Business name (Company name):	Labib Group		
Site name:	Raidha Collections Ltd.		
Site address: <i>(Please include full address)</i>	Hobirbari, Zamirdia, Valuka, Mymensingh.	Country:	Bangladesh.
Site contact and job title:	Md. Zulfiqar Ali – General Manager (HR & Compliance)		
Site phone:	Cell: +8801701202258	Site e-mail:	<a href="mailto:compliancehead@raidhacollectionsbd.com">compliancehead@raidhacollectionsbd.com</a>
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:			

<b>Audit Company Name &amp; Logo:</b>  <b>SGS Bangladesh Limited.</b>	<b>Report Owner (payer):</b> <i>(If paid for by the customer of the site please remove for Sedex upload)</i> <b>Raidha Collections Ltd.</b>
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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)			



## 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): Audit duration took less time than expected as the support of the facility was very prompt, transparent and no discrepancy was found during whole audit process.

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

### Day 1:

Lead auditor: Asadur Rahman (APSCA Registration Number: RA 21701424)

Team auditor: Mohammad Shoaeb Hasan (APSCA Registration Number: RA 21701635)

### Day 2:

Lead auditor: Asadur Rahman

Team auditor: Mohammad Shoaeb Hasan & Israt Zahan (APSCA Registration Number: RA 21703278)

Lead auditor: Asadur Rahman APSCA number: 21701424

Lead auditor APSCA status: Registered

Team auditor: Mohammad Shoaeb Hasan & Israt Zahan APSCA number: RA 21701635 & RA 21703278

Interviewers: Asadur Rahman, Mohammad Shoaeb Hasan, & Israt Zahan APSCA number: RA 21701424, RA 21701635 & RA 21703278

Report writer: Israt Zahan

Report reviewer: Mohammad Ziaur Rahman

Date of declaration: 15<sup>th</sup> July 2019.

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

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

## Summary of Findings

Issue <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"/>				None observed.
0B <a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed.
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed.
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed.
3. <a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	2			<b>NC:</b> <ul style="list-style-type: none"> <li>Workers were not using sufficient PPE (Personal protective equipment)</li> <li>MSDS, Label of identification &amp; Secondary containment was missing.</li> </ul>
4. <a href="#">Child Labour</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed.
5. <a href="#">Living Wages and Benefits</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>			5	<b>Good Example:</b> <ul style="list-style-type: none"> <li>The facility provides attendance bonus BDT 300 to piece rate workers.</li> <li>The facility provides production bonus to piece rate workers.</li> <li>The facility provides seasonal fruits to all workers.</li> </ul>

									<ul style="list-style-type: none"> <li>The facility provides winter dress and blanket to all workers during winter.</li> <li>The facility provides new dresses to all workers during Eid festival.</li> </ul>
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed.
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed.
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed.
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed.
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed.
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed.
10B2	<u>Environment 2-Pillar</u>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1			<b>NC:</b> <ul style="list-style-type: none"> <li>Waste water test not conducted periodically.</li> </ul>
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Not Applicable
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Not Applicable

General observations and summary of the site:

The factories produce sweater items.

Factory has a policy to endorse at the highest level, covering human rights impacts and issues, and ensures it is communicated to all employees.

Through plant tour, workers interview and documents review, physical verification/appearance of workers; no evidence of the use of child labour was observed. Factory checks the age before recruitment by the doctor and maintains age related documents in the workers' personnel files.

Facility does not engage any forced or bonded labour. In Bangladesh, no prison labour is engaged outside the prison according to the law. Nothing identified during audit. Factory also does not keep any original documents from the workers, noted by the interviewed workers. Workers are free to leave their employer at any time giving required notices.

Factory treats their workers with respect and dignity; no corporal punishment, threats of violence or other forms of physical, mental, sexual, verbal harassment and abuse is practised.

Facility did not discriminate between workers in any manner while selection, pay, promotion and termination. Nothing identified by the documents verification and nothing reported by the interviewed workers regarding discrimination. The payment and overtime record did not show any discriminatory incidents.

No trade union has been formed by the workers of the factory. Workers are free to join or form the trade union, no restriction has been imposed to the workers from the management. Nothing identified through policy verification. Moreover, factory has formed a Participation Committee(PC) as parallel means. The factory has provided suggestion & complaint box in the toilet area through which workers can give their suggestion / complaints if any.

First aid facility and toilet facilities have been found as per legal requirement. First aiders were well known about the first aid issues and fire fighters are well known about the operation of all firefighting equipment's and regular training is provided to them regarding this.

All workers are getting ID card during their recruitment. All the workers are receiving contract letter.

The factory implemented 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.

Workers have received overtime allowance at premium rate (double of the basic).

*\*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:	Raidha Collections Ltd.													
B: Site name:	Hobirbari, Zamirdia, Valuka, Mymensingh, Bangladesh.													
C: GPS location: (If available)	GPS Address:	Latitude: 24.307013 Longitude: 90.387187												
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p><b>Factory License No:</b> License no-212/Mymensingh, (L category) permission taken as industrial Building, issued by Chief Inspector General of Industries (Govt. Of the People's Republic of Bangladesh), which is valid till 30<sup>th</sup> June 2020.</p> <p><b>Trade License No:</b> Bohi Number-01, License No-071, issued by 10 no Hobirbari Union poeishodh, which is valid up to 30 June 2020.</p> <p><b>Fire License No:</b> License number: Mymen/1020/2012; Issued by Fire Service and Civil Defense Department which is valid up to 30 June 2020. Entire area (6,34,419 square feet) is covered in this license.</p>													
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Sweater items.													
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Raidha Collections Ltd. established in 2010(as per incorporation certificate). Facility located at Hobirbari, Zamirdia, Valuka, Mymensingh.</p> <p>The total land area is 279265 square feet, production area is about 544377 square feet and warehouse area is about 52406 square feet.</p> <p>The facility is consisting of 10 buildings. Details descriptions of the facility is given below-</p> <table border="1"> <thead> <tr> <th>Building # 1 (Two storied)</th> <th>Description</th> <th>Remark, If ant</th> </tr> </thead> <tbody> <tr> <td>Ground floor</td> <td>Auto Knitting Jacquard Section</td> <td>NA</td> </tr> <tr> <td>1<sup>st</sup> floor</td> <td>F Finished goods area, general stores, distribution &amp; panel check and winding section, maintenance room, training room.</td> <td>NA</td> </tr> <tr> <td>2<sup>nd</sup> floor</td> <td>Linking section, trimming section, mending section, pressing section, PQC section, Get up section, Finishing section, Sewing section and Packing section.</td> <td>NA</td> </tr> </tbody> </table>		Building # 1 (Two storied)	Description	Remark, If ant	Ground floor	Auto Knitting Jacquard Section	NA	1 <sup>st</sup> floor	F Finished goods area, general stores, distribution & panel check and winding section, maintenance room, training room.	NA	2 <sup>nd</sup> floor	Linking section, trimming section, mending section, pressing section, PQC section, Get up section, Finishing section, Sewing section and Packing section.	NA
Building # 1 (Two storied)	Description	Remark, If ant												
Ground floor	Auto Knitting Jacquard Section	NA												
1 <sup>st</sup> floor	F Finished goods area, general stores, distribution & panel check and winding section, maintenance room, training room.	NA												
2 <sup>nd</sup> floor	Linking section, trimming section, mending section, pressing section, PQC section, Get up section, Finishing section, Sewing section and Packing section.	NA												

3 <sup>rd</sup> floor	Linking section, trimming section, mending section, pressing section, PQC section, Get up section, Finishing section, Sewing section, Packing section, Office and Inspection room.	NA
4 <sup>th</sup> floor	Linking section, trimming section, mending section, Pressing section, PQC section, Get up section, Finishing section, Sewing section and Packing section.	NA
5 <sup>th</sup> floor	Bonded ware House (Yard Store), Dining, Auto Knitting (Jacquard) section, Panel Inspection room, Auto Placket and Back Winding Section.	NA
6 <sup>th</sup> floor	Office area, Sample & Accessories area and Auto Knitting Jacquard Section.	NA
7 <sup>th</sup> floor	Auto Knitting(Jacquard) section	NA
8 <sup>th</sup> floor	Electrical store & leftover goods. Roof Top (90% Vacant)	NA
9 <sup>th</sup> floor	Miscellaneous store (Electrical store)	NA
<b>Building # 2 (Two storied)</b>	<b>Description</b>	<b>Remark, If ant</b>
Ground floor	Doctor's Room, Child care room and Security Room	NA
1st floor	Fire Control Room	NA
Roof Top	100% vacant	NA
Is this a shared building?	No	NA
<b>Building # 3 (One storied)</b>	<b>Description</b>	<b>Remark, If ant</b>
Ground floor	RMS room	NA
Is this a shared building?	No	NA
<b>Building # 4 (One storied)</b>	<b>Description</b>	<b>Remark, If ant</b>
Ground floor	Generator Room	NA
Is this a shared building?	No	NA

<b>Building # 5 (One storied)</b>	<b>Description</b>	<b>Remark, If ant</b>
Ground floor to second floor	Ansar Rest house.	NA
Is this a shared building?	No	NA
<b>Building # 6 (One storied)</b>	<b>Description</b>	<b>Remark, If ant</b>
Ground floor	Boiler Room	NA
Is this a shared building?	No	NA
<b>Building # 7 (One storied)</b>	<b>Description</b>	<b>Remark, If ant</b>
Ground floor	Compressor Room	NA
Is this a shared building?	No	NA
<b>Building # 8 (One storied)</b>	<b>Description</b>	<b>Remark, If ant</b>
Ground floor	Sub-station room.	NA
Is this a shared building?	No	NA
<b>Building # 9 (One storied)</b>	<b>Description</b>	<b>Remark, If ant</b>
Ground floor	Common wash room	NA
Is this a shared building?	No	NA
<b>Building # 10 (One storied)</b>	<b>Description</b>	<b>Remark, If ant</b>
Basement	Pump House	NA
Ground floor	<b>Stair</b>	<b>NA</b>
Is this a shared building?	No	NA

	<p>For below, please add any extra rows if appropriate.</p> <p>Total production capacity is 10,00,000 pieces sweaters per month.</p> <p>In Raidha Collections Ltd. Currently 5715 employees are working in the facility. Among them 3350 are male and 2365 are female.</p> <p>In general, the employees of the factory works for 6 days in a week (Saturday to Thursday). Friday is weekly holiday. For night shift employees weekly holiday comes by rotation. Regular working hour is 7.00 am to 4.00 pm.</p> <p>Winding, Jacquard, panel inspection sections have night shifts also from 7.00 pm to 4.00 am. Workers gets 1 hour lunch break from 12.30 pm to 1.30 pm &amp; 1.00 pm to 2.00 pm. For night shift meal breaks starts from 1.00 am to 2.00 am.</p> <p>Facility is paying monthly salary; 100% employees were paid salary by cash. Around 40 % of the workers are piece rate worker and 60% workers are fixed. Facility used electronic time keeping system. The facility's wage period is 29<sup>th</sup> – 28<sup>th</sup> of each month.</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: Please give details: This audit has been undertaken by a qualified social auditor and not a structural engineer. As such SGS can only report on any evidence of structural defects or maintenance requirements based on external reports undertaken by local authorities or other licensed bodies. Equally SGS cannot accept any liability for subsequent failures not noted or reported because of their visual checks. The rating above is based on the auditor's opinion of general maintenance and cosmetic soundness of the building based on purely visual checks.</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: Building construction plan was approved by Public Works Department in 09.02.2016.</p> <p>Floor layout permission was taken from Department of Inspection for factories and establishment on 11.02.2018.</p> <p>F4: Please give details:</p>
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<p>G: Site function:</p>	<p> <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         </p>
<p>H: Month(s) of peak season: (if applicable)</p>	<p>July to October</p>
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p> <b>Product:</b> Sweater   <b>Process:</b> Winding&gt;Knitting&gt;Linking &gt; Sewing&gt; trimming&gt; Mending&gt; Wash&gt; Iron&gt; FQC&gt; Packing.   <b>Equipment:</b> Total machine-6456            Auto knit machine, auto placket, auto loop machine, manual liking machine, linking machine, sewing machine, Bar tack Button Stitch, Hole Stitch, Overlock, Winding Machine, Back Winding Machine, Soft Winding Machine, Hydro machine, Dryer, Metal Detector Single Head, Dust Shaker Machine, Compressor, Air Compressor, Generator, Boiler   <b>Chemicals used:</b> Poly Aluminum Chloride, Poly Electrolyte, Acetone, Machine oil, Wacker Power Soft, Transoft FLA         </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 checked="" type="checkbox"/> Yes  <input type="checkbox"/> No         </p>
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p> <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No            L1: If yes, approx. % of workers in on site accommodation         </p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<p> <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No            M1: If yes, approx. % of workers         </p>
<p>N: Were all site-provided accommodation buildings included in this audit</p>	<p> <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No            N1: If no, please give details         </p>

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:00 am Day 1 Time out: 10:00 am	Day 2 Time in: 5.45 pm Day 2 Time out: 4.30 pm	Day 3 Time in: NA Day 3 Time out: NA
B: Number of auditor days used:	Day 1: 02 Auditors used Day 2: 03 auditors used		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define:		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 4 weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 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. Zulfiquar Ali – General Manager (HR & Compliance)		
H: Is further information available (If yes, please contact audit company for details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
I: Previous audit date:	27 <sup>th</sup> & 28 <sup>th</sup> May 2018.		
J: Previous audit type:	Periodic		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

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

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

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	3350 (including management)	0	0	0	0	0	0	3350 (including management)
Worker numbers – female	2365(including management)	0	0	0	0	0	0	2365(including management)
Total	5715 (including management)	0	0	0	0	0	0	5715 (including management)
Number of Workers interviewed – male	37	0	0	0	0	0	0	37
Number of Workers interviewed – female	25	0	0	0	0	0	0	25
Total – interviewed sample size	62	0	0	0	0	0	0	62



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>	<p>Nationalities:</p> <p>B1: Nationality 1: <u> Bangladeshi </u></p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p>	<p>Was the list completed during peak season?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods:</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 <u> 100% </u></p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: <u> 40 </u> % workers on piece rate</p> <p>D1: _____ % hourly paid workers</p> <p>D2: <u> 60 </u> % salaried workers</p> <p>Payment cycle:</p> <p>D3: _____ % daily paid</p> <p>D4: _____ % weekly paid</p> <p>D5: <u> 100 </u> % monthly paid</p> <p>D6: _____ % other</p> <p>D7: If other, please give details</p>	



Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	40 employees (8 groups of 5 employees)
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 12      D2: Female: 10
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 issue was identified during worker interview.
I: What did the workers like the most about working at this site?	Working environment
J: Any additional comment(s) regarding interviews:	None
K: Attitude of workers to hours worked:	Comfortable
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:	
M: Attitude of workers: <i>(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</i>	

Total 62 employees selected for interview. Among them 22 employees were selected for individual interview and total 40 employees in 8 groups (5 employees in each group) were selected for the group interview. All the interviewees were favourable with the management.

The employees were assured of confidentiality and they spoke freely of their views of the facility. All employees said they were satisfied with their employment at the facility and they are provided wages as per their agreement. They felt free to leave this employer and understood the notice period required. They facility management treated them with respect. They are able to complain directly to their supervisors or line manager and also felt free to give their general concerns to their Participation Committee representative who would take it to the Participation Committee meeting.

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

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

Participation Committee members interviews of both facilities were conducted privately in a separate place. During opening meeting PC representatives were present and auditors clearly explained them about the audit, audit process, necessity of audit and audit criteria in local language. They replied naturally regarding their responsibilities as Participation Committee member and they also informed that they can easily carryout their daily job without any difficulties. Participation Committee meetings are held on regular basis. Last meeting was held on 13.06.2019. They also stated that they could give suggestions on all parts of the site's practices.

**O: Attitude of managers:**

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

Management of the factory was positive and supportive during the whole audit. Md. Zulfiqar Ali – General Manager (HR & Compliance) was the key person of the compliance team and he was responsible for compliance with the Code, legal requirements, development of policies and its implementation, monitoring & control. In this backdrop, management had comprehensive knowledge, as assumed, about audit requirements and scope; e.g. ETI Based Code, local laws etc. The factory management was found to be cooperative 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:

1. Facility implements and maintains systems for delivering compliance to this Code.
2. Md. Zulfiquar Ali, GM-HR & Compliance is responsible for compliance with human rights.

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

##### Details:

1. Facility Management Interview.
2. Document review.
3. Workers Interview.

Any other comments: Nil

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please give details: Both Factories has policy which authorized at the highest level human rights impacts and issues, and ensure it is communicated to all workers.</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. Zulfiqar Ali                  Job title:GM-HR &amp; Compliance</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please give details: Both factory management has provided complaint box in worker's toilet area. Through the complaint box workers can raise their suggestion and complaints. Workers can also approach the management directly for any grievances which confirmed the interviewed workers.</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                  Please give details: All employee information and personnel files are kept locked away in the human resources department and it is only viewed by the HR department.</p>

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

**Good examples observed:**

Description of Good Example (GE): None Observed

**Objective Evidence Observed:** Not applicable

## 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: 2018 __5.60__ %	A2: This year 2019 __4.01__ %
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]	4.90 %	
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: 2018 __4.80__ %	C2: This year 2019 __4.40__ %
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	4.35%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Accidents and injury is registered in the injury register.	
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:2018 Number: 15	F2: This year:2019 Number:03
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	5%	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year:2018 21 days 10 hour 30 min	H2: This year: 2019 6 days
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
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**0B: Management system and Code Implementation**  
[\(Click here to return to summary of findings\)](#)

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- The factory communicates their code of conduct through training program and notice board regularly including company's own COC.
- Md. Zulfiquar Ali – General Manager (HR & Compliance) is responsible for compliance with the Code.
- Facility communicates ETI code of conduct to their suppliers and where reasonably practicable extends the principles of this ethical code through their supply chain.

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

**Details:**

- Document review (Policy record review and training register review).
- Facility Management Interview.
- Workers Interview.
- Plant tour

**Any other comments:** Nil

**Management Systems:**

A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: Site has not been subjected to any fine.
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<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      B1: Please give details: There are effective policy and procedures found to reduce the risk of forced labour, child labour, discrimination, harassment &amp; abuse.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>The facility communicated the policy and procedures on risk of forced labour, child labour, discrimination and harassment &amp; abuse with the workers through training program and also posted those policies in the notice board. No complaint found from interviewed workers too.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      D1: Please give details: Managers and workers have received training on the standards for forced labour, child labour, discrimination, harassment &amp; abuse.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      E1: Please give details: Managers and workers have received training on the standards for forced labour, child labour, discrimination, harassment &amp; abuse and factory preserved training records as evidence. During interview workers &amp; management were found aware about the policies and procedures.</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                      F1: Please give details:</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      G1: Please give details: Facility has a Human Resources Department and Md. Zulfiquar Ali – General Manager (HR &amp; Compliance) along with his team are responsible for this department.</p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      H1: Please give details: Facility has a senior person and Facility has a Human Resources Department and Md. Zulfiquar Ali – General Manager (HR &amp; Compliance) is put into action of the Code.</p>

<p>I: Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      I1: Please give details: Factory has the policy to ensure all worker information confidential.</p>
<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: There is effective policy and procedures found to ensure confidential information is kept confidential.</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: Risk assessment was conducted by both factories to evaluate 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: Both Facilities has process to reduce the risks identified in the assessment. They also provide training to the workers. Last training on risk assessment was conducted on 1<sup>st</sup> July, 2009.</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 management 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>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: The factory has all required land rights licenses and permissions from concern authority.</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:</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 checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      P1: If yes, how does the company obtain FPIC: Facility has a written policy and procedures regarding to land rights with due diligence of obtain free, prior and informed consent.</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 type="checkbox"/> Yes  <input type="checkbox"/> No                      Q1: Please give details: NA</p>

R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: NA
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: NA

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

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

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

**1: Freely Chosen Employment**

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

**ETI**

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- The facility has a policy which prohibits forced labour and this was also available for review.
- Facility does not hold main copy of any legal document of the workers during recruitment. The factory maintains only photocopies of all hiring documents such application, date of birth certificates, school certificates etc.
- The workers are free to leave the work place If workers want to leave their job, they are free to do so, as long as they are fulfilled their obligations agreed under their appointment letter/agreement.
- Factory displayed overtime policy stating that over time work is voluntary.

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

**Details:**

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

**Any other comments:** Nil

A: Is there any evidence of retention of original documents, e.g. passports/ID's	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:
C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:

D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding:
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding:
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: Facility has no such type of restriction.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected:
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: Facility understands the risk and has a policy against forced/trafficked labour. No forced, trafficked and bonded evidence found during audit.

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

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

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

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

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- All the employees are allowed to participate and elect the committee members of their choice.
- There is no trade union in the facility and it is not mandated by law.
- There is Participation Committee (PC) as parallel means for trade union. Last election was held on 20-December-2017.
- Verified and confirmed through records review and interview process that Participation Committee members are not treated less favourably than other employees.
- Participation Committee members are allowed to carry out their duties within working hours without affecting their pay.

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

**Details:**

1. Facility management interview.
2. Worker interview.
3. Complaint box register (Suggestions from the complaint box and actions taken).
4. Participation Committee formation record review and PC meeting records review.
5. Grievance handling policy & procedure

**Any other comments:** Nil

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

- Union (name)
- Worker Committee
- Other (specify)
- None

B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>In Bangladesh, there is no obligation to join trade union and freedom of association and collective bargaining. For an establishment where there is no trade union, until a trade union is formed, the workers' representatives to the Participation Committee shall run activities related to workers' interests in the establishment concerned and workers representative should be elected by direct vote of workers (amendment 22nd of July 2013, Labour Law 2006).</p>	
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 <p>D1: Please give details: Facility has formed a safety committee. Total number of the committee member is 12; 6 members are from management and 6 members are from workers. Md. Zulfiquar Ali (GM-HR &amp; Compliance) is head of the safety committee.</p> <p>D2: Is there evidence of free elections?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>	
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 <p>E1: Please give details: Participation committee elected by the workers. Participation Committee meetings are held on regular basis. Last meeting was held on 13 June 2019.          PC meeting minutes recorded and action taken.</p>	
F: Name of union and union representative, if applicable:	NA; This is a non-unionized factory.	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?	Participation Committee (PC) has formed as a parallel means.	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	
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 20 December 2017.
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please state how many: 2	

<p>L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.</p>	<p>As per interview with the Participation Committee members &amp; document review it was noted that Participation Committee meetings are held on regular basis. Last meeting was held on 13 June 2019. Topics of last meeting are as follows:</p> <ul style="list-style-type: none"> <li>• Change working hour for the workers.</li> <li>• Replace of Vice President due to resign.</li> <li>• Need of fan in finishing section</li> <li>• Others</li> </ul> <p>Meeting minutes were communicated through notice board.</p>	
<p>M: Are any workers covered by Collective Bargaining Agreement (CBA)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>If <b>Yes</b>, what percentage by trade Union/worker representation</p>	<p><u>  0  </u>% workers covered by Union CBA</p>	<p><u>  0  </u>% workers covered by Union CBA</p>
<p>M3: If <b>Yes</b>, does the Collective Bargaining Agreement (CBA) include rates of pay?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable</p>	

<p style="text-align: center;"><b>Non-compliance:</b></p>	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI    <input type="checkbox"/> NC against Local Law    <input type="checkbox"/> NC against customer code: Not observed</p> <p><b>Local law and/or ETI requirement:</b> Not Applicable</p> <p><b>Recommended corrective action:</b> Not Applicable</p>	<p><b>Objective evidence observed:</b> (where relevant please add photo numbers) Not Applicable</p>

<p style="text-align: center;"><b>Observation:</b></p>	
<p><b>Description of observation:</b> Not observed</p> <p><b>Local law or ETI requirement:</b> Not Applicable</p> <p><b>Comments:</b> Not Applicable</p>	<p><b>Objective evidence observed:</b> Not Applicable</p>

Good Examples observed:	
Description of Good Example (GE): Not observed	<b>Objective evidence observed:</b> Not Applicable

### 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:

- Facility has formed safety committee. Total number of the committee member is 12; 6 member are from management and 6 members are from workers.
- Factory posted the evacuation plans on work floors, which indicated escape routes and the location of the fire extinguishers.
- Emergency lights were installed with IPS back up.
- Sufficient first aid kits stocked are provided in workshops. Total no. of first aid box 42 & first aider was found 118 persons.
- Workers receive regular and recorded health & safety training. Last Health & Safety training was provided on 07 July 2019 with 16 participants.
- Facility has total 1725 fire fighters. Among them 730 fire fighters were trained from Bangladesh Civil Defence services. Last refresher firefighting training provided on 03 July 2019 with 16 participants from both factory.
- Facility conducts evacuation drill on monthly basis. Last evacuation drill was conducted on 23 June 2019 with 4548 participants. Also, last night evacuation drill (night) was conducted on 26 June 2019 with 870 participants.
- PPE training provides regularly. Last PPE training provided on 06 July 2019 with 16 employees.
- First aid training provided regularly to the first aider. Last first aid training was conducted on 15 April 2019.
- Medical and child care facility available in the factory.
- Workers toilet segregate male and female, adequate number as per law, wash facility provided. Total no. of male toilets 130 and female toilets 208.
- The facility has done maintenance of the machines on regular monthly basis confirmed through the documents reviewed.
- Factory has regular fire equipment maintenance system.
- Drinking water facility was available at each floor with easy access. Last drinking water test done on 25 April, 2019.
- Facility has provided one common dining room in the facility for the workers.

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

**Details:**

1. Plant tour.
2. Document review (Training record review, daily machine maintenance register, electrical installation checking register, injury register, fire drill register, fire equipment checking register).
3. Facility management interview.
4. Worker interview.

**Any other comments:** Nil

<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: There is an open channel for all at the facility which anybody can report to management about any act properly or corruptly and health &amp; safety issues. Facility has communicated this procedure through orientation training confirmed from worker interview.</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: Policies are included in the workers' handbook.</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: No structural additions were done.</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  D1: Please give details: Visitors are informed on Health &amp; Safety and provided PPE when required.</p>
<p>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.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  E1: Please give details:  Facility has available medical facility with full time doctors (2 doctors) and Nurses (4 Nurses)  Also have paramedic for night shift workers.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  F1: Please give details: Sufficient first aid kits stocked and provided in workshops. Total no. of first aid box was found 42 &amp; 118 trained first aider was found.</p>
<p>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?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  G1: Please give details: Not applicable.  Transport facility is not provided to the workers and it is not required by law.</p>

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. Dormitory facility is not provided to the workers and it is not required by law
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: Risk assessment was conducted by factory regularly including all areas and employees. There is procedure to take corrective action of the identified risks.
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: Facility has valid environmental clearance certificate.
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: Facility does not use any banned chemical.

**Non-compliance:**

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

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

**Issue title:** Workers were not using sufficient PPE (Personal protective equipment)

**Description of non-compliance:**

- Approx. 5% Jacquard section workers were not using earplug during work.
- 04 out of 04 construction workers were not using safety belt, face mask, helmet during work.
- 1 out of 1 aisles painter was not using ear muff during work at boiler room.
- 1 out of 5 Iron section workers was not using rubber mat during work.

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

**In accordance with Bangladesh Labour Rules, 2015 Rule 67 (2):**

In addition to the arrangement of safety and health protection measures mentioned in Sub-section (1), the concerned manufacturing institute must provide necessary equipment, including safety shoes, helmets, goggles, masks, hand gloves, ear muffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage.

**In accordance ETI Base Code 3.1:**

A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of,

**Objective evidence observed:**

(where relevant please add photo numbers)

1. Plant Tour (NC picture no. 1,2 ,3 & 4)

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.

**Recommended corrective action:**

It is recommended that factory should ensure the use of PPE for the workers in the mentioned section during work.

**Action By:** Md. Zulfiqar Ali – General Manager (HR & Compliance)

**Time frame:** 30 days

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

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

2. Plant Tour (NC picture no. 5)

**Issue title:** MSDS, Label of identification & Secondary containment was missing.

**Description of non-compliance:**

It was noted through plant tour that no MSDS, label of identification and secondary containment was provided for 1 drum Compressor oil, 2 container thinner, 2 drum machine oil located at 1<sup>st</sup> floor maintenance room, general store of building 1 and metal storage area.

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

**In accordance with Bangladesh Labour Rules 2015, Rule 68 (10) :**

The owner shall place Material Safety Data Sheet (MSDS) of dangerous materials in an easily noticeable place so that the employed worker can be well informed about the possible hazards.

**In accordance ETI Base Code 3.1:**

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

**Recommended corrective action:**

It is recommended that factory management should provide MSDS, labelling & secondary containment for the chemical containers used in the mentioned area.

**Action By:** Md. Zulfiqar Ali – General Manager (HR & Compliance)

**Time frame:** 30 days

**Observation:**

<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI requirement:</b> Not Applicable</p> <p><b>Recommended corrective action:</b> Not Applicable</p>	<p><b>Objective evidence observed:</b> Not Applicable</p>
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<p align="center"><b>Good Examples observed:</b></p>	
<p>Description of Good Example (GE): None observed</p>	<p><b>Objective Evidence Observed:</b> Not Applicable</p>

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

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

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- Factory established a policy which discourages the employment of child labour and no child labour found in the factory during the audit.
- Factory has strong recruitment process to verify the workers age. 62 sampled workers' personal files were provided for review.
- In addition, every worker's file includes a bio-data sheet, a recent photo, age proof records (copy of birth registration certification, national ID card). Moreover, if there is any doubt regarding any one's age factory's registered doctor certifies his/her age.
- There was no child or young employee observed in the facility.

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

**Details:**

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

**Any other comments:** Nil

A: Legal age of employment:	14 years (With some restriction)
B: Age of youngest worker found:	19 years
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 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:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed  <b>Local law and/or ETI requirement:</b> Not Applicable  <b>Recommended corrective action:</b> Not Applicable	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>  Not Applicable

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

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

**5: Living Wages are Paid**

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

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

**ETI**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. The facility is providing local legal minimum wage BDT 8000/month for all the employees. Facility has 40%-piece rate employees and 60 % salary based employees.
2. Time keeping system is electronic (proximity card).
3. All employees are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
4. 100% employees were paid by cash within 07th of each month.
5. Each employee was given a pay slip and signed for their wages.
6. Employees are aware of their minimum wage.
7. Wages have been recorded according to documents checked.
8. There is a good practice by the facility; see below GE section.

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

Details:

1. Document review (wage sheet review, worker's personal file, bonus payment sheet review, maternity register review, wage & benefit policy etc)
2. Worker interview
3. Management interview

Any other comments: Nil

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

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

<b>Good Examples observed:</b>	
<p><b>Description of Good Example (GE):</b></p> <ol style="list-style-type: none"> <li>1. The facility provides attendance bonus BDT 300 to piece rate workers.</li> <li>2. The facility provides production bonus to piece rate workers.</li> <li>3. The facility provides seasonal fruits to all workers.</li> <li>4. The facility provides winter dress and blanket to all workers during winter.</li> <li>5. The facility provides new dresses to all workers during Eid festival.</li> </ol>	<p><b>Objective Evidence Observed:</b> Not Applicable</p>

**Summary Information**

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 8 hours per day and 48 hours per week.	A1: 8 hours/ day 48 hours/ week	A2: <input type="checkbox"/> Yes <input type="checkbox"/> No  Not applicable
B: Overtime hours:	Legal maximum:	B1: Maximum OT hours found	B2: <input type="checkbox"/> Yes

<p><i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i></p>	<p>2 hours per day and 12 hours per week. However, an adult worker may work for more than 8 (eight) hours in a day or 48 (forty-eight) hours in a week, provided that the total hours of work of an adult worker shall not exceed 60 (sixty) hours in any week and on the average 56 (fifty-six) hours per week in any year.</p> <p><b><u>Exception for 06 months:</u></b> This exemption has been extended several times in last few years and latest extension was on July 04, 2019 and it will be in effect from April 17, 2019 to October 16, 2019</p>	<p>2 hours/ day and 12 hours/ week in June 2019 (current month).</p>	<p><input type="checkbox"/> No Not applicable</p>
<p>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></p>	<p>Legal minimum: For Garments and Grade 7. BDT. 8000 per month (Basic BDT 4100, House rent 50% of the Basic which is BDT. 2050, Medical allowance BDT. 600, Conveyance allowance. BDT.350, Food Allowance BDT.900.)</p>	<p>C1: 8 hours/ day 48 hours/ week</p>	<p>C2: <input type="checkbox"/> Yes <input type="checkbox"/> No  Not applicable</p>

	For piece rate workers: Basis on the rate of the piece and which is meeting the legal minimum garments salary structure.		
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 200% of the basic wage rate per hour. For Piece rate workers: 100% of the gross wage rate per hour.	D1: 200% of the basic wage rate per hour.  For Piece rate workers: 100% of the gross wage rate per hour.	D2: <input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable

<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 (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)	62 attendance records and payroll records from June 2019 (Current month)  62 attendance records and payroll records from January 2019 (Off Peak month)  62 attendance records and payroll records from October 2018 (Peak month)																												
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>C1: If <b>Yes</b>, please give details: The Government has announced the new pay structure which was implemented from 1st December 2018 for the workers of the Garments Industries. The Gazette Notification has been published on 25th November 2018. There are two separate pay structures; for the garment workers (Schedule A) 1. For the stuff (Schedule B):</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Grade</th> <th>Monthly basic wage</th> <th>House rent 50% of the basic</th> <th>Medical allowance</th> <th>Conveyance allowance</th> <th>Food subsidy</th> <th>Gross monthly wage</th> </tr> </thead> <tbody> <tr> <td>Grade 1</td> <td>Tk. 10440</td> <td>Tk. 5220</td> <td>Tk. 600</td> <td>Tk. 350</td> <td>Tk. 900</td> <td>Tk.17510</td> </tr> <tr> <td>Grade 2</td> <td>Tk. 8520</td> <td>Tk. 4260</td> <td>Tk. 600</td> <td>Tk. 350</td> <td>Tk. 900</td> <td>Tk.14630</td> </tr> <tr> <td>Grade 3</td> <td>Tk. 5160</td> <td>Tk. 2580</td> <td>Tk. 600</td> <td>Tk. 350</td> <td>Tk. 900</td> <td>Tk. 9590</td> </tr> </tbody> </table>	Grade	Monthly basic wage	House rent 50% of the basic	Medical allowance	Conveyance allowance	Food subsidy	Gross monthly wage	Grade 1	Tk. 10440	Tk. 5220	Tk. 600	Tk. 350	Tk. 900	Tk.17510	Grade 2	Tk. 8520	Tk. 4260	Tk. 600	Tk. 350	Tk. 900	Tk.14630	Grade 3	Tk. 5160	Tk. 2580	Tk. 600	Tk. 350	Tk. 900	Tk. 9590
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		<table border="1"> <tr> <td>Grade 4</td> <td>Tk. 4930</td> <td>Tk. 2465</td> <td>Tk. 600</td> <td>Tk. 350</td> <td>Tk. 900</td> <td>Tk. 9245</td> </tr> <tr> <td>Grade 5</td> <td>Tk. 4670</td> <td>Tk. 2335</td> <td>Tk. 600</td> <td>Tk. 350</td> <td>Tk. 900</td> <td>Tk. 8855</td> </tr> <tr> <td>Grade 6</td> <td>Tk. 4370</td> <td>Tk. 2185</td> <td>Tk. 600</td> <td>Tk. 350</td> <td>Tk. 900</td> <td>Tk. 8405</td> </tr> <tr> <td>Grade 7</td> <td>Tk. 4100</td> <td>Tk. 2050</td> <td>Tk. 600</td> <td>Tk. 350</td> <td>Tk. 900</td> <td>Tk. 8000</td> </tr> <tr> <td>Apprentice</td> <td>Tk. 2750</td> <td>Tk. 1,375</td> <td>Tk. 600</td> <td>Tk. 350</td> <td>Tk. 900</td> <td>Tk. 5975</td> </tr> </table>	Grade 4	Tk. 4930	Tk. 2465	Tk. 600	Tk. 350	Tk. 900	Tk. 9245	Grade 5	Tk. 4670	Tk. 2335	Tk. 600	Tk. 350	Tk. 900	Tk. 8855	Grade 6	Tk. 4370	Tk. 2185	Tk. 600	Tk. 350	Tk. 900	Tk. 8405	Grade 7	Tk. 4100	Tk. 2050	Tk. 600	Tk. 350	Tk. 900	Tk. 8000	Apprentice	Tk. 2750	Tk. 1,375	Tk. 600	Tk. 350	Tk. 900	Tk. 5975
Grade 4	Tk. 4930	Tk. 2465	Tk. 600	Tk. 350	Tk. 900	Tk. 9245																															
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Apprentice	Tk. 2750	Tk. 1,375	Tk. 600	Tk. 350	Tk. 900	Tk. 5975																															
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	D1: If <b>No</b> , please give details:																																			
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i>  BDT 8000 per month.																																			
F: Please indicate the breakdown of workforce per earnings:	F1: <u>  0  </u> % of workforce earning under minimum wage F2: <u>  5  </u> % of workforce earning minimum wage F3: <u> 95 </u> % of workforce earning above minimum wage																																				
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i>  Factory management provides attendance bonus of BDT 300 per month to the workers for full presence of the month.																																				
H: What deductions are required by law e.g. social insurance? Please state all types:	As per section 125 of the Bangladesh Labour Law, 2006, factory may deduct wages for un-authorized absence, for fines, housing facility, advance payments, etc. However, factory is deducting only for un-authorized absence and revenue stamp.																																				
I: Have these deductions been made?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	I1: Please list all deductions that <b>have</b> been made. Based on document review it was noted that facility management deducts for below issues- 1. Unauthorised absence																																			
		I2: Please list all deductions that <b>have not</b> been made. Based on document review factory does not deduct for below issues- 1. Fines, 2. Housing facility, 3. Advance payments, 4. Loans, 5. Income tax, 6. Provident fund etc.																																			
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																																				

<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type</p> <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:
<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>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>L1: Please give details: All working hours are reflected in the attendance record.</p>
<p>M: Is there a defined living wage:  <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info:          Please see SMETA Best Practice Guidance and Measurement Criteria.</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>M1: Please specify amount/time: Factory did not define living wages as it is not required by law. However, factory is providing the minimum wage as Minimum Wages Gazette for Readymade Garments Sector published on 25th November 2018."</p>
<p>M2: If yes, what was the calculation method used.</p>	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: Not applicable.	
<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>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>N1: Please give details: Facility management is annually reviewed the wages as per local law. Facility increase minimum 5% on basic wages as increment for all grades worker annually.</p>
<p>O: Are workers paid in a timely manner in line with local law?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>P1: Please give details:</p>
<p>Q: How are workers paid:</p>	<input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other	<p>Q1: If other, please explain:</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:**

- Noted through working hour policy review that facility has implemented working hour policy as per law. Facility has maintained working hour related document accurately. No inconsistency identified during document review.
- In general, the employees of the factory works for 6 days in a week (Saturday to Thursday). Friday is weekly holiday, for night shift workers weekly holiday comes by rotation . Regular working hour is 7.00 am to 4.00 pm.
- Winding, Jacquard, panel inspection sections have night shifts also from 7.00 pm to 4.00 am. Workers gets 1 hour lunch break from 12.30 pm to 1.30 pm & 1.00 pm to 2.00 pm. For night shift meal breaks starts from 1.00 am to 2.00 am.
- Standard working hours found 48 hours in the facility.
- Through employees' interview it was noted that they were aware about voluntary overtime policy.
- Facility weekly holiday is Friday.
- Through employees' interview it was noted that they were aware about voluntary overtime policy.

- As per the company policy all overtime will be compensated at a premium rate (200% of basic wage for fixed rate employee and 100% of gross wages for piece rate employees).
- Casual leave, sick leave, festival leave were provided as per local Law.

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

Details:

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

Any other comments: Nil

**Non-compliance:**

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

NC against ETI       NC against Local Law       NC against customer code: None Observed

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

**Recommended corrective action:**  
Not Applicable

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

Not Applicable

**Observation:**

**Description of observation:** None Observed

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

**Comments:** Not Applicable

**Objective evidence observed:**  
Not Applicable

**Good Examples observed:**

Description of Good Example (GE): None Observed

**Objective Evidence Observed:**  
Not Applicable

<b>Working hours' analysis</b> Please include time e.g. hour/week/month ( <a href="#">Go back to Key information</a> )	
<b>Systems &amp; Processes</b>	
A. What timekeeping systems are used: time card etc.	Describe: <i>Electronic Proximity card</i>
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details
C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: If YES, please complete as appropriate:
	<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other
	If "Other", Please define:
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If <b>yes</b> , please detail hours, %, types of workers affected and frequency Please give details:
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:
	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Maximum number of days worked without a day off (in sample): 6 days (Saturday to Thursday)
<b>Standard/Contracted Hours worked</b>	
	<input type="checkbox"/> Yes G1: If yes, % of workers & frequency:

G: Were standard working hours over 48 hours per week found?	<input checked="" type="checkbox"/> No	
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 42 hours (monthly) found in the month of June 2019 (Current month) 48 hours (monthly) found in the month of January 2019 (Off peak month) 52 hours (monthly) found in the month of October 2018 (Peak month)	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	___14___%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:
<b>Overtime Premiums</b>		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages:
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency:
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please	<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>complete the boxes where relevant.</p>	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>
	<p>Not Applicable</p>
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<p><input type="checkbox"/> <b>Overtime is voluntary</b>  <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week  <input type="checkbox"/> Safeguards are in place to protect worker's health and safety  <input type="checkbox"/> Site can demonstrate exceptional circumstances  <input type="checkbox"/> Other reasons (please specify)</p>
	<p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p>
	<p>Not Applicable</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  <input checked="" type="checkbox"/> No  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  <input type="checkbox"/> No  Not Applicable</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 is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- Gender discrimination is also absent in the facility; both female and male employees were distributed in all types of work.
- The facility provides the same wage amount to male/female employees of the same rank.
- No complain or records found for pregnancy test.
- There is no restriction for formation of trade union in the facility.

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

**Details:**

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

**Any other comments:** Nil

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: <u>70</u> % A2: Female <u>30</u> %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	Nil
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability,	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion

gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Termination or retirement <input type="checkbox"/> No evidence of discrimination found  C1: Please give details: Not Applicable
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**Professional Development**

A: What type of training and development are available for workers?	Regular health and safety, P.P. E & First aid training provided to facility workers. <ul style="list-style-type: none"> <li>• Last health and safety training was conducted on 07.07.2019</li> <li>• Last P.P.E training was conducted on 06.07.2019</li> <li>• Last First aid training was conducted on 15.04.2019</li> </ul>
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B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details:
------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------

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

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

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

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**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:**

- Facility provides ID card for all workers in the time of recruitment.
- Factory maintains service books for all workers.
- There is no home working from the site.
- All workers are getting appointment letter in local language.

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

Details:

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

**Any other comments:** Nil

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

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

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

## 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                  B1: If yes, please describe details and specific category(ies) of workers affected:</p>
<p>C: If yes, check all that apply:</p>	<p><input type="checkbox"/> Recruitment / hiring fees  <input type="checkbox"/> Service fees  <input type="checkbox"/> Application costs  <input type="checkbox"/> Recommendation fees  <input type="checkbox"/> Placement fees  <input type="checkbox"/> Administrative, overhead or processing fees  <input type="checkbox"/> Skills tests  <input type="checkbox"/> Certifications  <input type="checkbox"/> Medical screenings  <input type="checkbox"/> Passports/ID's  <input type="checkbox"/> Work / resident permits  <input type="checkbox"/> Birth certificates  <input type="checkbox"/> Police clearance fees  <input type="checkbox"/> Any transportation and lodging costs after employment offer  <input type="checkbox"/> Any transport costs between work place and home  <input type="checkbox"/> Any relocation costs after commencement of employment  <input type="checkbox"/> New hire training / orientation fees  <input type="checkbox"/> Medical exam fees  <input type="checkbox"/> Deposit bonds or other deposits  <input type="checkbox"/> Any other non-monetary assets  <input type="checkbox"/> Other –                  C1: If other, please give details: Not Applicable</p>
<p>D: If any checked, give details:</p>	<p>Nil</p>

<p><b>Migrant Workers:</b>  <i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i></p>		
<p>A: Type of work undertaken by migrant workers:</p>	<p>NA; No migrant workers employed by the factory.</p>	
<p>B: Please give details about recruitment agencies for migrant workers:</p>	<p>B1: Total number of (in country recruitment agencies) used:                  B2: Total number of (outside of local country) recruitment agencies used:                  NA; No migrant workers employed by the factory.</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>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                  C1: Please describe finding: NA; No migrant workers employed by the factory.</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>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: If yes, number and example of roles: NA; No migrant workers employed by the factory.</p>
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**NON-EMPLOYEE WORKERS**

Recruitment Fees:	
<p>A: Are there any fees?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>B: 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>B1 – If other, please give details: Not Applicable</p>
<p>C: If any checked, give details:</p>	<p>Nil</p>

<b>Agency Workers (if applicable)</b> <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>	
<p>A: Number of agencies used (average):</p>	<p>A1: Names if available: Nil</p>

B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: Please give details: Not Applicable
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No  E1: Please give details: Not Applicable

<b>Contractors:</b> <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>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details:
B: If <b>Yes</b> , how many workers supplied by contractors?	Not Applicable
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not Applicable
D: If <b>Yes</b> , please give evidence for contractor workers being paid per law:	Not Applicable

**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:**

Facility does not have any sun contract process for their production.

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

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

Process Subcontracted	Process 1	Process 2
Name of factory	NA	NA
Address	NA	NA

Process Subcontracted	Process 3	Process 4
Name of factory	NA	NA
Address	NA	NA

Process Subcontracted	Process 5	Process 6
Name of factory	NA	NA
Address	NA	NA

Details: Not Applicable

**Non-compliance:**

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

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

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

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

- The facility has established anti-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 facility management and employee interview, it was noted that no physical or verbal abuse happened in the facility.
- There is an internal process for grievance, which is through grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, any received complaint will be handled by management, without any reprisal for the employee in question.

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

##### Details:

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

**Any other comments:** Nil

### Non-compliance:

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

NC against ETI       NC against Local Law       NC against customer  
code: None Observed

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

**Recommended corrective action:** Not Applicable

#### Objective evidence observed:

(where relevant please add photo numbers)

Not Applicable

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

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

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

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

**Additional Elements**

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.  
 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

**Current Systems and Evidence Examined**

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

**Current systems:**

- It was found through documents review and workers interview that there are no agency staffs, employment agencies and immigrant workers in the factory.

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

**Details:**

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

**Any other comments:** Nil

**Non-compliance:**

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

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

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

**Recommended corrective action:** Not Applicable

**Objective evidence observed:**

*(where relevant please add photo numbers)*  
 Not Applicable

**Observation:**

<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI/Additional Elements requirement:</b> Not Applicable</p> <p><b>Comments:</b> Not Applicable</p>	<p><b>Objective evidence observed:</b></p> <p>Not Applicable</p>
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<p><b>Good examples observed:</b></p>	
<p>Description of Good Example (GE): None observed</p>	<p><b>Objective Evidence Observed:</b></p>

**10. Other issue areas 10B2: Environment 2–Pillar**

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

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

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

10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

**Current Systems and Evidence Examined**

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

**Current systems:**

- The facility prepared an environmental policy and procedure.
- The facility also provides awareness training to all related personnel.
- Solid waste has been handover to licensee vendor as per local legislation who recycled that wastage.
- Mr. Nakibullah Rony, ECR-executive is responsible for Environmental issue.

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

Details:

Document review

Factory tour

Management interview

**Any other comments:** Nil

**Non-compliance:**

1. Description of non-compliance:

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

**Issue title:** Waste water test not conducted periodically.

**Description of non-compliance:**

Bases on documents review and management interview it was noted that, waste water test was not conducted periodically as per law. However, facility applied to Department of Environment for the waste water test report of ETP at April 17, 2019

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

In accordance In accordance with Environmental clearance certificate instruction no 6: For a running factory:

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

1. Document review and management review

<p>For any running factory, factory needs to assess their waste water quality (PH, EC, DO, TDS, COD, BOD) from department of environment quarterly (4 times in a year)</p> <p><b>In accordance with Other issue areas 10B2: Environment 2-pillar' - 10B2.1:</b> Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p><b>Recommended corrective action:</b> It is recommended that the factory management should collect updated environment clearance certificate from concern authority as per rule.</p> <p><b>Action By:</b> Mr. Mansurul Haque – Senior General Manager – Admin, HR, Compliance &amp; Operation</p> <p><b>Time frame:</b> 90 days.</p>	
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Observation:	
<p><b>Description of observation:</b> None Observed</p> <p><b>Local law or ETI/additional elements requirement:</b> Not Applicable</p> <p><b>Comments:</b> Not Applicable</p>	<p><b>Objective evidence observed:</b></p> <p>Not Applicable</p>

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

Other findings

<b>Other Findings Outside the Scope of the Code</b>
None

<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

## Appendix 1

<p><b>Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."</b></p> <p><input checked="" type="checkbox"/> Not Applicable please x</p>	
<p><b>NOTE:</b> The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p><b>Instruction to Audit Company:</b> fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
<p><b>ETI Code / Additional Elements</b></p>	<p><b>Customer's Supplier Code equivalent</b></p>
<p><b>0.A. Universal Rights covering UNGP</b></p>	<p><b>0.A. Universal Rights covering UNGP</b></p>
<p><b>0.A. Guidance for Observations</b>            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.</p>	<p>Not Applicable</p>
<p><b>0.B. Management Systems &amp; Code Implementation</b></p>	<p><b>0.B. Management Systems &amp; Code Implementation</b></p>
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p>	<p>Not Applicable</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>Not Applicable</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>Not Applicable</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>Not Applicable</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>Not Applicable</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>Not Applicable</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>Not Applicable</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>Not Applicable</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>Not Applicable</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>Not Applicable</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>Not Applicable</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>Not Applicable</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.</p> <p>10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.</p> <p><i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	<p>Not Applicable</p>
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## Photo Form

### Good Example Pictures:

Nil	Nil	Nil
Nil	Nil	Nil

### Non-Conformity Pictures:

<p><b>NC Picture:1</b> Jacquard section workers were not using earplug during work.</p>	<p><b>NC Picture: 2</b> Construction workers were not using PPE.</p>	<p><b>NC Picture:3</b> Aisles painter was not using ear muff during work at boiler room.</p>
<p><b>NC Picture:4</b> Iron section workers was not using rubber mat during work.</p>	<p><b>NC Picture:5</b> MSDS, Label of identification &amp; Secondary containment was missing</p>	<p><b>NC Picture:6</b> MSDS, Label of identification &amp; Secondary containment was missing</p>










		<p>Void</p>
<p><b>NC Picture:7</b> Aisle found partially obstructed</p>	<p><b>NC Picture:8</b> MSDS, labelling &amp; secondary containment found missing for 3 machine oil</p>	<p>Void</p>

### General facility tour Photos:

<p>Facility gate</p>	<p>Facility name</p>	<p>Facility building</p>
<p>Security Post</p>	<p>Winding Section</p>	<p>Auto Knitting (jacquard) Section</p>

<p>Linking Section</p>	<p>Sewing Section</p>	<p>Trimming Section</p>
<p>Mending Section</p>	<p>Washing Section</p>	<p>Ironing Section</p>
<p>Final Quality Check</p>	<p>Packing Section</p>	<p>Finished goods keeping area</p>
<p>Accessories store</p>	<p>Yarn Store</p>	<p>Chemical keeping area</p>

<p>Evacuation plan</p>	<p>Fire control panel</p>	<p>Fire alarm switch</p>
<p>Fire alarm bell</p>	<p>Emergency light</p>	<p>Fire extinguisher</p>
<p>Sprinkler Head</p>	<p>Firefighting equipment</p>	<p>Hose reel demonstration</p>

Smoke detector	PA system	Illuminated exit sign
		
Stair case	Drinking water facility	First aid box
		
Suggestion and complain box	Toilet area	Medical room with patient's bed
		
Child care room	Roof top	Workers' dining area

		
<p>Canteen</p>	<p>Generator</p>	<p>Boiler</p>
	<p>Void</p>	<p>Void</p>
<p>ETP</p>	<p>Void</p>	<p>Void</p>

-----Photo Report-----



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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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