



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC416548987	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS416551480	
Business name (Company name):	Metro Knitting & Dyeing Mills Ltd Factory 2			
Site name:	Metro Knitting & Dyeing Mills Ltd Factory-2			
Site address:	Charabag, Ashulia, Savar, Bangladesh Dhaka 1341 BD	Country:	BD	
Site contact and job title:	Subrata Das Gupta / AGM (HR, Admin & Compliance)			
Site phone:	01799985071	Site e-mail:	compliance@metrokd.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2023-12-20			

Audit Company Name:
SGS Bangladesh

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Aniruddha Paul	APSCA Number:	21702514
Additional Auditors:	Kazi Mohammad Morad Hossain		21703927
	Imran Ahmed		21701483
Date of declaration:	2023-12-21		

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

Site Representation	
Full Name:	Subrata Das Gupta
Title:	AGM (HR, Admin & Compliance)
Date of declaration:	2023-12-21
Comments:	<p><i>Any exceptions to this must be recorded here (e.g. different sample size):</i> <i>Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).</i> <i>The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i></p>
	None

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>0A - Universal rights covering UNGP</u>			0	0	0	
<u>0B - Management systems and code implementation</u>			0	0	2	GE - ZAF600293248 GE - ZAF600293249
<u>1 - Freely chosen employment</u>			0	0	0	
<u>2 - Freedom of association and right to collective bargaining are respected</u>			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.1 3.1 3.1 3.1	§1 §2 §3 §4 §5 §6 §7	7	0	0	NC - ZAF600283192 NC - ZAF600283193 NC - ZAF600293246 NC - ZAF600293247 NC - ZAF600293255 NC - ZAF600293256 NC - ZAF600293257
<u>4 - Child labour shall not be used</u>			0	0	0	
<u>5 - Living wages are paid</u>			0	0	5	GE - ZAF600293250 GE - ZAF600293251 GE - ZAF600293252 GE - ZAF600293253 GE - ZAF600293254
<u>6 - Working hours are not excessive</u>			0	0	0	
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>			0	0	0	
<u>8A - Subcontracting and homeworking</u>			0	0	0	
<u>9 - No harsh or inhumane treatment is allowed</u>			0	0	0	
<u>10A - Entitlement to work and immigration</u>			0	0	0	
<u>10B2 - Environment 2-pillar</u>			0	0	0	
<u>10B4 - Environment 4-pillar</u>			0	0	0	
<u>10C - Business ethics 4-pillar</u>			0	0	0	

Local Law Issues

Issue	Description
§1	Bangladesh Energy Regulatory Commission Act, 2003, Section-27 (1): (1) No person shall engage himself in the following business unless he is empowered by a licence or exempted from having it under this Act or any other Act, such as:- (a) power generation; (b) energy transmission; (c) energy distribution and marketing; (d) energy supply; and (e) energy storage.
§2	Building Construction Act 1952, Section-3: Notwithstanding anything contained in any other law for the time being in force, or in any agreement, no person shall, without the previous sanction of an Authorized Officer, construct or re-construct or make addition or alternation to any building, or excavate or re-excavate any tank within the area to which this Act applies;

§3	The Bangladesh Labor Rules, 2015, Rule 67 (2): In addition to the arrangement of safety and health protection measures mentioned in Sub-section (1), the concerned manufacturing institute must provide necessary equipments, including safety shoes, helmets, goggles, masks, hand gloves, ear muffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage.
§4	The Bangladesh Labor Act, 2006, Section 63 (1) D (3): (1) In every establishment the following shall be securely fenced by the safeguards of substantial construction which shall be kept in a position while the part of machinery required to be fenced are in motion or in use, namely - (a) every moving part of a prime move, and every fly wheel connected to a prime mover; (b) the head-race and tail-race of every water wheel and water turbine; (c) any part of a stock-bar which projects beyond the head stock of a lathe; and (d) unless they are in such position or of such construction as to be as safe to every person employed in the factory as they would be if they were securely fenced (i) every part of an electric generator, a motor or rotary converter; (ii) every part of transmission machinery; and (iii) every dangerous part of any machinery:
§5	The Petroleum Act, 2016, Section 4 & 6 (a): 4. Import, transport, storage and distribution of petroleum. - No person shall - (a) import, transport, store or distribute any petroleum save in accordance with the rules made under section 31; or (b) import class I petroleum, and transport, store or distribute any petroleum save in accordance with the licence and the conditions specified therein. 6. No licence is needed in certain circumstances. - Notwithstanding anything contained in this Chapter, no licence shall be required in the following circumstances, namely : (a) transport or storage of class II and class III petroleum not exceeding 2000 (two thousand) liters : Provided that such petroleum shall be contained in receptacles of 1000 (one thousand) liters or less in capacity;
§6	The Boiler Act, 2022, Section 18 (1) & (2): 18. Obtaining registration and certificate for use of boilers. (1) Any boiler for use within Bangladesh shall be registered at the office of the Chief Boiler Inspector. (2) Any person or user of boiler for obtaining registration under sub-section (1) shall apply to the Chief Boiler Inspector following the procedure prescribed by the rules and subject to payment of the prescribed fee.
§7	The Bangladesh Labor Rules, 2015, Schedule 4 Rule (2b-1): Functions and responsibilities of the safety committee: (b) Following matters shall be included in the guideline prepared under clause (a), namely: 1. Risk and safety related management of the firm: (a) Identifying risky areas (like parts of building, stairs, premises, electric lines, machinery, etc); (b) Nature of risk (like crack, gate locked during working hours, dangerous electric connection, etc) ; (c) Risk level (like high/medium/general/not satisfactory); (d) Assessment of immediate duties (like prohibition of use, immediate repair, reforms, closure); (e) Assessment of necessary protection system in different nature and levels of risk; and (f) Assessment of technical and administrative liability.

Site Details

Site Details		
Company Name	Metro Knitting & Dyeing Mills Ltd Factory 2	
Site Name	Metro Knitting & Dyeing Mills Ltd Factory-2	
GPS location (if available)	GPS Address:	Kumkumari - Doshaid Bazar Rd
	Coordinates:	Latitude: 23.8851732 and Longitude: 90.3074449
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Trade License No. 001691, issued by Ashulia Union Council, Savar, Dhaka, which is valid till 30th June 2024. Factory License No. 14813/Dhaka, Category is 'L', issued by Chief Inspector of Factories which is valid till 30th June 2024. Fire License No. DD/Dhaka/22250/2010 and DD/Dhaka/22736/2011, issued by Bangladesh Fire Service & Civil Defense Authority which are valid till 30th June 2024.	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	All kinds of Knit Items.	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Metro Knitting & Dyeing Mills Ltd. (Factory-2) is located at Charabag, Ashulia, Savar, Dhaka, Bangladesh. The factory has established on 21st June 2000 (as per Incorporation Certificate) and started its operation from June 2010. Total land area is about 174,240 square feet, production floor is about 350,365 square feet & warehouse is about 137,288 square feet. Currently 5276 employees are working in the factory including management. Among them 2171 are male and 3105 are female. Among 5276 employees, 4841 are production employees and 435 are non-production employees. All workers are Bangladeshi by born. In general, the employees work for 6 days in a week (Saturday to Thursday) and Friday is weekly holiday. Due to government notice on 11 August 2022 to reduce electricity usage, the facility adjusted the weekly holiday to Sunday from 14 August 2022 till 30 January 2023. Factory's general working hour started from 8:00 am to 5:00 pm with one-hour lunch break with 2 shifts e.g., from 12:45 pm to 1:45 pm & 1:15 pm to 2:15 pm. Furthermore, embroidery section has been carried out 2 shifts e.g., from 8:00 am to 5:00 pm & 8:00 pm to 5:00 am with one-hour meal break from 1:00 pm to 2:00 pm for day shift & 1:00 am to 2:00 am for night shift. Facility is paying monthly salary by mobile banking system (Rocket) to all the employees. The factory's wage period is 1st to 30th / 31st of every month and the payment is made within 07 working days of the following month. Facility production capacity is around 2,500,000 pieces/month. There are 03 buildings and 02 sheds in the facility premises. Detail building description is as below:</p>	

Structure and number of buildings	Building Name:	Building no. 01 (9 storied):

Floor	Description	Remark
Basement	Fire hydrant pump room.	NA
Ground floor	Embroidery section, finished goods area, HRD, security post, fire command room, fire alarm control panel board, generator, boiler, transformer, sub-station, hit presses area, waste keeping area and other goods area.	NA
Mezzanine floor	Security rest room and general store.	NA
1st floor	General store, accessories store, embroidery finishing room, inspection room, conference room, office area and finished goods store.	NA
2nd floor	Sewing section, finishing section, packing section, spot removing room and electrical mini boiler.	NA
3rd floor	Sewing section, finishing section, packing section, spot removing room and electrical mini boiler.	NA
4th floor	Sewing section, finishing section, packing section, spot removing room and electrical mini boiler.	NA
5th floor	Sewing section & finishing section and electrical mini boiler.	NA
6th floor	Sewing section, finishing section, packing section, spot removing room, maintenance room, electrical mini boiler and finished goods store.	NA

	7th floor	Sewing section, finishing section & packing section, fabric store, electrical mini boiler, spot removing room, maintenance room and fusing machine area.	NA
	8th floor	50% used as skill development training center, idle machine keeping area, solar panel & 50% vacant area.	NA
	Roof top	30% solar panels and 70% vacant.	NA

	Building Name:	Building no. 02 (9 storied):
--	-----------------------	-------------------------------------

Floor	Description	Remark
Basement	Waste keeping store, parking area, water pump room, leftover goods keeping area and fire alarm control panel.	NA
Ground floor	Finished goods store and sub-station area.	NA
1st floor	Worker dining hall, canteen area, prayer room and training room.	NA
2nd floor	Sewing section, finishing section, pressing section, packing area, spot removing room, HR office room and needle distribution room.	NA
3rd floor	Sewing section, finishing section, pressing section, packing area, office, spot removing area, needle distribution room and electrical mini boiler.	NA
4th floor	Sewing section, finishing section, packing area, iron section, office room, spot removing area, needle distribution room and electrical mini boiler.	NA
5th floor	Cutting section.	NA
6th floor	Cutting section.	NA
7th floor	Sample and CAD room, cutting input area, fabric relaxing area and electrical mini boiler.	NA
8th floor	Fabric store, shed checking area and fabric inspection area.	NA
Roof top	40% used as solar panels, 10% used as buyer lounge and 50% vacant.	NA

	Building Name:		Building no. 03 (3 storied):
	Floor	Description	Remark
	Ground floor	Generator, sub-station, exhaust gas boiler and diesel tank storage area.	NA
	1st floor	Incineration boiler.	NA
	2nd floor	Compressor.	NA
	Rooftop	60% cooling panel head and 40% vacant area.	NA
	Building Name:		Shed 01 (Single storied):
	Floor	Description	Remark
	Ground floor	Fair price shop, childcare room and medical center.	NA
	Building Name:		Shed 02 (Single storied):
	Floor	Description	Remark
	Ground floor	Diesel storage area.	NA
	Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: tor 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 as a result 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.	
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Building construction plan was taken from Local Government Engineering Department (LGED), Savar, Dhaka on 18.09.2022. Floor layout permission was taken from Deputy Chief Inspector on 28.10.2020.		
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor		
Months of peak season			

Process overview	Product: All Kinds of Knit Items. Process: Cutting > Embroidery > Sewing>Finishing (Pressing to Packing). Sewing line: 60 nos. Major Equipment: Cutting Machine, Embroidery machine, End Cutter, Fusing Machine, Auto Cutter, Spreader, Band Knife, Fabric Relax able, Single Needle Lock Stitch, Double Needles Lock stitch, Bartack Machine, Three needle cover stitch, Four-thread Over lock Machine, Feed of the Arm, Button hole, Fusing Press Machine, generator, boiler & boiler etc. & total machine 1865 sets.
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None
Please give details:	Facility has a committee named Participation Committee (PC).
Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable. Factory does not provide any living accommodation for the workers as all workers live in nearby areas and there is no legal requirement as well.

Audit Parameters				
Time in and time out	Day 1		Day 2	
	In	09:00	In	08:30
	Out	18:00	Out	15:00
Audit type:	PERIODIC			
Was the audit announced?	SEMI_ANNOUNCED			
Was the Sedex SAQ available for review?	Yes			
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No			
Who signed and agreed CAPR	Subrata Das Gupta / AGM (HR, Admin & Compliance)			
Is further information available	No			

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	Not Applicable. 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 worker representatives to the Participation Committee shall run activities related to workers' interests in the establishment concerned and worker's representative should be elected by direct vote of workers (amendment 22nd of July 2013, Labour Law 2006).		
<i>Reason for absence during the audit</i>	Not Applicable. 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 worker representatives to the Participation Committee shall run activities related to workers' interests in the establishment concerned and worker's representative should be elected by direct vote of workers (amendment 22nd of July 2013, Labour Law 2006).		
<i>Reason for absence at the closing meeting</i>	Not Applicable. 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 worker representatives to the Participation Committee shall run activities related to workers' interests in the establishment concerned and worker's 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	2171	0	0	0	0	0	0	2171
Worker numbers - female	3105	0	0	0	0	0	0	3105
Total	5276	0	0	0	0	0	0	5276
Number of Workers interviewed - male	34	0	0	0	0	0	0	34
Number of Workers interviewed - female	52	0	0	0	0	0	0	52
Total - interviewed sample size	86	0	0	0	0	0	0	86

Nationalities Structure	
Nationality of Management	Bangladeshi
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Bangladeshi approx %: 100%
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable as the facility has no obvious peak season.
Worker remuneration	Workers on piece rate: 0%
	Paid hourly: 0%
	Salaried: 100%
Payment cycle	Paid daily: 0%
	Paid weekly: 0%
	Paid monthly: 100%
	Other: 0%
	Details for other: Not applicable.

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	50 employees (10 groups with 05 employees in each group, Male: 20 & Female: 30).
Number of individual interviews:	Male: 14 Female: 22
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	No issue was identified during worker interview.
What did the workers like the most about working at this site?	Attendance Bonus, Annual Picnic, Fair price shop, on time payment, good behavior, good working environment etc.
Any additional comment(s) regarding interviews:	None
Attitude of workers to hours worked:	Comfortable.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:
Total 86 employees were selected for interview. Among them 36 were selected for individual interview and 50 employees in 10 groups (05 employees in each group) were selected for the group interview. All the interviewees were favorable 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 can complain directly to their supervisors or line manager and felt free to give their general concerns to the PC members who would take it to the PC meeting when happen.
Attitude of worker's committee/union reps:
Participation Committee member interviews was 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 06.11.2023. They also stated that they could give suggestions on all parts of the site's practices.
Attitude of managers:
Management of the factory was positive and supportive during the whole audit. Mr. Subrata Das Gupta- Assistant General Manager (HR, Admin & Compliance) is the key person of the compliance team and 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 Base Code, local laws etc. The factory management was found to be co-operative throughout the audit.

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

0A: Compliance Requirements

0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.
 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights
 0.A.3 Businesses shall identify their stakeholders and salient issues.
 0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
 0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.
 0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined

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

Current Systems:

1. Facility implements and maintains systems for delivering compliance to this code.
 2. Mr. Subrata Das Gupta-Assistant General Manager (HR, Admin & Compliance) is responsible for compliance with the Code.

Evidence examined:

1. Facility Management Interview.
 2. Document review (Policy record review and training register review).
 3. Workers Interview.

Any other comments:

Nil.

Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Factory has policy which authorized at the highest-level human rights impacts and issues, and ensure it is communicated to all workers.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All policies are included in workers manuals.
Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Mr. Subrata Das Gupta-Assistant General Manager (HR, Admin & Compliance) is responsible for implementing standards concerning Human Rights.

<p>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</p> <p>Please give details:</p> <p>The factory management has provided complaint box in workers' 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>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</p>				
<p>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</p> <p>Please give details:</p> <p>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>				
<p>Measuring Workplace Impact</p>					
<p>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))</p>	<table border="0"> <tr> <td>Last year</td> <td style="text-align: right;">3.0%</td> </tr> <tr> <td>This year</td> <td style="text-align: right;">3.0%</td> </tr> </table>	Last year	3.0%	This year	3.0%
Last year	3.0%				
This year	3.0%				
<p>Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])</p>	<p>3.0%</p>				
<p>Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)</p>	<table border="0"> <tr> <td>Last year</td> <td style="text-align: right;">2.0%</td> </tr> <tr> <td>This year</td> <td style="text-align: right;">2.0%</td> </tr> </table>	Last year	2.0%	This year	2.0%
Last year	2.0%				
This year	2.0%				
<p>Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month)</p>	<p>2.0%</p>				
<p>Are accidents recorded?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>It was noted through plant tour, documentation review and first aider interview that factory has system for tracking minor injury, which is treated by the first aider, occurred in the production floor to take corrective/ preventive action by analyzing root cause.</p>				

Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year	1.0%
	This year	1.0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	1.0%	
Lost day work cases per 100 workers(((Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year	1.0%
	This year	1.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

OB - Management Systems and code Implementation
[Summary of Findings]

OB: Compliance Requirements

- 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
- 0.B.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
- 0.B.3 Suppliers are expected to communicate this Code to all employees.
- 0.B.4 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with.
- 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:

1. The factory communicates their code of conduct through notice board regularly including company's own COC.
2. Mr. Subrata Das Gupta- Assistant General Manager (HR, Admin & Compliance) is responsible for compliance with the Code.
2. 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:

1. Document review (Policy record review and training register review).
2. Facility Management Interview.
3. Workers Interview.
4. Plant tour.

Any other comments:

Nil.

Management Systems

In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Site has not been subjected to any fines in the last 12 months.
Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There is effective policy and procedures found to reduce the risk of forced labor, child labor, discrimination, harassment & abuse.
If Yes, is there evidence (an indication) of effective implementation? Please give details.	The facility communicated the policy and procedures on risk of forced labor, child labor, discrimination and harassment & abuse with the workers through training program and posted those policies in the notice board. No complaint found from interviewed workers too.

<p>Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility communicated the policy and procedures on risk of forced labor, child labor, discrimination and harassment & abuse with the workers through training program and posted those policies in the notice board. No complaint found from interviewed workers too. Last Mid-level management training was held on 26.09.2023 with 17 participants.</p>
<p>If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Managers and workers have received training on the standards for forced labor, child labor, discrimination, harassment & abuse. Last orientation training was provided on 15.10.2023 with 14 participants.</p>
<p>Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The site has a internationally recognised system certification e.g., amfori BSCI, which is valid till 06.12.2025.</p>
<p>Is there a Human Resources manager/department?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Facility has an independent Human Resources Department and Mr. Subrata Das Gupta- Assistant General Manager (HR, Admin & Compliance) with some other colleagues are responsible for this department.</p>
<p>Is there a senior person /manager responsible for implementation of the code?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Mr. Subrata Das Gupta- Assistant General Manager (HR, Admin & Compliance) is responsible for compliance with the Code.</p>
<p>Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Factory has the policy to ensure all worker information confidential.</p>
<p>Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Factory has effective procedure to ensure all worker information is kept confidential.</p>
<p>Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Risk assessment was conducted by factory to evaluate effectiveness of policy and procedure. Last risk assessment was conducted on 03.01.2023.</p>

<p>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</p> <p>Please give details:</p> <p>Risk assessment was conducted by factory to evaluate effectiveness of policy and procedure. Last risk assessment training for the employees was held on 18.10.2023 with 14 participants.</p>
<p>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</p> <p>Please give details:</p> <p>Facility management communicates this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>
<p>Land Rights</p>	
<p>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</p> <p>Please give details:</p> <p>Facility is situated in its own building. All land rights related documents are available in the facility.</p>
<p>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</p> <p>Please give details:</p> <p>Facility has system in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.</p>
<p>Does the site have a written policy and procedures specific to land rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has developed a written policy and procedures regarding to land rights with due diligence of obtain free, prior and informed consent.</p>
<p>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 checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>NA</p>
<p>Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>NA</p>
<p>Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>NA</p>

Good Example		Evidence																		
<p>[Back to findings summary]</p> <table border="1"> <thead> <tr> <th colspan="2">Good Example</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600293248</td> </tr> <tr> <td>Clause</td> <td>0B - Management Systems and code Implementation</td> </tr> <tr> <td>Issue Title</td> <td>24 - There is an active programme of social events for workers</td> </tr> <tr> <td>Subcategory</td> <td>Site's Management systems & Monitoring</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Explanation to the good example</td> <td>The facility arranges annual picnic for their workers.</td> </tr> <tr> <td>Evidence</td> <td>Documents review, worker interview and management interview.</td> </tr> </tbody> </table>		Good Example		Status	OPEN	Reference	ZAF600293248	Clause	0B - Management Systems and code Implementation	Issue Title	24 - There is an active programme of social events for workers	Subcategory	Site's Management systems & Monitoring	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	The facility arranges annual picnic for their workers.	Evidence	Documents review, worker interview and management interview.	
Good Example																				
Status	OPEN																			
Reference	ZAF600293248																			
Clause	0B - Management Systems and code Implementation																			
Issue Title	24 - There is an active programme of social events for workers																			
Subcategory	Site's Management systems & Monitoring																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
Explanation to the good example	The facility arranges annual picnic for their workers.																			
Evidence	Documents review, worker interview and management interview.																			

Good Example		Evidence																		
<p>[Back to findings summary]</p> <table border="1"> <thead> <tr> <th colspan="2">Good Example</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600293249</td> </tr> <tr> <td>Clause</td> <td>0B - Management Systems and code Implementation</td> </tr> <tr> <td>Issue Title</td> <td>31 - Site supports community and charitable projects</td> </tr> <tr> <td>Subcategory</td> <td>Site's Awareness of Code/Legal Requirements</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Explanation to the good example</td> <td>The facility provides electricity bill support to the Masjid and Madrasa in the local community for the lifetime.</td> </tr> <tr> <td>Evidence</td> <td>Documents review and management interview.</td> </tr> </tbody> </table>		Good Example		Status	OPEN	Reference	ZAF600293249	Clause	0B - Management Systems and code Implementation	Issue Title	31 - Site supports community and charitable projects	Subcategory	Site's Awareness of Code/Legal Requirements	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	The facility provides electricity bill support to the Masjid and Madrasa in the local community for the lifetime.	Evidence	Documents review and management interview.	
Good Example																				
Status	OPEN																			
Reference	ZAF600293249																			
Clause	0B - Management Systems and code Implementation																			
Issue Title	31 - Site supports community and charitable projects																			
Subcategory	Site's Awareness of Code/Legal Requirements																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
Explanation to the good example	The facility provides electricity bill support to the Masjid and Madrasa in the local community for the lifetime.																			
Evidence	Documents review and management interview.																			

1 - Freely chosen Employment
[Summary of Findings]

1: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- 1. The facility has a policy which prohibits forced labor, and this was also available for review.
- 2. 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.
- 3. The workers are free to leave the workplace 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.
- 4. Factory displayed overtime policy stating that over time work is voluntary.
- 5. Mr. Subrata Das Gupta- Assistant General Manager (HR, Admin & Compliance) is responsible for compliance with the Code.

Evidence examined:

- 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.

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility has a policy mentioning workers are free to terminate employment from the facility.
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 Please give details: No UK based business found during audit.

<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>No evidence was noted of any restrictions on Workers' freedoms to leave the site at the end of the workday.</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>Facility has policy & procedure on force labor, bonded labor and they understand the risk also communicate with their supply chain.</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has a policy against forced/trafficked labor which maintained by the facility. No forced, trafficked and bonded evidence found during audit.</p>

2 - Freedom of Association and Right to Collective Bargaining are Respected
[Summary of Findings]

2: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- 1. All the employees can participate and elect the committee members of their choice.
- 2. There is no trade union in the facility, and it is not mandated by law.
- 3. There is Participation Committee (PC) as parallel means for trade union. Last election was held on 16.01.2023.
- 4. Verified and confirmed through records review and interview process that the facility does not discriminate any of the workers such as worker's representatives also.
- 5. Participation Committee members can carry out their duties within working hours without affecting their pay.
- 6. Mr. Subrata Das Gupta- AGM (HR, Admin & Compliance) is responsible for compliance with the Code.

Evidence examined:

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

Any other comments:

Nil.

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	Participation Committee (PC)	
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
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 Please give details: Facility has formed safety committee (Workers 06 & management 06) total 12.	
Is there evidence of free elections?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Participation committee elected by the workers. Participation committee (PC) meeting held on regular basis. Last PC meeting was held on 06.11.2023. PC meeting minutes recorded, and action taken.
Name of union and union representative, if applicable:	NA; This is a non-unionized factory.
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Participation Committee (PC) has been formed as a parallel means.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All workers are aware of their representatives.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2023-01-16
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	3.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	As per interview with the Participation Committee members & document review, it was noted that the meeting is held regularly. Last meeting was held on 06.11.2023. Meeting minutes were recorded in register. Topics of last meeting are as follows: 1. Discussion on providing falsified documents during recruitment. 2. Discussion on upcoming new minimum wages. 3. Discussion on maintaining quality of production. 4. Others. Meeting minutes were communicated through notice board.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

3: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- 1. Factory posted the evacuation plans on work floors, which indicated escape routes and the location of the fire extinguishers.
- 2. Exit signs were found illuminated and emergency lights were installed with IPS back up.
- 3. Sufficient first aid kits stocked are provided in workshops. Total no. of first aid box – 60 & first aiders were– 448 persons.
- 4. Workers receive regular and recorded health & safety training. Last health & safety training was provided on 17.12.2023 with 23 participants.
- 5. Firefighting trainings are provided as per law. Last firefighting training was provided on 26.11.2023 with 27 participants.
- 6. First aid training & PPE training are provided regularly. Last first aid training and PPE training were provided on 14.12.2023 & 12.12.2023 with 38 participants & 30 participants respectively.
- 7. Medical facility and childcare facility are available in the factory.
- 8. Worker toilets are segregated for male and female, adequate number as per law, washing facilities are provided. Total no. of male toilets -167 and female toilets- 258.
- 9. The facility has done maintenance of the machines on regular monthly basis confirmed through the documents reviewed. All switches in the electrical control panels have been labelled.
- 10. Factory has regular fire equipment maintenance system. Facility has provided dining facility with sufficient seating capacity.
- 11. Facility conducts fire drill regularly. Last (day) fire drill was conducted on 03.09.2023, with 5425 participants and last night drill was conducted on 25.05.2023, with 140 participants.
- 12. Md. Rakibul Hassan, Deputy Manager – Compliance is responsible to look after the health & safety issues.

Evidence examined:

- 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>Does the facility have general and occupational Health & 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</p> <p>Please give details:</p> <p>There is an open channel for all at the facility which anybody can report to management about any act properly or corruptly and health & safety issues. Facility has communicated this procedure through orientation training confirmed from worker interview.</p>
<p>Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>All policies are included in workers' manual.</p>
<p>Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>No structural addition without permits were found.</p>
<p>Are visitors to the site informed on H&S and provided with personal protective equipment?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Visitors are informed on H & S and provided PPE when required.</p>
<p>Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has fully equipped medical room which meets the legal requirement.</p>
<p>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</p> <p>Please give details:</p> <p>Factory has medical facility available with full-time Doctor- Dr. Sanjida Farha Soniya & Dr. Zesmin Anjum and Nurse- Sipra Bala & Paramedic- Angura Banu. Enough first aid kits stocked and provided in production floor. Total no. of first aid box- 60 & first aiders were -448 persons.</p>
<p>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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility provided workers bus and it is fit for purpose, safe, maintained and operated by competent persons.</p>
<p>Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>Dormitory facility is not provided to the workers, and it is not required by law.</p>
<p>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?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility conducts risk assessment on regular basis. Last risk assessment was conducted on 03.01.2023 and different initiatives are taken to control the risks. However one NC has raised on onsite CAPR regarding risk assessment as facility did not assess the risk of few areas.</p>





Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility meets legal obligation of disposing natural resource.
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 Please give details: Facility does not use any banned chemical.

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600283192	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	267 - No / inadequate certificates for inspections of machinery, or machines not registered as required by law	
Subcategory	Machinery	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA416626843	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Bangladesh Energy Regulatory Commission Act, 2003, Section-27 (1): (1) No person shall engage himself in the following business unless he is empowered by a licence or exempted from having it under this Act or any other Act, such as:- (a) power generation; (b) energy transmission; (c) energy distribution and marketing; (d) energy supply; and (e) energy storage.	
ETI 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.	
Explanation to the non compliance	Noted through document review and management interview that the facility has no generator license for 04 generators (492 KW+800 KW +800 KW + 64 KW) of 2156 KW capacity. Note that, the facility has applied to concern authority on 14th November 2021 and the grant is awaiting.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility management	






	should obtain generator license from concern authority at earliest.	
--	---	--


Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600283193	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	250 - No or inadequate assessment / certificates / report / licence in place for structural safety of building including building stability certificate	
Subcategory	Building/Site Maintenance	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA416626843	
Resolved by audit	ZAA600040376	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Building Construction Act 1952, Section-3: Notwithstanding anything contained in any other law for the time being in force, or in any agreement, no person shall, without the previous sanction of an Authorized Officer, construct or re-construct or make addition or alternation to any building, or excavate or re-excavate any tank within the area to which this Act applies;	
ETI 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.	
Explanation to the non compliance	This Periodic audit was conducted on 20th & 21st December 2023: Based on document review (building approval plan), Plant tour and management interview noted that Facility has taken building approval plan from LGED (Savar) dated on September 18, 2022./NA	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days	

	<input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility management should obtain building approval plan from concern authority. / NA	
Additional comments	<p>We have already applied to the concerned authority and regular communication is going on for the required building approval. Now we are waiting for feedback from government authority. Application copy is not sufficient to close this issue until construction approval plan taken from concern authority.</p> <p>This Periodic audit was conducted on 20th & 21st December 2023:</p> <p>Based on document review (building approval plan), Plant tour and management interview noted that Facility has taken building approval plan from LGED (Savar) dated on September 18, 2022. This Periodic audit was conducted on 20th & 21st December 2023:</p> <p>Based on document review (building approval plan), Plant tour and management interview noted that Facility has taken building approval plan from LGED (Savar) dated on September 18, 2022.</p>	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600293246	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate	
Subcategory	Personal Protective Equipment/Clothing	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	 <p><u>Cutting section employee was not using face mask.JPG</u></p>
Root cause	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	 <p><u>Overlock machine operator was not using face mask.JPG</u></p>
Root cause - Other	Lack of monitoring	
Local law issue	The Bangladesh Labor Rules, 2015, Rule 67 (2): In addition to the arrangement of safety and health protection measures mentioned in Sub-section (1), the concerned manufacturing institute must provide necessary equipments, including safety shoes, helmets, goggles, masks, hand gloves, ear muffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage.	 <p><u>Embroidery section employee was not using earplugs.JPG</u></p>
ETI 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.	
Explanation to the non compliance	Based on the facility tour following PPE related issues were observed: a) 02 out of 03 spot removing operators were not using required PPE such as chemical gloves, eye goggles etc. while working at 3rd floor of building 01. b) Approximately 10% embroidery section employees were not using earplugs during work at ground floor of building 01. c) Approximate 30% overlock machine operators at sewing section and 20% cutting section employees were not using face mask while working at 2nd to 7th floor of building 01 and 5th to 6th floor of building 02 respectively.	 <p><u>Spot removing operator was not using required PPE.JPG</u></p>
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days	

	<input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the factory management should ensure proper use of PPE to the workers of mentioned areas.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600293247	<u>Upper pulley cover of sewing machine was missing.JPG</u>
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt / hand guards on other machines)	
Subcategory	Machinery	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	<u>Lower pulley cover of sewing machine was missing.JPG</u>
Root cause - Other	Lack of monitoring	
Local law issue	The Bangladesh Labor Act, 2006, Section 63 (1) D (3): (1) In every establishment the following shall be securely fenced by the safeguards of substantial construction which shall be kept in a position while the part of machinery required to be fenced are in motion or in use, namely - (a) every moving part of a prime mover, and every fly wheel connected to a prime mover; (b) the head-race and tail-race of every water wheel and water turbine; (c) any part of a stock-bar which projects beyond the head stock of a lathe; and (d) unless they are in such position or of such construction as to be as safe to every person employed in the factory as they would be if they were securely fenced (i) every part of an electric generator, a motor or rotary converter; (ii) every part of transmission machinery; and (iii) every dangerous part of any machinery:	
ETI 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.	<u>Needle guard of plain sewing machine was found displaced.JPG</u>
Explanation to the non compliance	Based on the facility tour following machine safety related issues were observed: a) Approximately 40% of the eye safety guard of overlock machine, flatlock and bartack machines were found in displaced condition from its own position on 2nd to 7th floor of building 01 and 5th, 6th floor of building 02. b) Approximately 10% needle guards of plain sewing machine were found in displaced condition during	 <u>Eye safety guard of overlock machine was found displaced.JPG</u> 





	work at 2nd to 4th floor of building no 01. c) 06 out of 06 upper & lower pulley covers of sewing machine were missing during work at embroidery section of ground floor of building 01.	<p><u>Eye safety guard of flatlock machine was found displaced.JPG</u></p>  <p><u>Eye safety guard of bartack machines was found displaced.JPG</u></p>
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the factory management should ensure safety guards with the mentioned machines.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600293255	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	235 - Legally required chemical licence expired / not in place including any reporting to government bodies on list of hazardous chemicals on site	
Subcategory	Chemicals	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	The Petroleum Act, 2016, Section 4 & 6 (a): 4. Import, transport, storage and distribution of petroleum. - No person shall - (a) import, transport, store or distribute any petroleum save in accordance with the rules made under section 31; or (b) import class I petroleum, and transport, store or distribute any petroleum save in accordance with the licence and the conditions specified therein. 6. No licence is needed in certain circumstances. - Notwithstanding anything contained in this Chapter, no licence shall be required in the following circumstances, namely : (a) transport or storage of class II and class III petroleum not exceeding 2000 (two thousand) liters : Provided that such petroleum shall be contained in receptacles of 1000 (one thousand) liters or less in capacity;	
ETI 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.	
Explanation to the non compliance	It was noted during plant tour, documents review and management interview that the facility did not have diesel storing permission from the respective authority for storing 2039 liters diesel in the facility. However, the facility applied for the diesel storing permission to the concerned authority on 09.08.2023.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	

Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input checked="" type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility should collect the diesel storing permission from the concerned authority.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600293256	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	267 - No / inadequate certificates for inspections of machinery, or machines not registered as required by law	
Subcategory	Machinery	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	The Boiler Act, 2022, Section 18 (1) & (2): 18. Obtaining registration and certificate for use of boilers. (1) Any boiler for use within Bangladesh shall be registered at the office of the Chief Boiler Inspector. (2) Any person or user of boiler for obtaining registration under sub-section (1) shall apply to the Chief Boiler Inspector following the procedure prescribed by the rules and subject to payment of the prescribed fee.	
ETI 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.	
Explanation to the non compliance	It was noted during plant tour and management interview that no NOC (No Objection Certificate) was taken for 24 out of 24 electric mini boilers installed on 2nd floor to 7th floor of building 01 and 3rd, 4th, 7th floor of building 02 from the concerned authority.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input checked="" type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the factory shall apply & collect the NOC for the electric mini boilers from the	

	concerned authority.	
--	----------------------	--

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	 <p><u>Electrical mini boiler has installed at main production (floor) building -2.JPG</u></p>  <p><u>Electrical mini boiler has installed at main production (floor) building -1.JPG</u></p>  <p><u>The assembly point was partially occupied by car parking area 2.JPG</u></p>  <p><u>The assembly point was partially occupied by car parking area 1.JPG</u></p>
Reference	ZAF600293257	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	152 - Health and safety risk assessment conducted, but not suitable / sufficient and/or documented	
Subcategory	Health & Safety Management	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	The Bangladesh Labor Rules, 2015, Schedule 4 Rule (2b-1): Functions and responsibilities of the safety committee: (b) Following matters shall be included in the guideline prepared under clause (a), namely: 1. Risk and safety related management of the firm: (a) Identifying risky areas (like parts of building, stairs, premises, electric lines, machinery, etc); (b) Nature of risk (like crack, gate locked during working hours, dangerous electric connection, etc) ; (c) Risk level (like high/medium/general/not satisfactory); (d) Assessment of immediate duties (like prohibition of use, immediate repair, reforms, closure); (e) Assessment of necessary protection system in different nature and levels of risk; and (f) Assessment of technical and administrative liability.	
ETI 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.	
Explanation to the non compliance	Based on facility tour and documents review, it was noted that the facility conducted risk assessment. However, a) The facility did not assess the risk of the fire assembly area because the assembly point was partially occupied by car parking area at the assessment area. b) Specific hazard were not identified for electrical mini boilers had installed at main production building on 2nd floor to 7th floor of building 01 and 3rd, 4th, 7th floor of building 02 respectively.	
Follow up	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	

method		
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility shall conduct risk assessment for the mentioned areas and mitigate the risk accordingly.	

4 - Child Labour Shall Not Be Used
[Summary of Findings]

4: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

The factory establishes a policy that which discourages the employment of child labor and no child labor found in the factory during the audit. Factory has strong recruitment process to verify the workers' age. 86 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. Mr. Subrata Das Gupta- Assistant General Manager (HR, Admin & Compliance) is responsible for compliance with the Code.

Evidence examined:

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

Any other comments:

Nil

Legal age of employment:	14
Age of youngest worker found:	20
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No workers were found under 18 years old.

5 - Living Wages are Paid
[Summary of Findings]

5: Compliance Requirements

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

1. The facility is providing local legal minimum wage BDT 8000/month.
2. Time keeping system is electronic ((swipe 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. Each employee was given a pay slip and signed for their wages.
5. Employees are aware of their minimum wage.
6. Wages have been recorded according to documents checked.
7. Workers get salary through mobile banking for all employees.
8. Mr. Subrata Das Gupta- Assistant General Manager (HR, Admin & Compliance) is responsible for compliance with the Code.

Evidence examined:

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.

Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: null	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 12.0 Per Month: null	Actual Per Day: 2.0 Per Week: 12.0 Per Month: 50.0	NO

Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 8000.0	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 8000.0	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 200.0 Per Week: 200.0 Per Month: 200.0	Actual Per Day: 200.0 Per Week: 200.0 Per Month: 200.0	NO
Wages Analysis:			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	86 attendance records and payroll records for the month of November 2023 (Current month). 86 attendance records and payroll records for the month of June 2023 (Random month). 86 attendance records and payroll records for the month of December 2022 (Random month).		
Are there different legal minimum wage grades? If Yes, please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 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 and amendment was done on 24 January 2019. There are two separate pay structures: for the garment workers (Schedule A), For the Staff (Schedule B). Schedule A is as follows: Monthly basic wage House rent 50% of the basic wage medical allowance Conveyance Allowance Food Subsidy Gross monthly wage: Grade 1 Tk.10938Tk.5469Tk.600Tk.350Tk.900Tk. 18257 Grade 2 Tk. 9044Tk. 4522Tk.600Tk.350Tk.900Tk. 15416 Grade 3 Tk. 5330Tk. 2665Tk.600Tk.350Tk.900Tk. 9845 Grade 4 Tk. 4998Tk. 2499Tk.600Tk.350Tk.900Tk. 9347 Grade 5 Tk. 4683Tk. 2342Tk.600Tk.350Tk.900Tk. 8875 Grade 6 Tk. 4380Tk. 2190Tk.600Tk.350Tk.900Tk. 8420 Grade 7 Tk. 4100 Tk. 2050Tk.600Tk.350Tk.900Tk. 8000		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	Lowest Wages found: BDT 8000 per month.		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 5.0% of workforce earning minimum wage 95.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found:The facility provides attendance bonus BDT 500 per month to the workers as per company policy. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	As per section 125 of the Bangladesh Labor Law, 2006, factory may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc.		


Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Please list all deductions that have been made.	Unauthorized absent.
Please list all deductions that have not been made.	1. Fines; 2. Housing facility; 3. Advance payments; 4. Loan; 5. Income tax; 6. Provident fund; 7. Revenue Stamp.
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All working hours are reflected in the attendance record.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other - please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility management is annually reviewed the wages which is as per local law. Furthermore, the facility increases minimum 5% on basic wages as increment for all grades worker whoever has completed 1 year.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Through factory policy review, payroll records review and employees' interview, it is confirmed that equal rates are being paid for equal work.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input checked="" type="checkbox"/> Other
If other, please explain:	The facility has paid through mobile (Rocket) banking to their workers.

Good Example		Evidence																		
[Back to findings summary]																				
<table border="1"> <thead> <tr> <th colspan="2">Good Example</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600293250</td> </tr> <tr> <td>Clause</td> <td>5 - Living Wages are Paid</td> </tr> <tr> <td>Issue Title</td> <td>429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport</td> </tr> <tr> <td>Subcategory</td> <td>Benefits & Insurance</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Explanation to the good example</td> <td>The facility provides attendance bonus BDT 500 per month to the workers of their full presence of the month as per company policy.</td> </tr> <tr> <td>Evidence</td> <td>Documents review, worker interview and management interview.</td> </tr> </tbody> </table>		Good Example		Status	OPEN	Reference	ZAF600293250	Clause	5 - Living Wages are Paid	Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	Subcategory	Benefits & Insurance	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	The facility provides attendance bonus BDT 500 per month to the workers of their full presence of the month as per company policy.	Evidence	Documents review, worker interview and management interview.	
Good Example																				
Status	OPEN																			
Reference	ZAF600293250																			
Clause	5 - Living Wages are Paid																			
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport																			
Subcategory	Benefits & Insurance																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
Explanation to the good example	The facility provides attendance bonus BDT 500 per month to the workers of their full presence of the month as per company policy.																			
Evidence	Documents review, worker interview and management interview.																			

Good Example		Evidence																		
[Back to findings summary]																				
<table border="1"> <thead> <tr> <th colspan="2">Good Example</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600293251</td> </tr> <tr> <td>Clause</td> <td>5 - Living Wages are Paid</td> </tr> <tr> <td>Issue Title</td> <td>429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport</td> </tr> <tr> <td>Subcategory</td> <td>Benefits & Insurance</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Explanation to the good example</td> <td>The facility provides free medical check-up for the workers and their family members.</td> </tr> <tr> <td>Evidence</td> <td>Documents review, worker interview and management interview.</td> </tr> </tbody> </table>		Good Example		Status	OPEN	Reference	ZAF600293251	Clause	5 - Living Wages are Paid	Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	Subcategory	Benefits & Insurance	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	The facility provides free medical check-up for the workers and their family members.	Evidence	Documents review, worker interview and management interview.	
Good Example																				
Status	OPEN																			
Reference	ZAF600293251																			
Clause	5 - Living Wages are Paid																			
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport																			
Subcategory	Benefits & Insurance																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
Explanation to the good example	The facility provides free medical check-up for the workers and their family members.																			
Evidence	Documents review, worker interview and management interview.																			

Good Example		Evidence																		
<p>[Back to findings summary]</p> <table border="1"> <thead> <tr> <th colspan="2">Good Example</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600293252</td> </tr> <tr> <td>Clause</td> <td>5 - Living Wages are Paid</td> </tr> <tr> <td>Issue Title</td> <td>429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport</td> </tr> <tr> <td>Subcategory</td> <td>Benefits & Insurance</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Explanation to the good example</td> <td>The facility has a scholarship program for the workers and their children for the brilliant result in the board exam.</td> </tr> <tr> <td>Evidence</td> <td>Documents review, worker interview and management interview.</td> </tr> </tbody> </table>		Good Example		Status	OPEN	Reference	ZAF600293252	Clause	5 - Living Wages are Paid	Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	Subcategory	Benefits & Insurance	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	The facility has a scholarship program for the workers and their children for the brilliant result in the board exam.	Evidence	Documents review, worker interview and management interview.	
Good Example																				
Status	OPEN																			
Reference	ZAF600293252																			
Clause	5 - Living Wages are Paid																			
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport																			
Subcategory	Benefits & Insurance																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
Explanation to the good example	The facility has a scholarship program for the workers and their children for the brilliant result in the board exam.																			
Evidence	Documents review, worker interview and management interview.																			

Good Example		Evidence
[Back to findings summary]		
Good Example		
Status	OPEN	
Reference	ZAF600293253	
Clause	5 - Living Wages are Paid	
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	
Subcategory	Benefits & Insurance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	The facility has established fair price shop in the facility premises for the employees.	
Evidence	Facility tour, documents review, worker interview and management interview.	

Good Example		Evidence
[Back to findings summary]		
Good Example		
Status	OPEN	
Reference	ZAF600293254	
Clause	5 - Living Wages are Paid	
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	
Subcategory	Benefits & Insurance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	The facility has established a vending machine to provide sanitary napkins to the female workers at a subsidize price.	
Evidence	Facility tour, documents review, worker interview and management interview.	 Sanitary napkin vending machine.jpg

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

6: Compliance Requirements

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:
- 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined

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

Current Systems:

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.

- Standard working hours found 48 hours in the facility.
- 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).
- Casual leave, sick leave, festival leave was provided as per local Law.
- Facility ensured one day off for every 7 days period. Facility weekly holiday is Friday. However, the facility was open on 01 weekly holiday (Friday) dated on 23th June 2023 which was compensated with the festival EID holidays as per local law.
- Mr. Subrata Das Gupta- Assistant General Manager (HR, Admin & Compliance) is responsible for compliance with the Code.

Evidence examined:

- Employee interview
- Payroll records
- Job card records
- Production records
- Working hour and overtime hour policies & procedures etc.
- Management interview.

Any other comments:

Nil.

Working hours' analysis

Systems & Processes

What timekeeping systems are used? Electronic time keeping system (swipe card).

Is sample size same as in wages section? Yes No

Please give details:

Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input type="checkbox"/> 1 in 7 days <input checked="" type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	11
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 50 hours (monthly) found in the month of November 2023 (Current month) 44 hours (monthly) found in the month of June 2023 (Random month) 50 hours (monthly) found in the month of December 2022 (Random month)
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Combined hours were not found over 60 hours.
Approximate percentage of total workers on highest overtime hours:	22.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: Appointment letter, handbook, worker interviews show that the overtime is voluntary.
Overtime premium	

Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium Please give details: 100% workers who work overtime are paid overtime monthly at premium rate i.e., 200% of basic per hour as per law.
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 100% workers who work overtime are paid overtime monthly at premium rate i.e., 200% of basic per hour as per law.
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input checked="" type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other
Please give details	NA, Facility does not provide less than 125% OT premium.
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	<input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	Not Applicable, more than 60 total hours per week was not worked in the facility.
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

7 - No Discrimination is Practiced
[Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

1. There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
2. Gender discrimination is also absent in the facility; both female and male employees were distributed in all types of work.
3. The facility provides the same wage amount to male/female employees of the same rank.
4. No complaint or records found for pregnancy test.
5. There is no restriction for formation of trade union in the facility.
6. Mr. Subrata Das Gupta- Assistant General Manager (HR, Admin & Compliance) is responsible for compliance with the Code.

Evidence examined:

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. Complaint register

Any other comments:

Nil

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 94.0%	Female: 6.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	None	
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement
		<input type="checkbox"/> Access to training <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	Not applicable as no such discrimination was noted.	
Professional Development		

<p>What type of training and development are available for workers?</p>	<p>1. Workers receive regular and recorded health & safety training. Last health & safety training was provided on 17.12.2023 with 23 participants. 2. Firefighting trainings are provided as per law. Last firefighting training was provided on 26.11.2023 with 27 participants. 3. First aid training & PPE training are provided regularly. Last first aid training and PPE training were provided on 14.12.2023 & 12.12.2023 with 38 participants & 30 participants respectively.</p>
<p>Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

8 - Regular Employment Is Provided
[Summary of Findings]

8: Compliance Requirements

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current Systems:

1. Facility provides ID card for all workers in the time of recruitment.
2. Factory maintains service books for all workers.
3. There is no home working from the site.
4. All workers are getting appointment letter in local language.
5. Mr. Subrata Das Gupta- Assistant General Manager (HR, Admin & Compliance) is responsible for compliance with the Code.

Evidence examined:

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.

Responsible Recruitment

All Workers

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

- | | |
|--|---|
| <input checked="" type="checkbox"/> Terms & Conditions presented | <input checked="" type="checkbox"/> Understood by workers |
| <input checked="" type="checkbox"/> Same as actual conditions | |

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

- Yes No

Migrant Workers	
Type of work undertaken by migrant workers:	NA; No migrant workers employed by the factory.
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: NA; No migrant workers employed by the factory.
Is there any observation on this finding?	NA; No migrant workers employed by the factory.
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	NA; No agency workers employed by the factory.
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: NA; No agency workers employed by the factory.
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: NA; No agency workers employed by the factory.
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)	
Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No contract workers employed by the factory.
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No contract workers employed by the factory.

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

8A: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

Facility uses washing & printing process as sub-contracting process with other facilities. Mr. Subrata Das Gupta- Assistant General Manager (HR, Admin & Compliance) is responsible for compliance with the Code.

Evidence examined:

1. Document review
2. Management interview
3. Employee interview
4. Policy and procedures review
5. Plant tour

Any other comments:

Nil.

Summary of sub-contracting – if applicable

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

Process subcontracted

Process Subcontracted	Washing
Name of factory	Metro Knitting & Dyeing Mills Ltd.
Address	Ramabag, Fatullah, Narayangonj, Bangladesh.

Process subcontracted

Process Subcontracted	Printing
Name of factory	Mercer Design Tex Ltd.
Address	Bangobandhu Road, Tongabari, Ashulia, Dhaka, Bangladesh.

Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Auditors verified production record, timecard and workers interview to calculate the capacity with workers' workload.
--	--

If sub-contractors are used, is there evidence this has been agreed with the main client? (If yes, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Facility uses the sub-contracted facility if the client agrees.
--	--

Number of sub-contractors/agents used: 2

Is there a site policy on sub-contracting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Facility has a detail sub-contracting policy.
--	--

What checks are in place to ensure no child labour is being used and work is safe?	Facility has conducted internal audit and risk assessment as well as they have child labour, recruitment policy to ensure no child labour is being used in site and work is safe.
Summary of homeworking – if applicable	
Is homeworking used at this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<p>Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>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 Please give details:</p>

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

10A: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

It was noted through documents review & workers interview that there are no contractual workers, agents or agency workers and migrant workers in the factory. Mr. Subrata Das Gupta- Assistant General Manager (HR, Admin & Compliance) is responsible for compliance with the Code.

Evidence examined:

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

Any other comments:

Nil.

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

10B4: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

1. Facility has an environmental policy which covers all the process and complies the legal requirement.
2. Factory surrounding environment found acceptable.
3. Mr. Pritom Saha, Assistant Officer (ECR) is responsible for environment.
4. Facility provided environmental awareness training to employees and workers. Last training was held on 10.12.2023 with 22 participants.
5. Facility has conducted Environmental Impact Assessment (EIA) from third party in June 2018.
6. Facility assessed noise level, air emission, temperature and humidity on 1st June 2023 from a third party and test result were within acceptable limit.

Evidence examined:

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

Any other comments:

Nil.

Environmental Analysis

Is there a manager responsible for Environmental issues (Name and Position):

Mr. Pritom Saha, Assistant Officer (ECR).

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The Site has conducted risk assessment on the environmental impact of the site on 03.01.2023.
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The facility have no recognized environmental system certification.
Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The environmental policy addresses the key impacts from their operations and their commitment to improvement.
Does the site have a Biodiversity policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The facility did not have other any sustainability systems in present.
Have all legally required permits been shown?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility have all legally required permits like environment clearance certificate and water extraction permission.
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details: No hazardous chemicals are used in the manufacturing process as there is cutting, embroidery, sewing and finishing process only.
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility have a system for managing client's requirements and legislation.
Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility have reduction targets in place for environmental aspects i.e. water consumption, waste, energy and greenhouse gas emissions.

Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has a process to recycle for domestic waste water and after treatment, the water is reusing and monitoring it accordingly except solid wastes.
Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources.
Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility checked that any subcontracting agencies or business partners operating on the premises have the appropriate permits and licenses and are conducting business in line with the environmental expectations

Usage/Discharge analysis

Criteria	Previous year: 2022	Current year: 2023
Electricity Usage: Kw/hrs	3547500	2860000
Renewable Energy Usage: Kw/hrs	97416	288737
Gas Energy Usage: Kw/hrs	8817665	6431477
Has site completed any carbon Footprint Analysis?	Yes	Yes
If Yes, please state result	3303 Ton	3691 Ton
Water Sources	Ground water	Ground water
Water Volume Used	134132	111774
Water Discharged	Municipal drainage	Municipal drainage
Water Volume Discharged	120718	98900
Water Volume Recycled	0	1885
Total waste produced	1974045 Kg	1912897 Kg
Total hazardous waste produced	2536 Kg	2617 Kg
Waste to recycling	0	0
Waste to landfill	0	0
Waste to other	1025840 Kg	1218321 Kg
Total Product Produced	24378578 Pieces	18780074 Pieces

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

10C: Compliance Requirements

- 10.C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
- 10.C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.
- 10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.
- 10.C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.
- 10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,
- 10.C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics
- 10.C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.
- 10C: Guidance for Observations
- 10.C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.
- 10.C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

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

Current Systems and Evidence Examined

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

Current Systems:

1. The factory management has business policy, anti-corruption and anti-bribery policy.
2. Facility has access to a transparent system in place for confidentially reporting and dealing with unethical Business Ethics without fear of reprisals towards the reporter.
3. Facility has a business ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice.
4. Mr. Subrata Das Gupta- Assistant General Manager (HR, Admin & Compliance) is responsible for management of business ethics.

Evidence examined:

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

Any other comments:

Nil.

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

- Internal Policy
- Policy for third parties including suppliers

Please give details:

Facility has an internal business ethics policy and for third parties including suppliers.

<p>Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has provided training to the relevant personnel on business ethics policy and procedures to prevent or avoid bribery, corruption and other unethical business practices. Last training was provided on 16.08.2023 with 28 participants.</p>
<p>Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The policy is updated when needed.</p>
<p>Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility requires business ethics training from the third parties to complete their own business ethics training.</p>

Attachments



Metro Knitting & Dyeing Mills Ltd. (Factory-2)-
9010689-SMETA-4 Pillar-Periodic-Signed CAPR.pdf



Metro Knitting & Dyeing Mills Ltd. (Factory 2)-
9010689-SMETA-4 Pillar-Periodic-Photo Report.pdf



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

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

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

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

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

[Click here for Supplier \(B\) members:](#)

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d

[Click here for Auditors:](#)

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