




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 4872688	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 131479772
Business name (Company name):	D2D International		
Site name:	D2D International		
Site address: <i>(Please include full address)</i>	D.No.6/139-A, MSS Industrial Estate, Kuppuchipalayam, Allalapuram Road, Veerapandi (Post), Tirupur 641605 Tamil Nadu	Country:	India
Site contact and job title:	Mr. S. Sasikumar, Proprietor		
Site phone:	+91 77084 30555	Site e-mail:	hr@d2dinternational.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:	16 th & 17 th November 2022		

Audit Company Name & Logo: 	Report Owner (payer): D2D INTERNATIONAL
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact grievance@sedex.com.

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

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

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

Lead auditor: Kishore Sharfudeen APSCA number: RA 21704882

Lead auditor APSCA status: RA 21704882 (Part II)

Team auditor: NA APSCA number: NA

Interviewers: Kishore Sharfudeen APSCA number: RA 21704882

Report writer: Kishore Sharfudeen

Report reviewer: Alison Dsouza

Date of declaration: 17th November 2022

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

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

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> <i>Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>	
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE		
0A	Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		0	0	None Observed
0B	Management systems and code implementation		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1	1	0	<p>Summary of Non-Compliances:</p> <p>1. The facility had not displayed abstract of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, for the knowledge of employees.</p> <p>Summary of Observations:</p> <p>1. The awareness of employees on the requirements of the ETI base code was found to be inadequate</p>
1.	Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None Observed
2	Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None Observed
3	Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	6	1	0	<p>Summary of Non-Compliances:</p> <p>1. List of contents in the First Aid Boxes does not confirm to statutory requirements</p> <p>2. The facility had not assigned responsibility at different levels to carry out the declared Health & Safety Policy</p>

									<p>3. The existing machinery lay out does not confirm to the approved building plan of the facility</p> <p>4. The facility had not maintained soaps or other suitable means of cleaning in the hand wash facilities provided for employees</p> <p>5. The blade of the straight knife cutting machine had been kept exposed while not in operation</p> <p>6. Appropriate secondary containment had not been provided for the diesel in the electricity generator area.</p> <p>Summary of Observations:</p> <p>1. Medical Eye Drops had been maintained in First Aid Boxes</p>
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None Observed
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	0	0	1	<p>Summary of Good Examples:</p> <p>1. The facility provides free transportation for the employees who hail from nearby places.</p>
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None Observed
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None Observed
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None Observed
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None Observed
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None Observed

10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None Observed
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0	0	1	Summary of Good Example: The facility had installed Solar Power System with a capacity of 82.8 kVA which is said to be fulfilling 20% of facility's power requirements.
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	Not applicable as it is 2-pillar audit
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	Not applicable as it is 2-pillar audit

General observations and summary of the site:

This semi-announced full initial audit was conducted on 16th & 17th November 2022 and assessed the factory operation against ETI base code and Local law requirements on a sampling basis by 01 auditor in 02 days. The scope of this audit was based on 2-Pillar SMETA systems.

The facility was found to be established in 2009 and has been operating from current location, since then. The facility is a Proprietary concern and the operations of the facility are being managed by Mr. S. Sasikumar, Proprietor. The factory specializes in Manufacture of Knitted Garments. The main production processes include: Fabric Knitting, Fabric Cutting, Fusing, Sewing, Checking, Ironing, Packing and dispatch.

The manufacturing activities of the facility are being carried out 02 single storey Galvalume roofed buildings and 01 two storey (Ground + 1 Floors) RCC building. Utility activities are being carried out in 04 single storey Galvalume roofed buildings and 02 two storey (Ground + 1 Floors) RCC buildings. The total land area occupied by the facility is about 30,270 m² and the built-up area is about 8651 m².

The building details are:-

Building 01 (Production)-

Ground Floor – Fabric Storage, Fabric Checking, Fabric Cutting, Cut panel Storage, Accessories Stores

Mezzanine Floor – Pattern storage, CAD Room, Textile testing lab

Roof top – Solar panels

Periphery – Electricity generators, Cutting waste storage room, Security rest rooms, Security cabin

Building 02 (Production)-

Ground floor - Yarn storage, Fabric Knitting, Fabric checking, Finished fabric storage

Periphery –Air compressor

Building 03 (Production)-

Ground Floor – Sewing lines, Checking, Ironing, Packing, Metal detection, RFID Scanning, Finished goods storage, Mini Accessories stores, Sanitary facilities for men & women

1st Floor – Production floor (not in operation), Sanitary facilities for men & women

Periphery –Air compressors, IBR Steam Boiler

Building 04 (Utility)- Security cabin

Building 05 (Utility)- HR Cabin, Creche, Rest rooms for men, women and parents, Hydrant water pump room

Building 06 (Utility)- Canteen, Dining hall

Building 07 (Utility)- Women's Hostel

Ground floor – Rooms, sanitary facilities

1st Floor - Rooms, sanitary facilities

Building 08 (Utility)- Administrative Office

Ground floor – Administrative office, Pantry, Sanitary facilities

1st Floor – Vacant

Building 09 (Utility)- Sampling, CAD Room, Surplus good storage, Dining halls

Building 10 (Utility)- Waste storage, Maintenance room, Electricity generator

The total monthly production capacity of the facility is said to be 13,00,000 basic pieces per month. However, it was noted that the facility was not running to its full capacity due to shortage in orders.

The factory has a total strength of 260 (Male: 103 & Female: 157) employees out of which 188 (Male: 62 & Female: 126) are production employees and 72 (Male: 41 & Female 31) are non-production employees.

All workers were observed to be Indian citizen and come from neighbouring residential localities.

The workers have not formed or are associated with any union. However, the employees have formed various workers committees. There was no collective bargaining agreement.

The facility works in general shift and the normal working hours were from 08.30 A.M to 05.30 P.M;

Food Break: 12.45 P.M to 01.15 P.M;

Tea breaks: 10:30 AM to 10.45 AM & 3.15 PM to 3.30 PM

The security personnel work in rotational shifts and their shift timings are 08.00 AM To 04.00 PM; 04.00 PM to 12.00 AM & 12.00 AM to 08.00 AM.

The facility works six days in a week from Monday to Saturday and Sunday is observed as weekly rest day. Maximum total working hours in a week observed was 48 regular and continuous worked days noted through samples was 6 days with break. The facility is using Biometric Time Recording System for recording the in & out timings of employees. The wages are disbursed on monthly basis and normal practice is to disburse by 7th of following month. The mode of payment is by cash.

Mr. G. Ganapathi, HR Manager had been entrusted with the responsibility for implementation of standard requirements.

Additional Auditor Remark:

None

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

Site Details

Site Details																				
A: Company Name:	D2D International																			
B: Site name:	D2D International																			
C: GPS location: (If available)	GPS Address: D2D International HO 6, 139A, MSS Industrial Estate, Kuppuchipalayam, Allalapuram Rd, Veerapandi, Tiruppur, Tamil Nadu 641605	Latitude: 11.041908 Longitude: 77.348850																		
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<ol style="list-style-type: none"> 1. Business Licence: TPR 18254 valid till 31/12/2022 2. Fire License No. 502/2022 dated 25/02/2022 valid for one year. 3. Approved Building Plan dated 13/05/2019 4. Building Stability certificate dated 31/05/2022 (validity 3 years) 5. Goods and Services Tax No. 33BPZPS9229A1ZE 																			
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacture of Knitted Garments																			
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>The facility was found to be established in 2009 and has been operating from current location, since then.</p> <p>The manufacturing activities of the facility are being carried out 02 single storey Galvalume roofed buildings and 01 two storey (Ground + 1 Floors) RCC building. Utility activities are being carried out in 04 single storey Galvalume roofed buildings and 02 two storey (Ground + 1 Floors) RCC buildings. The total land area occupied by the facility is about 30,270 m² and the built-up area is about 8651 m².</p> <p>The building details are:-</p> <table border="1"> <thead> <tr> <th>Building #01</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground Floor</td> <td>Fabric Storage, Fabric Checking, Fabric Cutting, Cut panel Storage, Accessories Stores</td> <td>Production Floor</td> </tr> <tr> <td>Mezzanine Floor</td> <td>Pattern storage, CAD Room, Textile testing lab</td> <td>Production Floor</td> </tr> <tr> <td>Periphery</td> <td>Electricity generators, Cutting waste storage room, Security rest rooms, Security cabin</td> <td>Utility area</td> </tr> <tr> <td>Roof top</td> <td>Solar panels</td> <td>Utility</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>Nil</td> </tr> </tbody> </table>		Building #01	Description	Remark, if any	Ground Floor	Fabric Storage, Fabric Checking, Fabric Cutting, Cut panel Storage, Accessories Stores	Production Floor	Mezzanine Floor	Pattern storage, CAD Room, Textile testing lab	Production Floor	Periphery	Electricity generators, Cutting waste storage room, Security rest rooms, Security cabin	Utility area	Roof top	Solar panels	Utility	Is this a shared building?	No	Nil
Building #01	Description	Remark, if any																		
Ground Floor	Fabric Storage, Fabric Checking, Fabric Cutting, Cut panel Storage, Accessories Stores	Production Floor																		
Mezzanine Floor	Pattern storage, CAD Room, Textile testing lab	Production Floor																		
Periphery	Electricity generators, Cutting waste storage room, Security rest rooms, Security cabin	Utility area																		
Roof top	Solar panels	Utility																		
Is this a shared building?	No	Nil																		

Building #02	Description	Remark, if any
Ground Floor	Yarn storage, Fabric Knitting, Fabric checking, Finished fabric storage	Production Floor
Periphery	Air compressor	Utility area
Is this a shared building?	No	Nil
Building #03	Description	Remark, if any
Ground Floor	Sewing lines, Checking, Ironing, Packing, Metal detection, RFID Scanning, Finished goods storage, Mini Accessories stores, Sanitary facilities for men & women	Production Floor
1 st Floor	Production floor (not in operation), Sanitary facilities for men & women	Production Floor
Periphery	Air compressors, IBR Steam Boiler	
Is this a shared building?	No	Nil
Building #04	Description	Remark, if any
Ground Floor	Security cabin	Utility building
Is this a shared building?	No	Nil
Building #05	Description	Remark, if any
Ground Floor	HR Cabin, Creche, Rest rooms for men, women and parents, Hydrant water pump room	Utility building
Is this a shared building?	No	Nil
Building #06	Description	Remark, if any
Ground Floor	Canteen, Dining hall	Utility building
Is this a shared building?	No	Nil
Building #07	Description	Remark, if any
Ground Floor	Rooms, sanitary facilities	Women's Hostel
1 st Floor	Rooms, sanitary facilities	
Is this a shared building?	No	Nil

	Building #08	Description	Remark, if any
	Ground Floor	Administrative office, Pantry, Sanitary facilities	Administrative office
	1 st Floor	Vacant	
	Is this a shared building?	No	Nil
	Building #09	Description	Remark, if any
	Ground Floor	Sampling, CAD Room, Surplus good storage, Dining halls	Utility building
	Is this a shared building?	No	Nil
	Building #10	Description	Remark, if any
	Ground Floor	Waste storage, Maintenance room, Electricity generator	Utility building
	Is this a shared building?	No	Nil
	Weekly Holiday: Sunday		
	Employees' wages are calculated and paid on monthly basis and is being paid on or before the 7 th day after each pay period.		
	For below, please add any extra rows if appropriate.		
	F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
	F2: Please give details: No cracks observed		
	F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
	F4: Please give details: The stability of the buildings had been certified by structural engineer on 31/05/2022 and is valid for 3 years. A non-conformance had been raised in this regard.		
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider		

	<input type="checkbox"/> Sub-Contractor
H: Month(s) of peak season: (if applicable)	No specific peak season
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<p>Products/Activity:- Manufacture of Knitted Garments.</p> <p>Processes:- Main processes involved are:- Fabric Knitting, Fabric Cutting, Fusing, Sewing, Checking, Ironing, Packing and dispatch</p> <p>Production capacity: - Production capacity is said to be 13,00,000 basic pieces per month. However, the facility was found to be not working to its full capacity. The main equipment used by the factory are Sewing Machines, Straight Knife Cutting Machine, Band Knife Cutting machine, Spreader/ Cutting machines, Metal Detector Machines, Rib cutting machine etc., The facility has also installed Diesel powered Electricity Generators, Steam Boiler, Air Compressor and Ironing Tables.</p>
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: If yes, approx. 25% of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: If no, please give details-

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 09.20 AM A2: Day 1 Time out: 18.30 PM	A3: Day 2 Time in: 09.15 AM A4: Day 2 Time out: 18.30 PM	A5: Day 3 Time in: A6: Day 3 Time out:
B: Number of auditor days used:	01 auditor in 2.0 days		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 02 weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. G. Ganapathi, HR Manager		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	21 st & 22 nd October 2021		
J: Previous audit type:	Semi-announced/Full Initial/ 2-Pillar (Arche Advisors)		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	Not applicable		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	There is no Trade Union or Trade Union Representation in the Facility		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	43	0	0	19	0	0	0	62
Worker numbers – female	74	0	0	52	0	0	0	126
Total	117	0	0	71	0	0	0	188
Number of Workers interviewed – male	06	0	0	03	0	0	0	09
Number of Workers interviewed – female	10	0	0	07	0	0	0	17
Total – interviewed sample size	16	0	0	10	0	0	0	26

A: Nationality of Management	Indian	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: <u>100%</u> Indian</p> <p>B2: Nationality 2: <u>0%</u></p> <p>B3: Nationality 3: <u>0%</u></p>	<p>Was the list completed during peak season?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: The facility does not go through any peak or low season.</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 <u>100%</u> Indian</p> <p>C1: approx % total workforce: Nationality 2 <u>0%</u></p> <p>C2: approx % total workforce: Nationality 3 <u>0%</u></p>	
D: Worker remuneration (management information)	<p>D: <u>0%</u> workers on piece rate</p> <p>D1: <u>0%</u> hourly paid workers</p> <p>D2: <u>100%</u> salaried workers</p> <p>Payment cycle:</p> <p>D3: <u>0%</u> daily paid</p> <p>D4: <u>0%</u> weekly paid</p> <p>D5: <u>100%</u> monthly paid</p> <p>D6: <u>0%</u> other</p> <p>D7: If other, please give details</p>	

Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	04 groups of 05 employees (Male-05 & Female-15)
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 04 D2: Female: 02
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, please give details:
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	No complaint raised by any sample workers against facility because they are happy with their working environment.
I: What did the workers like the most about working at this site?	Workers like the direct involvement of Mr. G. Ganapathi, HR Manager in the day-to-day affairs of the factory and about the timely payment of salary and the general behaviour of all supervisors. No complaints against management were observed during worker interview. It was also confirmed that overtime had been declared as voluntary, no discrimination or inhumane treatment done or supported by the management.
J: Any additional comment(s) regarding interviews:	None
K: Attitude of workers to hours worked:	Satisfactory

L. Is there any worker survey information available?

Yes

No

L1: If yes, please give details:

M: Attitude of workers:

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

The factory allowed the auditor to conduct confidential worker interviews. The workers were chosen freely without any influence by the factory management; 26 workers (04 groups of 05 workers + 06 individuals) were randomly selected by auditor from different sections for interview. The workers showed a cooperative attitude during the interview process. Based on worker's interview, they expressed their positive attitude to the management and payment system. All workers were satisfied with working conditions and benefits. **Note:** Due to Covid-19 pandemic situation the interviews were conducted maintaining social distance and wearing masks. All the workers in the factory were aware of Covid-19 related safety norms. The management was found to be closely monitoring the safety norms.

The effective evidences were collected by worker's interview; the following information was summarized:

1. All interviewees confirmed that the factory had checked their ID cards or birth certificate to verify their ages. They never seen or heard any child labour less than 18 years old employed in this factory.
2. Workers said that they were not required to lodge "deposits" or their identity cards at the recruitment and were free to leave or resign after reasonable notice.
3. All workers stated that factory provided induction training for new workers and regular safety training for all workers. Workers said they had participated in fire drills at the production area every month, and most of them knew how to use the fire equipment.
4. All interviewees reflected that worker could complain to management or worker committee representative's directly or by writing letters through suggestion box and all interviewed workers were aware of workers' representative.
5. All interviewed workers said that they were paid by monthly wage system. Wages were paid once a month within first 7 working days of the following pay period. All the employees' wages were paid by cash. No delay of wage was identified through worker interview and management interview.
6. All employees work for 06 days in a week. The working hours in the factory were in general shift. The facility works in general shift and the normal working hours were from 08.30 A.M to 05.30 P.M.
7. 30 minutes of lunch break and 02 tea breaks with 15 mins duration each, are also provided.
8. The interviewed workers said that they could obtain the job based on their working experiences and abilities. The female workers or male workers' wages were calculated at the same for the same work based on their performance.

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

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

During Interview, the worker committee representatives expressed that the facility management was cordial to them and that they could freely express their opinions, grievances and suggestions without any fear or concern. No negative information was observed during the audit.

O: Attitude of managers:

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

The management was found to be reasonably aware of the requirements of social audit, management was very co-operative and transparent during the course of the audit. They were receptive towards findings. The management approach was found to be positive.

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The facility has a policy covering human rights impacts and issues, and it is communicated to all appropriate parties.
- The responsible person for implementation and monitoring is Mr. G. Ganapathi, HR Manager.
- The facility measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- The facility had a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the report.

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

Details:

1. Policy and Procedure related to human rights.
2. Appointment letters and communication to employees on implementation of ETI requirements.
3. Internal Audit report
4. Management interview and employee interview

Any other comments: None

A: Policy statement that expresses commitment to respect human rights?

Yes
 No

	A1: Please give details: The facility had established a policy which expresses its commitment to respect human rights.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Mr. G. Ganapathi Job title: HR Manager
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Suggestion/ Complaint boxes had been provided at conspicuous places in the facility through which workers express their suggestion / complaints if any.
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The privacy of the workers' information was found to be maintained throughout the business module of the facility.

Findings	
Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/> Description of observation: None observed ETI/Additional elements requirement: Not Applicable Comments: Not Applicable	Objective evidence observed: Not Applicable

Good examples observed:	
Description of Good Example (GE): None Observed	Objective Evidence Observed: Not Applicable

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2021 10.94 %	A2: This year: 2022 13.81 %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	11.21 %	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2021 32.83 %	C2: This year: 2022 25.44 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	28.41 %	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Statutory Register of Accidents and Dangerous Occurrences was found to be maintained. No major accidents ad happened during the last 12 months.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2021 Number: 00	F2: This year: 2022 Number: 00
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0.00	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: Nil (2021)	H2: This year: Nil (2022)
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0 % workers	I2: 12 months 0 % workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ____0____% workers	J2: 12 months ____0____% workers
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0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

- Mr. G. Ganapathi, HR Manager of the facility had been entrusted with the overall responsibility of meeting the legal and client code requirements.
- The facility management is conducting internal social compliance audit regularly and take necessary corrective action based on report.
- The facility conducts orientation training for all new employees.
- The facility provides training to the employees on ETI base code.
- Implementation of any necessary changes is then given to the individual department heads after agreement with the facility management.

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

Details:

- All policies of facility.
- Legal licenses, permissions and approvals (Factory)
- Internal audit records.
- Management employee training, training attendance record
- Meeting records.

Any other comments: None

Management Systems:

A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?

Yes

No

A1: Please give details: In the last 12 months, the site has not been subjected to any fines or prosecutions for non-compliance to any regulations.

B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?

Yes

No

B1: Please give details: It was noted through documentation review, facility has policies and

	procedures for reduce the risk of forced labour, child labour, discrimination, harassment & abuse.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	The written policies against forced labour, child labour, discrimination, harassment, abuse and policies on working hours, wages, health & safety etc., had been communicated to the employees through notice board.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: One batch of employees have received training on ETI Base Code on 26/10/2022.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The last training had been provided on 26/10/2022 for a batch of employees and records are being maintained.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: The site had no internationally recognised system certifications.
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Mr. G. Ganapathi, HR Manager is in charge of HRD activities.
H: Is there a senior person /manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Responsibility for meeting the legal and client code requirements had been undertaken by Mr. G. Ganapathi, HR Manager.
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The factory had adopted a policy which requires all worker information has to be maintained confidential.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The facility has an effective control procedure to keep the information confidential.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	<p>K1: Please give details: Facility conducted risk assessment to evaluate effectiveness of every policy and procedure department wise.</p>
<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>L1: Please give details: The facility has an internal system to raise the issue found the risk assessment and to implement the way of reduction it.</p>
<p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>M1: Please give details: The facility established a policy/code which requires labour standards of its own suppliers.</p>
<p>Land rights</p>	
<p>N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>N1: Please give details: The facility operates in its own building. Statutory approvals had been obtained for construction of the facility buildings.</p>
<p>O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>O1: Please give details: The facility operates in its own building. Person in charge of performing due diligence is Mr. G. Ganapathi, HR Manager of this facility.</p>
<p>P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>P1: If yes, how does the company obtain FPIC: Not Applicable</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Q1: Please give details: The facility operates in its own building. The facility had compensated the owner of the land prior to the factory being built, under a registered sale deed.</p>
<p>R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>R1: Please give details: The location of the factory had not been subjected to land acquisition. Review of records show that statutory property taxes had been paid for the facility premises by the landlord.</p>

<p>S: 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>S1: Please give details: No evidence of illegal appropriation of land was noted.</p>
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Non-compliance:	
<p>1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code:</p> <p>It was noted that the facility had not displayed abstract of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, for the knowledge of employees.</p> <p>Local law requirement In accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013-Sec 19 (b)- Duties of employer- Every employer shall display at any conspicuous place in the workplace, the penal consequences of sexual harassments;</p> <p>ETI requirement In accordance with ETI requirement 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>Recommended corrective action: It was recommended that the facility shall display abstract of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in local language, for the knowledge of employees.</p> <p>Action by: Mr. G. Ganapathi, HR Manager Timescale:30 Days</p>	<p>Objective evidence observed: 1. Facility tour/ Interview of Management representative & workers</p>

Observation:	
<p>1. Description of observation: The awareness of employees on the requirements of the ETI base code was found to be inadequate.</p> <p>ETI requirement: In accordance with ETI requirement 0.B.4 Suppliers are expected to communicate this Code to all employees.</p> <p>Comments: The management stated that the training provided to employees on ETI Base Code requirements had not been effective. The management agreed to provide effective and periodical training to all employees to create awareness on the standard requirements.</p>	<p>Objective evidence observed: 1. Review of records/ Interview of Management Representative & Workers</p>

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

1: Freely Chosen Employment

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

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

- The factory has a policy which prohibits forced labour and this was also available for review.
- Age verification documents (National ID card copy & School Leaving Certificate) were available in employee personal files.
- Overtime had been declared voluntary.
- The terms and conditions of employment state that the workers are free to leave the workplace outside of their working hours. Facility also has a written policy regarding this.
- The facility did not require any payment for work tools, PPE, ID card, training, etc.
- The facility does not use any prison labour.
- The above was confirmed in management and employees' interviews.

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

Details:

1. Personnel files
2. Factory policy, rules and regulations, and training records etc.
3. Resignation records
4. Factory rules
5. Management and worker interview

Any other comments: None

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

D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: Facility has a policy declaring that workers are free to terminate employment from the facility.
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding: Not applicable as the yearly turnover of the factory was less than £36m.
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: No evidence of any restrictions on workers freedoms to leave the site at the end of the workday
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: The facility established a policy against forced / trafficked / bonded labour and had displayed the same in local language.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: The facility management was found to be substantially aware of the requirement and Mr. G. Ganapathi, HR Manager had undertaken the responsibility related to prevention of forced labour.

Non-compliance:	
<p>Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code: None observed</p> <p>ETI/Local law requirement Not Applicable</p> <p>Recommended corrective action: Not Applicable</p>	<p>Objective evidence observed: Not Applicable</p>

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

Comments: Not Applicable	
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Good Examples observed:	
Description of Good Example (GE): None Observed	Objective evidence observed: Not Applicable

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

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- All the employees are allowed to form or join the trade union of their choice.
- There is no trade union in the facility but worker committees had been formed by the workers through an election dated 04/01/2022.
- There are 04 committees formed by the employees. The committees formed are:-
 - Workers Committee
 - Health & Safety Committee
 - Grievance Handling Committee
 - Internal Complaints Committee
 - Canteen Committee
- Regular Worker Committee meetings had been held. The recent Workers Committee meeting was found to be held on 22/10/2022.
- Meetings are held once in 02 months and meeting minutes are recorded in a register.
- Worker Committee members are not treated less favourably than other workers.
- Worker Committee members are allowed to carry out their duties within working hours without affecting their pay.

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

Details:

1. Freedom of association policy review
2. Facility management interviews
3. Worker interview
4. Suggestion/ Complaint box register
5. Worker Committee Election Records / Worker Committee meeting minutes
6. Grievance handling policy & procedure.

Any other comments: None

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

- Union (name)
- Worker Committee

	<input type="checkbox"/> Other (specify) <input type="checkbox"/> None	
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: The factory management has provided suggestion/complain box in the toilet area through which workers can raise their suggestion / complaints. Workers can also approach the management directly for any grievances which confirmed the interviewed workers. D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The Worker Committee members able to perform their responsibility without any management intervention though the factory had formed various worker committees by election process.	
F: Name of union and union representative, if applicable:	Not Applicable	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Employees had formed Worker committees	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Based on employee's interview, it was noted that workers were aware about works committee representative.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 04/01/2022
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: 03 representatives from the Worker committees were interviewed during the audit.	
L: Please describe any evidence that union/worker's committee is effective?	Facility has conducted last works committee meeting on 22/10/2022. Topics discussed during the committee meeting were	

Specify date of last meeting; topics covered; how minutes were communicated etc.	regarding responsibilities of worker representatives and other general discussions.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes , what percentage by trade Union/worker representation	M1: __NA__% workers covered by Union CBA	M2: __NA__% workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable	

Non-compliance:	
<p>Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code: None observed</p> <p>ETI/Local law requirement Not Applicable</p> <p>Recommended corrective action: Not Applicable</p>	<p>Objective evidence observed: Not Applicable</p>

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

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

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. General Health and Safety management

- Mr. J. U. Gopinathan, Compliance Manager looks after Health & Safety issues for the site.
- Potable water was freely available in all areas.
- Sufficient clean toilets (28 toilets for male; 19 toilets for female) segregated by gender were available at all times for workers.
- Ventilation, temperature and lighting were adequate for the production processes.
- Review of records show that the last Health and Safety Committee meeting had been held on 22/10/2022. The meetings are held once in two months.

2. Fire Safety

- Safe assembly point had been provided in front of the facility building.
- Fire-fighting equipment were adequate and checks were up-to-date.
- The facility management posted the evacuation plans on production floor with local language.
- Facility had installed fire alarm system, Fire Hydrant System, Fire Water hose Reel and smoke detectors.

3. Fire Evacuation Drill information:

Fire Drill Type	Date	Time	Participants	Trainer
Fire Evacuation Drill (External)	14/10/2022	04.40.00 PM	157 employees + 01 visitors	V.R. Fire Protection Engineers, Tirupur

List of trainings provided to employees:

	Training name	Date	Participants	Trainer
1	H& S Training	07/10/2022	111	Mr. G. Ganapathi, HR Manager
2	Mock Fire Fighting	14/10/2022	21	V.R. Fire Protection Engineers, Tirupur
3	First Aid Training	17/08/2022	15	St John's Ambulance, Bangalore

4. Electrical, Machine & fire safety

- Electrical wiring was found to be maintained in good condition such as sockets, plugs, switches and main fuse boards.
- Facility checks all electric channels, distribution board and electric connection periodically.
- Facility maintains a scheduled maintenance plan for doing maintenance of all machines.

5. Chemical safety

- The facility uses non-hazardous chemicals like Water Softener, Floor Cleaner, Soap Oil, Phenol etc.
- MSDS was available for all chemicals being used.

6. Medical services

- There was 12 first aid box provided within the factory.

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

Details:

1. Business Licence: TPR 18254 valid till 31/12/2022
2. Fire License No. 502/2022 dated 25/02/2022 valid for one year.
3. Approved Building Plan dated 13/05/2019
4. Building Stability certificate dated 31/05/2022 (validity 3 years)
5. Drinking water test report dated 04/08/2022
6. H&S Risk assessment dated 03/01/2022
7. Food Safety and Standards Authority of India certificate dated 27/12/2018 (valid for 05 years)
8. Accident Register
9. Machine and electric maintenance record
10. Training record (Fire training, PPE training etc.,)
11. Fire drill record
12. Health and safety committee register
13. Fire equipment and electric equipment checking record

Any other comments: None

<p>A: 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 A1: Please give details: Factory had adopted health & safety policy which ensures a health and safety working environment for all employees. The policy had been displayed in the notice board in local language.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility does not provide a separate workers manual to the workers. However, all policies had been displayed in local language for the knowledge of the employees.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: There were no structural additions without prior permits/inspections.</p>

<p>D: 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 D1: Please give details: The site has kept dedicated PPE for visitors (Mask & Ear Plug). Visitors are briefed about H&S policy and are provided with PPE, if required.</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: There is no legal requirement to provide a medical room or medical facility, considering the number of employees allowed to be employed by the facility.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: There is no legal requirement to provide services of a doctor or nurse. First aiders were available and easily accessible.</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: The facility provides free transportation for employees' who hail from nearby places.</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: All employees who stay in hostel have been provided with secure personal storage space.</p>
<p>I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: H&S risk assessment is being done periodical basis.</p>
<p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The facility had been categorised under White Category (Non Polluting Industries) as per the notification of the Tamilnadu Pollution Control Board dated 02.08.2016 and hence exempted from obtaining environmental permits.</p>
<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Factory does not use banned chemicals and follows the entire customer requirement on environmental standard.</p>

x

Non-compliance:	
<p>1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p>	<p>Objective evidence observed:</p>

<p>It was noted that the list of contents in the First Aid Boxes does not confirm to statutory requirements. Eg: Polythene Eye Wash Bottle and triangular bandage were found to be missing.</p> <p>ETI requirement: 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.</p> <p>Local law: In accordance with Tamil Nadu Factories Rules (1950), Rule 63 - The first-aid boxes or cupboards shall be distinctively marked with a red cross on white back ground and shall contain the following equipment: (xiv) One polythene wash bottle (500 cc) for washing eyes. (xvii) Six triangular bandages</p> <p>Recommended corrective action: It is recommended that the factory shall replenish the First Aid Boxes with adequate contents.</p> <p>Action by: Mr. G. Ganapathi, HR Manager Timescale: 30 Days</p>	<p>1. Factory Tour / H&S Representative interview NC Photo #01</p>
<p>2. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>It was noted that the facility had not assigned responsibility at different levels to carry out the declared Health & Safety Policy.</p> <p>ETI requirement: 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.</p> <p>Local law : In accordance with the Tamil Nadu Factories Rules (1950), Rule 62-B (4) The Health and Safety Policy should contain or deal with: (b) organizational set up to carry out the declared policy clearly assigning the responsibility at different levels and;.</p> <p>Recommended corrective action: It is recommended that the facility shall amend its Health & Safety Policy by assigning responsibility at different levels to carry out the declared Policy.</p> <p>Action by: Mr. G. Ganapathi, HR Manager Timescale: 30 Days</p>	<p>2. Review of records / H&S Representative interview</p>
<p>3. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p>	<p>3. Facility tour / Interview of H&S Representative</p>

The existing machinery lay out does not confirm to the approved building plan of the facility.

Eg: The additional installations of 05 Knitting machines and 01 Automated Fabric Cutting Machine had not been incorporated in the approved building plan of the facility.

ETI requirement:

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.

Local law:

In accordance with Tamil Nadu Factories Rules (1950) Rule 3 (5)(a) A factory or part of a factory constructed, reconstructed, extended or taken into use, shall be in accordance with the plans approved by the *(Chief Inspector or Deputy Chief Inspector, as the case may be] and shall satisfy the conditions subject to which the plans have been approved.

Recommended corrective action:

It was recommended that the facility shall incorporate the changes made to the machinery layouts in the building plan and shall obtain approval of the amended building plan from statutory authority.

Action by: Mr. G. Ganapathi, HR Manager

Timescale:30 Days

4. Description of non-compliance:

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

It was noted that the facility had not maintained soaps or other suitable means of cleaning in the hand wash facilities provided for employees.

ETI requirement:

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.

Local law:

In accordance with Tamil Nadu Factories Rules (1950), Rule 62(2)- There shall be provided and maintained in every factory for the use of employed persons adequate and suitable facilities for washing which shall include soap and nail brushes or other suitable means of cleaning and the facilities shall be conveniently accessible and shall be kept in a clean and orderly condition.

Recommended corrective action:

It is recommended that the factory shall maintain soaps or other suitable means of cleaning in the hand wash facilities provided for the employees.

Action by: Mr. G. Ganapathi, HR Manager

Timescale:30 Days

5. Description of non-compliance:

4. Facility tour / Interview of H&S Representative & Workers

NC Photo #02

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

It was noted that the blade of the straight knife cutting machine had been kept exposed while not in operation, posing a potential risk of workers getting injured while removing the fabric cut panels from the machine table.

ETI requirement:

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.

Local law:

In accordance with Factories Act (1948), Sec.7A -

(1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.

(2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include:

(a) The provision and maintenance of plant and systems of work in the factory that are safe and without risks to health;

Recommended corrective action:

It is recommended that the facility shall provide appropriate protective cover for the blade of the straight knife cutting machine, while not in operation

Action by: Mr. G. Ganapathi, HR Manager

Timescale: 30 Days

6. Description of non-compliance:

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

It was noted that appropriate secondary containment had not been provided for the diesel in the electricity generator area.

Note: The capacity of the secondary containment was found to be not adequate for containing the diesel in case any leakage in diesel containers.

ETI requirement:

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.

Local law:

In accordance with Tamil Nadu Factories Rules (1950), Rule 61(7)- (a) The quantity of flammable liquids in any workroom shall be the minimum required for the process or processes carried on in such room. Flammable liquids shall be stored in suitable containers with close fitting covers.

(d) Effective steps shall be taken to prevent leakage of such liquids into basements, sums or drains and to confine any escaping liquid within safe limit.

Recommended corrective action:

It is recommended that the factory shall provide appropriate secondary containment for the diesel stored in the electricity generator area.

Action by: Mr. G. Ganapathi, HR Manager

5. Facility tour / Interview of H&S Representative & Workers

NC Photo #03

6. Facility tour / Interview of H&S Representative

NC Photo #04

Timescale: 30 Days	
---------------------------	--

Observation:	
<p>1. Description of observation: It was found that Medical Eye Drops had been maintained in First Aid Boxes. Note: As per the instructions on the cover of the medicine can be sold only on the prescription issued by a registered medical practitioner.</p> <p>ETI requirement: 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.</p> <p>Local law: In accordance with The Drugs And Cosmetics Rules, 1945 – Rule 122-P. (viii) - No drug manufactured under the licence shall be sold unless the precautions necessary for preserving its properties have been observed throughout the period after manufacture. Further no batch/unit manufactured under this licence shall be supplied/distributed to any person without prescription of a Registered Medical Practitioner.</p> <p>Comments: The management stated that the issue was due to lack of awareness. The management stated that they will remove the Medical Eye Drops from all first aid boxes and that they will ensure that prescription medicines are not kept in the First Aid Boxes.</p>	<p>Objective evidence observed: 1. Facility tour/ Interview of H&S management representative</p> <p>OBS Photo#01</p> <p>Note:- Though the issue amounts to a non-conformance, the same had been raised as an observation as it was noted during the course of audit that Medical Eye Drops had been removed from the First aid boxes.</p>

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

4: Child Labour Shall Not Be Used

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- The facility has established a practice that they will never employ and use any child labour.
- The facility verifies all workers' original national ID card, School Leaving Certificate etc. at the time of recruitment and keeps the photocopies of workers' ID cards, birth certificate in their personal files.
- Factory verifies the workers age through registered doctor.
- Sampling basis employees' personal files was taken for review. Each employee file included a bio-data sheet, recent photo, birth registration certificate / photo copied national identification card and other documents.
- There was no child or young employee observed in the facility.
- It was evident during the documents review; the age of youngest worker is 29 years and 06 months old (DOB: 10/05/1993 & DOJ: 13/12/2017). During the facility walkthrough, there were no concerns regarding child labour observed.

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

Details:

1. The recruitment procedure was available for review, the personnel files with Photostat copies of National ID or school leaving certificate were available for review. The employment contracts with all the employees and the roster were available for audit.
2. Document review
3. Management interview
4. Worker interview
5. On-site observation during facility tour

Any other comments: None

A: Legal age of employment:	15+ years with significant restriction
B: Age of youngest worker found:	29 years and 06 months
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details

Non-compliance:	
<p>Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed</p> <p>Local law and/or ETI requirement: Not Applicable</p> <p>Recommended corrective action: Not Applicable</p>	<p>Objective evidence observed: Not Applicable</p>

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

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

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The facility had been classified under Employment in Hosiery Industry by the local Government.
- As per the wages prescribed for the Employment in Hosiery Manufactory, the lowest wages to be paid is INR 228.85/day (Helper).
- The lowest wages paid by the facility was found to be INR 240/day for Helper.
- Biometric Time Recording system is being followed.
- All workers 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. Wages are paid in cash.
- Employees had been provided with Social Security Scheme of Employees State Insurance (ESI) and Employees Provident Fund (EPF).
- All employees are being provided with pay slip and they had acknowledged for their wages.
- All employees had been paid within 7 working days of the following month.
- Payment of wages are being recorded as per statutory requirements.
- According to the documents which were provided by the Management and during the worker's interview, it was noted that factory provides all kinds of leave. The facility had undertaken to provide Maternity leave and Earned leave benefits to the employees as per law.

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

Details:

1. Document review
2. Worker interview
3. Management interview
4. Local and national laws
5. Wages and benefits policy
6. Local legal minimum wage documents
7. Payroll records for the sampled months of Nov 2021; Apr 2022 & Oct 2022.
8. Leave records
9. Social Security Contributions (ESI & EPF) and payment receipts issued by the concerned authority related to the sampled months of Nov 2021; Apr 2022 & Oct 2022.
10. Labour contracts for all employees

- 11. Resignation records
- 12. Payslips of all workers interviewed for the sampled months of Nov 2021; Apr 2022 & Oct 2022.
- 13. Overtime records

Any other comments: nil

Non-compliance:

Description of non-compliance:

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

Local law and/or ETI requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed:

Not Applicable

Observation:

Description of observation:

None Observed

Local law or ETI requirement:

Not Applicable

Comments:

Not Applicable

Objective evidence observed:

Not Applicable

Good Examples observed:

1. Description of Good Example (GE):

The facility provides free transportation to employees who hail from nearby places.

Objective evidence observed:

Interview of management representative/ employees; Review of records

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours:	Legal maximum: 48 hours / Week	A1: 48 hours / Week	A2: <input type="checkbox"/> Yes

<p>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</p>			<input checked="" type="checkbox"/> No
<p>B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)</p>	<p>Legal maximum:</p> <ul style="list-style-type: none"> • 02 hours/day • 12 hours/ week 	<p>B1:</p> <ul style="list-style-type: none"> • 01 hour/day • 06 hour/ week 	<p>B2:</p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</p>	<p>Legal minimum: The facility falls under the classification of Employment in Hosiery Garments as notified by the Government of Tamilnadu. As per the wages prescribed for the Employment in Hosiery Garments, the monthly minimum wage to be paid for Fabric Cutter, Tailor, Ironer and Packer is INR 315.38/day; Checker is INR 246.15/day; for Hand Folder, Helper is INR 228.85/day; respectively, exclusive of the overtime payment. The wages are applicable with effect from April 1, 2022.</p>	<p>C1: The monthly wages paid by the facility for Cutter is INR 340/day; for Tailor/ Ironer/ Packer is INR 320/day; for Labelling Trainee is INR300/day; for Checker is INR 280/day and for Helper/House Keeper is INR 250/day, respectively. The wages are applicable with effect from April 1, 2022.</p>	<p>C2:</p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</p>	<p>Legal minimum: 200% of ordinary rate of wages</p>	<p>D1: The facility had paid premium rate of wages @ 200% normal wages, for overtime hours of work engaged.</p>	<p>D2:</p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Wages analysis:

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

A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																									
A1: If No , why not?	Not Applicable																									
B: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	26 samples for the month of Nov 2021 (Random month) 26 samples for the month of Apr 2022 (Random month) 26 samples for the month of Oct 2022 (Current month)																									
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please give details: The Local Government has announced the pay structure, which was implemented from 01 April, 2022 for the workers employed in Hosiery Manufactory: - <table border="1" data-bbox="738 813 1460 1216"> <thead> <tr> <th>Classification of workers</th> <th>Basic per month</th> <th>VDA per month</th> <th>Total per month</th> <th>Wages per day</th> </tr> </thead> <tbody> <tr> <td>Fabric Cutter, Tailor, Ironer and Packer</td> <td>₹ 4248</td> <td>₹ 3952</td> <td>₹ 8200</td> <td>₹ 315.38</td> </tr> <tr> <td>Checker</td> <td>₹ 2448</td> <td>₹ 3952</td> <td>₹ 6400</td> <td>₹ 246.15</td> </tr> <tr> <td>Helper (Hand Folding)</td> <td>₹ 1998</td> <td>₹ 3952</td> <td>₹ 5950</td> <td>₹ 228.85</td> </tr> <tr> <td>Fold & Tie like assistance</td> <td>₹ 1848</td> <td>₹ 3952</td> <td>₹ 5800</td> <td>₹ 223.08</td> </tr> </tbody> </table>	Classification of workers	Basic per month	VDA per month	Total per month	Wages per day	Fabric Cutter, Tailor, Ironer and Packer	₹ 4248	₹ 3952	₹ 8200	₹ 315.38	Checker	₹ 2448	₹ 3952	₹ 6400	₹ 246.15	Helper (Hand Folding)	₹ 1998	₹ 3952	₹ 5950	₹ 228.85	Fold & Tie like assistance	₹ 1848	₹ 3952	₹ 5800	₹ 223.08
Classification of workers	Basic per month	VDA per month	Total per month	Wages per day																						
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Helper (Hand Folding)	₹ 1998	₹ 3952	₹ 5950	₹ 228.85																						
Fold & Tie like assistance	₹ 1848	₹ 3952	₹ 5800	₹ 223.08																						
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A D1: If No , please give details: Not Applicable																									
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above E1: Lowest actual wages found: The actual lowest minimum wage in the facility was INR 250/day for Helper, which is above the legal minimum wage																									
F: Please indicate the breakdown of workforce per earnings:	F1: <u> 0 </u> % of workforce earning under minimum wage F2: <u> 0 </u> % of workforce earning minimum wage F3: <u> 100 </u> % of workforce earning above minimum wage																									
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: The facility had paid yearly bonus @ 8.33 % for the year 2021-22, during the month of Oct 2022 for all employees.																									
H: What deductions are required by law e.g. social insurance? Please state all types:	Deductions are required to be made for Statutory Social Security Benefits viz., Employees Provident Fund Scheme & Employees State Insurance Scheme.																									

I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made.	1. Employees Provident Fund 2. Employees State Insurance Please describe: 1. EPF@ 12.0% of basic wages (Basic +DA) 2. ESI@ 0.75% of Gross wages
		I2: Please list all deductions that have not been made.	1. Tamilnadu labour welfare fund Please describe: 1. @INR 10 per employee
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Factory had provided complete payroll & attendance records for review.		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time:		
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details: Not applicable		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The local government reviews and notifies revision of minimum wages payable to all classes of employees. The facility also reviews the wages to be paid to its employees based on the periodical notifications issued by the local government.		
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Based on employee's interview, copy of appointment letter issues to employees and wage records, it was noted that equal rates are paid for equal work.</p>
<p>Q: How are workers paid:</p>	<p><input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:</p>

6: Working Hours are not Excessive

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ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The In-Out timings of all employees are being maintained electronically (Biometric).
- Overtime had been declared as voluntary and the worker interviews confirm the same.
- The management had paid wages for overtime hours of work at a premium rate (200%) for all employees.
- The time frame of the records reviewed are as follows:
 - 26 samples for the month of Nov 2021 (Random month)
 - 26 samples for the month of Apr 2022 (Random month)
 - 26 samples for the month of Oct 2022 (Current month)
- According to time records and worker interview basic working hours were 8 hours per day and a max 48 hours per week.
- Overtime hours of work engaged during the sampled months were found to be within statutory limits. The facility operates from Monday to Saturday. All Sundays are weekly offs.
 - The facility works in general shift and the normal working hours were from 08.30 A.M to 05.30 P.M;

- Food Break: 12.45 P.M to 01.15 P.M;
- Tea breaks: 10:30 AM to 10.45 AM & 3.15 PM to 3.30 PM
- The security personnel work in rotational shifts and their shift timings are 08.00 AM To 04.00 PM; 04.00 PM to 12.00 AM & 12.00 AM to 08.00 AM

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

Details:

1. Employee interview
2. Management interview
3. Local and national laws
4. Factory policy on working hours
5. Attendance records for the sampled months of Nov 2021; Apr 2022 & Oct 2022.
6. Wage records for the sampled months of Nov 2021; Apr 2022 & Oct 2022.
7. Time Records for the sampled months of Nov 2021; Apr 2022 & Oct 2022.
8. Pay slips with recorded hours of all interviewed workers for the sampled months of Nov 2021; Apr 2022 & Oct 2022.
9. Sample production records.
10. Workers Contracts

Any other comments: Nil

Non-compliance:

Description of non-compliance:

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

None Observed

Local law and/or ETI requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed:

Not Applicable

Observation:

Description of observation:

None Observed

Local law or ETI requirement:

Not Applicable

Comments:

Not Applicable

Objective evidence observed:

Not Applicable

Good Examples observed:

Description of Good Example (GE): None Observed	Objective Evidence Observed: Not Applicable
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Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)			
Systems & Processes			
A. What timekeeping systems are used: time card etc.	Describe: Biometric Time recording system is being followed to record work timings of employees.		
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details : Not Applicable		
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: Not Applicable	
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:	
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time
		<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:	
		Not Applicable	
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: Not Applicable	
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	Maximum number of days worked without a day off (in sample):		

		The factory worked maximum 6 days in a week without a day off.
Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:
		Not Applicable
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:
		Not Applicable
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 23 hours in the month of Nov 2021 26 hours in the month of Apr 2022 24 hours in the month of Oct 2022	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	3.28 %	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	<i>L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:</i> Based on the factory policy, rules and regulations, and training records and workers/management interview it was noted that the overtime is voluntary in this factory.
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A –	<i>M1: Please give details of normal day overtime premium as a % of standard wages:</i> The facility had paid 200% of normal rate of wages for overtime hours of work engaged.
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<i>N1: If yes, please describe % of workers & frequency:</i> The facility had paid 200% of normal rate of wages for overtime hours of work engaged.

<p>O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p>	<p> <input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other </p> <p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p> <p>Not Applicable</p>
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<p> <input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify) </p> <p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> <p>Factory does not require the employees to work more than 48 hours per week. Overtime is voluntary. The employees have rights to refuse overtime any time which was confirmed through workers interviewed.</p>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details: Not Applicable </p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </p>

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- Gender discrimination was also absent in the facility; both female and male workers were distributed in all types of work.
- There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
- The factory provides the same wage amount to male/female employees of the same rank.

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

Details:

1. The hiring and termination procedure, leave application records and HR Policies.
2. Payroll records
3. Attendance records
4. Termination records
5. Training records
6. Employment contracts.
7. Management interview and employee interview

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: <u>60</u> % A2: Female <u>40</u> %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	#: 0
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found

	C1: Please give details: As per documents review, management & works interview there is no evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
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Professional Development

A: What type of training and development are available for workers?	Workers had been provided awareness training on Fire Fighting, PPE Usage etc.,
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B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details: NA
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Non-compliance:	
<p>Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed</p> <p>Local law and/or ETI requirement: Not Applicable</p> <p>Recommended corrective action: Not Applicable</p>	<p>Objective evidence observed: Not Applicable</p>

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

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

8: Regular Employment Is Provided

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

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

- All employees were recruited by the factory directly.
- No labour agency was found to be used to hire workers.
- No subcontractors were found to be used.
- All workers getting signed labour contract and ID card during their recruitment.
- Factory maintains service books for all workers
- Factory has policy to provide all kinds of compensation and benefits to the employees
- If any employees want to leave the job, he or she may leave giving 30 days' notice prior to leave as per law
- No temporary worker, apprenticeship schemes or home worker were identified.

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

Details:

1. Factory policy, rules and regulations, employees' personnel files, employees' ID card, pay slips etc.
2. Management interview and employee interview
3. The hiring and termination records.
4. Worker interview

Any other comments: Nil

Non-compliance:	
<p>Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed</p> <p>Local law and/or ETI requirement: Not Applicable</p> <p>Recommended corrective action: Not Applicable</p>	<p>Objective evidence observed: Not Applicable</p>

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

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

Responsible Recruitment

All Workers	
<p>A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?</p>	<p><input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category (ies) of workers affected: Not Applicable</p>
<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>B1: If yes, please describe details and specific category (ies) of workers affected: Not Applicable</p>

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

Migrant Workers:			
<p><i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i></p>			
A: Type of work undertaken by migrant workers:	<p>The domestic migrant workers were found to be engaged in all departments of the facility in par with local employees.</p> <p>Interview of the domestic migrant workers show that they had joined the facility voluntarily.</p>		
B: Please give details about recruitment agencies for migrant workers:	<p>B1: Total number of (in country recruitment agencies) used: NA</p> <p>B2: Total number of (outside of local country) recruitment agencies used: NA</p>		
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<table border="1" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Deductions are being made for statutory contributions like ESI, EPF and Tamilnadu Labour Welfare Fund </td> <td style="width: 50%; vertical-align: top;"> C2: Observations: The domestic migrant workers were found to be aware of the deductions made in their salary and they had acknowledged the same in the copy of wage slips provided to them. </td> </tr> </table>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Deductions are being made for statutory contributions like ESI, EPF and Tamilnadu Labour Welfare Fund	C2: Observations: The domestic migrant workers were found to be aware of the deductions made in their salary and they had acknowledged the same in the copy of wage slips provided to them.
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Deductions are being made for statutory contributions like ESI, EPF and Tamilnadu Labour Welfare Fund	C2: Observations: The domestic migrant workers were found to be aware of the deductions made in their salary and they had acknowledged the same in the copy of wage slips provided to them.		

<p>D: Are Any migrant workers in skilled, technical, or management roles</p> <p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>D1: If yes, number and example of roles:</p>
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NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other
C: If any checked, give details:	Not Applicable
B1 – If other, please give details: Not Applicable	

Agency Workers (if applicable)	
<i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	A1: Names if available: Agency workers had not been engaged
B: Were agency workers' age/pay/hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No

C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details:

<p style="text-align: center;">Contractors:</p> <p style="text-align: center;"><i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i></p>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details: Not Applicable
B: If Yes , how many workers supplied by contractors?	Not Applicable
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not Applicable
D: If Yes , please give evidence for contractor workers being paid per law:	Not Applicable

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

- Review of documents, management/worker interviews and factory tour show that the core processes of the facility are not being outsourced.
- The facility had not sub contracted any of its core manufacturing processes like Fabric Cutting, Sewing, Checking, Ironing and Packing.

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

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

Process Subcontracted	Not applicable	
Name of factory		
Address		

Details:

1. Site tour (Calculation on total production and estimated capacity)
2. Materials in/out records
3. Management interview
4. Worker interview

Non-compliance:

Description of non-compliance:

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

Objective evidence observed:

Not Applicable

Local law and/or ETI /Additional Elements requirement:

Not Applicable	
Recommended corrective action: Not Applicable	

Observation:	
Description of observation: None Observed Local law or ETI/Additional elements requirement: Not Applicable Comments: Not Applicable	Objective evidence observed: Not Applicable

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

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

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

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

ETI

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

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Through supervisor, management, suggestion box and worker committees.</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>Workers are aware about the complaint channels.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Through direct supervisors, management, suggestion box and worker committees.</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: The grievance procedure of the facility covers issues related to the employees engaged in the facility. Workers can report directly to the top management and also can drop a complaint/suggestion in the complaint/suggestion box provided in the facility.</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details</p>
<p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details: The factory encourages its suppliers to provide access to grievance mechanisms by individuals and communities.</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain</p>

<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>H1: If no, please give details</p>
<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>I1: If yes, please give details- The internal rules and regulations allow deductions from wages for disciplinary purposes. However, review of records and worker interview show that no disciplinary actions had been initiated in the past.</p>

Current Systems and Evidence Examined

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

Current systems:

1. From interview with the employees, there was no evidence of harsh or inhumane treatment of employees.
2. All workers are treated with respect and dignity.
3. There was no evidence of sexual harassment.
4. The company's disciplinary policies had been displayed for the knowledge of employees.
5. An Internal Complaints Committee had been formed.
6. Abuse of any nature; be it verbal or physical was not reported by the workers during the interview.
7. All the interviewed workers stated that they enjoy cordial relations with the factory manager and find themselves free to confront them with an issue for discussion.

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

1. Policy on prevention of harassment and abuse
2. Grievance handling procedure documentation.
3. Training records
4. Internal Complaints Committee meeting minutes.

Details: Physical abuse or the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation not found practised within the company.

Any other comments: NA

Non-compliance:	
<p>1. Description of non-compliance:</p> <p><input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>None observed</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>

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

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

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

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

Additional Elements

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

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

Current Systems and Evidence Examined

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

Current systems:

- As per document review, factory management representation and worker interview, it was observed that all workers in the factory were of Indian origin. No permission is required for working from one district/state to another district/state.
- All workers had the proper legal rights to work in this region.
- All of them were recruited directly by the factory and no agency was found to be involved in factory's recruitment processes.
- No agency staff or foreign worker was used by the factory.
- The factory recruits new worker through references by employees and by posting job advertisement. The workers have not paid any deposit when they were recruited in the factory.
- There were not any deductions for items such as travel and equipment.

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

Details:

1. Hiring procedure
2. Personnel files
3. Worker interview
4. Management interview

Any other comments: None

Non-compliance:

Description of non-compliance:

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

Local law and/or ETI /Additional Elements requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed:

Not Applicable

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The company had undertaken to comply with the local and international laws and regulations and also their end client's environmental requirements through its Environmental Policy.
2. The company was found to be aware of the end client's environmental requirements and is committed to comply with the same.
3. There are no hazardous operations involved in the manufacturing process of the company.

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

Details:

- On site observation
- Environmental Policy
- Ambient Air Quality, Illumination, Noise and Stack Monitoring Reports.
- The facility had been categorised under White Category (Non Polluting Industries) as per the notification of the Tamilnadu Pollution Control Board dated 02.08.2016 and hence exempted from obtaining environmental permits.

Any other comments: NA

Non-compliance:

Description of non-compliance:

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

Local law and/or ETI /Additional Elements requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed:

Not Applicable

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

Good examples observed:	
<p>Description of Good Example (GE):</p> <p>The facility had installed Solar Power System with a capacity of 82.8 kVA which is said to be fulfilling 20% of facility's power requirements.</p>	<p>Objective evidence observed: Facility tour/ Interview of management representative</p>

Other findings

Other Findings Outside the Scope of the Code

None observed

Community Benefits

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

None observed

Appendix 1

Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."


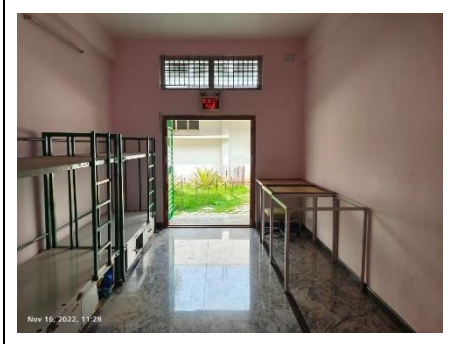

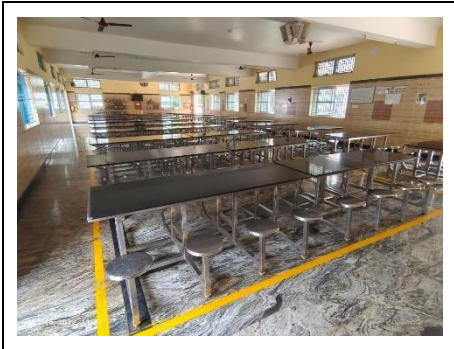



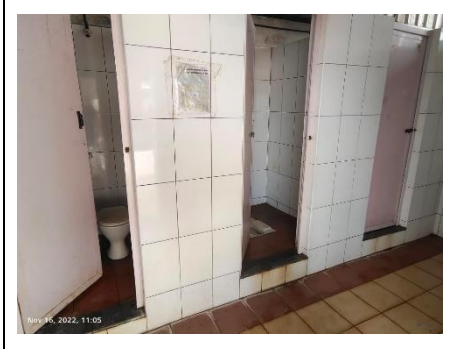




Not Applicable please x

Photo Form

<p>Facility Name board</p>	<p>Facility Elevation</p>	<p>Display of working hours</p>
<p>Emergency contacts</p>	<p>Security cabin</p>	<p>Fabric & Accessories Building</p>
<p>Entrance</p>	<p>Fabric Cutting Machine</p>	<p>Fabric storage</p>
<p>Fabric checking</p>	<p>Mezzanine floor</p>	<p>Textile testing lab</p>

Exit	Entrance - Knitting Floor	Yarn storage
Knitting machine	Knitted fabric	Exit
Garment production building	Ground floor -Entrance	Production lines
Checking	Packing	Metal detection

<p>RFID Scanning</p>	<p>Finished goods storage</p>	<p>Exit</p>
<p>1st floor -Entrance</p>	<p>Idle production lines</p>	<p>Exit</p>
<p>Sampling department</p>	<p>Electricity generator</p>	<p>First aid box</p>
<p>Women's Hostel</p>	<p>Entrance</p>	<p>Rooms</p>

		
<p>Inner side of a room</p>	<p>Exit</p>	<p>Canteen</p>
		
<p>Dining hall – women</p>	<p>Dining hall – Men</p>	<p>Display of abstracts of laws</p>
		
<p>Safe assembly point</p>	<p>Sanitary facilities- men</p>	<p>Sanitary facilities -women</p>
		
<p>Suggestion box</p>	<p>Air compressor</p>	<p>Drinking water point</p>

Non Compliance Photos:-



NC Photo #01

List of contents in the First Aid Boxes does not confirm to statutory requirements



NC Photo #02

Facility had not maintained soaps or other suitable means of cleaning in the hand wash facilities provided for employees



NC Photo #03

The blade of the straight knife cutting machine had been kept exposed while not in operation



NC Photo #04

Appropriate secondary containment had not been provided for the diesel in the electricity generator area

Observation Photos:-



OBS Photo #01

Medical Eye Drops maintained the First Aid Boxes



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>