




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: (only available on Sedex System)	ZC: 407829584	Sedex Site Reference: (only available on Sedex System)	ZS: 408213269	
Business name (Company name):	Dekko Garments Ltd.			
Site name:	Dekko Garments Ltd.			
Site address: (Please include full address)	Mawna, Sreepur, Gazipur.	Country:	Bangladesh	
Site contact and job title:	Md. Arif Hasan Jony- Sr. Manager (HR & Compliance)			
Site phone:	+8801841297256	Site e-mail:	arif.dgl@dekkoisho.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:	08 February 2021			

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

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

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): None

Auditor Team (s) (please list all including all interviewers): Syeda Rabeka Sultana- Senior Auditor (RA 21700951), Shibshankar Dey- Senior Auditor (RA 21700609), E.M Saber in Bhuiyan- Auditor (RA 21700585) and Md. Kamrul Hasan - Assistant Supervisor (ASCA 21700579)

Lead auditor: Syeda Rabeka Sultana APSCA number: RA 21700951

Lead auditor APSCA status: In good standing

Team auditor: Shibshankar Dey, E.M Saber in Bhuiyan and Md. Kamrul Hasan

APSCA number: RA 21700609, RA 21700585 and ASCA 21700579

Interviewers: Syeda Rabeka Sultana, Shibshankar Dey, E.M Saber in Bhuiyan and Md. Kamrul Hasan

APSCA number: RA 21700951, RA 21700609, RA 21700585 and ASCA 21700579

Report writer: Shibshankar Dey

Report reviewer: Mazharul Anwar

Date of declaration: 08 February 2021

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

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

Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.	Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Universal Rights covering UNGP		<input type="checkbox"/>	<input type="checkbox"/>				• None observed
0B	Management systems and code implementation		<input checked="" type="checkbox"/>	<input type="checkbox"/>	02	01		Obs: • The facility has posted Supplier Protector Line in a common place for easy visualization of the employees. NCs: • Validity of 01 out of 02 boiler license was expired • Facility management did not provide leave book to the employee.
1.	Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>					• None observed
2	Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>					• None observed
3	Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		01			NCs: • Eye guard was found displaced in around 10% overlook machine.
4	Child Labour	<input type="checkbox"/>	<input type="checkbox"/>					• None observed
5	Living Wages and Benefits	<input type="checkbox"/>	<input type="checkbox"/>				04	GEs:

									<ul style="list-style-type: none"> Facility management provides monthly attendance bonus to all the employees as per company policy. Facility arranges yearly picnic, birthday celebration & best performance line award programme for the employees. Facility has a fair price shop where employee can buy their daily necessary goods by wholesale price. Facility management provides education scholarship for their employee's children.
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> None observed
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> None observed
8	<u>Regular Employment</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	01			NC: <ul style="list-style-type: none"> Few required information/ criteria in around 15% ID cards of the employees were not updated
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None observed
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None observed
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None observed
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None observed
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None observed
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None observed

General observations and summary of the site:

- The product manufactured at this site is all type of woven items.
- Overall responsibility for meeting the standards is taken by Md. Arif Hasan Jony- Sr. Manager (HR & Compliance).
- Total 2641 employees are working in the facility including 333 non-production employees. Out of 2641 employees, 1541 are female employees and 1100 are male employees.
- All employees in the facility are fixed rated.
- In general, the employee work for 06 days in a week (Saturday to Thursday) and Friday is weekly holiday for all employees.
- Facility has one general working shift for all section which starts from 8:00 am to 5:00 pm. Facility ensures one hour break for all section for taking meal and rest starts from 01:00 pm to 02:00 pm.
- Legal minimum pay (BDT 8000) was paid to all employees. Correct OT hours were paid; Employees were paid 200% of minimum hourly wage for OT hours.
- Employee's wages are calculated on a monthly basis. The payment method of the salary is through 100% bank transfer within 07 working days of following month and the payment cycle is followed by English calendar month.
- The youngest worker on site was 20 years old.
- Facility has formed Participation Committee through election process consisting of total 18 members.
- There is no union and collective bargaining at this factory. It is also not mandatory by Local Law.
- There is evidence of both male and female in management and among supervisor. The distribution was Male 90%, Female 10%.
- Site has no peak seasons.
- Site uses no sub-contractors.
- 62 employees were selected for interview including 24 male and 38 female employees, they were interviewed as 08 groups of 05 and the balances of 22 employees were interviewed individually.
- 62 Records to show wages and hours were taken from February 2020 to January 2021.

**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:	Dekko Garments Ltd.																			
B: Site name:	Dekko Garments Ltd.																			
C: GPS location: (If available)	GPS Address: Noyanpur bazar road, Mawna Union, Bangladesh.	Latitude: 24.2526253 Longitude: 90.3922757																		
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Factory License No: 06558/Gazipur 'L' category, issued by Deputy Inspector of Industry (Govt. Of the People's Republic of Bangladesh) which is valid till 30 June 2021.</p> <p>Trade License No: 110/2020-2021, issued by 01 No. Mawna Union Parishad which is valid till 30 June 2021.</p> <p>Fire License No: DD/Dhaka/26134/2016 issued by Bangladesh Fire Service & Civil Défense Authority which is valid till 30 June 2021.</p>																			
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	All type of woven Items.																			
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>The audited facility Dekko Garments Ltd. is located at Mawna, Sreepur, Gazipur. Facility started its operation since 2018 in this location. The total land area was 1132560 square feet and the production area was 396697 square feet and the warehouse area was 60000 square feet.</p> <p>The facility premises consist of only requested facility; no other sister concern or entity was found during audit.</p> <p>A total of 2641 employees are currently working in the facility, which includes 2308 production employees and 333 non-production employees. Out of 2641 employees 1100 are male employees and 1541 are female employees.</p> <p>Facility compound consists of 08 buildings and 02 sheds which are made up of mixture of concrete, cement and steel. Details are following:</p> <table border="1"> <thead> <tr> <th>Production Building /shed</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td colspan="3">Building 01 (Admin building)</td> </tr> <tr> <td>Ground floor</td> <td>Office</td> <td>None</td> </tr> <tr> <td>1st floor</td> <td>Office</td> <td>None</td> </tr> <tr> <td colspan="3">Building 02 (Security building)</td> </tr> <tr> <td>Ground floor</td> <td>Security post & office</td> <td>None</td> </tr> </tbody> </table>		Production Building /shed	Description	Remark, if any	Building 01 (Admin building)			Ground floor	Office	None	1st floor	Office	None	Building 02 (Security building)			Ground floor	Security post & office	None
Production Building /shed	Description	Remark, if any																		
Building 01 (Admin building)																				
Ground floor	Office	None																		
1st floor	Office	None																		
Building 02 (Security building)																				
Ground floor	Security post & office	None																		

	Building 03 (Day care building)		
	Ground floor	Fair shop, Medical, Day care, Locker room	None
	1st floor	Workers Dining	None
	2nd floor	Sample, Canteen, Server room, Prayer room & Rest room	None
	Building 04 (Store building)		
	Ground and Mezzanine floor	Raw material store	None
	Building 05 (Main Production building)		
	Ground floor	Cutting, Sewing, Finishing, Sub-store, Spot room, Sucker room, Fusing area & Idle machine area	None
	Mezzanine floor	Toilet area	None
	1st floor	Cutting, Sewing, Finishing, CAD room, Pilot section & Toilet area	None
	Building 06 (Finished Goods store building)		
	Ground floor	Inspection, Packing & Folding section, Carton keeping area	None
	1st floor	Inspection, Packing & Carton keeping area, Toilet area	None
	Building 07 (Finished Goods store building)		
	Ground floor	Boiler, Generator, Substation, Diesel room, Transformer room	None
	1st floor	Compressor & Utility Office	None
	Building 08	STP building	None
	Shed 01	WTP, Fire control, Fire pump room	None
	Shed 02	Waste keeping area	None
	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 such cracks observed during audit day.		
	F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
	F4: Please give details: This facility has completed structural engineer evaluation from ACCORD.		
G: Site function:	<input type="checkbox"/> Agent <input type="checkbox"/> Factory Processing/Manufacturer <input checked="" 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)	Round the year same production
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<p>Product manufactured: All type of woven items</p> <p>Main production process: Cutting, Sewing, Finishing and Packing.</p> <p>Monthly production capacity: 550000 Pieces per month</p> <p>No. of production line: 20</p> <p>Machines used: Main equipment of the facility are Single needle, Two needle, Over Lock Machine, Flat Lock Machine, Feed of the Aram, Button hole, Button Stitch, Bar tack, Snap Button Machine, Fusing machine, Snap attach, Pattern cutting, Auto pocket setter, End cutting, Dice cutting, APW machine, Band knife, Auto cutter, Boiler, Generator, Compressor etc.</p> <p>Chemical used: Spot lifter-833, Diesel, Mobil.</p>
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee (Participation 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details Not Applicable as the site do not provide accommodation for workers.

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 10:03 hours A2: Day 1 Time out: 17:30 hours	A3: Day 2 Time in: NA A4: Day 2 Time out: NA	A5: Day 3 Time in: NA A6: Day 3 Time out: NA
B: Number of auditor days used:	Four Man Days (Four auditors in a day)		
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: 04 weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Md. Arif Hasan Jony- Sr. Manager (HR & Compliance)		
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 October 2020		
J: Previous audit type:	Periodic		
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 (only complete if no worker reps present)	Not Applicable		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	There is no trade union at this facility, and it is not mandated by law.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	819	0	0	0	0	0	0	819
Worker numbers – female	1489	0	0	0	0	0	0	1489
Total	2308	0	0	0	0	0	0	2308
Number of Workers interviewed – male	24	0	0	0	0	0	0	24
Number of Workers interviewed – female	38	0	0	0	0	0	0	38
Total – interviewed sample size	62	0	0	0	0	0	0	62



A: Nationality of Management	Bangladeshi	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i>	Nationalities: B1: Nationality 1: Bangladeshi B2: Nationality 2: _____ B3: Nationality 3: _____	Nationalities: B1: Nationality 1: Bangladeshi B2: Nationality 2: _____ B3: Nationality 3: _____
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1: 100% Bangladeshi C1: approx % total workforce: Nationality 2: _____ C2: approx % total workforce: Nationality 3: _____	
D: Worker remuneration (management information)	D: 0% workers on piece rate D1: 0% hourly paid workers D2: 100% salaried workers Payment cycle: D3: 0% daily paid D4: 0% weekly paid D5: 100% monthly paid D6: 0% other D7: If other, please give details: Not applicable.	



Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	08 groups of 05	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 09	D2: Female: 13
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	None	
I: What did the workers like the most about working at this site?	Facility workplace condition is comfortable, Timely payment of wage and benefits. Good relationship with facility management.	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	Total working hour is within their limit and overtime is fully voluntary.	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:		
M: Attitude of workers: (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 worker was generally positive about their workplace, they got on well fellow workers and managers. They found management team positive and approachable.

The employees were assured of confidentiality and they spoke freely of their views of the factory. All employees said they were satisfied with their employment at the factory and they are provided wages as per their agreement. They felt free to leave this employer and understood the notice period required. They facility management treated them with respect.

They are able to complain directly to their supervisors or line manager and also felt free to give their general concerns to the member of Participation Committee who would take it to the next meeting of the Committee.

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

The Members of Participation Committee were positive about the facility and looking forward to developing relationships with the management team.

Interview was conducted with the member Participation Committee in a separate place. They replied logically regarding their responsibilities as member of Participation Committee and they also informed that they can easily carryout their daily job without any difficulties.

O: Attitude of managers:

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

The facility management showed a positive attitude to this audit and during the whole audit process, Md. Arif Hasan Jony- Sr. Manager (HR & Compliance) along with his team was present though the audit process and co-operated the whole audit. Facility management respect client's requirement and allowed auditor to take photographs of all production process, best practices and also nonconformities. They also provide required documents photocopy and allowed auditors to interact with the employees confidentially. At the closing meeting, the facility management agreed with all the findings and suggested corrective actions.

The factory management had a system in place to check their current practices against their clients' requirements and the local law, and they took notice of the findings of the internal audit team and also have a Health & Safety committee to take care of health and safety concerns.

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 had a policy, endorsed at the highest level, covering human rights impacts and issues, and it is communicated to all appropriate parties, including its own suppliers.
- The responsible person for implementation and monitoring is Md. Arif Hasan Jony- Sr. Manager (HR & Compliance).
- The facility had identified their stakeholders and salient issues.
- The facility measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- Where businesses have an adverse impact on human rights within any of their stakeholders, they address these issues and enable effective remediation.
- The facility had a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the report.
- The facility has policy and procedures for human rights.
- The facility communicates this code of conduct to the employees through notice board and orientation training.
- It is communicated to all appropriate parties, including suppliers through the responsible person.

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

Details:

- Written policies and procedure that being provided individually to employees.

- Facility code of conduct
- All policies of facility, Employee hand book.
- Employees' training records showed that the management conducted training for employees about the legal rights and requirements during orientation.

Any other comments: None

A: Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility has a social compliance policy which is a 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: Md. Arif Hasan Jony Job title: Sr. Manager (HR & Compliance)
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: The facility has an independent compliance team for reporting and dealing with human rights impact without fear and it is a completely transparent system.
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 facility uses worker register for keeping privacy of workers information. Moreover, facility has a policy for data safety.

Findings

Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/> Description of observation: None Observed Local law or ETI/Additional elements / customer specific requirement: None Comments: None,	Objective evidence observed: None Observed.
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Good examples observed:	
Description of Good Example (GE): None Observed.	Objective Evidence Observed: None Observed.

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: January 2019 to December 2019: 5 %	A2: This year: January 2020 to December 2020: 4.5 %
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]	October 2020 to December 2020: 4 %	
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: January 2019 to December 2019: 5 %	C2: This year: January 2020 to December 2020: 4.1%
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	October 2020 to December 2020: 5 %	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Last injury was noted on 21.01.2021 which was small cut injury in left hand finger by needle.	
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: January 2019 to December 2019: 0.2 %	F2: This year: January 2020 to December 2020: 0.18 %
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]	October 2020 to December 2020: 0 %	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: January 2019 to December 2019: 0%	H2: This year: January 2020 to December 2020: 0%
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0% workers	I2: 12 months 0% workers

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

- Responsibility for meeting the legal and client code requirements is taken by Md. Arif Hasan Jony- Sr. Manager (HR & Compliance).
- The facility management communicates this code of conduct (COC) to the employees through notice board and orientation training.
- 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.
- Supplier communicates ETI code of conduct to their suppliers and where reasonably practicable extends the principles of this ethical code through their supply chain.
- Implementation of any necessary changes is the given to the individual department heads after agreement with the facility manager.

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

Details:

- Employee handbook.
- Facility Code of Conduct (COC).
- All policies of facility.
- Legal license (Factory, Fire, Trade)
- 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: In the last 12 months the site has not been subjected to any fines or prosecutions for non-compliance to any regulations.
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: It was noted through documentation review, facility has policies and procedures for forced labour, child labour, discrimination, harassment & abuse.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	It was noted through interview with the management and workers that, overtime is voluntary for all employees. No child labour was found in the facility during the facility visit and age verification certificate found in all the reviewed personnel files.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: All the employees in the facility have received orientation training where standards for forced labour, child labour, discrimination, harassment & abuse are covered. Last orientation training was held on 07.02.2021 with 10 participants and conducted by HR & Compliance Officer.
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: Training records were found including picture and attendance sheet.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: Facility has faced BSCI audit which was conducted by third party (Last audit conducted on 19 October 2020).
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: Facility has a dedicated Human Resources department consisting of 06 members and is headed by Md. Arif Hasan Jony- Sr. Manager (HR & Compliance).
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 is taken by Md. Arif Hasan Jony- Sr. Manager (HR & Compliance).
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 facility has an IT security policy which ensures worker information is 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 key 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 K1: Please give details: Facility conducts risk assessment periodically which evaluates effectiveness of every policy and procedure department wise. Last risk assessment conducted on 04.11.2020.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: The facility has an internal system to raise the issue found in risk assessment and to implement the way of reduction it.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Facility has a supplier selection policy which ensures labour standard of its own supplier.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Facility has approved floor lay-out plan and building approval from Legal Authority.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: The facility has anti-corruption committee, anti-bribery policy to support due diligence in applying national laws and practices relating to land title.
P: Does the site have a written policy and procedures specific to land rights.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC:

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	Not Applicable.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: The facility acquired and used the land according the legal procedure and project's requirement.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: The facility constructed the building maintaining all legal procedure and specific land acquisition were considered to avoid or minimize adverse impacts.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: No illegal appropriation of land for facility building or expansion of footprint.

Non-compliance:	
<p>1. Description of non-compliance:</p> <p><input type="checkbox"/> NC against ETI/Additional Elements <input checked="" type="checkbox"/> NC against Local Law</p> <p><input type="checkbox"/> NC against customer code:</p> <p>It was noted through documents review and management interview that validity of 01 out of 02 boiler license (boiler no. Ba: Bo: 11483) was expired on 17 January 2021. However, facility has applied and deposited necessary fee for renewal of the boiler license to the concern authority on 03 January 2021.</p> <p>Local law and/or ETI requirement: <u>In accordance with Managements system and Code Implementation, 0B1:</u> Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p><u>In accordance with Bangladesh Boilers Act 1923, Section 8 (1):</u> A certificate authorizing the use of a boiler shall cease to be in force on the expiry of the period for which it was granted.</p> <p>Recommended corrective action: It is recommended that facility should collect updated boiler license from concerned authority.</p> <p>Verification Method: Desktop Action By: Md. Arif Hasan Jony- Sr. Manager (HR & Compliance) Timescale: 60 days</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>Documents review and management interview</p>

2. Description of non-compliance:

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

☒ NC against Local Law

Management and employee interview

It was noted through management and employee interview that the facility management did not provide leave book to the employee.

Local law and/or ETI requirement:

In accordance with Managements system and Code Implementation, 0B1:

Suppliers are expected to implement and maintain systems for delivering compliance to this Code.

In accordance with Bangladesh Labour Rules, 2015, Rule 108 (1):

The Owner or the Manager shall provide a Leave Book to each worker in accordance with Form-9.

Recommended corrective action: It is recommended that facility should provide leave book to all employees.

Verification Method: Desktop

Action By: Md. Arif Hasan Jony- Sr. Manager (HR & Compliance)

Timescale: 60 days

Observation:

Description of observation:

It was noted from facility visit and management interview that the facility has posted Supplier Protector Line in a common place for easy visualization of the employees.

Local law or ETI requirement: Not applicable.

In accordance with Client's specific requirement:

All production site must show the supplier line poster in local language in conspicuous areas frequented by workers.

Comments: None

Objective evidence observed:

Facility visit and management interview

Observation photo: 01

Good Examples observed:

Description of Good Example (GE): None observed

Objective evidence observed:

None observed

1: Freely Chosen Employment

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

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

- The facility has a policy which prohibits forced labour, and this was also available for review.
- Age verification documents (National ID card copy, educational certificate, nationality certificates) were available in employee personal files.
- Service book is maintaining for every employee.
- Overtime is voluntary.
- The terms and conditions of employment state that the employees 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, IC/staff card, training, etc.
- The facility does not use any prison labour.
- The above was confirmed in management and employee interview.

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

Details:

- Facility rules.
- Policy on No-Forced labour and prison labour.
- Sample employees' personal files.
- Service book.
- Time record.

Any other comments: None.

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

	C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: Facility has a policy mentioning 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: Yearly turnover of the facility is 18 Million USD.
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 there is no such restriction.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: Facility has forced labour and bonded labour policy; also, they have no such type of labour.
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 has policy on forced/trafficked labour. The facility maintains it through notice board on production floor. Overtime is total voluntary. Employees can leave their workplace freely after their respective jobs.

Non-compliance:	
1. 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 Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: <i>(where relevant please add photo numbers)</i> None observed

Observation:

Description of observation: None observed Local law or ETI requirement: Not applicable Comments: None	Objective evidence observed: None observed
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Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: None observed

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 there is a Participation Committee formed by election on 07 December 2020.
- Regular meeting of Participation Committee is held, last meeting was held on 02 February 2021.
- Meeting minutes are posted in notice board and recorded in a register.
- There are 12 members from worker side and 06 from management side. Total Participation committee member is 18.
- Members of Participation Committee are not treated less favourably than other workers.
- Members of Participation Committee 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:

- Participation Committee member and committee list.
- Participation Committee formation records
- Participation Committee meeting minutes
- Participation Committee meeting attendance register.

Any other comments: None.

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

- ☐ Union (name)
- ☒ Worker Committee (Participation Committee)
- ☐ Other (specify)
- ☐ None

B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
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: Facility has an effective grievance handling procedure. Workers can submit their grievance verbally or in written through Welfare Officer or complain box. Moreover, facility has a Safety Committee. The safety committee consists of 12 members where 06 are from employee side. D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility has a policy regarding Freedom of Association.	
F: Name of union and union representative, if applicable:	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?	Participation Committee: A Participation Committee of 18 members in place with 12 employee level members elected by the employees to represent each section of the facility.	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 07 December 2020
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: 2	

L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	Meeting of Participation committee (PC) held on once in every two months. Last meeting held on 02 February 2021 and following topics were covered: 1. Discussion about new member selection 2. Discussion about covid-19 awareness	
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: ____% workers covered by Union CBA Not applicable, no Collective Bargaining Agreement.	M2: ____% workers covered by worker rep CBA Not applicable, no Collective Bargaining Agreement.
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable, no Collective Bargaining Agreement.	

Non-compliance:	
1. 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 Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: <i>(where relevant please add photo numbers)</i> None observed

Observation:	
Description of observation: None observed Local law or ETI requirement: Not applicable Comments: None	Objective evidence observed: None observed
Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: None observed

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

- Md. Arif Hasan Jony- Sr. Manager (HR & Compliance) looks after Health & Safety issues for the site.
- Potable water was freely available in all areas and the Potable water tested last on 14 July 2020 by the Department of Civil Engineering, DUET.
- Sufficient clean toilets (102 for male and 122 for female) were available at all times for employees in the site.
- Ventilation, temperature and lighting were adequate for the production processes.
- Meeting of Health & Safety Committee held once in every 03 month. Last meeting held on 23 December 2020.

2. Fire Safety

- There were minimum 02 or more exit in each floor.
- Enough assembly area was found in front of the facility building.
- Firefighting equipment was adequate, and checks were up to date. Fire equipment last checking was done on 02 February 2021.
- The facility management posted the evacuation plans on every production floors/shed with local language.
- Public Address System and fire alarm were available in all areas.
- Facility has total 406 members in emergency preparedness team and all of them are trained from Fire Service and Civil Defence.
- Facility has designated fire warden for all the fire doors of the facility.

Fire Drill information:

Last fire drill	Date	Time took	Employee was present	Fire drill monitored by
Day	28.01.2021	2 Minute 34 Seconds	2694	Fire safety officer

FSCD	28.11.2020	3 Minutes 15 Seconds	1891	Deputy Asst. Director- FSCD
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Facility firefighting equipment details:

Fire hook, Fire Alarm, Emergency Exit, Pillar Hydrant, Gas mask, Lock cutter, Public address system, Fire Apron, Stretcher, Fire gum boot(pair), Fire Gloves(pair), Sand bucket, Helmet, Blanket, Fire beater, Fire water drum, Fog light.

Facility provide bellow training to employees:

Training Type	Last Date of training	Participant	Trainer Designation	Frequency of training
Orientation Training	07.02.2021	10	HR & Compliance Officer	As required
Fire Fighting Training (Internal)	25.01.2021	21	Fire Safety Officer	Monthly
Fire Fighting Training (External)	27 & 28.09.2020	40	Warehouse Inspector (FSCD)	As required
First Aid Training	21.01.2021	17	Medical Officer	Monthly
PPE Training	02.01.2021	25	Welfare Officer	Monthly
Mid-level management Training	21.12.2020	15	Sr. Manager- HR & Compliance	Every two months
Health & Safety Training	12.01.2021	24	Sr. Officer (Compliance)	Monthly
Chemical Handling Training	24.01.2021	07	Sr. Officer (Compliance)	Monthly
Electrical Safety Training	05.01.2021	13	Sr. Executive- Electrical	Every two months
Covid-19 awareness Training	01.02.2021	15	Medical Officer	Monthly

3. Electrical, Machine & fire safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- Facility has licensed electrician who check and do inspection, roster wise for whole facility.
- Facility checks all electric channels, distribution board and electric connection daily and monthly schedule wise.
- Facility maintains a scheduled maintenance plan for doing maintenance of all machines.

(Name) Inspection record	Last inspection date (Internal)	Internal check done by (designation)	Frequency of inspection (Internal)	Last inspection date (External)	Actual frequency of inspection need
Compressor	08.02.2021	Electrical engineer	Daily	None	As required
Generator	08.02.2021	Electrical engineer and Generator operator	Daily	None	As required
Boiler	08.02.2021	Boiler operator	Daily	None	As per requirement
Distribution Board	25.01.2021	Electrical engineer	Every 15 days	None	As required
Firefighting equipment	02.02.2021	Fire Safety Officer	Monthly	None	As required

4. Chemical safety:

- Facility uses different kinds of printing chemicals, Machine oil, Diesel, Spot lifter etc. MSDS, Labelling and secondary containment was found available for all chemicals.

5. Medical services:

- There were 27 first aid boxes with enough kits in the full facility.
- Facility has medical room and appointed 01 registered physicians, 01 Nurse and 01 medical Assistant who are available in working time of the facility. They also arranged monthly first aid training with first aider.

6. Building safety:

- Facility building was constructed for industrial purpose and has completed structural engineer evaluation from ACCORD.

7. Dormitory: Facility didn't provide dormitory facilities to any employees.

8. Summary of Covid-19:

Facility has developed covid-19 management guidance with self-assessment checklist and provided awareness training in regular basis. Note that last training was conducted on 01.02.2021. Also, facility has taken following precautionary measures to prevent & control the spread of the corona virus in the workplace:

- Maintaining social distance in entrance of the facility.
- They are disinfecting foot before entering the workplace.
- Thermal checking of each employees and visitors during entrance of the facility premises.
- Disinfecting the whole premises in regular basis.
- Health awareness poster in different areas of the facility.
- Hand washing facilities for each employee.

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

Details:

- License review (Fire license, Trade license, Factory license).
- Building approval plan and layout approval plan.
- Group insurance.
- Drinking water test report.
- Injury record and analysis report.
- Machine and electric maintenance record.
- Risk assessment report.
- Training record (Fire training, First aid training, PPE training and Health and safety training).
- Fire drill record.
- Health and safety committee register.
- Fire equipment and electric equipment checking record.

Any other comments: None.

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

☒ Yes

☐ No

A1: Please give details: The facility has general Health & Safety and Occupational Health & Safety Policy and Procedures which are fit for purposes and these policies are communicated through orientation training. The Health and Safety Committee consists of 12 members where 06 are from

	employee side and it is headed by Md. Arif Hasan Jony- Sr. Manager (HR & Compliance).
B: Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility provides workers manual to the workers where all the policies and applicable govt. law are included.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: No additional structures were found in building construction approval.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: All the visitors to the site are informed on Health and Safety and provided with personal protective equipment where necessary.
E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility has medical facility for the employees. Equipment's are provided as per legal requirements.
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: The facility management has appointed 01 registered physicians, 01 Nurse and 01 Medical Assistant for medical treatment of the employees.
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: The facility does not provide transport for workers.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: No living space provide by facility.
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: It was noted through documentation review, facility conducts risk assessment periodically. Last risk assessment conducted on 04.11.2020.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The facility meets all legal obligations on environmental requirements including required permits for use and disposal of natural resources like gas, water etc.

K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: The facility does not use banned chemicals and follows all the customer requirement on environmental standard.
---	--

Non-compliance:

1. Description of non-compliance:

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

It was noted through facility visit that eye guard of 10 % overlook, machines were found displaced in the sewing section at ground & 1st floor of main production building.

Note that, total 115 overlook machines were in operation in that mentioned area.

Local law and/or ETI requirement:

In Accordance with working condition are safe and hygienic ETI base code 3.1:

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

In Accordance with Bangladesh Labour Law 2006, Section 63(1) D(3):

(1) In every establishment the following shall be securely fenced by the safeguards of substantial construction which shall be kept in position while the part of machinery required to be fenced are in mention or in use, namely-

(d) unless they are in such position or of such construction as to be as safe to every person employed in the establishment as they would be if they were securely fenced-

(iii) every dangerous part of any machinery

Recommended corrective action:

It is recommended that the facility should ensure the use of the mentioned machine safety guards.

Verification Method: Desktop

Action By: Md. Arif Hasan Jony- Sr. Manager (HR & Compliance)

Timescale: 30 days

Objective evidence observed:

(where relevant please add photo numbers)

Facility visit
(NC Photo 01)

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: None

Objective evidence observed:

None observed

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

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 employees' original national ID card, birth certificate, school 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 doctors.
- 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.

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

Details:

- Recruitment policy.
- Policy on No-Child labour.
- Personal file including Birth certificate, primary/secondary education certificate, national ID card, etc. of sample employees.
- Age verification documents.

Any other comments: None.

A: Legal age of employment:	18 years
B: Age of youngest worker found:	20 years
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0%

E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: If yes, give details Not applicable as the facility did not recruit workers under 18 age.
--	---

Non-compliance:	
1. 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 Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: <i>(where relevant please add photo numbers)</i> None observed

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

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

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 is providing local legal minimum wage BDT 8000 per month for all the employees.
- Time keeping system is electronic face detection.
- All employees are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- All social insurance payments were passed on to the relevant authorities in a timely manner.
- Each employee was given a pay slip and signed for their wages.
- All employees are paid within 07 working day of following month through 100% bank transfer.
- Employees are aware of their minimum wage.
- Wages have been recorded according to documents checked.
- There are some good practices by the facility; see below GE section.

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

Details:

- Salary sheet review.
- Overtime payment record review.
- Payslip review.
- Attendance registers review.
- Production record review.
- Maintenance registers review.
- Maternity benefit registers review.
- Leave record review.
- Final settlement record review.

Any other comments: Facility declared general holiday from 26 March to 04 April 2020 and 06 April to 30 April 2020 due to Covid-19 situation. Also, facility management declared partial layoff from 08 August to 31 October 2020 due to insufficient work order. Facility management provided employee's wages as per

government circular as well as industry practice. Note that facility management has provided 100% wages in March 2020 and 65% wages in April 2020 for general holidays. However, employees got their 100% salary for the present days in the month of April 2020. Moreover, facility management provided layoff benefits to the respective employees as per local law.

Non-compliance:

1. Description of non-compliance:

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

None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: Not applicable

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

None observed

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: None

Objective evidence observed:

None observed

Good Examples observed:

Description of Good Example (GE):

1. Facility provides monthly attendance bonus to all the employees as per company policy.
2. Facility arranges yearly picnic, birthday celebration & best performance line award programme for the employees.
3. Facility has a fair price shop where employee can buy their daily necessary goods by wholesale price.
4. Facility management provides education scholarship for their employee's children.

Objective Evidence Observed:

Document review and management interview.

Good Example photo:1

Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 08 hours per day 48 hours per week	A1: 08 hours per day 48 hours per week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	208 hours per month.	208 hours per month (For all sample months)	
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 04 hours per day 24 hours per week 104 hours per month. (With legal waiver of 02 hours per day.	B1: 2 hours/day 12 hours/Week in January 2021 (1 st Current month) 2 hours/day, 12 hours/Week in December 2020 (2 nd Current month) 2 hours/day, 12 hours/Week in June 2020 (Random month).	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: BDT 8000 per month.	C1: BDT 8000 per month (From sample employees)	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: Per hour 200% of basic hourly rate.	D1: Per hour 200% of basic hourly rate.	D2: <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 (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	62 samples from January 2021 (1 st Current month) 62 samples from December 2020 (2 nd Current month) 62 samples from June 2020 (Random month)

<p>C: Are there different legal minimum wage grades? If Yes, please specify all.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>C1: If Yes, please give details: The Government announced pay structure on 24th January 2019 for the workers of the Garments Industries with effect from December 2018.</p> <table border="1"> <thead> <tr> <th>Grades</th> <th>Basic wage (BDT)</th> <th>House rent (50% × basic) (BDT)</th> <th>Meal (BDT)</th> <th>Medical (BDT)</th> <th>Travel (BDT)</th> <th>Gross monthly wage (BDT)</th> </tr> </thead> <tbody> <tr> <td>Grade 1</td> <td>10938</td> <td>5469</td> <td>900</td> <td>600</td> <td>350</td> <td>18257</td> </tr> <tr> <td>Grade 2</td> <td>9044</td> <td>5422</td> <td>900</td> <td>600</td> <td>350</td> <td>15416</td> </tr> <tr> <td>Grade 3</td> <td>5330</td> <td>2665</td> <td>900</td> <td>600</td> <td>350</td> <td>9845</td> </tr> <tr> <td>Grade 4</td> <td>4998</td> <td>2499</td> <td>900</td> <td>600</td> <td>350</td> <td>9347</td> </tr> <tr> <td>Grade 5</td> <td>4683</td> <td>2342</td> <td>900</td> <td>600</td> <td>350</td> <td>8875</td> </tr> <tr> <td>Grade 6</td> <td>4380</td> <td>2190</td> <td>900</td> <td>600</td> <td>350</td> <td>8420</td> </tr> <tr> <td>Grade 7</td> <td>4100</td> <td>2050</td> <td>900</td> <td>600</td> <td>350</td> <td>8000</td> </tr> <tr> <td>Apprentice</td> <td>2750</td> <td>1375</td> <td>900</td> <td>600</td> <td>350</td> <td>5975</td> </tr> </tbody> </table>	Grades	Basic wage (BDT)	House rent (50% × basic) (BDT)	Meal (BDT)	Medical (BDT)	Travel (BDT)	Gross monthly wage (BDT)	Grade 1	10938	5469	900	600	350	18257	Grade 2	9044	5422	900	600	350	15416	Grade 3	5330	2665	900	600	350	9845	Grade 4	4998	2499	900	600	350	9347	Grade 5	4683	2342	900	600	350	8875	Grade 6	4380	2190	900	600	350	8420	Grade 7	4100	2050	900	600	350	8000	Apprentice	2750	1375	900	600	350	5975
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<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>D1: If No, please give details:</p>																																																															
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i></p> <p>Lowest gross salary was found 8194 BDT per month in the Month of January 2021 which meets minimum legal wage.</p>																																																															
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: 0% of workforce earning under minimum wage. F2: 20% of workforce earning minimum wage. F3: 80% of workforce earning above minimum wage.</p>																																																																
<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i></p> <p>Monthly Attendance Bonus: As per company policy.</p>																																																																
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>As per section 125 of the Bangladesh Labour Law, 2006, facility may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc. As per Bangladesh Stamp Act 1899 (Amendment 2010) factory may deduct BDT 10 for Government Revenue Stamp.</p>																																																																

<p>I: Have these deductions been made?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Please list all deductions that have been made.</p>	<p>1. Un-Authorized Absent days.</p> <p>Please describe: Deduction is only made for un-authorized absent which is done as per law.</p>
		<p>I2: Please list all deductions that have not been made.</p>	<p>1. 2.</p> <p>Please describe: Not Applicable.</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type</p> <p><input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:</p>	
<p>L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>L1: Please give details: The facility shows all real records which reflect all scenario.</p>		
<p>M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>M1: Please specify amount/time: Facility did not define living wages as it is not required by law. However, facility is providing the minimum wage as Government announced pay structure on 24th January 2019 for the workers of the Garments Industries with effect from December 2018.</p>		
<p>M2: If yes, what was the calculation method used.</p>	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <p>Other – please give details: Not applicable, there is no defined living wage.</p>		
<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>N1: Please give details: There is no periodic review of wages.</p>		

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

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- In this audit, auditor had randomly selected production record, such as: Material in/out records, daily production reports, and crosschecked these records with payroll records and attendance records, no inconsistency was noted. In addition, through employee interview, no inconsistency was noted either.
- Through employees' interview, overtime is voluntary.
- Time recording system is electronic face detection.
- All overtime is compensated at a premium rate for all employees.
- Facility remains closed on Friday.
- Based on the provided records, working hour statistics are as the following:
 - 62 samples from January 2021 (1st Current month).
 - 62 samples from December 2020 (2nd Current month).
 - 62 samples from June 2020 (Random month).

Working section	No. of workers in the section	No. of Sampled workers in the section	Records of which month	% of workers worked continuously 7 days without rest day	Highest number of days Worked consecutively	Highest number of OVERTIME hours worked in a day	Highest number of total hours worked in a day
Cutting	136	10	January 2021	0%	06 Days	02 hours	10 hours
Sewing	1446	25	January 2021	0%	06 Days	02 hours	10 hours
Finishing	312	10	January 2021	0%	06 Days	02 hours	10 hours
Packing	95	05	January 2021	0%	06 Days	06 Days	10 hours
Quality	319	12	January 2021	0%	06 Days	02 hours	10 hours
Cutting	136	10	December 2020	0%	06 Days	02 hours	10 hours
Sewing	1446	25	December 2020	0%	06 Days	02 hours	10 hours
Finishing	312	10	December 2020	0%	06 Days	02 hours	10 hours
Packing	95	05	December 2020	0%	06 Days	02 hours	10 hours
Quality	319	12	December 2020	0%	06 Days	02 hours	10 hours
Cutting	136	10	June 2020	0%	06 Days	02 hours	10 hours
Sewing	1446	25	June 2020	0%	06 Days	02 hours	10 hours
Finishing	312	10	June 2020	0%	06 Days	02 hours	10 hours
Packing	95	05	June 2020	0%	06 Days	02 hours	10 hours
Quality	319	12	June 2020	0%	06 Days	02 hours	10 hours

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

Details:

- Employee interview
- Management interview
- Facility policy on working hours
- Salary sheet
- Pay slip

- Job card
- Attendance register
- Production record
- Quality and production records to cross check hours

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: Not applicable

Objective evidence observed:

(where relevant please add photo numbers)

None observed

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: None

Objective evidence observed:

None observed

Good Examples observed:

Description of Good Example (GE): None observed

Objective evidence observed:

None observed

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: Time keeping system is electronic face detection.				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details				
C: Are standard/contracted working hours defined in 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:			
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:			
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):				
	06 days				
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	H1: If yes, please give details: As per Circular from Bangladesh Labour and Employment Ministry dated on 17 October 2020; Facility can do 4 hours overtime in a day and 24 hours overtime in a week with the consent of employees which is valid till 16 April 2021.
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 2 hours/day 12 hours/Week in January 2021 (1 st Current month) 2 hours/day, 12 hours/Week in December 2020 (2nd Current month) 2 hours/day, 12 hours/Week in June 2020 (Random month)	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	60%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Facility provides employment contract to all employees where it is written that overtime is fully voluntary.
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of standard wages: 200% of standard wages.
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: Overtime payments for 100% employees are as per legal requirement.

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

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 no evidence of sexual harassment.
- There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
- The facility provides the same wage amount to male/female employees of the same rank.
- There is no restriction for formation of trade union in the factory.

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

Details:

- Policy of Anti-Discrimination.
- Recruitment policy.
- Training record.
- Termination records.
- Female employee rights.

Any other comments: None.

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 90 % A2: Female: 10 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	As per management comments, facility does not have any women who are in skilled or technical roles.
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability,	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training

gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input type="checkbox"/> No evidence of discrimination found C1: Please give details: No such evidence found.
---	--

Professional Development	
A: What type of training and development are available for workers?	The facility provides on job training for the selected workers in their training section. After completion of training the workers are evaluated through exams.

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

Non-compliance:	
1. 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 Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: <i>(where relevant please add photo numbers)</i> None observed

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

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

	None observed
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8: Regular Employment Is Provided

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

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

- All employees were recruited by the factory directly.
- No labour agency was used to hire workers. No temporary worker, apprenticeship schemes or home worker was identified by the auditors.
- No subcontractors were used.
- All workers getting signed labour contract and ID card during their recruitment.
- Factory maintains service books for all workers.

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

Details:

- Recruitment policy.
- Employees personal file.
- Appointment letter.
- Employee service book.
- New employee joining register.

Any other comments: None.

Non-compliance:	
<p>1. Description of non-compliance:</p> <p><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 through ID card review and management interview that few required information/ criteria in around 15% ID cards of the employees were not updated as per legally prescribed format (e.g. National ID, permanent address, nature of work, employee signature and blood group information were missing).</p> <p>Local law and/or ETI requirement: <u>In accordance with ETI base code 8.1:</u> To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p><u>In accordance with Bangladesh Labour Rules, 2015, Rule 19(5):</u> Each owner will provide identity card with the photograph to each worker working in the firm at the costs of the owner as per Form-6.</p> <p>Recommended corrective action: It is recommended that facility should provide ID card to all employees as per prescribed format.</p> <p>Verification Method: Desktop Action By: Md. Arif Hasan Jony- Sr. Manager (HR & Compliance) Timescale: 60 Days</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>1. ID card review and management interview</p>

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:</p> <p>None observed.</p>

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

Responsible Recruitment

All Workers	
<p>A: Were all workers presented with terms of employment at the time of recruitment, did they</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>

understand them and are they same as current conditions?	A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:	
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category(ies) of workers affected:	
C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details:	
D: If any checked, give details:	Not Applicable	

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

<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</p> <p><input type="checkbox"/> No</p> <p>D1: If yes, number and example of roles: Not Applicable</p>
---	---

NON-EMPLOYEE WORKERS

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

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>	
<p>A: Number of agencies used (average):</p>	<p>A1: Names if available: There are no agency workers in the facility.</p>
<p>B: Were agency workers' age / pay / hours included within the scope of this audit?</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Not applicable</p>

C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Not applicable, site does not use agencies.
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Not applicable, site does not use agencies.

Contractors:	
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,	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details:
B: If Yes , how many workers supplied by contractors?	Not applicable. There are no contractors in the facility.
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not applicable. There are no workers supplied by contractors in the facility.
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:

- All employees were recruited by the factory directly.
- No labour agency was used to hire workers. No temporary worker, apprenticeship schemes or home worker was identified by the auditors.
- No Sub-contracting and Home-working was used by this facility.
- All workers getting signed labour contract and ID card during their recruitment.
- Factory maintains service books for all workers.

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

Details:

- Shipment record.
- Goods in and out register.
- Production record.
- Goods in and out gate pass / records.

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code:

None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: Not applicable

Objective evidence observed:

(where relevant please add photo numbers)

None observed

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

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

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

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:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:

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

9: No Harsh or Inhumane Treatment is Allowed

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

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility has an open channel for reporting any violations of labour standard which is posted in the notice board. Facility provided complain box in every washroom for receiving complain. Workers can report any violations directly to the compliance manager. Facility also has a grievance handling procedure in place.
B: If Yes , are workers aware of these channels and have access? Please give details.	All the workers are aware of these channels and have full access to these channels. Facility also has a grievance handling procedure posted with every complain box.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Facility has posted hotline & provided complain box in washroom.
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: Workers can place their grievance verbally or in written. Workers can also keep their identity confidential if required.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain

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

Current Systems and Evidence Examined

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

Current systems:

- The facility has established anti-harassment or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- Anti-harassment issue is also covered in employee orientation training; Last orientation training was held on 07.02.2021 with 10 participants and conducted by HR & Compliance officer.
- Through the factory management and employee interview, it was noted that no physical abuse happened in the factory.
- There is an internal process for grievance, which is through grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, any received complaint will be handled by management, without any reprisal for the worker in question.

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

Details:

- Anti-Harassment policy.
- Grievance box open register.
- Orientation training record.

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: Not applicable

Objective evidence observed:

(where relevant please add photo numbers)

None observed

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

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

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

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

Additional Elements

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

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

Current Systems and Evidence Examined

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

Current systems:

- Only employees with a legal right to work shall be employed or used by the factory.
- The youngest age was 20 years old.

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

Details:

- Factory recruitment policy
- Employees personal file

Any other comments: None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code:

None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: Not applicable

Objective evidence observed:

(where relevant please add photo numbers)

None observed

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: None

Objective evidence observed:

None observed

Good examples observed:

Description of Good Example (GE):

None observed

Description of Good Example (GE):

None observed

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The facility prepared an environmental policy and procedure.
- The facility disposes all solid waste in a segregated area with proper level and identification.
- The facility also provides awareness training to all related personnel.
- Solid waste has been handover to licensee vendor as per local legislation who recycled that wastage.
- Facility conduct air emission and noise level test. Note that, last test done on 21 June 2020.

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

Details:

- Environment policy
- Wastage management policy
- Air emission and noise level test reports

Any other comments: None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

None observed

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

Recommended corrective action: Not applicable.

Objective evidence observed:

(where relevant please add photo numbers)

None observed

Observation:	
Description of observation: None observed Local law or ETI/additional elements requirement: Not applicable Comments: None	Objective evidence observed: None observed

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

Other findings

Other Findings Outside the Scope of the Code

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

Appendix 1

<p>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."</p> <p><input type="checkbox"/> Not Applicable please x</p>	
<p>NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p>Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
<p>0.A. Guidance for Observations</p> <p>0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.</p> <p>0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.</p>	
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p>	<p>Description of observation:</p> <p>It was noted from facility visit and management interview that the facility has posted Supplier</p>

<p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	<p>Protector Line in a common place for easy visualization of the employees.</p> <p>Local law or ETI requirement: Not applicable</p> <p>In accordance with Client's specific requirement:</p> <p>All Tesco production site must show Tesco supplier line poster in local language in conspicuous areas frequented by workers.</p> <p>Comments: None</p>
ETI 1. Forced Labour	ETI 1. Forced Labour
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.</p>	
ETI 2. Freedom of association and the right to collective bargaining are respected	ETI 2. Freedom of association and the right to collective bargaining are respected
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.</p>	
ETI 3. Working conditions are safe and hygienic	ETI 3. Working conditions are safe and hygienic
<p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.</p>	

<p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p> <p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.</p>	
ETI 4. Child labour shall not be used	ETI 4. Child labour shall not be used
<p>4.1 There shall be no new recruitment of child labour.</p> <p>4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	
ETI 5. Living wages are paid	ETI 5. Living wages are paid
<p>5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</p> <p>5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.</p> <p>5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.</p>	
ETI 6. Working Hours are not excessive	ETI 6. Working Hours are not excessive
<p>6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.</p>	

<p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p> <p>6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:</p> <ul style="list-style-type: none"> – 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. <p>6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.</p>	
ETI 7. No discrimination is practised	ETI 7. No discrimination is practised
<p>7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p>	
ETI 8. Regular employment is provided	ETI 8. Regular employment is provided
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be</p>	

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


legal right to work by reviewing original documentation.	
10. Other issue areas 10B2: Environment 2–Pillar	
<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p>10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.</p> <p><i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	

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


<p>10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.</p> <p>10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p>	
Business Practices Section	
<p>10C. Compliance Requirements</p> <p>10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.</p> <p>10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.</p> <p>10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.</p> <p>10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.</p> <p>10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,</p> <p>10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics</p> <p>10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.</p> <p>10C. Guidance for Observations</p> <p>10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.</p> <p>10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented.</p>	

Photo Form


Non-Compliance photos:

	Nil	Nil
NC photo: 01 Eye guard was found displaced of overlock machine	Nil	Nil









Observation photos:











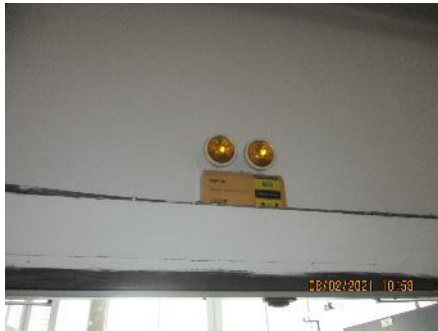

	Nil	Nil
Observation photo: 01 Supplier protector line posted	Nil	Nil

Good example photos:

	Nil	Nil
Good Example photo: 1 Fair price shop	NA	NA


General facility tour photos:

		
Facility gate	Facility name	Facility building
		
Security check post	Emergency number	No Smoking sign
		
Assembly point	Evacuation plan	Accessories store
		
Cutting section	Sewing section	Finishing section

		
Packing section	Finished goods store	Dining area
		
Canteen area	Fire door	Smoke detector
		
Fire alarm	Exit sign	Fire alarm switch
		
PA system	Fog light	Fire hose cabinet

		
Hose pipe checked	Notice board	Fire fighter
		
Fire rescuer	Distribution board	Exhaust fan
		
Fire extinguisher	Time keeping machine	Stairway
		
Pure drinking water area	First aid box	Toilet area

		
Complaint box	Medical room	Childcare room
		
Fire equipment	Fire control panel	Boiler
		
Compressor	Generator	Diesel keeping area
		
Covid-19 Temperature checking	Covid-19 Disinfectant channel	Covid-19 Social distancing marks

	Nil	Nil
Covid-19 Hand washing facilities	Nil	Nil

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End of report.



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