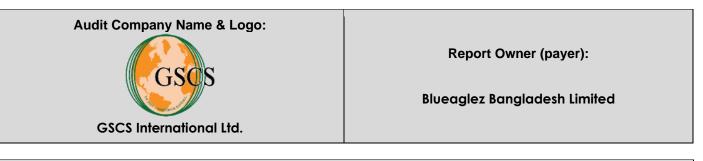


Sedex Members Ethical Trade Audit Report

Version 6.1



	Audit Details						
Sedex Company Reference: (only available on Sedex System)	ZC: 421429028		Sedex Site Reference: (only available on Sedex System)			1653378	
Business name (Company name):	Blueaglez Bangladesh Limited						
Site name:	Blueaglez Bangla	Blueaglez Bangladesh Limited					
Site address: (Please include full address)	Durgapur, Ashulia, Savar, Dhaka-1341		Country:		Bangladesh		
Site contact and job title:	Md. Abul Hossain	Md. Abul Hossain Shohag, General Manager (Operation & Marketing)					
Site phone:	+88 01671960801		Site e-mail:		shohag@blueaglezbangladesh.com		
SMETA Audit Pillars:	Labour Standards	Sa	Health & fety (plus vironment 2- ar)	Environment 4- pillar		Business Ethics	
Date of Audit:	11 November, 2022						



	Audit Conducted By					
Affiliate Audit Company		Purchaser		Retailer		
Brand owner		NGO		Trade Union		
Multi– stakeholder			Combined Audit (select all that apply)			

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

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



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): Nil

Auditor Team (s) (please list all including all interviewers): Lead auditor: Kazi Mohammad Morad Hossain (CSCA 21703927) Lead auditor APSCA status: In good Standing

Team auditor: Md. Abdullah Al-Mamun (ASCA 32200120)

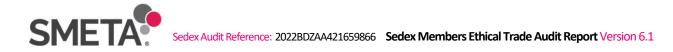
Interviewers: Kazi Mohammad Morad Hossain & Md. Abdullah Al-Mamun

Report writer: Kazi Mohammad Morad Hossain Report reviewer: Md. Anisur Rahman

Date of declaration: 11 November, 2022

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

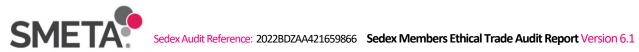
This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information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



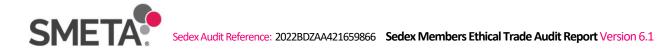
Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing	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)
the audit report, hyperlinks are retained.	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	

0A	Universal Rights covering UNGP					0	0	None Observed
OB	<u>Management systems and</u> <u>code implementation</u>				01	02	0	 Summary Of Non-Compliance: a) The facility has two generators with capacity of 320 Kw had no waiver certificate from the respective authority. b) The Export Promotion Bureau (EPB) License No BD-06392 had expired on 30 June 2022. Summary Of Observations: SAQ was not completed by the facility. Boiler operator' competency certificates according to the new boiler law will no longer be valid.
1.	Freely chosen Employment				0	0	0	None Observed
2	Freedom of Association				0	0	0	None Observed
3	Safety and Hygienic Conditions	\boxtimes	\square		06	0	0	Summary Of Non-Compliances:



	1. a) Approximately 20% firefighters and rescue team members were not properly aware about his/ her duties during emergency situations.
	b) Approximately 17% first aiders were not aware about first aid kits & medicines and preliminary treatment procedures.
	2. (a) 02 out of 02 knitting machine operators were not using ear plug.
	(b) Approximately 25% workers were not using face mask.
	(c) 01 out of Boiler operator was not using ear plug.
	3. Randomly checked one female washroom did not have adequate soap & sandals.
	4. a) around 30% eye guards were displaced with overlock & Flatlock machines.
	b) around 25% needle guards were misplaced with sewing plain machines.
	5. In Building-1 at sewing section located at 1 st floor, eye wash station was not installed in the spot removing room and this room was not covered. Note that 01 female workers work in the open area where use spot lifter 833.
	6. The facility obtained building approval from local union Porishod instead of concern government authority.



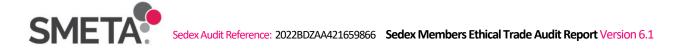
4	<u>Child Labour</u>			0	0	0	None Observed
5	Living Wages and Benefits			0	0	01	Summary Of Good Example: 1. The facility provides monthly attendance bonus BDT 500 to all operators & quality inspectors and BDT 300 to all helpers as per factory policy.
6	Working Hours			0	0	0	None Observed
7	Discrimination			0	0	0	None Observed
8	Regular Employment			0	0	0	None Observed
8A	<u>Sub-Contracting and</u> <u>Homeworking</u>			0	0	0	None Observed
9	Harsh or Inhumane Treatment			0	0	0	None Observed
10A	Entitlement to Work			0	0	0	None Observed
10B2	Environment 2-Pillar			0	0	0	None Observed
10B4	Environment 4–Pillar			NA	NA	NA	Not Applicable as it is 2 pillar audit report.
10C	Business Ethics			NA	NA	NA	Not Applicable as it is 2 pillar audit report.

General observations and summary of the site:

Blueaglez Bangladesh Limited was located at Durgapur, Ashulia, Savar, Dhaka-1341, Bangladesh. The site was established in year 2022. This full initial audit was conducted by two auditors, assessed the factory operation against ETI base code and Local law requirements on a sampling basis in one day. The scope of this audit was based on 2-Pillars SMETA procedures.

The factory specialized in manufacturing of all kinds of knit & woven Items. The main production process is-knitting, Cutting, Sewing, Ironing and Packing. The total factory area was 38,600 square feet and the production area was 35,000 square feet. The factory had no peak season. Production capacity is around 650,000 pieces per month.





In view of facilities, the factory is made in 02 Buildings.

Total manpower of the factory is 402, On the day of audit, there were 391 workers (Male- 150 & Female- 241) in the factory in which 341 production workers and 50 non-production workers. All workers were local. Weekend of the factory was Saturday. The general working hours for all section in the factory on one shift starts from 08:00 to 17:00 including one-hour lunch break from 13:00 to 14:00. Only security has three shifts per eight hours each with rostering schedule of break & weekend.

Auditors entered the facility at 09:00 and conducted an opening meeting with facility management according to the ETI Base Code requirements and local laws. Participation representative was present in the meeting and they assured full co-operation to this audit.

Based on documents review, employees' interview and site tour, the positive and negative findings are as follows:

1. The factory provided company registration no. C-127548/2015 with lifetime validity started from 13 December, 2015.

2. All employees were recruited directly by the factory. The all employees provided the copy of their personal ID cards, birth certificate, and educational certificate (if any) and characterize certificate to the factory before they started work. Both copy of ID cards, birth certificate, educational certificate, characterize certificate and latest individual photos are kept properly in their personnel files.

- 3. The emergency evacuation floor plan was posted on the wall of each floor.
- 4. No child labour or young worker was found during audit.
- 5. Neither migrant workers nor agency workers were found in the facility.
- 6. No forced labour, discrimination & harsh or inhumane treatment were found during the audit.

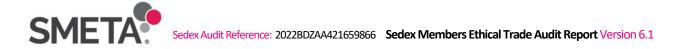
7. Suggestion box was available for employees to complain or feedback their working condition. Also, they could communicate with their supervisors, top management directly and through participation representatives.

8. The factory conducted fire drill from Bangladesh Fire Service and Civil defence in regular basis.

9. Total 26 workers: Six (06) individual workers and Twenty (20) (Four groups of five workers) were interviewed in the confidential room. Employees' attitude was positive and polite during the audit. And employees showed the favourable attitude toward the factory via workers' interview. **Note:** Although nowadays Covid-19 pandemic situation has been reduced all over the world. Moreover, we had to manage our activities by maintaining safety when we conducted workers interview, facility visit and other auditing activities maintaining social distance. We also observed that the following measure has been taken by the site while starting the operation in every day to prevent their employees from Covid-19:

- •Ensuring facemask for each employee.
- •Ensuring facemask and safety precautions for visitors.
- Arranging a hand-washing facility for all employees while entering the factory.
- Facility has posted awareness posters of Covid-19.
- •Having a reporting system to medical person or management if a suspected case is observed.
- •Facility has taken different steps for creating awareness for covid-19.
- 10. Fire-fighting facilities were well equipped.





11. Drinking water and toilet were available and accessed easily.

12. Per payroll record review and interviews with management all workers were paid by monthly wage system. Wages were paid once a month within first 7 working days of the following pay period. All the employees' wages were paid by cash. No delay of wage was identified through documents review, worker interview and management interview.

Negative findings:

One non- compliance was found in the area of "Management systems and Code implementation", six non- compliances were found in the area of "Safety and Hygienic Conditions". For other areas, no violations were noted.

Observations:

Two observations were found in the area of "Management systems and Code implementation".

Good Example :

One Good Example was found in the area of "Living wages and Benefits".

The closing meeting had been started at 16:30 and corrective action plans were discussed. A copy of the CAPR was given to Md. Abul Hossain Shohag, General Manager (Operation & Marketing). Auditors thanked for good cooperation & organizing a friendly working environment and left company at 17:10 on 11 November 2022.

*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 Deta	ills				
A: Company Name:	Blueaglez Ban	gladesh Limited				
B: Site name:	Blueaglez Bangladesh Limited					
C: GPS location: (If available)	GPS Address: Durgapur, Ashulia, Savar, Dhaka-1341, Bangladesh. Latitude: 23.7728798 Longitude: 90.416214					
D: Applicable business and other legally required licence numbers and documents, for example, business	Government,	which is valid till Ju		3.		
license number, liability insurance, any other required government inspections		: 009789, issued b till on June 30 th , 20	-	ion Porishod, Savar,		
				by Bangladesh Fire Ilid till June 30 th , 2023		
		Certificate: C-127 3 December, 2015		h lifetime validity		
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting,	The factory specialized in manufacturing of all kinds of knit & woven Items.					
sewing, packing etc	The main production process is Knitting, Cutting, Sewing, Ironing and Packing.					
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	-					
	In view of facilities, the factory is made in 02 buildings.					
	Building Desci Building No. 01	Description		Remark, if any		
	Ground floor	Accessories stor warehouse, cutt knitting section section, CAI inspection roon section & securit	ing section, n, sample D room, n, packing	Nil		
	Floor 1	Sewing section section	· ·	Nil		
	ls this a shared building?	No		Nil		



	Building No. 02 (Utility)	Description	Remark, if any			
	Ground	Security post, generator room, boiler room, compressor room, dining room, canteen, childcare room, medical room, prayer room & wastage area.	Nil			
	Is this a shared building?	No	Nil			
	 F1: Visible structural integrity issues (large cracks) observed? Yes No F2: Please give details: No cracks were observed on the day of audit. 					
	F3: Does the site have a structural engineer evaluation? Yes No					
	F4: Please give details: The site did not have a structural engineer evaluation.					
G: Site function:	Agent Agent Factory Processing/Manufacturer Finished Product Supplier Grower Homeworker Labour Provider Pack House Primary Producer Service Provider Sub-Contractor					
H: Month(s) of peak season: (if applicable)	Round the yea	ar same				
I: Process overview: (Include products being produced, main operations, number of production lines,	Production Capacity: The production capacity is around 650,000 Pcs per month.					
main equipment used)	Main Product: Facility specialized in manufacturing of all kinds of knit & woven Items.					
	The Main production process: Knitting, Cutting, Sewing, Ironing and Packing.					
	05 sets, Chair Machine (4 th 63 sets, Button Kansai Machir	ent: Plain Machine 165 sets, Tw o Stitch Machine (2 needle) nread) 105 sets, Flat Lock Mac Hole Machine 05 sets, Bartak ne 03 sets, Feed of the Arm 0 sets, Eye let Hole Machine 0	06 sets, Over Lock hine (Cylinder Bed) Machine 02 sets, 03 sets, Snap Button			



	Machine 01 set, Waist Belt Elastic Joint Machine 01 set, Rib Cutter Machine 02 sets, Recon Machine 01 set & Cutting Machine 05 sets.
J: What form of worker representation / union is there on site?	□ Union (name) ⊠ Worker Committee □ Other (specify) □ None
K: Is there any night production work at the site?	∑ Yes □ No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	 ☐ Yes ☑ No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	☐ Yes ⊠ No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	Yes Xo N1: If no, please give details: Not Applicable, as all the workers are come from local area.



	Audit Parameters						
A: Time in and time out	A1: Day 1 Time in: 09:00 A3: Day 2 Time in: NA A5: Day 3 Time A2: Day 1 Time out: 17:10 A4: Day 2 Time out: NA A6: Day 3 Time						
B: Number of auditor days used:	2.0 Man-days (2 Auditors u	sed in 1 day)					
C: Audit type:	Full Initial Periodic Full Follow-up Partial Follow-Up Partial Other If other, please define						
D: Was the audit announced?	∑ Announced □ Semi – announced: Window detail: □ Unannounced						
E: Was the Sedex SAQ available for review?	☐ Yes ⊠ No If No, why not-The SAQ had not been completed for review by site. Note that the facility management was not aware regarding SAQ.						
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	Yes No If Yes , please capture detail in appropriate audit by clause						
G: Who signed and agreed CAPR (Name and job title)	Md. Abul Hossain Shohag, General Manager (Operation & Marketing)						
H: Is further information available (If yes, please contact audit company for details)	☐ Yes ⊠ No						
I: Previous audit date:	NA						
J: Previous audit type:	NA						
K: Were any previous audits reviewed for this audit	□ Yes □ No ⊠ N/A						

Audit attendance	Management	Worker Representatives				
	Senior management	Worker Committee representatives	Union representatives			
A: Present at the opening meeting?	🛛 Yes 🗌 No	Yes 🗌 No	🗌 Yes 🛛 No			
B: Present at the audit?	🛛 Yes 🗌 No	Yes 🗌 No	🗌 Yes 🛛 No			
C: Present at the closing meeting?	🛛 Yes 🗌 No	Yes 🗌 No	🗌 Yes 🛛 No			



D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Not applicable as participations committee representative was present.
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	No union is at this facility, and it is not mandatory by local 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	161	0	0	0	0	0	0	161
Worker numbers – female	241	0	0	0	0	0	0	241
Total	402	0	0	0	0	0	0	402
Number of Workers interviewed – male	10	0	0	0	0	0	0	10
Number of Workers interviewed – female	16	0	0	0	0	0	0	16
Total – interviewed sample size	26	0	0	0	0	0	0	26





A: Nationality of Management	Bangladeshi	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. Please add more nationalities as applicable to site. Add more rows if required.	Nationalities: B1: Nationality 1:100% Bangladeshi B2: Nationality 2:0% B3: Nationality 3:0%	Was the list completed during peak season? Yes No If no, please describe how this may vary during peak periods: Not applicable
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1100%_ C1: approx % total workforce: Nationality 20_ C2: approx % total workforce: Nationality 30_	
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?	∑ Yes □ No			
B: Were workers aware of the code?	∑ Yes □ 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)	Total 20 workers: 04 groups of 05 people in each group.			
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 02	D2: Female: 04		
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	Yes No If no, please give detail:	s: N/A		
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	∑ Yes □ No			
G: In general, what was the attitude of the workers towards their workplace?	∑ Favourable □ Non-favourable □ Indifferent			
H: What was the most common worker complaint?	No complaint was ro workers against facilit happy with their working	y because they are		
I: What did the workers like the most about working at this site?	Facility workplace cor timely payment of wag relationship with facility	ges and benefit. Good		
J: Any additional comment(s) regarding interviews:	Nothing to Report.			
K: Attitude of workers to hours worked:	Total working hour is within standard and overtime is fully voluntary.			
L. Is there any worker survey information available?				
☐ Yes ⊠ No L1: If yes, please give details: Not applicable				
M: Attitude of workers:				



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

The factory allowed the auditor from GSCS International Ltd. to conduct confidential worker interviews. The workers were chosen freely without any influence by the factory management; 26 workers (04 group of 05 workers and 06 individuals) were randomly selected by auditor from different sections for interview. The workers showed a cooperative attitude during the interview process. Based on worker's interview, they expressed their positive attitude to the management and also payment system. All workers were satisfied with working conditions and benefits.

The effective evidences were collected by workers interview; the following information was summarized:

1. Workers said that they were not required to lodge "deposits" or their identity cards at the recruitment and were free to leave or resign after reasonable notice.

2. All interviewees reflected that worker could complain to management & worker committee representatives directly or by writing letters through suggestion box and all interviewed workers were aware of participation representatives.

3. All workers stated that factory provided induction training for new workers and regular safety training for all workers. Workers said they had participated in fire drills at the production area every month.

4. All interviewees confirmed that the factory had checked their ID cards or birth certificate to verify their ages. They never seen or heard any child labour less than above 18 years old employed in this factory.

5. All interviewed workers said that they were paid by monthly wage system. Wages were paid once a month within first 7 working days of the following pay period. All the employees' wages were paid by cash. No delay of wage was identified through worker interview and management interview.

6. All employees work for 06 days in a week. Weekend of the factory was Saturday. The general working hours for all sections in the factory is operating in one shift. This shift starts from 08:00 to 17:00 with one-hour lunch break from 13:00 to 14:00. Only security has three shifts per eight hours each with roster schedule of break & weekend.

7. The interviewed workers said that they could obtain the job based on their working experiences and abilities. The female workers or male workers' wages were calculated at the same for the same work based on their performance.

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

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

During Interview, participation committee representative expressed that the facility management was nice to them, they could freely express their opinions, will, advice and suggestion without any fear or concern and they could make grievance if necessary. No negative information was observed during the audit.

O: Attitude of managers:

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

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



Audit Results by Clause

0A: Universal Rights covering UNGP

(Click here to return to summary of findings)

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The facility 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. Abul Hossain Shohag, General Manager (Operation & Marketing).
- 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.
- 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:

1. Documentation files were reviewed. It stipulates complying with Human Rights, written policies and procedure that being provided individually to employees.

- 2. Letter of Authorization on implementing Human Rights
- 3. Impact for Human Rights assessment report
- 4. Management interview and employee interview



A: Policy statement that expresses commitment to respect human rights?	Yes No A1: Please give details: The facility had posted the policy about respecting Human Rights in the policy board stated that child labour shall not be used, Forced Labour shall not be used, no discrimination is practised, no harsh or inhumane treatment is allowed, disciplinary action taken, working hours etc.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	Yes No Please give details: Name: Md. Abul Hossain Shohag Job title: General Manager (Operation & Marketing)
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?	Yes No C1: Please give details: The facility had established a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter by means of suggestion box, making the contact way of management in policy board and public areas in the facility.
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)	Yes No D1: If no, please give details: Not applicable
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	Yes No E1: Please give details: The facility established an effective data privacy procedure for workers' information to protect the workers' privacy information.

Findings				
Finding: Observation Description of observation: None Observed Local law or ETI/Additional elements Not Applicable Comments: Not Applicable	Company NC 🗌 / customer specific requirement:	Objective evidence observed: Not Applicable		



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



Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2021 NA%	A2: This year: 2022 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 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	4%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2021 NA%	C2: This year: 2022 2%
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	1%	
E: Are accidents recorded?	Yes No E1: Please describe: Factory maintains accident register regularly. Factory Doctor and Nurse are responsible positions to keep the accident records.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total worke rs]	F1: Last year: 2021-00 Number: NA	F2: This year: 2022-15 Number: 3.73%
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]	1.42%	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 0	H2: This year: 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0% workers	I2: 12 months 0% workers



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

<u>(Click here to return to summary of findings)</u>

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. Abul Hossain Shohag, General Manager (Operation & Marketing).
- The facility communicated this code of conduct (COC) to the suppliers and employees.
- The facility management is conducting internal social compliance audit regularly and take necessary corrective action based on report.
- The facility arranged mid-level management training for all mid-level management employees such as supervisors, quality in charge, production officers, etc.
- The facility conducts orientation training for all new employees.
- The facility conducted training to the employees on ETI base code.
- Implementation of any necessary changes is then given to the individual department heads after agreement with the facility manager.

One non-compliance and two observations were found in the area of "Management system & Code implementation". For details please refer to the contents of 'Non-compliance' & Observations.

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



Management Systems:			
A: In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	Yes No A1: Please give details: In the last 12 months the site has not been subjected to any fines or prosecutions for non-compliance to any regulations.		
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	Yes No B1: Please give details: It was noted through documentation review, facility has policies and procedures for reduce the risk of forced labour, child labour, discrimination, harassment & abuse.		
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Through documents review and workers interview, the written policies (no forced labour, no child labour, non-discrimination, working hours, health & safety, harassment and abuse) were communicated to the workers as much as factory mid-level management & workers were informed by training via notification board and training.		
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	Yes No D1: Please give details: All the managers and workers in the facility have received orientation training where standards for forced labour, child labour discrimination, harassment & abuse are covered.		
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	Yes 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). <i>Please detail (Number and date)</i> .	☐ Yes ⊠ No F1: Please give details: The site has no other internationally recognised system certifications.		
G: Is there a Human Resources manager/department? If Yes, please detail.	Yes No G1: Please give details: Facility has a dedicated Human Resources department consisting 3 members and is headed by Md. Harun or Rashid, Officer (HR & Admin).		
H: Is there a senior person / manager responsible for implementation of the code	Yes No H1: Please give details: Responsibility for meeting the legal and client code requirements is taken		



	by Md. Abul Hossain Shohag, General Manager (Operation & Marketing).
I: Is there a policy to ensure all worker information is confidential?	Yes No I1: Please give details: The factory had adopted a policy decision where by all employees of the company will be required to maintain confidentiality with regard to the affairs of the company & it's greater.
J: Is there an effective procedure to ensure confidential information is kept confidential?	Yes 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?	Yes No K1: Please give details: Facility conducted risk assessment evaluates effectiveness of every policy and procedure department wise.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	Yes No L1Please give details: The facility has an internal system to raise the issue found the 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?	Yes No M1: Please give details: The facility established a policy/code which requires labour standards of its own suppliers.
Land rig	hts
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	☐ Yes ➢ No N1: Please give details: The facility obtained building approval from local union Porishod instead of concern government 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?	Yes 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. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed	☐ Yes ⊠ No P1: If yes, how does the company obtain FPIC: Not Applicable



consent, (FPIC) even if national/local law does not require it		
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	 Yes No Q1: Please give details: The facility land is rented by the facility owner. 	
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	Yes No R1: Please give details facility are using rented	s: Not Applicable as the land and buildings.
rent agreement revi interview that the fac		It was noted through land ew and management illity did not go through land for facility building.
Non-compli	iance:	
 1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code: It was noted through documents review and managem a) The facility has two generators with capacity of 3 certificate from the respective authority. However, the applied for the permission to the concerned authority or b) The Export Promotion Bureau (EPB) License No BD-06 June 2022. Noted that the facility applied on 25 July 20 update yet. 	Objective evidence observed: 1. Based on documents review and management interview	
Local law and/or ETI requirement: In accordance with Additional Element 0.B.2: Supplier operating legally in premises with the correct business liv and to have systems to ensure that all relevant land righ with.		
In accordance with Bangladesh Energy Regulatory C Section 27 (1): No person shall engage himself in the follo is empowered by a license or exempted from having it other Act, such as: (a) Power generation; (b) Energy transmission; (c) Energy distribution and marketing; (d) Energy supply; and (e) Energy storage		
In accordance with the Importers, Exporters and Indento 1981, Order No. 21: (1) Every importer, every exported applying for registration or renewal of registration shall po		



paid in the Bangladesh Bank or in the Government treasury or in Sonali Bank under the Head "XL VI—Misc—Fees realised under Imports and Exports (Control) Act, 1950" and the original copy of receipted bank certificate or treasury chalan, as the case may be, shall be submitted or forwarded to the nominated bank for endorsement on the pass book or Import Registration Certificate where there is no pass book and in respect of indentor or exporter to the respective licensing offices of the Chief Controller through the nominated bank. (3) The first annual fees shall be paid along with the registration fee and the annual fee for every subsequent year shall be paid by the 31st December in the year preceding the year in respect of which the renewal of registration is applied for and the original copy of receipted bank certificate or treasury chalan as the case may be, shall be submitted so as to reach the respective licensing authority stated above not later than 31st January unless otherwise notified.

Recommended corrective action: It is recommended that the factory management should obtain both the updated licenses from the concern authorities.

Action by: Md. Abul Hossain Shohag, General Manager (Operation & Marketing))

Timescale: 180 days.

Observation:	
 1. Description of observation: The SAQ was not completed by the facility. The factory management explained that they had not been aware how to fill up the SAQ. However, they had started this work, and would finalise the SAQ within the next week. Local law or ETI requirement: In accordance with Additional Element 0.B.1: Suppliers are expected to implement and maintain systems for delivering compliance to this Code. Comments: The site would finalise the SAQ within the next week. 	Objective evidence observed: 1. Based on onsite SAQ review and management interview.
2. Description of observation: It was noted through document review and management interview that as per Boiler act 2022, boiler operator's competency certificate will be validated for 5 years. according to boiler act, 2022, currently 01 out of 01 boiler operator' competency certificates according to the new boiler law will no longer be valid.	2. Based on document review and management interview
Local law or ETI requirement: In accordance with Additional Element 0.B.1: Suppliers are expected to implement and maintain systems for delivering compliance to this Code.	
In accordance with Boiler act, 2022, section-9(6): The boiler operating license will be valid for 5 years and will be renewable thereafter.	
Comments: The site shall collect updated competency licenses.	



Good Examples observed:	
None Observed	Objective evidence observed: Not Applicable



1: Freely Chosen Employment

(Click here to return to summary of findings)

ETI

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

to leave their employer after reasonable notice.

Current Systems and Evidence Examined

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

Current systems:

- The factory has a policy which prohibits forced labour and this was also available for review.
- Age verification documents (National ID card copy, educational certificate, nationality certificates) were available in employee personal files.
- Service book is provided to every employee.
- Overtime is voluntary.
- The terms and conditions of employment state that the workers are free to leave the workplace outside of their working hours. Facility also has a written policy regarding this.
- The facility did not require any payment for work tools, PPE, IC/staff card, training, etc.
- The facility does not use any prison labour.
- The above was confirmed in management and employees' interviews.

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

Details:

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

A: Is there any evidence of retention of original documents, e.g. passports/ID's	 ☐ Yes ➢ No A1: If yes, please give details and category of workers affected: Not Applicable.
B: Is there any evidence of a loan scheme in operation	☐ Yes ⊠ No B1: If yes, please give details and category of worker affected: Not Applicable.
C: Is there any evidence of retention of wages /deposits	Yes No C1: If yes, please give details and category of worker affected: Not Application



D: Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ⊠ No D1: Please describe finding: Not Applicable
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?	 Yes No Not applicable E1: Please describe finding: The facility did not have any business part with UK which across £36m turnover annually.
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	 Yes No F1: Please describe finding: No evidence of any restrictions was found on workers freedoms to leave the site at the end of the workday.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	Yes No Not applicable G1: If yes, please give details and category of workers affected: The facility established a policy about forbidden of forced / trafficked / bonded labour and implemented strict management system to control the risk of forced / trafficked / bonded labour in its supply chain. The facility sent agreement of commitment to its suppliers, and operated social responsibility audit on suppliers to control the risk of forced / trafficked / bonded labour in its supply chain.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	Yes No H1: Please describe finding: Factory had provided training and awareness session to all employees to reduce the risk of forced / trafficked labour.

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: Not Applicable	

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



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



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

<u>(Click here to return to summary of findings)</u> (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.
- Participation Committee was formed by election on 01 November, 2022.
- Last meeting of the committee was held on 02 November, 2022.
- Meeting minutes are posted in notice board and recorded in a register.
- There are 07 members from workers' side and 05 from management side with a total of 12 members.
- PC members are equally treated than other workers.
- PC members are allowed to carry out their duties within working hours without affecting their pay.

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

Details:

- 1. Freedom of association policy review
- 2. Facility management interviews
- 3. Worker interview
- 4. Complain box register (Suggestions from the complaint box and actions taken)

5. Participation Committee formation record review and its meeting records review, grievance handling policy & procedure.

A: What form of worker representation/union is there on site?	□ Union (name) ⊠ Worker Committee □ Other (specify) □ None
B: Is it a legal requirement to have a union?	☐ Yes ⊠ No
C: Is it a legal requirement to have a worker's committee?	X Yes No



D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	Yes No D1: Please give details: The factory management has provided complain box in the toilet area through which workers can raise their suggestion / complaints. Workers can also approach the management directly for any grievances which confirmed the interviewed workers.		
	D2: Is there evidence of free elections? Yes No		
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	Yes No E1: Please give details: The PC members are able to perform their responsibility without any management intervention, though the factory had formed participation committee by election process.		
F: Name of union and union representative, if applicable:	Not Applicable		re evidence of free elections?
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Participation Committee		ere evidence of free elections?
H: Are all workers aware of who their representatives are?	🛛 Yes 🗌 No	All worke represen	ers are well aware of their tatives.
I: Were worker representatives freely elected?	Yes 🗌 No	11: Date o 2022.	of last election: 01 November,
J: Do workers know what topics can be raised with their representatives?	Yes No		
K: Were worker representatives/union representatives interviewed?	Yes No If Yes , please state how many: One worker representative was interviewed during audit.		
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	07 worker representatives were elected by the workers among the workers to represent each section of the facility. The last communication meeting was held on 02 November, 2022 with topic of discussion about introducing with each other, election of vice president of the committee, discussion on duties and responsibilities of members etc. Meeting minutes was shared with all workers through posting the meeting minutes on communication board.		
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	Tes No		
If Yes , what percentage by trade Union/worker representation	M1:N/A_% workers covered M2:N/A_% workers covered by Union CBA by worker rep CBA		



M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	☐ Yes ⊠ No

Non-compliance:	
1. Description of non-compliance: NC against ETI NC against Local Law NC against ETI NC against Local Law None Observed Local law and/or ETI requirement: Not Applicable Recommended corrective action: Not Applicable	Objective evidence observed: Not Applicable

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

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



3: Working Conditions are Safe and Hygienic

<u>(Click here to return to summary of findings)</u>

(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. Abul Hossain Shohag, General Manager (Operation & Marketing Officer looks after Health & Safety issues for the site.
- Potable water was freely available in all areas.
- Sufficient clean toilets 29 (15 for male and 14 for female) segregated by gender were available at all times for workers.
- Ventilation, temperature and lighting were adequate for the production processes.
- Minutes of meetings show that there are every three months Health and Safety meeting held. Last meeting was held on 7 November, 2022.

2. Fire Safety

- Sufficient assembly area was found in front of the facility building.
- Firefighting equipment was adequate and checks were up-to-date.
- The facility management posted the evacuation plans on production floors with local language.
- Public Address System and Fire Alarm System were available in all areas.

3. Fire Drill Information

Type of Fire Drill	Date	Time Duration	No. of Participant	Conducted by
Day (Internal)	18.10.2022	01.57 minutes	420	Md. Abul Hossain Shohag, General Manager (Operation & Marketing)

Facility provide bellow training to employees:

Training Name	Date	Participant	Name of Trainer
1. New Workers Orientation	13.10.2022	19	Elma Jahan, Welfare Officer
Training			
2. Occupational Health & Safety	17.10.2022	19	Md. Harun or Rashid, Officer, HR &
Training			Admin
3. Machine Safety Training	12.10.2022	15	Md. Harun or Rashid, Officer, HR &
			Admin
4. ETI Base Code Training	03.10.2022	15	Elma Jahan, Welfare Officer



5. P.P.E Training	13.10.2022	15	Md. Harun or Rashid, Officer, HR & Admin
6. Grievance Handling Training	07.10.2022	15	Elma Jahan, Welfare Officer
7. Firefighting Training	06.10.2022	15	Md. Harun or Rashid, Officer, HR & Admin
8. Risk Assessment Training	13.10.2022	15	Md. Harun or Rashid, Officer, HR & Admin
9. Mid-level Management	11.10.2022	10	Md. Harun or Rashid, Officer, HR & Admin
10. Chemical Handling Training	18.10.2022	15	Md. Harun or Rashid, Officer, HR & Admin
11. Environmental Management Training	05.10.2022	14	Md. Harun or Rashid, Officer, HR & Admin

4. Electrical, Machine & fire safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- 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.

5. Chemical safety

• Facility uses chemical for their production process and provided training and Personal Protection Equipment.

6. Medical services

- There were 04 first aid boxes with sufficient kits in the full facility.
- Facility has appointed 01 doctor and 01 nurse who are available in working time of the facility. They also arranged monthly first aid training with first aiders.
- Facility has a medical room.

7. Dormitory

• Facility didn't provide dormitory facilities to any employees.

Six non-compliances were found in the area of "Working Conditions are Safe and Hygienic". For details, please refer to contents of 'Non-compliances'.

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

Details:

- 1. License review (Fire license, Trade license, Factory license)
- 2. Building approval plan and layout approval plan
- 3. Group insurance
- 4. Drinking water test report
- 5. Injury record and analysis report
- 6. Machine and electric maintenance record
- 7. Risk assessment report
- 8. Training record (Fire training, First aid training, PPE training and Health and safety training)
- 9. Fire drill record
- 10. Health and safety committee register
- 11. Fire equipment and electric equipment checking record



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: Factory had adopted health & safety policy which covers PPE, machine safety device, fire safety (fire extinguisher, freighting equipment, hose pipe etc.), emergency pathway, evacuation drill, housekeeping, first aid, electrical safety etc. Last training was conducted on 17 October, 2022.
B: Are the policies included in workers' manuals?	Yes No B1: Please give details: The facility provides workers manual to the workers where all the policies and applicable government law are included.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	 Yes No C1: Please give details: There were no structural additions without prior permits/ inspections.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	Yes No D1: Please give details: The site kept dedicated PPE(s) for visitors. While any visitor visits in the factory generally, they brief the visitor about H&S policy and provide PPE(s) as and when required.
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.	Yes No E1: Please give details: The facility had a medical room dedicated for workers with 02 beds, 01 bed for male and 01 bed for female.
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	Yes No F1: Please give details: The facility has 01 doctor and 01 nurse are appointed for medical treatments 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?	Yes No G1: Please give details: The factory does not provide transport facility to their workers.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	 Yes No H1: Please give details: Not applicable as factory did not provide living space to the workers.
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	Yes No 11: Please give details: Workers risk assessment is done on a monthly basis according to the training schedule.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	⊠ Yes □ No



	J1: Please give details: The facility meets all the legal obligations on environmental requirement including required permits for use and disposal natural resources like water, gas etc.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	Yes No K1: Please give details: Factory did not use banned chemicals and follows the entire customer requirement on environmental standard.

Non-compliance:		
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	Objective evidence observed: 1. Based on workers interview.	
It was noted through workers interview that- a) Approximately 20% firefighters and rescue team members were not properly aware about the types of fire extinguishers, types of fire, usage of firefighting equipment, rescue procedures and his/ her duties during emergency situations. b) Approximately 17% first aiders were not aware about first aid kits & medicines and preliminary treatment procedures.		
Local law and/or ETI requirement: In accordance with 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 Rules 2015, Rule 55 (10): If possible, all workers or at least 18% of the workers employed in each department have to be trained on fire-fighting, emergency rescue operation, first aid and the usage of portable fire-repellant instruments. And the security has to be ensured by dividing the trained workers into fire-fighting team, rescue team and first aid team (6% members in each team) and the records related herewith have to be preserved in accordance with Form- 22.		
Recommended corrective action: It is recommended that the facility management shall arrange firefighting, rescue and first aid trainings on regular basis to prepare them aware on firefighting requirements, rescue procedures and first aid treatment procedures in case of emergency situations.		
Action by: Md. Abul Hossain Shohag, General Manager (Operation & Marketing)		
Timescale: 90 Days.		
2. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: NC NC	2. Based on plant tour NC Picture No. 01, 02 & 03	



It was noted through during plant tour that-

(a) 02 out of 02 knitting machine operators were not using ear plug while they are working on the production floor.

Moreover, the facility provide ear plug to the workers.

(b) Approximately 25% workers were not using face mask while they are working in the production floor.

(c) 01 out of Boiler operator was not using ear plug while they are working.

Local law and/or ETI requirement:

In accordance with 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 Rules, 2015, Section 67 (2 & 3): 2) In addition to the arrangement of safety and health protection measures mentioned in Sub-section (1), the concerned manufacturing institute must provide necessary equipment's, including safety shoes, helmets, goggles, masks, hand gloves, ear muffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage. 3) No worker can be employed in the relevant works without ensuring safety and health protection measures and the training related therewith. In addition, personal safety equipment's must be preserved in accordance with Information Form-23.

Recommended corrective action: It is recommended that the facility management should provide appropriate PPE(s) to the Knitting operators and boiler operator who need ear plug and ensure the usage of PPE(s) while these are required during works.

Action by: Md. Abul Hossain Shohag, General Manager (Operation & Marketing).

Timescale: 30 Days.

3. Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	3. Based on plant tour NC Picture No. 04
It was noted through plant tour that randomly checked one female washroom did not have adequate soap & sandals which located at 1st floor of building-1.	
Local law and/or ETI requirement: In accordance with 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 The Bangladesh Labor Rules, 2015, Chapter-5, Section-51 (1): As per the section 59, the number, location and cleanliness of the toilets and wash room should be in accordance with the schedule-2.	
Recommended corrective action: It is recommended that the management adopt practices and controls to ensure that factory should provide adequate soap and sandals at the female wash room.	
Action by: Md. Abul Hossain Shohag, General Manager (Operation & Marketing).	
Timescale: 30 Days.	
4. Description of non–compliance: ⊠ NC against ETI ⊠ NC against Local Law □ NC against customer code:	4. Based on plant tour NC Picture No. 05, 06 & 07
It was noted through plant tour that- (a) around 30% eye guards were displaced with overlock & Flatlock machines in the sewing section locate at ground floor of building 1. (b) around 25% needle guards were misplaced with sewing plain machines of building-01 of 1st floor at sewing section.	
Local law and/or ETI requirement: In accordance with 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 shall ensure the safety guards in proper position with all the mentioned machines all workers as per required.	
Action by: Md. Abul Hossain Shohag, General Manager (Operation & Marketing).	
Timescale: 30 Days.	
5. Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	5. Based on plant tour NC Picture No. 08



It was noted through plant tour that In Building-1 at sewing section located at 1st floor, eye wash station was not installed in the spot removing room and this room was not covered. Note that 01 female workers work in the open area where use spot lifter 833. Local law and/or ETI requirement: In accordance with 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 Labor Act 2006, Section 53 (1): If in any establishment, by reason of any manufacturing process carried on, there is given off any dust or fume or other impurity of such a nature and to such an extent as is likely to be injurious to the health of, or offensive to, the workers employed therein, the effective measures shall be taken to prevent its accumulation in any work-room and its inhalation by workers, and if any exhaust appliance is necessary for this purpose, it shall be applied as near as possible to the point of origin of the dust, fume or other impurity, and such point shall be enclosed as far as possible. In accordance with Bangladesh Labor Act 2006, Section 78 (2): Where in any establishment the plant or machinery used in a process is not so constructed as to withstand the probable pressure which is produced in the case of such explosion, all practicable measures shall be taken to restrict the spread and effects of the explosion by the provision of chokes, baffles, vents or any other effective apparatus in the plant or machinery. Recommended corrective action: It is recommended that the facility shall ensure that no female worker to be deployed to use chemical and ensure functional spot removing room separated from other workers. Action by: Md. Abul Hossain Shohag, General Manager (Operation & Marketing). Timescale: 60 Days. 6. Description of non-compliance: 6. Based on documents NC against Local Law INC against customer NC against ETI review and code: management interview It was noted through documents review and management interview that the facility obtained building approval from local union Porishod instead of concern government authority. Local law and/or ETI requirement: In accordance with Building Construction Act, 1952, Section 3 (a): No owner or occupier of a building shall, without obtaining previous permission from the Authorized Officer or the Committee, as the case may be, use the building for the purpose other than that mentioned in the sanction.



Recommended corrective action: It is recommended that the facility shall obtain the building approval from the concerned authority.	
Action by: Md. Abul Hossain Shohag, General Manager (Operation & Marketing.	
Timescale: 90 Days.	

Observation:		
Description of observation: None Observed Local law or ETI requirement: Not Applicable Recommended corrective action: Not Applicable	Objective evidence observed: Not Applicable	

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



4: Child Labour Shall Not Be Used

(Click here to return to summary of findings)

(Click here to return to Key Information)

ETI

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined

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

Current systems:

- The facility has established a practice that they will never employ and use any child labour.
- The facility verifies all workers' original national ID card, birth certificate etc. at the time of recruitment and keeps the photocopies of workers' ID cards, birth certificate in their personal files.
- Factory verifies the workers age through registered doctor.
- Sampling basis employees' personal files was taken for review. Each employee file included a biodata sheet, recent photo, birth registration certificate / photocopied national identification card and other documents.
- There was no child or young employee observed in the facility.
- It was evident during the documents review; the age of youngest worker is above 21 years old (DOB: 10 May 2001 & DOJ: 02 February 2022). During the facility walkthrough, there were no concerns regarding child labour observed.

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

Details:

1. The procedure of <Recruiting regulation> was available for review, the personnel files with ID or birth certificate copy were available for review, the contracts with all the employees were available for audit, and the roster had established by the factory.

- 2. Document review
- 3. Management interview
- 4. Worker interview
- 5. On-site observation during floor visit

A: Legal age of employment:	14+ years with significant restriction
B: Age of youngest worker found:	21+ years
C: Are there children present on the work floor but not working at the time of audit?	☐ Yes ⊠ 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)	☐ Yes ⊠ No E1: If yes, give details: Not Applicable

Non-compliance:		
1. Description of non-compliance: NC against ETI NC against Local Law NC against ETI NC against Local Law None Observed Local law and/or ETI requirement: Not Applicable Recommended corrective action: Not Applicable	Objective evidence observed: Not Applicable	

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

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



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:

- Based on the Gazette Notification, the actual lowest minimum wage in the facility is BDT 8,000 per month.
- Time keeping is manual time card system.
- All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Each employee was given a pay slip and signed for their wages.
- All employees were paid within 7 working days of the following month.
- Employees are aware of their minimum wage.
- Wages have been recorded according to documents checked.
- According to the documents which were provided by the HR & Accounts Departments and during the workers interview, it was noted that factory provides all kinds of leave. Maternity leave and earn leave benefits are provided to the employees as per law. Moreover, employees were allowed to take 14 days' sick leave; 10 days' casual leave according to law and 11 days' festival leave.

One good example was found in the area of "Living wages and benefits". For details please refer to contents of "Good example".

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

Details:

- 1. Document review
- 2. Worker interview
- 3. Management interview
- 4. Local and national laws
- 5. Wages and benefits policy
- 6. Local legal minimum wage documents
- 7. Payroll records from March 2022 to audit day
- 8. Leave records
- 9. Social group insurance and payment receipts from the local labour department
- 10. Labour contracts for all employees
- 11. Resignation records



12. Payslips of all workers interviewed

13. Overtime records

Any other comments: None

Non-compliance:					
1. Description of non-compliance: NC against ETI NC against Local Law: None Observed Local law and/or ETI requirement Not Applicable Recommended corrective action: Not Applicable	Objective evidence observed: Not Applicable				

Observation:

Description of observation: None Observed	Objective evidence observed:
	Not Applicable
Comments:	
Not Applicable	

Good Examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:
1. The facility provides monthly attendance bonus BDT 500 to all operators & quality inspectors and BDT 300 to all helpers as per factory policy.	1. Based on payroll records review and workers & management interview

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 208 hours per month	A1: 08 hours per day 48 hours per week 208 hours per month	A2: ☐ Yes ⊠ No
B: Overtime hours:	Legal maximum: 2 hours/ day and	B1: 2 hours/ day and	B2: Yes



(Maximum legal and actual overtime hours, please state if possible per day, week, and month)	12 hour/ week 52 hour/month	12 hour/ week 52 hour/month	🖾 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 for the Garments division: Grade-1: 18257 BDT/Month Grade-2: 15416 BDT/Month Grade-3: 9845 BDT/Month Grade-4: 9347 BDT/Month Grade-5: 8875 BDT/Month Grade-6: 8420 BDT/Month Grade-7: 8000 BDT/Month Trainee / Apprentice: 5975 BDT/Month	C1: The Site provides: Grade-1: 18257 BDT/Month Grade-2: 15416 BDT/Month Grade-3: 9845 BDT/Month Grade-4: 9347 BDT/Month Grade-5: 8875 BDT/Month Grade-6: 8420 BDT/Month Grade-7: 8000 BDT/Month Trainee / Apprentice: 5975 BDT/Month	C2: Yes 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: 200% of basic wage	D1: 200% of basic wage	D2: Yes No

Wages analysis: (Click here to return to Key Information)					
A: Were accurate records shown at the first request?	∑ Yes □ 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)	26 samples from the month of October 2022 (Current month) 26 samples from the month of June 2022 (Random month) 26 samples from the month of March 2022 (Random month)				
C: Are there different legal minimum wage grades? If Yes , please specify all.	 Yes C1: If Yes, please give details: The Government has announced the pay structure, which was implemented from 1st December 2018 for the workers of the Garments Industries. The amended Gazette Notification has been published on 24th January, 2019. There are two separate pay structures; for the garment workers (Schedule A) 1. For the workers (Schedule A): 				



		Grade	Monthly basic wage	House rent 50% of the basic	Medical allowance	Conveyance allowance	Food subsidy	Gross monthly wage
		Grade 1	Tk. 10938	Tk. 5469	Tk.600	Tk.350	Tk.900	Tk. 18257
		Grade 2	Tk. 9044	Tk. 4522	Tk.600	Tk.350	Tk.900	Tk. 15416
		Grade 3	Tk. 5330	Tk. 2665	Tk.600	Tk.350	Tk.900	Tk. 9845
		Grade 4	Tk. 4998	Tk. 2499	Tk.600	Tk.350	Tk.900	Tk. 9347
		Grade 5	Tk. 4683	Tk. 2342	Tk.600	Tk.350	Tk.900	Tk. 8875
		Grade 6	Tk. 4380	Tk. 2190	Tk.600	Tk.350	Tk.900	Tk. 8420
		Grade 7	Tk. 4100	Tk. 2050	Tk.600	Tk.350	Tk.900	Tk. 8000
		Apprentice						Tk. 5975
		2. For the s	staff leve	el (Sche	edule B) e	mployees:		
		Grade	Monthly basic wage	House rent 50% of the basic	Medical allowance	Conveyance allowance	Food subsidy	Gross monthly wage
		Grade 1	Tk.8150	Tk.4075	Tk.600	Tk.350	Tk.900	Tk. 14075
		Grade 2	Tk.6300	Tk.3150	Tk.600	Tk.350	Tk.900	Tk. 11300
		Grade 3	Tk.5950	Tk.2975	Tk.600	Tk.350	Tk.900	Tk. 10775
		Grade 4 Apprentice	Tk.4350	Tk.2175	Tk.600	Tk.350	Tk.900	Tk. 8375 Tk. 6164
D: If there are different legal minimum grades, are all workers graded and paid correctly?	Yes D1: If No , please give details:							
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	□ E1: Lowest actual wages found: The actual lowest minimum wage in the facility was BDT. 8,000 per month. This is government declaring legal minimum wage. Meet △ Above							
F: Please indicate the breakdown of workforce per earnings:	F1:0_% of workforce earning under minimum wage F2:18% of workforce earning minimum wage F3:82% of workforce earning above minimum wage							
G: Bonus Scheme found: Please specify details:	 Bonus Scheme found: 1. The facility provides festival bonus 50% of basic during Eid UI Fitr and Eid UI Azha (each) as per factory policy. 2. The facility provides monthly attendance bonus BDT 500 to all operators & quality inspectors and BDT 300 to all helpers as per factory policy. 							
H: What deductions are required by law e.g. social insurance?	As per section 125 of the Bangladesh Labour Law, 2006, factory may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc. However,							



Please state all types:	the factory is deducting only for un-authorized absence and revenue stamp deduction.				
I: Have these deductions been made?	Yes D No	 11: Please list all deductions that have been made. 12: Please list all deductions that have not been made. 		 Absent deduction in case of worker is absent as per law. Revenue Stamp Please describe: The factory deducted for absent and revenue stamp. 	
				 Group Insurance Please describe: The factory did not deduct for group insurance. 	
J: Were appropriate records available to verify hours of work and wages?	X Ye				
K: Were any inconsistencies found? (if yes describe nature)	🗌 Isolated i		Poor reco	ord keeping incident ed occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	Yes No L1: Please give details: Factory had provided accurate and complete payroll & attendance records to the auditors for review where all working hours were recorded.				
M: Is there a defined living wage: 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.	 Yes No M1: Please specify amount/time: Factory did not define living wages as it is not required by law. However, factory is providing the minimum wage as Minimum Wages Gazette for Readymade Garments Sector published on 24th January, 2019. 				
M2: If yes, what was the calculation method used.	ISEAL/Anker Benchmarks Asia Floor Wage Figures provided by Unions Living Wage Foundation UK Fair Wear Wage Ladder Fairtrade Foundation Other – please give details: Not Applicable				
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	Yes No N1: Please give details: At least 5% of basic wages shall be increased yearly.				



O: Are workers paid in a timely manner in line with local law?	∑ Yes □ No
P: Is there evidence that equal rates are being paid for equal work:	Yes No P1: Please give details: Based on employees' interview, copy of appointment letter issued to employees and wage records, it was noted that equal rates are paid for equal work.
Q: How are workers paid:	∑ Cash ☐ Cheque ☐ Bank Transfer ☐ Other Q1: If other, please explain: Not applicable



6: Working Hours are not Excessive

<u>(Click here to return to summary of findings)</u>

(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 <u>all</u> 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 employees' interviews, no inconsistency was noted either.
- Through employees' interview, overtime is voluntary.
- Timecards are completed manual.
- All overtime is compensated at a premium rate for all employees.
- The time frame of the records reviewed are as follows: 26 samples from the month of October 2022 (Current month) 26 samples from the month of June 2022 (Random month) 26 samples from the month of March 2022 (Random month)

According to time records and worker interview basic working hours were 8 hours per day and a max 48 hours per week. Maximum OT 2 hours per day and 12 hours per week were found in the three sample months. The employee works for 06 days in a week. The employee works for 06 days in a week (Sunday to Thursday). Weekend of the factory was Saturday. The general working hours for all sections in the factory is



operating in one shift. This shift starts from 08:30 to 17:30 with one-hour lunch break from 13:00 to 14:00. Only security has three shifts per eight hours each with roster schedule of break & weekend.

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

Details:

- 1. Employee interview
- 2. Management interview
- 3. Local and national laws
- 4. Factory policy on working hours
- 5. Attendance and wages records from March 2022 to the audit day
- 6. Manual attendance system
- 7. Sample pay slips with recorded hours all workers interviewed
- 8. Quality and production records to cross check hours
- 9. Workers contracts

Non-compliance:					
1. Description of non-compliance: NC against ETI NC against Local Law None Observed Local law and/or ETI requirement: Not Applicable Recommended corrective action: Not Applicable	Objective evidence observed: Not Applicable				

Observation:					
None Observed	Objective evidence observed: Not Applicable				

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



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: Attend by Manual timec			uding OT) record w	as maintained
B: Is sample size same as in wages section?	Yes No B1: If no, please give details: Not applicable				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	 ∑ Yes C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: Not Applicable 				
D: Are there any other types of	☐ Yes ⊠ No	D1: If YES, please complete as appropriate:			
contracts/employment agreements used?		0 hrs	Part time	Variable hrs	Other
		If "Other", Please define:			
		Not Applicable			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	☐ Yes ⊠ No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: Not Applicable			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: 1 in 7 days 2 in 14 days No If 'No', please explain:				
	Maximum numbe	er of days	worked without a	day off (in sample)	:
	The factory work	ed maxim	um 6 days in a we	ek without a day o	ff
Standard/Contracted He	ours worked				
	G1: If yes, % of workers & frequency:				



G: Were standard working hours over 48 hours per week found?	No No	Not Applicable		
H: Any local		H1: If yes, please give details:		
waivers/local law or permissions which allow averaging/annualised hours for this site?	No No	Not Applicable		
Overtime Hours worked				
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: October 2022: No found OT in this month June 2022: 02 hours per day, 12 hours per week and 52 hours per month March 2022: 02 hours per day, 12 hours per week and 52 hours per month			
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	☐ Yes ⊠ No			
K: Approximate percentage of total workers on highest overtime hours:	2.56%			
L: Is overtime voluntary?	Yes No Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Based on the factory policy, rules and regulations, and training records, employee handbook and workers and management interview it was noted that the overtime is voluntary in this factory.		
Overtime Premiums	•			
M: Are the correct legal overtime premiums paid?	Yes No N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of <u>standard</u> wages: Double of basic wages as overtime rate.		
N: Is overtime paid at a premium?	X Yes No	N1: If yes, please describe % of workers & frequency: All workers receive double of basic wages as overtime rate every month.		
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.	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other
	Not Applicable
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please	 Overtime is voluntary Onsite Collective bargaining allows 60+ hours/week Safeguards are in place to protect worker's health and safety Site can demonstrate exceptional circumstances Other reasons (please specify)
complete the boxes where relevant.	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:
	Not Applicable
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ∑ No Q1: If yes, please give details: Not Appliable
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	☐ Yes ⊠ No



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 factory 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:

1. The hiring and termination procedure, leave application records and employee handbook.

2. Payroll records

3. Attendance records

4. Termination records

5. Training records

6. Employment contracts were provided for review and they showed that male and female employees were on the same pay grade.

7. Management interview and employee interview

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male:100 % A2: Female0 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	0
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability,	 Hiring Compensation Access to training Promotion



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

Professional Development				
A: What type of training and development are available for workers?	All workers are given H&S training, different types of machine operation and quality assurance training.			
B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	Yes No			

lf	no,	please	give	details:	Based	on	docu	Jments	rev	/iew,
m	anag	gement	and	workers	interview	v it	was	observ	əd	that
pr	omo	tion, trai	ning, d	compens	ation de	cisio	ns we	ere mad	le b	y HR
De	epart	ment.								

Non-compliance:				
1. Description of non-compliance: NC against ETI NC against Local Law NC against ETI NC against Local Law None Observed Local law and/or ETI requirement: Not Applicable Recommended corrective action: Not Applicable	Objective evidence observed: Not Applicable			

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

Good Examples observed:	
None Observed	Objective Evidence Observed: Not Applicable



8: Regular Employment Is Provided

<u>(Click here to return to summary of findings)</u>

(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.
- There is no sub-contractor in the factory.
- All workers getting signed labour contract and ID card during their recruitment.
- Factory maintains service books for all workers
- Factory has policy to provide all kinds of compensation and benefits to the employees
- If any employees want to leave the job, he or she may leave giving 60 days' notice prior to leave as per law
- No temporary worker, apprenticeship schemes or home worker was identified by the auditors.

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

Details:

1. Factory policy, rules and regulations, employees' personnel files, employees' ID card, pay slips etc.

- 2. Management interview and employee interview
- 3. The hiring and termination records.
- 4. Worker interview



Non-compliance:					
1. Description of non-compliance: NC against ETI NC against Local Law NC against ETI NC against Local Law None Observed Local law and/or ETI requirement: Not Applicable Recommended corrective action: Not Applicable	Objective evidence observed: Not Applicable				

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

Good Examples observed:		
None Observed	Objective Evidence Observed: Not Applicable	

Responsible Recruitment

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



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

Migrant Workers:

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

A: Type of work undertaken by migrant workers:	Not applicable as no migrant worker was found in this factory.		
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: Not Applicable B2: Total number of (outside of local country) recruitment agencies used: Not applicable as factory had recruited all workers directly.		
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?	Yes No C1: Please describe finding: Not Applicable	C2: Observations: Not Applicable	
D: Are Any migrant workers in skilled, technical, or management roles Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)	Yes No D1: If yes, number and	example of roles: Not Applicable	



NON-EMPLOYEE WORKERS

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

Agency Workers (if applicable)

(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)			
A: Number of agencies used (average):	A1: Names if available: Not applicable as factory had recruited all workers directly.		
B: Were agency workers' age / pay / hours included within the scope of this audit?	☐ Yes ☐ No Not Applicable		
C: Were sufficient documents for agency workers available for review?	☐ Yes ☐ No Not Applicable		
D: Is there a legal contract / agreement with all agencies?	☐ Yes ☐ No D1: Please give details: Not Applicable		
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	Yes No E1: Please give details: Not Applicable		



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?	 Yes No A1: If yes, how many contractors are present, please give details: Not Applicable 		
B: If Yes , how many workers supplied by contractors?	Not Applicable		
C: Do all contractor workers understand their terms of employment?	Yes No C1: Please describe finding: Not Applicable		
D: If Yes , please give evidence for contractor workers being paid per law:	Not Applicable		



8A: Sub–Contracting and Homeworking

(Click here to return to summary of findings)

(Click here to return to Key Information)

8A.1 There should be no sub-contracting unless previously agreed with the main client.8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external

processing.

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

- As per factory tour, documents review and management & workers interview, there was no subcontractor or home working used by facility currently.
- Therefore, no apparent concern was detected regarding this section.

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

Details:

- 1. Management interview & workers interviews
- 2. Production capacity plan
- 3. Material in/out registers
- 4. Production process of the factory
- 5. Policies and procedures

Non-compliance:			
1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code: None Observed	Objective evidence observed: Not Applicable		
Local law and/or ETI /Additional Elements requirement:			
Not Applicable			
Recommended corrective action: Not Applicable			



Observation:			
Description of observation: None Observed Local law or ETI/Additional elements requirement: Not Applicable Comments: Not Applicable	Objective evidence observed: Not Applicable		
Good Examples observed:			
Description of Good Example (GE): None Observed	Objective Evidence Observed: Not Applicable		

Summary of sub-contracting – if applicable 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	☐ Yes ☐ No A1: Please describe:		
B: If sub–contractors are used, is there evidence this has been agreed with the main client?	☐ Yes ☐ No B1: If Yes , summarise details:		
C: Number of sub– contractors/agents used:			
D: Is there a site policy on sub- contracting?	☐ Yes ☐ 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				
A: If homeworking is being used, is there evidence this has been agreed with the main client?	en 🗌 No			
B: Number of homeworkers	B1: Male:	B2: Female:		Total:
C: Are homeworkers employed direct or through agents?	Directly Through Agents		C1: If through agents, number of agents:	



D: Is there a site policy on homeworking?	Yes 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?	☐ Yes ☐ No G1: Please give details:
H: Are full records of homeworkers available at the site?	Yes 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?	Yes No A1: Please give details: Through direct supervisors, management, suggestion box and workers participation committee.
B: If Yes , are workers aware of these channels and have access? Please give details.	Workers can share their concern drop to their complaint into suggestion box and even go to the top management.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion box & HR Department
D: Which of the following groups is there a grievance mechanism in place for?	 Workers Communities Suppliers Other D1: Please give details: All workers were aware of these processes; suggestion box was known by the workers. Also, workers can share their concern with workers representatives; drop their complains into suggestion box and even go to the top management.
E: Are there any open disputes?	 ☐ Yes ☑ No E1: If yes, please give details; Not Applicable
F: Does the site encourage its business partners (e.g. suppliers) to provide	☐ Yes ⊠ No
individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	F1: If no, please give details: The factory had no procedure to encourage to business partners to established grievance mechanism.
G: Is there a published and transparent disciplinary procedure?	∑ Yes □ No
	G1: If no, please explain: Not Applicable



H: If yes, are workers aware of these the disciplinary procedure?	Yes No
	H1: If no, please give details: Not Applicable
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages	Yes No
section)?	11: If yes, please give details: Absent deduction in case of worker is absent as per law.

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 training.
- Through the factory management and employees' interview, it was noted that no physical abuse was 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:

- 1. The relevant policy on prevention of harassment and abuse.
- 2. Internal grievance procedure documentation.
- 3. Training records.
- 4. Management interview and employee interview.

Non-compliance:		
1. Description of non-compliance: NC against ETI NC against Local Law NC against ETI NC against Local Law None Observed Local law and/or ETI requirement: Not Applicable Recommended corrective action: Not Applicable	Objective evidence observed: Not Applicable	



Observation:		
Description of observation: None Observed Local law or ETI requirement: Not Applicable Comments: Not Applicable	Objective evidence observed: Not Applicable	
Good Examples observed:		

Good Examples observed.	
	Objective Evidence Observed: Not Applicable



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:

- Per document review, factory management representation and workers interview, it was observed that all workers in the factory were Bangladeshi and 100% were local workers and no permission was required for working from one district to another district.
- All workers had the proper legal rights to work in this region.
- All of them were recruited directly by the factory and no agency was involved in factory's recruitment processes.
- No agency staff or foreign worker was used by the factory.
- There were not any deductions for items such as travel and equipment.

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

Details:

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

Non-compliance:		
 1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code: None Observed Local law and/or ETI /Additional Elements r Not Applicable Recommended corrective action: Not Applicable 	NC against Local Law	Objective evidence observed: Not Applicable



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

Good examples observed:	
None Observed	Objective Evidence Observed: Not Applicable



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:

- Through onsite visit, workers & management interviews and documents review, no violation of environment pollution was observed.
- The factory had established an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.
- Factory management has appointed a designated person Md. Abul Hossain Shohag, General Manager (Operation & Marketing to take care about environmental requirement.
- Production process of the factory is Knitting, Cutting, Sewing, Finishing & Packing. No hazardous types of chemicals are used in the factory. Factory management has conducted training on minimal uses of water, energy and natural resource to all employees.
- Factory management has the agreement with waste collect company for the disposal of general wastages like jute, fabrics, poly, wastage cartons, papers etc. Factory management is aware about the environmental impact of their business activities.

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

Details:

- 1. Environmental policy and procedures
- 2. Environmental impact report form and approval
- 3. Management interview
- 4. Worker interview
- 5. Site tour



Non-compliance:		
NC against ETI/Additional Elements NC against Local Law	Objective evidence observed: Not Applicable	

Observation:		
Description of observation: None Observed Local law or ETI/additional elements requirement: Not Applicable Comments: Not Applicable	Objective evidence observed: Not Applicable	
Good examples observed:		
Description of Good Example (GE):	Objective Evidence	

Description of Good Example (GE): None Observed

Observed: Not Applicable



Other findings

Other Findings Outside the Scope of the Code

None Observed

Community Benefits

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

None Observed

Appendix 1

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

Not Applicable please x



Photo Form



Knitting Section

Cutting Section

Sewing Section



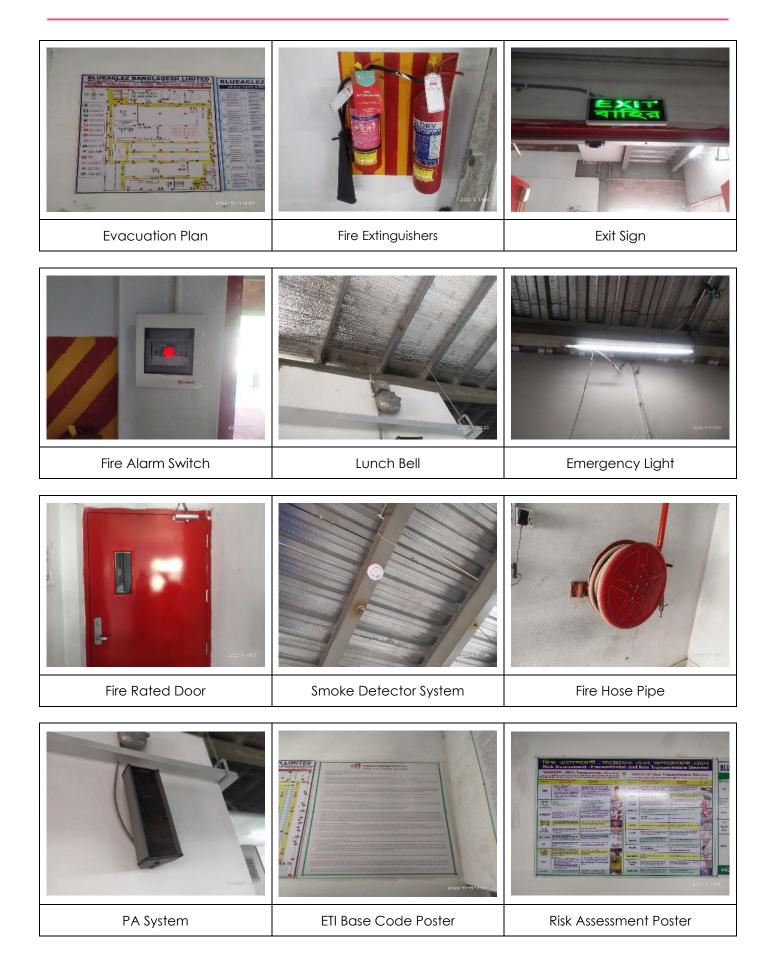
Ironing Section

Finishing Section

Packing Section











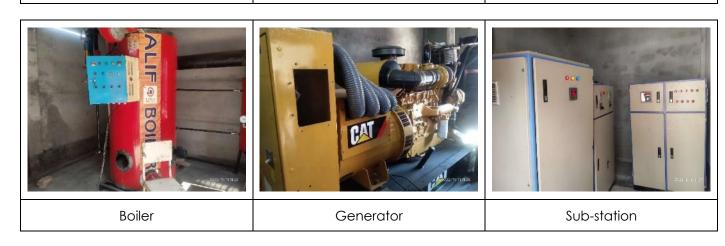


First Aid Box

Grievance Box













Non-compliance photo



Knitting machine operators were not using ear plug while they are working **NC Picture No.01**



Workers were not using face mask while they are working **NC Picture No.02**



Boiler operator was not using ear plug **NC Picture No.03**







Female washroom did not have adequate soap & sandals **NC Picture No.04**

Eye guard was displaced with overlock smachine **NC Picture No.05**

Eye guard was displaced with Flatlock machine **NC Picture No.06**



Needle guard was misplaced with sewing plain machine **NC Picture No.07**



The spot removing room was not covered & furnished **NC Picture No.08**





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http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5Iw_3d_3d

Click here for Supplier (B) members:

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

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