




# Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 402590318	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 402665038	
Business name (Company name):	Continental Garments Ind. (Pvt.) Ltd.			
Site name:	Continental Garments Ind. (Pvt.) Ltd.			
Site address: <i>(Please include full address)</i>	8, Dewan Idris Road, Boro Rangamatia, Ashulia, Savar, Dhaka-1340.	Country:	Bangladesh	
Site contact and job title:	Mr. Shiper Samajpati- Head of HR & Compliance			
Site phone:	+008801917021279	Site e-mail:	<a href="mailto:shiper@continental-bd.com">shiper@continental-bd.com</a>	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	31 <sup>st</sup> October 2022			

<b>Audit Company Name &amp; Logo:</b>    <b>SGS Bangladesh Limited</b>	<b>Report Owner (payer):</b>  <b>Continental Garments Ind. (Pvt.) Ltd.</b>
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact [grievance@sedex.com](mailto:grievance@sedex.com).

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

## Audit Content:

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

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

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size): None.

Auditor Team (s) (please list all including all interviewers): Mohammed Saiful Islam, Md. Mehadi Hassan, Nazma Akhter and Md. Fazlay Rabby Anabil

Lead auditor: Mohammed Saiful Islam APSCA number: RA 21701603

Lead auditor APSCA status: RA (In Good Standing)

Team auditor: Md. Mehadi Hassan, Nazma Akhter and Md. Fazlay Rabby Anabil  
APSCA number: RA 21704658, ASCA 21705132 and ASCA 21703698

Interviewers: Mohammed Saiful Islam, Md. Mehadi Hassan, Nazma Akhter and Md. Fazlay Rabby Anabil  
APSCA number: RA 21701603, RA 21704658, ASCA 21705132 and ASCA 21703698

Observer: Md. Ansarul Islam

Report writer: Md. Ansarul Islam

Report reviewer: Ananya Mallick

Date of declaration: 31<sup>st</sup> October 2022

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

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

## Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A <a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>				• None Observed
0B <a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			1	• The facility arranges annual picnic for the workers.
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				• None Observed
2 <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				• None Observed
3 <a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	6			<b>NC:</b> <ul style="list-style-type: none"> <li>• No building approval plan.</li> <li>• Generator licence was expired.</li> <li>• Insufficient Public Announcing (PA) system.</li> <li>• Workers were not using PPE.</li> <li>• Machine safety guards were displaced.</li> <li>• Minor injury was not recorded properly.</li> </ul>
4 <a href="#">Child Labour</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				• None Observed
5 <a href="#">Living Wages and Benefits</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>			2	• The facility provides attendance bonus to all workers as per their designation and full presence in the month. Facility provides monthly

									<p>attendance bonus BDT 300 to the Assistant Operator and BDT 400 to the operator per month based on workers' attendance as per their policy.</p> <ul style="list-style-type: none"> <li>The facility has a fair price shop (Apon Bazar) to get commodity with discounted price by workers.</li> </ul>
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None Observed</li> </ul>
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>Not Applicable</li> </ul>
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>Not Applicable</li> </ul>
<p>General observations and summary of the site:</p> <ol style="list-style-type: none"> <li>The factory produces woven (Tops) items.</li> <li>Factory has a policy to endorse at the highest level, covering human rights impacts and issues, and ensures it is communicated to all employees.</li> <li>Through plant tour, workers interview and documents review, physical verification/appearance of workers; no evidence of the use of child labour was observed. Factory checks the age before recruitment by the doctor and maintains age related documents in the workers' personnel files.</li> </ol>									

4. Facility does not engage any forced or bonded labour. In Bangladesh, no prison labour is engaged outside the prison according to the law. Nothing identified during audit. Factory also does not keep any original documents from the workers, noted by the interviewed workers. Workers are free to leave their employer at any time giving required notices.
5. Factory treats their workers with respect and dignity; no corporal punishment, threats of violence or other forms of physical, mental, sexual, verbal harassment and abuse is practised.
6. Facility did not discriminate between workers in any manner while selection, pay, promotion and termination. Nothing identified by the documents verification and nothing reported by the interviewed workers regarding discrimination. The payment and overtime record did not show any discriminatory incidents.
7. No trade union has been formed by the workers of the factory. Workers are free to join or form the trade union, no restriction has been imposed to the workers from the management. Nothing identified through policy verification. Moreover, factory has formed a Participation Committee (PC) as parallel means. The factory has provided suggestion & complaint box in the toilet area through which workers can give their suggestion / complaints if any.
8. First aid facility and toilet facilities have been found as per legal requirement. First aiders were well known about the first aid issues and fire fighters are well known about the operation of all firefighting equipment's and regular training is provided to them regarding this.
9. All workers are getting ID card during their recruitment. All the workers are receiving contract letter.
10. The factory implemented anti-harsh or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Through the factory management and workers' interview, it was noted that no physical abuse or discipline happened in the factory.
11. Workers have received overtime allowance at premium rate (double of the basic). Workers are getting day off on Friday as weekly holiday.
12. Dining and canteen facility are provided for the workers.
13. Facility has no piece rated workers.
14. All workers were provided with pay slips for each pay period which is in easily understandable language to all workers. Facility has designated different person to look after different sections in the factory. As a senior management Md. Mazharul Islam- Asst. Manager (HR & Compliance), is responsible for ETI Base code.

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

## Site Details

Site Details		
A: Company Name:	Continental Garments Ind. (Pvt.) Ltd.	
B: Site name:	Continental Garments Ind. (Pvt.) Ltd.	
C: GPS location: (If available)	GPS Address: Nil.	Latitude: 23.911737 Longitude: 90.305160
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p><b>Trade Licence No:</b> License no. 002182, issued by Ashulia Union Parishad which is valid till 30<sup>th</sup> June 2023.</p> <p><b>Factory Licence No:</b> 5693 / Dhaka, issued by Chief Inspector of Factories which is valid till 30<sup>th</sup> June 2023.</p> <p><b>Fire Licence No:</b> DD/Dhaka/19621/2006 issued by Bangladesh Fire Service &amp; Civil Defence Authority which is valid till 30<sup>th</sup> June 2023.</p>	
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Garments Manufacturer (woven-tops) items.	
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Continental Garments Ind. (Pvt.) Ltd. is located at 8, Dewan Idris Road, Boro Rangamatia, Ashulia, Savar, Dhaka-1340, Bangladesh. The factory has started operation from April 2006 and established in April 1979 as per incorporation. Total land area is about 93393 square feet, production floor is about 133000 square feet, warehouse is about 11960 square feet and dining area is about 3280 square feet.</p> <p>Currently 2300 employees are working in the factory including management. Among them 920 are male and 1380 are female. Among 2300 employees, 120 are non-production. All workers are Bangladeshi by born.</p> <p>In general, the employees work for 6 days in a week (Saturday to Thursday) and Friday is weekly holiday. Factory's general working hour started from 8:30 am to 5:30 pm. There are total 30 security guard including 03 lady checkers who work in 03 shifts (06:00 am to 02:00 pm, 02:00 pm to 10:00 pm and 10:00 pm to 06:00 am).</p> <p>Facility is paying monthly salary by Rocket for all the employees. The factory's wage period is 1<sup>st</sup> to 30<sup>th</sup> / 31<sup>st</sup> of every month. Facility production capacity is 400,000 pieces/month.</p> <p>The facility details building description has given in below:</p>	



Building 01 (4 Storied)	Description	Remark, if any
Ground Floor	Reception, Medical Room, CAD Room, Child Care Room, Cutting Section, Pattern Section, Sample Section, Bonded Warehouse, Fabric Inspection Room, Lab Room and Fire Control Room.	NA
1 <sup>st</sup> floor	Renovation Work on Progress for Proposed Sewing Section & Finishing Section, Finished Good Area, Packing Section, Inspection Room, Ideal Machine Room and Temporary Cartons Area.	NA
2 <sup>nd</sup> floor	Sewing Section, Finishing Section, Spot Removing Room, Maintenance Room, Needle room, Sub-store and Office Room.	NA
3 <sup>rd</sup> floor	Sewing Section, Finishing Section, Spot Removing Room, Maintenance Room, Needle room, Sub-store, Training for Skill Development Room and Office Room.	NA
Roof Top	Tin Shed.	NA
Is this a shared building?	No	NA

Building 02 (2 Storied)	Description	Remark, if any
Ground floor	Generator room, Compressor, Boiler & Sub-station.	NA
1 <sup>st</sup> Floor	Maintenance Material Store and Office File Keeping Area.	NA
Roof Top	100% Open Space.	NA
Is this a shared building?	No	NA

Building 03 (Single Storied)	Description	Remark, if any
Ground floor	Generator Room.	NA
Roof Top	100% Open Space.	NA

Is this a shared building?	No	NA
<b>Building 04 (Single Storied)</b>	<b>Description</b>	<b>Remark, If any</b>
Ground floor	Fire Pump Room.	NA
Roof Top	100% Open Space.	NA
Is this a shared building?	No	NA
<b>Building 05 (2 Storied)</b>	<b>Description</b>	<b>Remark, If any</b>
Ground floor	Security Guard Post.	NA
1 <sup>st</sup> Floor	Office Staff Dining Area.	NA
Roof Top	100% Open Space.	NA
Is this a shared building?	No	NA
<b>Building 06 (2 Storied)</b>	<b>Description</b>	<b>Remark, If any</b>
Ground floor	Departmental (Apon) Shop, Diesel Storage Area and Wastage Keeping Area.	NA
1 <sup>st</sup> Floor	Office Room.	NA
Roof Top	100% Open Space.	NA
Is this a shared building?	No	NA
<b>Building 07 (Single Storied)</b>	<b>Description</b>	<b>Remark, If any</b>
Ground floor	Security Guard Post.	NA
Roof Top	100% Open Space.	NA
Is this a shared building?	No	NA

Building 08 (Single Storied)	Description	Remark, If any
Ground floor	Submersible Pump Room-1.	NA
Roof Top	100% Open Space.	NA
Is this a shared building?	No	NA

Building 09 (Single Storied)	Description	Remark, If any
Ground floor	Submersible Pump Room-2.	NA
Roof Top	100% Open Space.	NA
Is this a shared building?	No	NA

**Shed 01:** Shoes Storing Area.  
**Shed 02:** Workers' Dining Hall.  
**Shed 03:** Workers' Canteen.  
**Shed 04:** RMS Room.

F1: Visible structural integrity issues (large cracks) observed?  
 Yes  
 No

F2: Please give details:  
 This audit has been undertaken by a qualified social auditor and not a structural engineer. As such SGS can only report on any evidence of structural defects or maintenance requirements based on external reports undertaken by local authorities or other licensed bodies. Equally SGS cannot accept any liability for subsequent failures not noted or reported as a result of their visual checks. The rating above is based on the auditor's opinion of general maintenance and cosmetic soundness of the building based on purely visual checks.

F3: Does the site have a structural engineer evaluation?

	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <p>F4: Please give details: Factory has architectural and structural designs of those buildings by competent engineer and got recognition certificate from ACCORD.</p> <p>However, based on facilities approved building plan review and management interview that facility did not have building approval plan. Further NC has been raised on CAPR and detail description given there (NC no.01).</p> <p>Building floor layout plan was taken from Factory Engineer Mr. AKM Salauddin dated on 23-12-2021.</p>
<p>G: Site function:</p>	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
<p>H: Month(s) of peak season: (if applicable)</p>	<p>Round the year same production</p>
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p><u>Product:</u> Garment manufacture- (woven items).</p> <p><u>Process:</u> Cutting&gt;Sewing&gt;washing &gt; Finishing (Pressing to Packing)</p> <p><u>Production line:</u> 16</p> <p><u>Major Equipment:</u> Cutting Machine, End Cutter, Fusing Machine, Auto Cutter, Spreader, Band Knife, Fabric Relax able, Single Needle Lock Stitch, Double Needles Lock stitch, Bar Tack Machine, Three needle cover stitch, Four-thread Over lock Machine, Feed of the Arm, Button hole, Button stitch, Fusing Press Machine, Steam Iron, Dryer, Compressor, generator, boiler &amp; total machine 1570 pieces.</p>
<p>J: What form of worker representation / union is there on site?</p>	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
<p>K: Is there any night production work at the site?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                      L1: If yes, approx. % of workers in on site accommodation                      NA. Factory does not provide any living accommodation for the workers as all workers live in nearby areas and there is no legal requirement as well.</p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                      M1: If yes, approx. % of workers                      NA. Factory does not provide any living accommodation for the workers as all workers live in nearby areas and there is no legal requirement as well.</p>
<p>N: Were all site-provided accommodation buildings included in this audit</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                      N1: If no, please give details                      NA. Factory does not provide any living accommodation for the workers as all workers live in nearby areas and there is no legal requirement as well.</p>

Audit Parameters			
A: Time in and time out	Day 1 Time in: 8:45 am Day 1 Time out: 5:40 pm	Day 2 Time in: NA Day 2 Time out: NA	Day 3 Time in: NA Day 3 Time out: NA
B: Number of auditor days used:	4 auditors used in one day		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define:		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 03 weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Md. Mazharul Islam- Asst. Manager (HR & Compliance)		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	NA		
J: Previous audit type:	NA		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	920 (including management)	0	0	0	0	0	0	920 (including management)
Worker numbers – female	1380 (including management)	0	0	0	0	0	0	1380 (including management)
Total	2300 (including management)	0	0	0	0	0	0	2300 (including management)
Number of Workers interviewed – male	28	0	0	0	0	0	0	28
Number of Workers interviewed – female	34	0	0	0	0	0	0	34
Total – interviewed sample size	62	0	0	0	0	0	0	62



A: Nationality of Management	14 Bangladeshi and 01 Indian	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: Bangladeshi</p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p>	<p>Was the list completed during peak season?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: All workers listed from different section and different wages period. There is no peak season in the facility.</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 _100%</p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: _____% workers on piece rate</p> <p>D1: _____% hourly paid workers</p> <p>D2: <u>100%</u> salaried workers</p> <p>Payment cycle:</p> <p>D3: _____% daily paid</p> <p>D4: _____% weekly paid</p> <p>D5: <u>100%</u> monthly paid</p> <p>D6: _____% other</p> <p>D7: If other, please give details</p>	

**Worker Interview Summary**

Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	40 employees (8 groups with 5 employees in each group, Male 20 & Female 20).
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 08      D2: Female: 14
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	No issue was identified during worker interview
I: What did the workers like the most about working at this site?	Good working environment, On time payment, No excessive working hour
J: Any additional comment(s) regarding interviews:	None
K: Attitude of workers to hours worked:	Comfortable
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details: NA	
M: Attitude of workers: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>	

Total 62 employees selected for interview. Among them 22 employees were selected for individual interview and total 40 employees in 8 groups (5 employees in each group) were selected for the group interview. All the interviewees were favourable with the management. The employees were assured of confidentiality and they spoke freely of their views of the facility. All employees said they were satisfied with their employment at the facility and they are provided wages as per their agreement. They felt free to leave this employer and understood the notice period required. They facility management treated them with respect. They can complain directly to their supervisors or line manager and felt free to give their general concerns to their Participation Committee representatives who would take it to the Participation Committee meeting.

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

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

Participation Committee member interviews was conducted privately in a separate place. During opening meeting PC representatives were present and auditors clearly explained them about the audit, audit process, necessity of audit and audit criteria in local language. They replied naturally regarding their responsibilities as Participation Committee member and they also informed that they can easily carryout their daily job without any difficulties. Participation Committee meetings are held on regular basis. Last meeting was held on 23.10.2022. They also stated that they could give suggestions on all parts of the site's practices.

**O: Attitude of managers:**

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

Management of the factory was positive and supportive during the whole audit. Mr. Shiper Samajpati- Head of HR & Compliance is the key person of the compliance team and for compliance with the Code, legal requirements, development of policies and its implementation, monitoring & control. In this backdrop, management had comprehensive knowledge, as assumed, about audit requirements and scope; e.g. ETI Base Code, local laws etc. The factory management was found to be co-operative throughout the audit

## Audit Results by Clause

### 0A: Universal Rights covering UNGP

#### 0A: Universal Rights covering UNGP

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

##### 0.A. Guidance for Observations

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

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

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

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

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

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

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

#### Current Systems and Evidence Examined

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

##### Current systems:

1. Facility implements and maintains systems for delivering compliance to this Code.
2. Mr. Shiper Samajpati- Head of HR & Compliance is responsible for compliance with the Code.

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

##### Details:

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

Any other comments: Nil

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

Yes

No

A1: Please give details:

	Factory has policy which authorized at the highest level human rights impacts and issues, and ensure it is communicated to all workers.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Mr. Shiper Samajpati- Job title: Head of HR & Compliance
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The factory management has provided complaint box in workers' toilet area. Through the complaint box workers can raise their suggestion and complaints. Workers can also approach the management directly for any grievances which confirmed the interviewed workers.
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details:
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: All employee information and personnel files are kept locked away in the human resources department and it is only viewed by the HR department

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

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

# Measuring Workplace Impact

## Measuring Workplace Impact Table

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 _5_ %	A2: This year 2022 _6_ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	5%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2021 _2_ %	C2: This year 2022 _2.1_ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	2%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Factory used prescribed form of Accident register for recording accidents/injuries, noted through documents review. Moreover, correct reflection of injury analysis and root cause for corrective action was found.  However, floor wise minor injury were not included in injury investigation report to find out the root cause of each accident/injury to take preventive or corrective action to prevent re-occurrence of same type of accidents which were treated by the first aider.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2021 Number: 0.8	F2: This year: 2022 Number: 0.5
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0.2	
H: Lost day work cases per 100 workers:	H1: Last year: 2021 (0.72 days)	H2: This year: 2022 (0.4 days)

[(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]		
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

**0: Management systems and Code Implementation**

**0B: Management system and Code Implementation**

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- 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:**

1. The factory communicates their code of conduct through notice board regularly including company's own COC.
2. Mr. Shiper Samajpati- Head of HR & Compliance is responsible for compliance with the Code.
3. Facility communicates ETI code of conduct to their suppliers and where reasonably practicable extends the principles of this ethical code through their supply chain.

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

Details:

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

Any other comments: Nil

<b>Management Systems:</b>	
<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                      A1: Please give details: Site has not been subjected to any fines in the last 12 months.</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      B1: Please give details: There is effective policy and procedures found to reduce the risk of forced labour, child labour, discrimination, harassment &amp; abuse.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>The facility communicated the policy and procedures on risk of forced labour, child labour, discrimination and harassment &amp; abuse with the workers through training program and posted those policies in the notice board. No complaint found from interviewed workers too.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      D1: Please give details: The facility communicated the policy and procedures on risk of forced labour, child labour, discrimination and harassment &amp; abuse with the workers through training program and posted those policies in the notice board. No complaint found from interviewed workers too. Last Mid-level management training was held on 06.08.2022 with 25 participants.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      E1: Please give details: Managers and workers have received training on the standards for forced labour, child labour, discrimination, harassment &amp; abuse. Last orientation training was provided on 26.09.2022 with 65 participants.</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                      F1: Please give details: Facility does not have any internationally recognized system certification.</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      G1: Please give details: Facility has a Human Resources Department and Mr. Shiper Samajpati- Head of HR &amp; Compliance is responsible for this department.</p>



<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      H1: Please give details:                      Mr. Shiper Samajpati- Head of HR &amp; Compliance is responsible for implementation of the code.</p>
<p>I: Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      I1: Please give details: Factory has the policy to ensure all worker information confidential.</p>
<p>J: Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      J1: Please give details: Factory has effective procedure to ensure all workers' information is kept confidential.</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      K1: Please give details: Risk assessment was conducted by factory to evaluate effectiveness of policy and procedure. Last risk assessment was conducted on 01.02.2022.</p>
<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      L1 Please give details: Risk assessment was conducted by factory to evaluate effectiveness of policy and procedure. Last risk assessment training for the employees was held on 19.09.2022 with 17 participants.</p>
<p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      M1: Please give details: Facility management communicates this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>
<p><b>Land rights</b></p>	
<p>N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      N1: Please give details: Facility has valid land license noted through documents review. Facility is situated in its own land.</p>
<p>O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      O1: Please give details: Facility has system in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.</p>

<p>P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: Facility has a written policy and procedures regarding to land rights with due diligence of obtain free, prior and informed consent.</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: NA</p>
<p>R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: NA</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: NA</p>

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

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

Good Examples observed:	
<p>Description of Good Example (GE): The facility arranges annual picnic for the workers.</p>	<p><b>Objective evidence observed:</b> Document review and workers &amp; management interview</p>

**1: Employment is Freely Chosen**

**1: Freely Chosen Employment**

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**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:**

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

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

Details:

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

Any other comments: Nil

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

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

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

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

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

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

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

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

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- 1. All the employees are allowed to participate and elect the committee members of their choice.
- 2. There is no trade union in the facility and it is not mandated by law.
- 3. There is Participation Committee (PC) as parallel means for trade union. Last election was held on 12.12.2020.
- 4. Verified and confirmed through records review and interview process that the facility does not discriminate any of the workers such as worker's representatives also.
- 5. Participation Committee members are allowed to carry out their duties within working hours without affecting their pay.
- 6. Mr. Shiper Samajpati- Head of HR & Compliance is responsible for compliance with the Code.

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

Details:

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

Any other comments: Nil.

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

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

B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No In Bangladesh, there is no obligation to join trade union and freedom of association and collective bargaining. For an establishment where there is no trade union, until a trade union is formed, the workers' representatives to the Participation Committee shall run activities related to workers' interests in the establishment concerned and worker's representative should be elected by direct vote of workers (amendment 22nd of July 2013, Labour Law 2006).	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Facility has formed safety committee. (Workers 05 & management 05) total 10.  D2: Is there evidence of free elections? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No NA	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Participation committee elected by the workers. Participation committee (PC) meeting held on regular basis. Last PC meeting held on 23.10.2022. PC meeting minutes recorded, and action taken.	
F: Name of union and union representative, if applicable:	NA; This is a non-unionized factory.	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Participation Committee (PC) has been formed as a parallel means.	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	All workers aware of their representatives.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 12.12.2020
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: 01	

<p>L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.</p>	<p>As per interview with the Participation Committee members &amp; document review it was noted that the meeting is held regularly. Last meeting held on 23.10.22. Meeting minutes were recorded in register. Topics of last meeting are as follows:</p> <ol style="list-style-type: none"> <li>1. Discussion about additional chair for operator.</li> <li>2. Discussion about gate pass</li> <li>3. Discussion about to play religious lecture in PA system.</li> <li>4. Others</li> </ol> <p>Meeting minutes were communicated through notice board.</p>	
<p>M: Are any workers covered by Collective Bargaining Agreement (CBA)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>If <b>Yes</b>, what percentage by trade Union/worker representation</p>	<p>M1: 0% workers covered by Union CBA NA</p>	<p>M2: 0% workers covered by worker rep CBA NA</p>
<p>M3: If <b>Yes</b>, does the Collective Bargaining Agreement (CBA) include rates of pay?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No NA</p>	

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

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

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

### 3: Working Conditions are Safe and Hygienic

#### 3: Working Conditions are Safe and Hygienic

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#### 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. Factory posted the evacuation plans on work floors, which indicated escape routes and the location of the fire extinguishers.
2. Exit signs were found illuminated and emergency lights were installed with IPS back up.
3. Sufficient first aid kits stocked are provided in workshops. Total no. of first aid box – 26 & first aider was found – 52 persons.
4. Workers receive regular and recorded health & safety training. Last Health & Safety training was provided on 22.09.2022 with 25 persons.
5. Firefighting training provided as per law. Last firefighting training provided on 16.09.2022 with 09 persons.
6. First aid, PPE training provides regularly. Last first aid and PPE training provided on 18.09.2022 & 24.09.2022 with 52 persons & 25 persons.
7. Medical and childcare facility available in the factory.
8. Workers toilet segregated for male and female, adequate number as per law, wash facility provided. Total no. of male toilets -34 and female toilets-43.
9. The facility has done maintenance of the machines on regular monthly basis confirmed through the documents reviewed. All switches in the electrical control panels have been labelled.
10. Factory has regular fire equipment maintenance system. Facility has provided one dining rooms in the facility for the workers. Total seating capacity is 270 per shift.
11. Facility has conducted fire drill on 30.10.2022 with total 2232 participants.
12. Mr. Shiper Samajpati- Head of HR & Compliance is responsible to look after the health and safety issues.

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

#### Details:

1. Plant tour.



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

Any other comments: Nil

<p>A: Does the facility have general and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  A1: Please give details: There is an open channel for all at the facility which anybody can report to management about any act properly or corruptly and health &amp; safety issues. Facility has communicated this procedure through orientation training confirmed from worker interview.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  B1: Please give details: All policies included in workers manual.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  C1: Please give details: No structural addition without permits were found.</p>
<p>D: Are visitors to the site informed on H&amp;S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  D1: Please give details: Visitors are informed on H&amp;S and provided PPE when required.</p>
<p>E: Is a medical room or medical facility provided for workers?  If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  E1: Please give details: Facility has fully equipped Medical room which meets the legal requirement.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?</p>	<p>F1: Please give details:  1. Factory has medical facility available with full-time Doctor Sharmin Akter Sheuli and nurse Shima Mondol.   2. Medical room is fully equipped.   3. Sufficient first aid kits stocked and provided in production floor. Total no. of first aid box was 26 &amp; first aider was found 52 persons.</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No  G1: Please give details: Not Applicable as Facility did not provide free transport facility for all workers though it is not required by law.</p>

H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Please give details: NA, facility does not provide any dormitory for 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Facility conducts risk assessment on regular basis. Last risk assessment was conducted on 01.02.2022 and different initiatives are taken to control the risks.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility meets legal obligation of disposing natural resources.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility does not use any banned chemical.

<b>Non-compliance:</b>	
<p><b>1. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input checked="" type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p><b>Issue title:</b> No Building approval plan.</p> <p><b>Description of non-compliance:</b>                      Based on plant tour, document review and management interview, it was noted that the facility did not have building approval plan for buildings of the facility from concern authority such as RAJUK/PWD/LGED.</p> <p>However, the factory management has applied on 27/06/2013 to collect the approval of building construction plan from concerned authority named PWD (Public works Department). Beside factory has architectural and structural designs of those constructions by competent engineer and got recognition certificate from ACCORD.</p> <p><b>Local law and/or ETI requirement:</b>                      In accordance with ETI Base Code 3.1 and Building Construction Act 1952, Section-3(1):</p> <p><b>ETI Base code 3.1:</b> A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Building Construction Act 1952, Section-3 (1):</b>  <i>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.</i></p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)</p> <p>1. Based on facilities approved building plan review and management interview</p>

**Recommended corrective action:**

It is recommended that the factory management should take approval of the mentioned construction plan from concerned authority

**Time Scale:** 120 days

**Action by:** Md. Mazharul Islam- Asst. Manager (HR & Compliance)

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

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

**Issue title:** Generator license was expired.

**Description of non-compliance:**

Based on document review and management interview, it was noted that generator license of the factory was expired on 12<sup>th</sup> August 2022. Note that facility is using four generators with the capacity of 1030 kw, 440 kw, 330 kw and 86.49 kw respectively, which are equivalent to 1886.49 KW. However, the facility management applied on 7<sup>th</sup> August 2022 to concerned authority for renewal.

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

In accordance with Energy Regulatory Commission Rules 2006, Rule 16 (1 & 3) and ETI Base Code 3.1.

**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.

**Energy Regulatory Commission Rules 2006, Rule 16 (1&3):**

1. In general validity of the license will be 2 years.
3. For the purpose of the renewing the license, an application has to be submitted to the commission in the prescribed form, after depositing the fees mentioned in the schedule- B, 30 days before the expiry of validity.

**Recommended corrective action:**

It is recommended that the facility should collect the generator license for (1886.49 KW) generator from the concern authority.

**Time Scale:** 120 days

**Action by:** Md. Mazharul Islam- Asst. Manager (HR & Compliance)

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

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

2. Based on facilities document review and management interview

<p><b>Issue title:</b> Insufficient Public Announcing (PA) system.</p> <p><b>Description of non-compliance:</b></p> <p>During plant tour and management interview, it was noted that public address system was not covered for the security guard room, worker dining area, worker canteen area, utility section, diesel storage area, wastage keeping area, fair price shop i.e., apon bazer and office area located at building-05, 06 &amp; 07 and shed-01, 02 &amp; 03. Note that other areas public address system was checked and found active.</p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>In accordance with ETI Base Code 3.1:</b> A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Recommended corrective action:</b> It is recommended that facility should ensure PA system for the mentioned areas of the facility.</p> <p><b>Time Scale:</b> 120 days</p> <p><b>Action by:</b> Md. Mazharul Islam- Asst. Manager (HR &amp; Compliance)</p>	<p>3. Based on facilities tour, Workers and management interview</p>
<p><b>4. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input checked="" type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p><b>Issue title:</b> Workers were not using Personal Protective equipment (PPE).</p> <p><b>Description of non-compliance:</b></p> <p>During floor visit following PPE issue was observed:</p> <p>a) Around 15% workers of cutting section were not using dust masks during work at ground floor of building 01.</p> <p>b) Around 20% overlock machine operators of sewing section were not using dust masks during work at 2<sup>nd</sup> and 3<sup>rd</sup> floor of building 01.</p> <p><b>Local law and/or ETI requirement:</b> In accordance with ETI Base code 3.1 and Bangladesh Labor Rules 2015, Rule 67 (2):</p> <p><b>ETI Base code 3.1:</b> 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</p>	<p>4. Through plant tour (NC picture no.1 &amp; 2)</p>

minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

**Bangladesh Labor Rules 2015, Rule 67 (2):**

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

**Recommended corrective action:**

It is recommended that the facility management should ensure the use of PPE to the workers where required.

**Time Scale:** 30 days

**Action by:** Md. Mazharul Islam- Asst. Manager (HR & Compliance)

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

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

**Issue title:** Machine safety guards were displaced.

**Description of non-compliance:**

During floor visit following machine safety guards related issues were observed:

- a) Approximately 20% needle guards of plain sewing machines were found in displaced condition at sewing section of 2<sup>nd</sup> and 3<sup>rd</sup> floor of building 01.
- b) Approximately 10% eye guards of overlock machines were found in displaced condition at sewing section of 2<sup>nd</sup> and 3<sup>rd</sup> floor of building 01.

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

In accordance with ETI Base Code 3.1 and Bangladesh Labour Law 2006, section 63(1) D (iii).

**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.

**Bangladesh Labour Law 2006, Section 63 (1) D (iii):** Fencing of machinery. – (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(iii) every dangerous part of any machinery.

5. Through plant tour (NC picture no.3 & 4)

<p><b>Recommended corrective action:</b> It is recommended that the facility management should ensure the machine safety guards in right position with all machines.</p> <p><b>Time Scale:</b> 30 days</p> <p><b>Action by:</b> Md. Mazharul Islam- Asst. Manager (HR &amp; Compliance)</p> <p><b>6. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input checked="" type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p><b>Issue title:</b> Minor injury were not recorded properly.</p> <p><b>Description of non-compliance:</b></p> <p>Based on plant tour and first aider interview that the factory has no system for tracking minor injury, which is treated by the first aider, occurred in the production floor to take corrective/ preventive action by analysing root cause.</p> <p><b>Local law and/or ETI/Additional Elements requirement:</b>                  In accordance with ETI Base code-3.1 and Bangladesh Labor Rules 2015, Rule 73(1)</p> <p><b>ETI Base code-3.1</b>                  A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Bangladesh Labor Rules 2015, Rule 73(1)</b>                  Authority of every institute shall preserve the record of each accident or mishap in the Register in accordance with Form-28. The authority would also accurately record the steps taken by the institute in relevant Register.</p> <p><b>Recommended corrective action:</b>                  It is recommended that factory management should keep record of all injuries to find out the root cause.</p> <p><b>Timescale:</b> 30 days</p> <p><b>Action by:</b> Md. Mazharul Islam- Asst. Manager (HR &amp; Compliance)</p>	<p>6. Document review and management interview</p>
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<b>Observation:</b>	
<p><b>Description of observation:</b> None Observed</p> <p><b>Local law or ETI requirement:</b> Not Applicable</p>	<p><b>Objective evidence observed:</b></p> <p>Not Applicable</p>

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

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

<p><b>4: Child Labour Shall Not Be Used</b>  <a href="#">(Click here to return to summary of findings)</a>  <a href="#">(Click here to return to Key Information)</a></p>
<p><b>ETI</b></p>
<p>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.</p>

<p><b>Current Systems and Evidence Examined</b></p> <p><i>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.</i></p>
<p><b>Current systems:</b></p> <p>The factory establishes a policy that which discourages the employment of child labour and no child labour found in the factory during the audit. Factory has strong recruitment process to verify the workers age. 62 sampled workers' personal files were provided for review. In addition, every worker's file includes a bio-data sheet, a recent photo, age proof records (copy of birth registration certification, national ID card). Moreover, if there is any doubt regarding any one's age factory's registered doctor certifies his/her age. Mr. Shiper Samajpati- Head of HR &amp; Compliance is responsible for compliance with the Code.</p> <p><b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b></p> <p>Details:</p> <ol style="list-style-type: none"> <li>1. Policy review</li> <li>2. Document review</li> <li>3. Management interview</li> <li>4. Worker interview</li> <li>5. Factory tour</li> </ol> <p>Any other comments: Nil</p>

A: Legal age of employment:	14 years (With some restriction as per local law)
B: Age of youngest worker found:	19 years
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %



<p>E: Are workers under 18 subject to hazardous work assignments?  <a href="#">(Go to clause 3 – Health and Safety)</a></p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  E1: If yes, give details</p>
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Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer  code: None Observed</p> <p><b>Local law and/or ETI requirement:</b> Not Applicable</p> <p><b>Recommended corrective action:</b> Not Applicable</p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p> <p>Not Applicable</p>

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

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

**5: Living Wages are paid**

**5: Living Wages are Paid**

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

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

**ETI**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. The facility is providing local legal minimum wage BDT 8000/month.
2. Time keeping system is electronic.
3. All employees are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
4. Each employee was given a pay slip and signed for their wages.
5. Employees are aware of their minimum wage.
6. Wages have been recorded according to documents checked.
7. Workers get salary through cash for all employees.
8. Mr. Shiper Samajpati- Head of HR & Compliance for compliance with the Code.

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

Details:

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

Any other comments: Nil

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

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

Good Examples observed:	
<p><b>Description of Good Example (GE):</b></p> <p>1. The facility provides attendance bonus to all workers as per their designation and full presence in the month. Facility provides monthly attendance bonus BDT 300 to the Assistant Operator and BDT 400 to the operator per month based on workers' attendance as per their policy.</p> <p>2. The facility has a fair price shop (Apon Bazar) to get commodity with discounted price by workers.</p>	<p><b>Objective Evidence Observed:</b></p> <p>Documents review (Salary sheet), Site tour, management and workers' interview</p>

### Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 8 hours per day and 48 hours per week.	A1: 8 hours/ day 48 hours/ week	A2: <input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable
B: Overtime hours:	Legal maximum: 2 hours per day	B1: Maximum OT hours found	B2: <input type="checkbox"/> Yes

<p>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</p>	<p>and 12 hours per week. However, an adult worker may work for more than 8 (eight) hours in a day or 48 (forty eight) hours in a week, provided that the total hours of work of an adult worker shall not exceed 60 (sixty) hours in any week and on the average 56 (fifty-six) hours per week in any year. Exception for 6 months: Government has exempted section 100 and 102 of the Bangladesh Labour Law-2006 publishing a Gazette notification in August 2011 as per section 324 Bangladesh Labour Law-2006 for 06 months relaxing daily overtime hours. In accordance with the Clause/Condition No. – 3 of this notification, no worker shall work more than 04 hours of overtime in any day without his/her consent. This exemption has been extended several times in last few years and latest extension was on</p>	<p>2 hours/ day and 10 hours/ week in September 2022 (current month), 2 hours/ day and 14 hours/ week March 2022 (random month &amp; 2 hours/day and 12 hours/week December 2021 (random month)).</p>	<p><input type="checkbox"/> No NA</p>
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	May 11, 2022 and it will be in effect from April 17, 2022 to October 16, 2022.		
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: For Garments and Grade 7. BDT. 8000 per month (Basic BDT 4100, House rent 50% of the Basic which is BDT. 2050, Medical allowance BDT. 600, Conveyance allowance. BDT.350, Food Allowance BDT.900).	C1: BDT 8000 / month	C2: <input type="checkbox"/> Yes <input type="checkbox"/> No  NA
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 200% of the basic wage rate per hour.	D1: 200% of the basic wage rate per hour	D2: <input type="checkbox"/> Yes <input type="checkbox"/> No NA

**Wages analysis:**

<p><b>Wages analysis:</b> <a href="#">(Click here to return to Key Information)</a></p>	
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A1: If <b>No</b> , why not?	Not applicable
B: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	62 attendance records and payroll records for the month of September 2022 (Current month)  52 attendance records and payroll records for the month of March 2022 (Random month)  62 attendance records and payroll records for the month of December 2021 (Random month)
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  C1: If <b>Yes</b> , please give details: The Government has announced the new pay structure which was implemented from 1st December 2018 for the workers of the Garments Industries. The Gazette Notification has been published on 25th November 2018 and amendment was done on 24 January 2019. There

		<p>are two separate pay structures; for the garment workers (Schedule A), For the staff (Schedule B). Schedule A is as follows:</p> <table border="1" data-bbox="608 320 1481 853"> <thead> <tr> <th>Grade</th> <th>Monthly basic wage</th> <th>House rent 50% of the basic wage</th> <th>Medical allowance</th> <th>Conveyance allowance</th> <th>Food subsidy</th> <th>Gross monthly wage</th> </tr> </thead> <tbody> <tr> <td>Grade 1</td> <td>Tk.10938</td> <td>Tk.5469</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 18257</td> </tr> <tr> <td>Grade 2</td> <td>Tk. 9044</td> <td>Tk. 4522</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 15416</td> </tr> <tr> <td>Grade 3</td> <td>Tk. 5330</td> <td>Tk. 2665</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 9845</td> </tr> <tr> <td>Grade 4</td> <td>Tk. 4998</td> <td>Tk. 2499</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 9347</td> </tr> <tr> <td>Grade 5</td> <td>Tk. 4683</td> <td>Tk. 2342</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 8875</td> </tr> <tr> <td>Grade 6</td> <td>Tk. 4380</td> <td>Tk. 2190</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 8420</td> </tr> <tr> <td>Grade 7</td> <td>Tk. 4100</td> <td>Tk. 2050</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 8000</td> </tr> </tbody> </table>	Grade	Monthly basic wage	House rent 50% of the basic wage	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
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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																																																				
<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>D1: If <b>No</b>, please give details: Not Applicable</p>																																																								
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> Lowest Wages found BDT 8000 per month</p>																																																								
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: <u>0</u>% of workforce earning under minimum wage            F2: <u>13.46</u>% of workforce earning minimum wage            F3: <u>86.54</u>% of workforce earning above minimum wage</p>																																																									
<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found:  <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i>            Factory management paid Eid bonus in two Eid festivals in per year. Also provides attendance bonus to all workers for full presence in the month.</p>																																																									
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>As per section 125 of the Bangladesh Labour Law, 2006, factory may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc.</p>																																																									

I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that <b>have</b> been made.  1. Unauthorized absent. 2. Lunch facility. 3. Revenue stamp 3. Advance payment deduction (if provided).  Please describe: Based on document review it was noted that facility management deduct for above issues.
		I2: Please list all deductions that <b>have not</b> been made.  1. Fines, 2. Housing facility, 3. Loans, 4. Income tax 5. Provident fund etc.  Please describe: Based on document review factory does not deduct for above issues.
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type  <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence: NA
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: All working hours are reflected in the attendance record.	
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 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 Ready made Garments Sector published on 24th January 2019."	
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation	

	Other – please give details: Not applicable
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility management is annually reviewed the wages which is as per local law. Further facility increases minimum 5% on basic wages as increment for all grades worker whoever has completed 1 year.
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No All workers are paid within the 7 <sup>th</sup> working day of the following month.
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Through factory policy review, payroll records review and employees' interview, it is confirmed that equal rates are being paid for equal work.
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input checked="" type="checkbox"/> Other Q1: If other, please explain: Mobile (Rocket)



**6: Working Hours are not Excessive**

**6: Working Hours are not Excessive**

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

**ETI**

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

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

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

Noted through working hour policy review that facility has implemented working hour as per law. Facility has maintained working hour related document accurately. No inconsistency identified during document review.

1. Standard working hours found 48 hours in the facility.
2. Through employees' interview it was noted that they were aware about voluntary overtime policy.
3. As per the company policy all overtime will be compensated at a premium rate (200% of basic wage).
4. Casual leave, sick leave, festival leave was provided as per Local Law.
5. Mr. Shiper Samajpati- Head of HR & Compliance is responsible for looking after working hour issues.

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

Details:

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

Any other comments: Nil

**Non-compliance:**

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

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

None Observed

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

**Recommended corrective action:** Not Applicable

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

Not Applicable

**Observation:**

**Description of observation:** None Observed

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

**Comments:** Not Applicable

**Objective evidence observed:**

Not Applicable

**Good Examples observed:**

Description of Good Example (GE): None Observed

**Objective Evidence Observed:**

Not Applicable

**Working hours' analysis**

<b>Working hours' analysis</b> Please include time e.g. hour/week/month ( <a href="#">Go back to Key information</a> )					
<b>Systems &amp; Processes</b>					
A. What timekeeping systems are used: time card etc.	Describe: <i>Electronic Time keeping system (Card Punch).</i>				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details				
C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: NA			
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:			
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Other
		If "Other", Please define:			
		NA			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If <b>yes</b> , please detail hours, %, types of workers affected and frequency Please give details: NA			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
		Maximum number of days worked without a day off (in sample):			
		10 days in the month of March 2022 (Random month).			

	<p>Generally, workers get 1 day off in every 7day period but it was noted through documents review (Timecard, wages sheet), workers and management interview that the facility was open on March 04 &amp; 25, 2022 and compensated these weekend work with Eid ul Fitre, 2022.</p> <p>Moreover, this issue was also discussed with their Participation Committee members through meeting. Also, workers and Participation members were found agreed to do consecutive weekend work.</p>	
<b>Standard/Contracted Hours worked</b>		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency: NA
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details: NA
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 10 hours (monthly) found in the month of September 2022 (Current month) 51 hours (monthly) found in the month of March 2022 (Random month) 50 hours (monthly) found in the month of December 2021 (Random month)	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	__3.23%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Appointment letter, handbook, worker interviews show that the overtime is voluntary.
<b>Overtime Premiums</b>		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal	M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages:

	requirement to OT premium	Facility has a policy to pay 200% of basic per hour for overtime work.
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<i>N1: If yes, please describe % of workers &amp; frequency:</i>  100% workers who work overtime are paid overtime monthly.
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.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	
	NA	
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<input checked="" type="checkbox"/> <b>Overtime is voluntary</b> <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)	
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:	
	NA	
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details: NA	
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	<input type="checkbox"/> Yes <input type="checkbox"/> No NA	

**7: No Discrimination is practiced**

**7: No Discrimination is Practiced**

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**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:**

1. There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
2. No gender discrimination was found in the facility; both female and male employees were distributed in all types of work.
3. The facility provides the same wage amount to male/female employees of the same rank.
4. No complaint or records found for pregnancy test.
5. There is no restriction for formation of trade union in the facility.
6. Mr. Shiper Samajpati- Head of HR & Compliance is responsible for looking after no discrimination is practiced.

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

Details:

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

Any other comments: Nil

<p>A: Gender breakdown of Management + Supervisors (Include as one combined group)</p>	<p>A1: Male: __94.29_ % A2: Female__5.71__ %</p>
<p>B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:</p>	<p>#: no females are in technical roles.</p>

C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found  C1: Please give details: Not applicable as no such discrimination was noted.

Professional Development	
A: What type of training and development are available for workers?	Firefighting training, Health and Safety Training, first aid Training, Orientation training, Hazardous materials handling training.

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details: Not Applicable
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Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed  <b>Local law and/or ETI requirement:</b> Not Applicable  <b>Recommended corrective action:</b> Not Applicable	<b>Objective evidence observed:</b> (where relevant please add photo numbers)  Not Applicable

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

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

**8: Regular Employment Is Provided**

**8: Regular Employment Is Provided**

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**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:**

1. Facility provides ID card for all workers in the time of recruitment.
2. Factory maintains service books for all workers.
3. There is no home working from the site.
4. All workers are getting appointment letter in local language.
5. Mr. Shiper Samajpati- Head of HR & Compliance is responsible for ensuring compliance with this code.

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

Details:

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

Any other comments: Nil.



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

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

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

## Responsible Recruitment

All Workers	
<p>A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?</p>	<p><input checked="" type="checkbox"/> Terms &amp; Conditions presented  <input checked="" type="checkbox"/> Understood by workers  <input checked="" type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: NA</p>
<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>B1: If yes, please describe details and specific category(ies) of workers affected: NA</p>

C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details: NA
D: If any checked, give details:	NA

<b>Migrant Workers:</b> <i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>			
A: Type of work undertaken by migrant workers:	Not applicable; No migrant workers employed by the factory.		
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used:  B2: Total number of (outside of local country) recruitment agencies used: Not applicable: No migrant workers employed by the factory.		
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<table border="1" style="width: 100%;"> <tr> <td style="width: 50%;"> <input type="checkbox"/> Yes  <input type="checkbox"/> No                              C1: Please describe finding:                              Not applicable; No migrant workers employed by the factory.                         </td> <td style="width: 50%;">C2: Observations:</td> </tr> </table>	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not applicable; No migrant workers employed by the factory.	C2: Observations:
<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not applicable; No migrant workers employed by the factory.	C2: Observations:		
D: Are Any migrant workers in skilled, technical, or management roles  <i>Migrant Workers (this should include all migrant workers including permanent</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: If yes, number and example of roles: Not applicable; No migrant workers employed by the factory.		

workers, temporary and/or seasonal workers)

### NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other  B1 – If other, please give details: NA
C: If any checked, give details:	Nil

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

<p>D: Is there a legal contract / agreement with all agencies?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No  D1: Please give details: Not Applicable</p>
<p>E: Does the site have a system for checking labour standards of agencies?  If yes, please give details.</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No  E1: Please give details: Not Applicable</p>

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

**8A: Sub-Contracting and Homeworking:**

**8A: Sub-Contracting and Homeworking**

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

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

*Note to auditor on homeworking:*

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

Facility has used sub-contract facility from where printing, embroidery and washing support are taken, based on management interview & documents review. Further Mr. Shiper Samajpati- Head of HR & Compliance is responsible for compliance with the Code.

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

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

Process Subcontracted	Process 1 (Embroidery & Printing)	Process 2 (Washing)
Name of factory	Alif Embroidery Village Ltd.	Vision Washing Ltd.
Address	Tagor Para, Helal Master Road, Ashulia, Savar, Dhaka, Bangladesh.	B/47, Purba Rajashan, Savar, Dhaka, Bangladesh.

**Details:**

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

Any other comments: Nil

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

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

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

Summary of sub-contracting – if applicable	
<input type="checkbox"/> Not Applicable please x	
<p>A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>A1: Please describe: Auditors verified production record, time card and workers interview to calculate the capacity with workers' work load.</p>
<p>B: If sub-contractors are used, is there evidence this has been agreed with the main client?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>B1: If <b>Yes</b>, summarise details: Facility has agreement with subcontract factory and acknowledgement with the client.</p>
<p>C: Number of sub-contractors/agents used:</p>	<p>02</p>

D: Is there a site policy on sub-contracting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If <b>Yes</b> , summarise details: Facility has detail sub-contracting policy.
E: What checks are in place to ensure no child labour is being used and work is safe?	Internal audit report of their sub-contracting factory to ensure no child labour is being used and work is safe.

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

**9: No Harsh or Inhumane Treatment is allowed**

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

**ETI**

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

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&amp;S or any other grievances to a 3<sup>rd</sup> party?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  A1: Please give details:  There is an open channel for all at the facility which anybody can report to management about any act properly or corruptly, or to accept or give a bribe or gift and health &amp; safety issues.</p>
<p>B: If <b>Yes</b>, are workers aware of these channels and have access? Please give details.</p>	<p>Factory has communicated this procedure through orientation training confirmed from worker interview.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Factory has installed complaint boxes in workers toilet area and also has posted hotline number in production floor where workers can easily make call and discuss about their problems. However, no complaint records found regarding physical abuse or harassment.</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers  <input checked="" type="checkbox"/> Communities  <input checked="" type="checkbox"/> Suppliers  <input type="checkbox"/> Other</p> <p>Please give Details: Facility has set up complaint box in their toilet area as well as in front of main gate for community grievance. Moreover, they have email feedback system for getting any suggestions or grievance from their suppliers. Besides this, open door policy and PC (Participation committee) are available for all workers.</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  E1: If yes, please give details NA</p>
<p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  F1: If no, please give details NA</p>



<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>G1: If no, please explain NA</p>
<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>H1: If no, please give details NA</p>
<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>I1: If yes, please give details NA</p>

**Current Systems and Evidence Examined**

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

**Current systems:**

1. The facility has established anti-harsh or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
2. Through the facility management and employee interview, it was noted that no physical or verbal abuse happened in the facility.
3. There is an internal process for grievance, which is through grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, any received complaint will be handled by management, without any reprisal for the employee in question.
4. Mr. Shiper Samajpati- Head of HR & Compliance is responsible for this code.

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

Details:

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

Any other comments: Nil.

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

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

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

**10 A: Entitlement to Work and Immigration**

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

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

**Additional Elements**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

It was noted through documents review and workers interview that there are no agency staffs, employment agencies and migrant workers in the factory. Md. Mazharul Islam– Asst. Manager – HR & Compliance is responsible for this code.

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

Details:

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

Any other comments: Nil.

**Non-compliance:**

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

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

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

**Recommended corrective action:** Not Applicable

**Objective evidence observed:**

*(where relevant please add photo numbers)*

Not Applicable

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

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

**10 B 2: Environment 2-pillar**

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. Facility has an environmental policy which cover the all the process and comply the legal requirement.
2. Factory surrounding environment found acceptable.
3. Facility conduct air and noise assessment regularly. Last assessment was done on 15.12.2021 by third party named Qtex Solution Limited. Also has done EIA (Environment Impact Assessment) on April 2017.
4. Factory has waste management policy regarding solid waste.
5. Facility has appointed Md. Mazharul Islam- Asst. Manager-HR & Compliance as environmental responsible person.

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

Details:

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

Any other comments: Nil

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

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

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

Other findings

Other Findings Outside the Scope of the Code
None Observed

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

**NOTE:** The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.

**Instruction to Audit Company:** fill in the relevant clauses from the Customer Supplier Code - where applicable.

Not Applicable

## Photo Form

### Non-Conformity Pictures:




1. Workers of cutting section were not using dust masks during work.



2. Machine operators of sewing section were not using dust masks during work.



3. Eye guards of over lock machines were found in displaced condition.

	<p>Void</p>	<p>Void</p>
<p>4. Needle guard of plain sewing machines were displaced.</p>	<p>Nil</p>	<p>Nil</p>

**Best practice Pictures:**

		<p>Void</p>
<p>Fair price shop (Apon Bazar) to get commodity with discounted price.</p>	<p>Fair price shop (Apon Bazar) to get commodity with discounted price.</p>	<p>Nil</p>

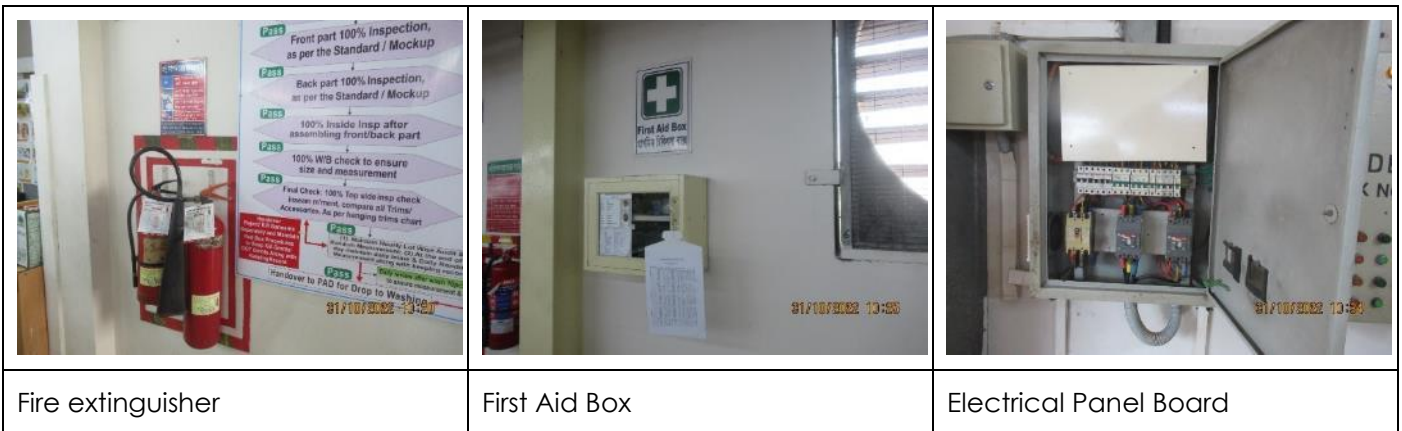
**General facility tour pictures:**

		
<p>Facility Gate</p>	<p>Facility Building</p>	<p>Facility name</p>





<p>Firefighting Equipment</p>	<p>Staircase</p>	<p>Notice board</p>
<p>Fire Alarm Switch</p>	<p>Fire alarm</p>	<p>No smoking Sign</p>
<p>Smoke Detector</p>	<p>Emergency light</p>	<p>Illuminated exit light</p>



<p>Danger Sign</p>	<p>Drinking water facility</p>	<p>ETI Base Code posted</p>
<p>PPE Box</p>	<p>Workers' toilet</p>	<p>Complaint/Suggestion Box</p>
<p>Spot Removing Area</p>	<p>Canteen</p>	<p>Childcare room</p>
<p>Medical room</p>	<p>Patient Bed</p>	<p>Compressor</p>

		<p>Void</p>
<p>Power generator</p>	<p>Boiler</p>	<p>Nil</p>



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

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

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

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

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw\\_3d\\_3d](http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

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

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\\_2brg\\_3d\\_3d](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

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