




# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 1025370	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 1073961
Business name (Company name):	Birla Corporation Ltd. - Unit Birla Jute Mills		
Site name:	Birla Corporation Ltd. - Unit Birla Jute Mills		
Site address: <i>(Please include full address)</i>	PO Birlapur PS NoDakhali Dist South 24 Parganas Pin 743318 West Bengal.	Country:	India
Site contact and job title:	Mr. Anup Pandey - Sr. GM R&D		
Site phone:	+91 91 9920663340	Site e-mail:	anup.pandey@birlacorp.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	02-06 March, 2021		

<b>Audit Company Name &amp; Logo:</b>  <b>BSI Group India Pvt. Ltd.</b> 	<b>Report Owner (payer):</b> <i>(If paid for by the customer of the site please remove for Sedex upload)</i>  <b>Birla Corporation Ltd. - Unit Birla Jute Mills</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): NIL

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

Lead auditor: Manish Doshi APSCA number: 21701516

Lead auditor APSCA status: Registered Auditor

Team auditor: Not Applicable APSCA number: Not Applicable

Interviewers: Manish Doshi APSCA number: 21701516

Report writer: Manish Doshi

Report reviewer: Sahil Kukreja

Date of declaration: March 06, 2021

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

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

## Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> <i>Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A <a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>		00	00	None observed
0B <a href="#">Management systems and code implementation</a>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	02	01	00	<p><b>NC's:</b></p> <ol style="list-style-type: none"> <li>02-diesel generator sets and the bag unit were not included in the approved layout plan.</li> <li>The facility has not obtained the registration certificates of the 02 X 500 KVA diesel generator sets from the local authority. The facility has applied for the same on dated 14.11.2014.</li> </ol> <p><b>Obs:</b></p> <ol style="list-style-type: none"> <li>The site has not completed the SAQ prior to the audit.</li> </ol>
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	01	00	00	<p><b>NC:</b></p> <ol style="list-style-type: none"> <li>The labour contractors do not issue appointment letters to their employees.</li> </ol>
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None observed
3. <a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	12	00	00	<p><b>NC's:</b></p> <ol style="list-style-type: none"> <li>The facility has not covered all the shifts in their fire mock drill.</li> </ol>

									<ol style="list-style-type: none"> <li>2. Hand rails not provided to the stairs located at the store godown.</li> <li>3. Pulley guard not provided to the pully attached to the dryer machine installed at the process house, rotating machine installed at the boiler section and colour mixing machine installed in the bag unit.</li> <li>4. Aisle markings were faded at many locations in the production floors.</li> <li>5. The facility has not provided adequate numbers of power backed up emergency lights in the production area.</li> <li>6. Tripping hazards were observed at the 02 secondary exits.</li> <li>7. The compressor installed at the effluent treatment plant was not in safe condition.</li> <li>8. Hydro machine installed in the process house was not having a lid and emergency switch. Also, 02 hydro machines installed in the dyeing section were not having the lid to close during its operation.</li> <li>9. The facility has not provided appropriate PPEs to the workers working in the dyeing section.</li> <li>10. 100% of the trimmers and scissors were not secured and also, the facility has not provided needle guard to all the stitching machines.</li> <li>11. The facility has not provided the fire call point at the boiler section.</li> <li>12. The diesel cargo stored in the pump room were not labelled and were not stored in the secured place.</li> </ol>
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None observed

5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None observed
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	01	00	00	<b>NC:</b> 1. Contracted security personnel were found working for continuous 28 days without a weekly off day in the month of February 2021.
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None observed
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None observed
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None observed
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None observed
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None observed
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	Not Applicable
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	03	00	00	<b>NC's:</b> 1. The facility has not obtained the Authorization of the Hazardous Waste from the concerned authority. The facility has applied for the same on 25.01.2021. 2. The waste water generated from the screen washing department is drained directly into the drainage line and is not treated in the effluent treatment plant. 3. Filled and used oil drums were stored directly under the sunlight and rain water. Chemicals spills were observed on the ground and facility has not provided secondary containers to the oil drums.

10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None observed
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This Initial 04- Pillar Audit was conducted by BSI Group India Pvt. Ltd. One auditor who assessed facility's operation against ETI base code and Local law requirements on a sampling basis in 4.5 days.

**Site Summary:**

1. This facility was established in year 1990 as a Limited Company and started its operations from 1919. Facility is involved in manufacturing and exports of Jute & its allied Fibre and Cotton products such as Jute Yarn, Jute - Cotton & its LLIWD Fibre made Fabric, Jute/Cotton/Juco Bags.
2. Overall responsibility for meeting the standards is taken by Mr. Anup Pandey - Sr. GM R&D.
3. Facility has employed total of 4747 employees at the site, which includes 4316 production employees and 431 non-production employees. Out of 4747 employees, 4457 employees are employed on company roll and 290 are contracted workers. Out of 4457 employees 252 employees are staff and 4205 are workers.
  - 290 workers are employed though 05 labour contractor –
    - o Nikkon Enterprise – 70 workers for production
    - o B K Jute and Trading Company – 50 workers for production
    - o Medini Construction – 50 workers for civil work
    - o Munna Motor Garage – 30 workers for automobiles
    - o Biswas Engineering Works – 50 workers for maintenance
  - 40 Security guards are employed though 02 agencies.
    - o SIS (India) Pvt. Ltd. – 20 security personnel for Security and
    - o Bengal Security Force – 20 security personnel for Security.
4. Facility operates 06 days a week in general shift for office staff, rotational off for production staff and workers and three shifts for security. The production shift is from - 06.00 AM to 11.00 AM & 02.00 PM to 05.00 PM, 11.00 AM to 02.00 PM & 05.00 PM to 10.00 PM and 10.00 PM to 06.00 AM with half hour break in phased manner. General shift is from 08.00 AM to 12.00 PM & 02.00 PM to 06.00 PM. Security timings from 05.30am to 01.30pm, 01.30pm to 09.30pm and 09.30pm to 05.30pm. Weekly off – Sunday for office staff and rotational off for production staff and workers.
5. No child labour at audited site. As per available records, the youngest employee at site was 19 years completed. Age proof record was available all 62 sampled employees.
6. Facility has 05 trade unions and has formed grievance committee, Environmental health and safety committee, Internal Complaint Committee, canteen committee and meetings are conducted on regular interval.
7. There is a collective bargaining agreement between the Jute Association and trade unions. The facility is one of the members of the Jute Association. The site has installed the suggestion box and has the open-door policy. Even workers during their interviews confirmed that they can approach the top management for any suggestions/grievances.
8. Facility does not discriminate any employees in hiring.
9. As per discussion with Management, no obvious peak season for the audited site.
10. Facility does not sub-contract any production process.



11. Facility does not engage any home worker in any of the production activity.
12. Total of 62 employees were randomly selected for interview, they were interviewed in 8 groups of 5 employees and the balance of 22 employees were interviewed individually. In general, interviewed employees were satisfied with working environment.
13. Out of last 12 months' time and wage records, randomly sampled 62 employees' IN/OUT time records and payrolls (January 2021 - Most Recent paid month, October 2020 – random month and February 2020 – random month) were reviewed for checking the status of wages and working hours.
14. No overtime is performed by the workers and the same was conformed by the workers during their interviews.
15. As per available IN/OUT time record and audit process, employees work 6 days a week in 8 hours shift. The facility has maintained the system generated IN/OUT time record for all the company and contracted employees.
16. All employees are paid on monthly basis through bank transfer latest by 7th of every month.
17. No piece rate employee employed at site.
18. Social security benefit (Provident Fund – PF and Employee State Insurance - ESI) is extended to all eligible employees.
19. No harassment reported by the employees.
20. Linoleum building was non-operational on the date of the audit.

Good Example: No observed.

Not covered under the scope – None

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

## Site Details

Site Details																													
A: Company Name:	Birla Corporation Ltd. - Unit Birla Jute Mills																												
B: Site name:	Birla Corporation Ltd. - Unit Birla Jute Mills																												
C: GPS location: (If available)	GPS Address: PO Birlapur PS No Dakhali Dist South 24 Parganas Pin 743318 West Bengal.	Latitude: 22.424122 Longitude: 88.146903																											
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<ul style="list-style-type: none"> <li>• Factory License No. 000675, Reg. No. 0154/TP(s)/X/1932 Workers - 5000 HP 10000 Valid up to 31.12.2021.</li> <li>• Approved Layout Plan No. 835/8 dated 12.07.2016.</li> <li>• Fire NOC: License No. FL0125182201204641 DATED 13.10.2020 valid till 12.10.2023.</li> <li>• Pollution Consent: Consent Letter No. -CO 109808, Memo Number - 97/30/WPB-B (387)/98 dated 23.05.2017 valid till - 30.06.2021 and Consent Letter No. CO 125108, Memo Number - 65/30/WPB-B (387)/98 dated 30.06.2020 valid till - 30.06.2021 only for new boiler.</li> <li>• Boiler License: Boiler 1 - 5 Tph registration no. WBL11914 dated 02.09.2020 valid from 17.06.2020 to 16.06.2021. Boiler 2 - 5 Tph registration no. WBL13053 dated 24.08.2020 valid from 10.06.2020 to 09.06.2021.</li> </ul>																												
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturer of Jute & its allied Fibre and Cotton products such as Jute Yarn, Jute - Cotton & its LLIWD FIBRE MADE FABRIC, Jute/Cotton/Juco Bags.																												
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Main Mill</td> <td>26625.24 sq. mtrs</td> <td>None</td> </tr> <tr> <td>CBP Mill</td> <td>8828.92 sq. mtrs</td> <td>None</td> </tr> <tr> <td>TFO Shed</td> <td>656.70 sq. mtrs</td> <td>None</td> </tr> <tr> <td>Dornier</td> <td>3626.56 sq. mtrs</td> <td>None</td> </tr> <tr> <td>V.Loom &amp; Broad Loom</td> <td>25096.67 sq. mtrs</td> <td>None</td> </tr> <tr> <td>Dye House</td> <td>1127.68 sq. mtrs</td> <td>None</td> </tr> <tr> <td>Carpet Mill (Food Grade Unit)</td> <td>3101.48 sq. mtrs</td> <td>None</td> </tr> <tr> <td>Shed-1</td> <td>2416.72 sq. mtrs</td> <td>None</td> </tr> </tbody> </table>		Production Building no	Description	Remark, if any	Main Mill	26625.24 sq. mtrs	None	CBP Mill	8828.92 sq. mtrs	None	TFO Shed	656.70 sq. mtrs	None	Dornier	3626.56 sq. mtrs	None	V.Loom & Broad Loom	25096.67 sq. mtrs	None	Dye House	1127.68 sq. mtrs	None	Carpet Mill (Food Grade Unit)	3101.48 sq. mtrs	None	Shed-1	2416.72 sq. mtrs	None
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	<table border="1"> <tr> <td>Jute Felt</td> <td>1152.87 sq. mtrs</td> <td>None</td> </tr> <tr> <td>Bag Unit</td> <td>1381.97 sq. mtrs</td> <td>None</td> </tr> <tr> <td>Is this a shared building?</td> <td>No, It's not a shared building</td> <td>None</td> </tr> </table> <p>Facility is operational at current location since 1919. The total built up area is around 74014.80 square meters. The details are as per below –</p> <p>Periphery – Effluent treatment plant, recreation club, Occupational health centre, Pump house, staff quarters.</p> <p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F2: Please give details:</p> <p>F3: Does the site have a structural engineer evaluation?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>F4: Please give details: The site has obtained the stability certificate from Rabin Kumar Banerjee, Chartered Civil Engineer. Certificate No. RKB/BJM/BILL/19/1 dated 23.02.2019</p>	Jute Felt	1152.87 sq. mtrs	None	Bag Unit	1381.97 sq. mtrs	None	Is this a shared building?	No, It's not a shared building	None
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Is this a shared building?	No, It's not a shared building	None								
<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>Consistent throughout the year</p>									
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>Manufacturer of Jute &amp; its allied Fibre and cotton products such as Jute Yarn, Jute - Cotton &amp; its LLIWD FIBRE MADE FABRIC, Jute/Cotton/Juco Bags.</p>									
<p>J: What form of worker representation / union is there on site?</p>	<input checked="" type="checkbox"/> Union (name) - Birla Jute & Industries Limited Workers Union, Bengal Chatkal Mazdoor Union, Federation of Chatkal Mazdoor Union, Birlapur Chatkal Mazdoor Sabha and Hind Mazdoor Sabha <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (specify) Grievance Committee									

	<input type="checkbox"/> None
K: Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation - No on-site dormitory provision for workers.
M: Are there any off site provided worker accommodation buildings	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: If yes, approx. % of workers – 80% of the workers were provided accommodation.
N: Were all site-provided accommodation buildings included in this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: If no, please give details -

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 09.30am  A2: Day 1 Time out: 06.00pm	A3: Day 2 Time in: 09.30am  A4: Day 2 Time out: 06.00pm	A5: Day 3 Time in: 09.30am  A6: Day 3 Time out: 06.00pm
	A7: Day 4 Time in: 09.30am  A8: Day 4 Time out: 06.00pm	A9: Day 5 Time in: 09.30am  A10: Day 5 Time out: 01.30pm	
B: Number of auditor days used:	4.5 man-days (01 Auditor X 4.5 days)		
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 checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail:    weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If No, why not – The site has missed out to complete the SAQ prior to the audit		

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)	Mr. Anup Pandey - Sr. GM R&D
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:	Not Applicable
J: Previous audit type:	Not Applicable
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Representative from the grievance committee was present in the opening and closing meeting; however, he was not present during the audit due some urgent assignment.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	Union representative was present in the opening and closing meeting; however, he was not present during the audit due some urgent assignment.		

## 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	4449	0	271	0	0	0	0	4720
Worker numbers – female	08	0	19	0	0	0	0	27
Total	4457	0	290	0	0	0	0	4747
Number of Workers interviewed – male	37	0	14	0	0	0	0	51
Number of Workers interviewed – female	02	0	09	0	0	0	0	11
Total – interviewed sample size	39	0	23	0	0	0	0	62

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

Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input 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>	07 groups of 05 workers each (Male) & 01 groups of 05 workers each (Female)
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 16      D2: Female: 06
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?	None
I: What did the workers like the most about working at this site?	Positive approach of the management
J: Any additional comment(s) regarding interviews:	None
K: Attitude of workers to hours worked:	Workers had favourable attitude towards management
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>L1: If yes, please give details:</i>	
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>	



- 62 workers were interviewed during audit, out of which 08 groups of 5 employees each and remaining of 22 workers were interviewed individually. Workers had favourable attitude towards management.
- Also, they felt comfortable to complain with their supervisors. They were given assurance about the confidentiality.

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

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

The worker representatives were found positive during the interviews. No negative feedback was given by them.

O: Attitude of managers:

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

- The management was positive towards audit and its process. Also, they were transparent and co-operative during audit.
- Management has agreed to the findings are and were committed to implement the further corrective actions and comply the facility.

## Audit Results by Clause

### 0A: Universal Rights covering UNGP

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

#### 0.A. Guidance for Observations

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

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

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

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

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

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

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

#### Current Systems and Evidence Examined

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

#### Current systems:

- Mr. Anup Pandey - Sr. GM R&D is responsible for implementing standards concerning Human rights.
- The site has the Human right policy covering human rights impacts and issues.
- The site in their employee hand book has mentioned all the terms and conditions of the employment
- Grievance procedures are briefed to all the employees
- The site has communicated their policy to respective stakeholders.

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

Details:

- Human Right Policy
- Interaction with Management and Interview with employees

Any other comments: NIL

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  A1: Please give details: The site has documented a human rights policy which expresses commitment to respect human rights. The policy was reviewed on the date of the audit.</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please give details:                  Name: Mr. Anup Pandey                  Job title: Sr. GM R&amp;D</p>
<p>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?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  C1: Please give details: It was confirmed by workers interview that they can approach their management for any kind of issues.</p>
<p>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)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  D1: If no, please give details</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  E1: Please give details: Data is maintained by HR manager</p>

Findings		
<p><b>Finding: Observation</b> <input type="checkbox"/>      <b>Company NC</b> <input type="checkbox"/></p> <p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI/Additional elements / customer specific 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></p>

## Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: __12__ %	A2: This year __3__ %
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]	2% turnover in the last quarter	
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: __6__ %	C2: This year __2__ %
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	8%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: In Accident register. However, no accident occurred in last 12 months.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2020 Number: Nil	F2: This year:2021 Number: Nil
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]	None	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: None	H2: This year: None
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months __Nil__% workers	I2: 12 months __Nil__% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ___Nil___% workers	J2: 12 months ___Nil___% workers
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**0B: Management system and Code Implementation**  
*(Click here to return to summary of findings)*

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

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

**Current systems:**

- Mr. Anup Pandey - Sr. GM R&D is responsible to ensure compliance with these code requirements.
- Facility has obtained Factory License including approved building layout plan and stability certificate.
- Employees were found trained about the Ethical Tread Initiative (ETI) code requirements. The training was imparted on February 15, 2021.
- Facility has posted copy of ETI Code of Conduct in local language for employee's reference.
- Facility has communicated ETI code requirement to their suppliers.
- Facility has conducted internal audit to monitor effectiveness of social management system implemented at audited site.
- Facility has conducted adequate risk assessment covering all aspects of social and labour management system.
- Facility has the systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land rights.

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

Details:

- Facility Policy and Procedures.
- All statutory licenses including factory License and building plan approvals.
- Factory license is valid till December 31, 2021.
- Approved layout plan obtained on July 12, 2016.
- Internal audit conducted from December 03, 2020 to December 09, 2020.

Any other comments: None

<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: No such fine imposed on the site till date.</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: The facility has established the policies and procedure with respect to social compliance on 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>Facility has conducted internal audit to monitor effective implementation of social management system (compliance of policies and procedures).</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: All the employees will be undergone an induction training where the social compliance policies and procedures were explained.</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: Based on interaction with the employees, it was noted that facility has a program to train relevant individuals regarding the standards for forced labour, child labour, discrimination, harassment &amp; abuse and changes of any Laws or revisions to existing Laws &amp; regulations. Provided training was found effective.</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 checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      F1: Please give details:                      1. ISO 9001:2015 – Bureau of Indian Standards. Licence No. QM/L-500086.8 dated 29.05.2019 valid from 22.05.2019 to 30.04.2022.                      2. ISO 14001:2015 – BSI Assurance UK Limited, Certificate No.: EMS 602582, Effective date: 27.09.2019 Valid till 26.09.2022.                      3. OHSAS 45001:2018 - BSI Assurance UK Limited, Certificate No.: OHS 602584, Effective date: 30.06.2020 Valid till 26.09.2022.                      4. SA8000:2014 - BSI Assurance UK Limited, Certificate No.: SA 637688, Effective date: 31.08.2018 Valid till 30.08.2021.</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 defined HR Department which monitor and control all HR related activities.</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. Anup Pandey - Sr. GM R&amp;D is responsible for compliance with 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: Policy is in place also facility keeps 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: Procedures to ensure confidential information is kept confidential that includes information such as caste, wages, salary etc.</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: Facility has identified basic risks associated with the facility.</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: Facility has system to mitigate identified risks.</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: Policy is maintained and is circulated to their respective suppliers.</p>
<b>Land rights</b>	
<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: The site has purchased the land from the British Government in 1919. The facility has obtained the factory license valid till 31.12.2021.</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: These has been conducted by the legal staff to accepted procedures for due diligence.</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: The site has the documented policy and procedures specific to land rights. The policy covers the due diligence to 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: The site has purchased the land from the British Government in 1919.</p>
<p>R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: The site has purchased the land from the British Government in 1919.</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: All the areas of the site were legal according to the interview and document review.</p>

<b>Non-compliance:</b>	
<p><b>1. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI/Additional Elements      <input checked="" type="checkbox"/> NC against Local Law  <input type="checkbox"/> NC against customer code:</p> <p>It was observed during the document review that 02-diesel generator sets and the bag unit were not included in the approved layout plan.</p> <p><b>ETI requirement:</b> 0.B.4 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with.</p> <p><b>Local law: As per Rule 3 (1) of The West Bengal Factories Rules, 1958.</b></p> <p>(1) No building, part of the building or structure, shall be constructed, extended, or taken into use as a factory or part of a factory on any site unless previous permission in writing has been obtained from the chief Inspector for the site and construction, extension or use of the building or part of the building or structure, on such site.</p> <p><b>Recommended corrective action:</b> It is recommended that the facility shall include 02-diesel generator sets and the bag unit in the approved layout plan.</p> <p><b>Action By:</b> Mr. Anup Pandey - Sr. GM R&amp;D  <b>Timescale:</b> 90days</p>	<p><b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i></p> <p>Document review</p>



<p><b>2. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI/Additional Elements      <input type="checkbox"/> NC against Local Law  <input type="checkbox"/> NC against customer code:</p> <p>It was observed during the document review that the facility has not obtained the registration certificates of the 02 X 500 KVA diesel generator sets from the local authority. The facility has applied for the same on dated 14.11.2014.</p> <p><b>ETI requirement:</b> O.B.4 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with.</p> <p><b>Recommended corrective action:</b> It is recommended that the facility shall obtain the registration of their 02 X 500 KVA diesel generator sets from the local authority.</p> <p><b>Action By:</b> Mr. Anup Pandey - Sr. GM R&amp;D  <b>Timescale:</b> 90days</p>	<p>Document review</p>
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Observation:	
<p><b>Description of observation:</b> The site has missed out to complete the SAQ prior to the audit.</p> <p><b>Local law or ETI requirement:</b> N/A</p> <p><b>Comments:</b> It is recommended that the site shall complete the self-assessment questionnaire and shall make it available to the auditor for pre-review.</p>	<p><b>Objective evidence observed:</b> Document review</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p><b>Objective evidence observed:</b></p>

**1: Freely Chosen Employment**  
*(Click here to return to summary of findings)*

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- 1) Mr. Anup Pandey - Sr. GM R&D is responsible to oversee that no forced, bonded, involuntary or prison labor is employed.
- 2) There was no presence of forced / bonded or prison labor at the workplace.
- 3) Employees are not required to lodge any deposits, identity papers with the facility before or after joining the services.
- 4) Employees are free to leave at the end of their shift and there is no compulsion to work overtime.
- 5) Employees are free to leave their employer after reasonable notice.

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

Details:

- Facility Policy and Procedures.
- Personal files with application form and bio data including employment contract.
- Interaction with Management and Interview with employees.

Any other comments: None

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

<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  D1: Please describe finding: As per the appointment letter a worker can terminate his service by giving one-month notice.</p>
<p>E: If any part of the business is UK based or registered there &amp; has a turnover over £36m, is there a published a 'modern day slavery statement'?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No  <input checked="" type="checkbox"/> Not applicable                  E1: Please describe finding: NA</p>
<p>F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  F1: Please describe finding: The workers confirmed that there is no restriction on them to leave the site at the end of the workday.</p>
<p>G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Not applicable                  G1: If yes, please give details and category of workers affected:                  Site understand the risks of forced / trafficked / bonded labour in its supply chain</p>
<p>H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  H1: Please describe finding: The site has displayed policy on forced and bonded labour and the same has been communicated to the workers.</p>

Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law:      <input type="checkbox"/> NC against customer code:                  It was observed during document review that the labour contractors do not issue appointment letters to their employees.</p> <p><b>ETI requirement:</b> 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.</p> <p><b>Recommended corrective action:</b> It is recommended that the labour contractors issue appointment letters to their employees, required by the applicable law.</p> <p><b>Action By:</b> Mr. Anup Pandey - Sr. GM R&amp;D  <b>Timescale:</b> 30days</p>	<p><b>Objective evidence observed:</b>                  (where relevant please add photo numbers)</p> <p>Document review</p>

Observation:	
<b>Description of observation:</b> Not Applicable <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>

**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) Mr. Anup Pandey - Sr. GM R&D is responsible to ensure that 'Freedom of Association and Right to Collective Bargaining' is respected by the management'.
- 2) 05 trade unions were present in the facility and Memorandum of Settlement between the Employers of the Jute Mills in West Bengal and their Workmen represented by the trade union on dated 13.03. 2019.
- 3) Employees without distinction, have the right to join any union or form trade unions of their own choosing and to bargain collectively.
- 4) Facility has provided suggestion box through which employees can report grievances. Further, employees can also approach management with their grievance and adequate actions are taken.

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

Details:

- Facility Policy and Procedures.
- Last grievance committee meeting conducted on December 23, 2020.
- Interaction with Management and Interview with employees.

Any other comments: None

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

- Union (name) - Birla Jute & Industries Limited Workers Union, Bengal Chatkal Mazdoor Union, Federation of Chatkal Mazdoor Union, Birlapur Chatkal Mazdoor Sabha and Hind Mazdoor Sabha
- Worker Committee

	<input checked="" type="checkbox"/> Other (specify): Health & Safety committee, Grievance committee. <input type="checkbox"/> None	
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Facility has formed grievance committee and health and safety committee to resolve workers issues and grievances. Further, suggestion box is provided for confidential reporting of grievances.  D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The site does not restrict the union member to conduct their related business in the factory premises and allow them to use their facilities.	
F: Name of union and union representative, if applicable:	1. Birla Jute & Industries Limited Workers Union, 2. Bengal Chatkal Mazdoor Union, 3. Federation of Chatkal Mazdoor Union, 4. Birlapur Chatkal Mazdoor Sabha and 5. Hind Mazdoor Sabha	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?	Grievance Committee	G1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
I: Were worker representatives freely elected?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable	I1: Date of last election:

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: 02 union representatives were interviewed in the conference hall.	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	As per audit process and review of records, it was noted that union and grievance committee was effective. As per employee's interview and interaction with representative's facility has formed required committees like grievance committee and health & safety committee. Meetings are conducted on regular interval. Issues are discussed during meeting along with corrective/preventive action. Corrective actions are taken in timely manner to resolve workers grievance.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If <b>Yes</b> , what percentage by trade Union/worker representation	M1: <u>100</u> % workers covered by Union CBA	M2: <u>    </u> % workers covered by worker rep CBA
M3: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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:</p> <p>No Non-conformance observed on the day of the audit</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> Not Applicable</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>

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	<b>Good Examples observed:</b>
Description of Good Example (GE): None observed	<b>Objective evidence observed:</b>



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

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

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

**ETI**

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

3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

**Current Systems and Evidence Examined**

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

**Current systems:**

**1. General Health and Safety management**

- Mr. Anup Pandey - Sr. GM R&D is responsible for Health & Safety aspects for the site.
- Potable water was freely available in the facility and test certificates were up-to-date.
- Sufficient number of toilets were available at all times to workers. Toilets were maintained in hygienic condition.
- Ventilation, temperature and lighting were adequate in all section of the facility.
- Housekeeping was found acceptable throughout the facility.
- Facility building was found structurally in safe condition.
- Facility has provided training on COVID 19 safety to their employees.
- Facility has provided adequate number of hand washing facility to prevent COVID 19 virus. Temperate of each employee is checked twice per day.

**2. Fire Safety**

- There were at least 2 exits/staircases from each work area/floor.
- Facility has installed Fire Extinguisher - 381, Sand Bucket - 280, Sprinkler ICV - 14, Hose Cabinet - 55, Hose reel - 310, Jockey Pump - 01, Sprinkler pump - 01, Diesel Hydrant pump - 01, Electrical pump (main pump) - 01 and electrical pump for sprinkler - 01, Fire Call Point - 05, Assembly point 07, Stretcher point 11, Fire alarm (siren) - 01, Emergency lights - 41.
- Firefighting equipment inspections were conducted on quarterly basis.
- Fire drills were organized and recorded once in every 3 months.
- Facility has obtained Fire-NOC (No Objection Certificate) from local authorized body.
- Fire safety training is provided to sufficient number of employees through competent agency.

**3. Machine & Electrical safety**

- All machines and electrical equipment's were found maintained in good condition.
- There were competent mechanic & electricians at the site to do the electrical work.
- Facility has obtained periodic inspection certificate for the compressors.
- Safety sign was posted near machines/equipment's for employee's reference.
- Facility has provided adequate safety guard on all required plant and machineries.

**4. Chemical safety and use of PPE's**

- Occupational health check-up was conducted for most of the employees working in hazardous area.
- Training was provided on usage of PPEs, chemical handling and waste handling to all the relevant employees.

**5. Medical services**

- Facility has provided occupational health centre.
- Facility has provided first aid box in every section with required contents.

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

Details:

- Health and Safety Policy.
- Fire NOC obtained on October 13, 2020.
- Record of Health and Safety committee meeting conducted on February 11, 2021. All the 13 members were present during the meeting.
- Industrial accident records – Updated till February 2021 and no accident occurred in last one year.
- First aid training was provided to 67 employees on February 05, 2021.
- Drinking Water Test conducted on June 08, 2020.
- Fire Drill conducted once in 3 months. Last drill was conducted on February 22, 2021.
- Fire training was provided to 623 employees internally by the safety officer on February 12, 2021.
- Interaction with Management and Interview with employees

Any other comments: None

<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: The site has effective policies and procedures on health &amp; safety and the same are communicated to all the workers.</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 are included in the workers manual and displayed on the notice board at the factory premises.</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 additions observed</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 with personal protective equipment.</p>
<p>E: Is a medical room or medical facility provided for workers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>

<p>If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p>E1: Please give details: The site has provided occupational health centre as required by the applicable law.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: The site has 67 nos. of first aid trainers. Ensuring any one is available during working hours.</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 checked="" type="checkbox"/> No G1: Please give details: The site does not provide transport facility to its workers.</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: The site has provided a secure place for workers such as lockers to keep their personal belongings.</p>
<p>I: Are H&amp;S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The site has conducted Health &amp; Safety Risk assessment and same was confirmed during record review</p>
<p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The site has obtained pollution consent from the West Bengal Pollution Control Board.</p>
<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: No banned chemicals are used at the site.</p>

<p style="text-align: center;"><b>Non-compliance:</b></p>	
<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>It was observed during the document review that the facility has conducted the fire mock drill only in the 1st shift on dated 22.02.2021 and has not covered all the shifts in their fire mock drill.</p> <p><b>Local law:</b> As per section 7A of The Factories Act 1948            7A. General duties of the occupier. (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.</p> <p><b>ETI requirement:</b> 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</p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p> <p>Document Review</p>

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

**Recommended corrective action:** It is recommended that the facility shall ensure that all shifts are covered in fire mock drill.

**Action By:** Mr. Anup Pandey - Sr. GM R&D

**Timescale:** 30 days

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

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

It was observed during the site tour that the facility has not provided handrails to the stairs located at the store godwon.

**Local law:** As per section 7A of The Factories Act 1948

7A. General duties of the occupier. (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.

**ETI requirement:** 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. 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.

**Recommended corrective action:** It is recommended that the site shall provide the handrails to the stairs located at the store godwon.

**Action By:** Mr. Anup Pandey - Sr. GM R&D

**Timescale:** 30 days

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

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

It was observed during the site tour that the facility has not provided the pulley guard to the pully attached to the dryer machine installed at the process house and has also not provided pulley guard to the machine installed at the boiler section and colour mixing machine installed in the bag unit.

**Local law:** As per section 7A of The Factories Act 1948

7A. General duties of the occupier. (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.

**ETI requirement:** 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. 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.

Site tour and see NC photo # 1

Site tour and see NC photo # 2

<p><b>Recommended corrective action:</b> It is recommended that the facility shall provide the pulley guards to the rotating machines.</p> <p><b>Action By:</b> Mr. Anup Pandey - Sr. GM R&amp;D <b>Timescale:</b> 30 days</p> <p><b>4. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p>It was observed during the site tour that the aisle markings were faded at many locations in the production floors.</p> <p><b>ETI requirement:</b> 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Recommended corrective action:</b> It is recommended that the facility shall ensure that the aisle marking are made available at all the required places in the production floors.</p> <p><b>Action By:</b> Mr. Anup Pandey - Sr. GM R&amp;D <b>Timescale:</b> 30 days</p>	<p>Site tour and see NC photo # 3</p>
<p><b>5. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p>It was observed during the site tour that the facility has not provided adequate numbers of power backed up emergency lights in the production area.</p> <p><b>ETI requirement:</b> 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Recommended corrective action:</b> It is recommended that the facility shall provide adequate numbers of power backed up emergency lights in the production area.</p> <p><b>Action By:</b> Mr. Anup Pandey - Sr. GM R&amp;D <b>Timescale:</b> 60 days</p>	<p>Site tour</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>Site tour and see NC photo # 4</p>

During the site tour 02 tripping hazards were observed at the 02 secondary exits (01 at weaving department and 01 at the finished goods section)

**Local law:** As per section 7A of The Factories Act 1948  
7A. General duties of the occupier. (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.

**ETI requirement:** 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. 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.

**Recommended corrective action:** It is recommended that the facility shall ensure that the secondary exits are free of obstructions.

**Action By:** Mr. Anup Pandey - Sr. GM R&D  
**Timescale:** 30 days

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

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

Site tour and see NC photo # 5

It was observed during the site tour that the compressor installed at the effluent treatment plant was not in safe condition.

**Local law:** As per Section 21 of The Factories Act 1948.

21. Fencing of machinery. (1) In every factory the following, namely, --  
(i) every moving part of a prime mover and every flywheel connected to a prime mover whether the prime mover or flywheel is in the engine house or not;  
(ii) the headrace and tailrace of every waterwheel and water turbine;  
(iii) any part of a stock-bar which projects beyond the head stock of a lathe; and (iv) unless they are in such position or of such construction as to be safe to every person employed in the factory as they would be if they were securely fenced, the following, namely, --  
(a) every part of an electric generator, a motor or rotary convertor.  
(b) every part of transmission machinery; and  
(c) every dangerous part of any other machinery shall be securely fenced by safeguards of substantial construction, which shall be constantly maintained and kept in position while the parts of machinery they are fencing are in motion or in use:

**ETI requirement:** 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. 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><b>Recommended corrective action:</b> It is recommended that the facility shall ensure that the compressor is installed in safe condition.</p> <p><b>Action By:</b> Mr. Anup Pandey - Sr. GM R&amp;D  <b>Timescale:</b> 30 days</p> <p><b>8. 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>It was observed during the site tour that a hydro machine installed in the process house was not having a lid and emergency switch. Also, 02 hydro machines installed in the dyeing section were not having the lid to close during its operation.</p> <p><b>Local law:</b> As per section 7A of The Factories Act 1948  7A. General duties of the occupier. (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.</p> <p><b>ETI requirement:</b> 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Recommended corrective action:</b> It is recommended that the facility shall ensure that adequate measures are taken for the 03 hydro machines.</p> <p><b>Action By:</b> Mr. Anup Pandey - Sr. GM R&amp;D  <b>Timescale:</b> 60 days</p> <p><b>9. 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>It was observed during the site tour that the facility has not provided appropriate PPEs to the workers working in the dyeing section.</p> <p><b>Local law:</b> As per section 7A of The Factories Act 1948  7A. General duties of the occupier. (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.</p> <p><b>ETI requirement:</b> 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p>	<p>Site tour and see NC photo # 6</p>
<p><b>Recommended corrective action:</b> It is recommended that the facility shall ensure that adequate measures are taken for the 03 hydro machines.</p> <p><b>Action By:</b> Mr. Anup Pandey - Sr. GM R&amp;D  <b>Timescale:</b> 60 days</p> <p><b>9. 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>It was observed during the site tour that the facility has not provided appropriate PPEs to the workers working in the dyeing section.</p> <p><b>Local law:</b> As per section 7A of The Factories Act 1948  7A. General duties of the occupier. (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.</p> <p><b>ETI requirement:</b> 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p>	<p>Site tour and see NC photo # 7</p>

<p><b>Recommended corrective action:</b> It was observed during the site tour that the facility has not provided appropriate PPEs to the workers working in the dyeing section.</p> <p><b>Action By:</b> Mr. Anup Pandey - Sr. GM R&amp;D <b>Timescale:</b> 30 days</p> <p><b>10. 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>It was observed during the site tour that 100% of the trimmers and scissors were not secured and also, the facility has not provided needle guard to all the stitching machines.</p> <p><b>Local law:</b> As per section 7A of The Factories Act 1948 7A. General duties of the occupier. (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.</p> <p><b>ETI requirement:</b> 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Recommended corrective action:</b> It is recommended that the facility shall ensure that all the sharp tools are secured and needle guards are provided to all the stitching machines.</p>	<p>Site tour and see NC photo # 8</p>
<p><b>Action By:</b> Mr. Anup Pandey - Sr. GM R&amp;D <b>Timescale:</b> 30 days</p> <p><b>11. 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>It was observed during the site tour that the facility has not provided the fire call point at the boiler section.</p> <p><b>Local law:</b> As per section 7A of The Factories Act 1948 7A. General duties of the occupier. (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.</p> <p><b>ETI requirement:</b> 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p>	<p>Site tour</p>



<p><b>Recommended corrective action:</b> It is recommended that the facility shall provide the fire alarm call point at the boiler section.</p> <p><b>Action By:</b> Mr. Anup Pandey - Sr. GM R&amp;D <b>Timescale:</b> 30 days</p> <p><b>12. 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>It was observed during the site tour that the diesel cargo stored in the pump room were not labelled and were not stored in the secured place.</p> <p><b>Local law:</b> As per section 7A of The Factories Act 1948          7A. General duties of the occupier. (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.</p> <p><b>ETI requirement:</b> 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Recommended corrective action:</b> It is recommended that the facility shall label the diesel cargo and store the diesel cargo in the secured place.</p> <p><b>Action By:</b> Mr. Anup Pandey - Sr. GM R&amp;D <b>Timescale:</b> 30 days</p>	<p>Site tour and see NC photo # 9</p>
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<b>Observation:</b>	
<p><b>Description of observation:</b> Not Applicable</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>

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

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

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- 1) Mr. Anup Pandey - Sr. GM R&D is responsible to oversee that no child is employed at site.
- 2) There was no evidence of child labor or young labor throughout the facility.
- 3) Age proof records were maintained in the form of Aadhar card, School certificate. Age proof was maintained for 62 of 62 sampled employees.
- 4) As per available records, age of youngest worker was 19 years completed.
- 5) Based on the employee interviews, review of facility's Anti Child Labour & Hiring Policy and age proof documents, the facility has complied with ILO Standards for Child Labor.

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

Details:

- Child Labor and Child Labor Remediation Policy.
- Age Proof records of 62 of 62 selected samples.
- Interaction with Management and Interview with employees.

Any other comments: None

A: Legal age of employment:	14 years completed.
B: Age of youngest worker found:	19 years completed.
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)	Nil %
E: Are workers under 18 subject to hazardous work assignments? <u>(Go to clause 3 – Health and Safety)</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details: Not Applicable

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:  No Non-conformance observed on the day of the audit  <b>Local law and/or ETI requirement</b> Not Applicable  <b>Recommended corrective action:</b> Not Applicable	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>  Not Applicable

Observation:	
<b>Description of observation:</b> Not Applicable  <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>

**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. Mr. Anup Pandey - Sr. GM R&D is responsible to ensure that all employees are paid legal minimum wages with all legal benefits on time as per law.
2. Based on review of wage records, the facility has paid the applicable minimum wages to the employees.
3. Based on employee's interview, wages are fixed on daily basis and paid on fortnightly.
4. Wages are paid to all the employees through bank transfer on or before 7th of every month.
5. Based from employee's interview, wage slips are provided to all the employees and employees are aware of their wage calculations.
6. Based from audit process and wage record review, all eligible employees are covered under social security benefit of Provident Fund (PF) and Employee State Insurance Corporation (ESIC)
7. Bonus benefit is extended to the employees.
8. Facility has extended Leave with Wage benefits to the employees.
10. Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules.

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

Details:

- Facility Policy.
- Wage records Pay slip and Time records for 62 selected samples for 03 months i.e. January 2021 - Most Recent paid month, October 2020 – random month and February 2020 – random month.
- Provident Fund (PF) and Employee State Insurance Corporation (ESIC) remittance challan.
- Bonus records.
- Bank transfer proof of wages.
- Leave with wage records.
- List of National and Festival Holidays.
- Interaction with management and Employees.

Any other comments: None

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:</p> <p>No Non-conformance observed on the day of the audit</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> Not Applicable</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>

**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 & 48 hours per week	A1: 8 hours per day & 48 hours per week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Not Applicable

<p>B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i></p>	<p>Legal maximum: 12 hours per week, subject to 50 hours in three months</p>	<p>B1: No overtime was observed in the sample months.</p>	<p>B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Not Applicable</p>						
<p>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></p>	<p>Legal minimum: Minimum wages as per Memorandum of Settlement at entry level is INR 370 per day.</p>	<p>C1: Based on confirmation</p> <table border="1" data-bbox="932 443 1271 644"> <tr> <td>Unskilled</td> <td>INR 556.12/day</td> </tr> <tr> <td>semiskilled</td> <td>INR 558.52/day</td> </tr> <tr> <td>Skilled</td> <td>INR 561.40/day</td> </tr> </table> <p>and number of years worked, the workers are paid as per below.</p>	Unskilled	INR 556.12/day	semiskilled	INR 558.52/day	Skilled	INR 561.40/day	<p>C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Not Applicable</p>
Unskilled	INR 556.12/day								
semiskilled	INR 558.52/day								
Skilled	INR 561.40/day								
<p>D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i></p>	<p>Legal minimum: 200% of wages</p>	<p>D1: 200% of wages</p>	<p>D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Not Applicable</p>						

<p style="text-align: center;"><b>Wages analysis:</b> <i>(Click here to return to Key Information)</i></p>			
<p>A: Were accurate records shown at the first request?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>		
<p>A1: If <b>No</b>, why not?</p>	<p>Not Applicable</p>		
<p>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></p>	<p>62 samples were reviewed for the month of January 2021 - Most Recent paid month, October 2020 – random month and February 2020 – random month.</p>		
<p>C: Are there different legal minimum wage grades? If <b>Yes</b>, please specify all.</p>	<table border="1"> <tr> <td data-bbox="644 1530 867 1713"> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> </td> <td data-bbox="867 1530 1459 1713"> <p>C1: If <b>Yes</b>, please give details:  Minimum wages as per Memorandum of Settlement at entry level is INR 370 per day.</p> </td> </tr> </table>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>C1: If <b>Yes</b>, please give details:  Minimum wages as per Memorandum of Settlement at entry level is INR 370 per day.</p>
<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>C1: If <b>Yes</b>, please give details:  Minimum wages as per Memorandum of Settlement at entry level is INR 370 per day.</p>		
<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<table border="1"> <tr> <td data-bbox="644 1719 867 1833"> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> </td> <td data-bbox="867 1719 1459 1833"> <p>D1: If <b>No</b>, please give details:</p> </td> </tr> </table>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>D1: If <b>No</b>, please give details:</p>
<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>D1: If <b>No</b>, please give details:</p>		

<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i></p> <p>Unskilled workers – INR 556.12 per day</p> <p>Skilled workers – INR 561.40 per day</p>	
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: ___% of workforce earning under minimum wage            F2: __100__% of workforce earning minimum wage            F3: ___% of workforce earning above minimum wage</p>		
<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found:  <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i></p> <p>Bonus is distributed to all the permanent workers at 8.33% in line with the applicable law.</p>		
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>Provident fund: 12% employee's share and Employees State Insurance – 0.75% of earned wage and labour welfare fund of INR. 03.00 (employee contribution) is deducted in the month of June and December every year.</p>		
<p>I: Have these deductions been made?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Please list all deductions that <b>have</b> been made.</p>	<p>1. Provident fund            2. Employees State Insurance            3. Labour Welfare Fund</p> <p>Please describe:</p>
		<p>I2: Please list all deductions that <b>have not</b> been made.</p>	<p>1. NA            2. NA</p> <p>Please describe:</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type</p> <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	

<p>L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details:</p>
<p>M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time:</p>
<p>M2: If yes, what was the calculation method used.</p>	<p><input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details:</p>
<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The wages are reviewed in the memorandum of settlement by the facility and the union in every three years.</p>
<p>O: Are workers paid in a timely manner in line with local law?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: The site follows the memorandum of settlement based on the skill level.</p>
<p>Q: How are workers paid:</p>	<p><input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:</p>



**6: Working Hours are not Excessive**

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

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

**ETI**

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

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

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- 1) Mr. Anup Pandey - Sr. GM R&D is responsible for ensuring compliance with regular and overtime hours as per law.
- 2) Facility has installed the bio-metric attendance system.
- 3) "IN/OUT" time record was maintained for all 62 of 62 randomly selected employees.
- 4) As per available IN/OUT time record, no overtime was performed by sampled employees in sampled months.
- 5) As per available IN/OUT time record, weekly rest after 6 days of working was provided.

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

Details:

- Facility Policy.
- In/Out time records for 62 selected samples for 03 months i.e., January 2021 - Most Recent paid month, October 2020 – random month and February 2020 – random month.
- The site complies legal working hours of 8 hours per shift as per the applied law.
- Facility operates 06 days a week in general shift for office staff, rotational off for production staff & workers and three shifts for security. The production shift is from - 06.00 AM to 11.00 AM & 02.00 PM to 05.00 PM, 11.00 AM to 02.00 PM & 05.00 PM to 10.00 PM and 10.00 PM to 06.00 AM with half hour break in phased manner. General shift is from 08.00 AM to 12.00 PM & 02.00 PM to 06.00 PM. Security timings from 05.30am to 01.30pm, 01.30pm to 09.30pm and 09.30pm to 05.30pm. Weekly off – Sunday for office staff and rotational off for production staff and workers.

Any other comments: None

**Non-compliance:**

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

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

It was observed during the document review that the contracted security personnel were found working for continuous 28 days without a weekly off day in the sample month of January 2021.

**Local law: As per Section 51 of The Factories Act 1948.**

51. Weekly hours. No adult worker shall be required or allowed to work in a factory for more than forty-eight hours in any week.

**ETI requirement:** 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.

**Recommended corrective action:** It is recommended that the facility shall ensure that the contracted security agency provide a weekly off day to its security personnel.

**Action By:** Mr. Anup Pandey - Sr. GM R&D

**Timescale:** 90days

**Objective evidence observed:**

*(where relevant please add photo numbers)*

Document review

**Observation:**

**Description of observation:** Not Applicable

**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:

Working hours' analysis			
Please include time e.g. hour/week/month <i>(Go back to Key information)</i>			
Systems & Processes			
A. What timekeeping systems are used: time card etc.	Describe: Bio-metric time recording system		
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:	
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:	
		<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other	
		If "Other", Please define:	
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:	
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	F3: Is this allowed by local law? <input type="checkbox"/> Yes <input type="checkbox"/> No	

	If 'No', please explain:	
	Maximum number of days worked without a day off (in sample):	
	01 weekly off day was observed in every 7-day-period.	
<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:
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:
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: NA, no overtime hours worked in the sample months.	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input type="checkbox"/> No NA, no overtime hours worked in the sample months	
K: Approximate percentage of total workers on highest overtime hours:	_____% NA, no overtime hours worked in the sample months	
L: Is overtime voluntary?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information NA	<i>L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:</i>  <i>As per policy, overtime will be performed on voluntarily basis and also workers during their interviews confirmed that the overtime is voluntary.</i>
<b>Overtime Premiums</b>		
M: Are the correct legal overtime premiums paid?	<input 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 N/A No overtime hours worked	
N: Is overtime paid at a premium?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A No overtime hours worked	N1: If yes, please describe % of workers & frequency:
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 N/A No overtime hours worked	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	
	No Overtime conducted	
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:	
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 checked="" type="checkbox"/> No	

**7: No Discrimination is Practiced**  
*(Click here to return to summary of findings)*

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- 1) Mr. Anup Pandey - Sr. GM R&D is responsible to check discrimination issue in the facility.
- 2) No discrimination reported / observed in hiring, compensation, promotion and termination based on race, caste, national origin, religion, age, disability, gender, marital status and sexual orientation.
- 3) All employees have fairly equal opportunity for training in their respective departments.

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

Details:

- Facility Policy.
- Appointment letter with terms and conditions of employment for 62 of 62 selected sampled employees.
- Salary and other benefit records.
- Interaction with management and employees.

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: <u>99</u> % A2: Female <u>01</u> %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	None
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
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Professional Development	
A: What type of training and development are available for workers?	Not applicable. No such program exists at audited site.

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:
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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:  No Non-conformance observed on the day of the audit  <b>Local law and/or ETI requirement</b> Not Applicable  <b>Recommended corrective action:</b> Not Applicable	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>  Not Applicable

Observation:	
<b>Description of observation:</b> Not Applicable  <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>

**8: Regular Employment Is Provided**

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

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

**ETI**

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

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

**Additional Elements: Responsible Recruitment**

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- 1) Mr. Anup Pandey - Sr. GM R&D is responsible to ensure compliance with these code requirements.
- 2) Employment contracts (appointment letters) were available and maintained for 62 of 62 selected employees.
- 3) Facility does not follow and believe in the fixed term employment.
- 4) Facility understands recruitment process. Facility has employed contractor employees in production process as per local law regulations.
- 5) Facility does not employ any migrant workers.
- 6) Based on interaction with employees, no recruitment fee is required at any stage of the recruitment process.

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

Details:

- Facility Policy.
- Appointment letter with terms and conditions for 62 of 62 selected samples.
- Salary and other benefit records.



- Interaction with management and Employees.

Any other comments: None

**Non-compliance:**

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

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

No Non-conformance observed on the day of the audit.

**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:** Not Applicable

**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:**

**Responsible Recruitment**

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

Migrant Workers:	
<p><i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i></p>	
A: Type of work undertaken by migrant workers:	Facility does not employ any migrant workers.
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used:None  B2: Total number of (outside of local country) recruitment agencies used:

	None	
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not applicable. Facility does not employ any migrant workers.	C2: Observations: Facility does not employ any migrant workers.
D: Are Any migrant workers in skilled, technical, or management roles  <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, number and example of roles: Not applicable. Facility does not employ any migrant 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: Not Applicable

C: If any checked, give details:	Not Applicable

<b>Agency Workers (if applicable)</b> <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: 02 security agencies o M/s. SIS (India) Pvt. Ltd. – 20 security personnel for Security and o M/s. Bengal Security Force – 20 security personnel for Security.
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: The facility has the legal contract with both the security agencies.
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility has a system in place for checking the labour standard of agencies.

<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>	
A: Any contractors on site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: If yes, how many contractors are present, please give details: 05 Contractors. o Nikkon Enterprise – 70 workers for production o B K Jute and Trading Company – 50 workers for production o Medini Construction – 50 workers for civil work o Munna Motor Garage – 30 workers for automobiles

	<ul style="list-style-type: none"> <li>o Biswas Engineering Works – 50 workers for maintenance</li> </ul>
B: If <b>Yes</b> , how many workers supplied by contractors?	290 workers for Production, civil work, automobiles and maintenance.
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please describe finding: The labour contractors do not issue the copy of terms of employment.
D: If <b>Yes</b> , please give evidence for contractor workers being paid per law:	Wages are paid as per current memorandum of settlement.

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

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

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

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

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

*Note to auditor on homeworking:*

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1) Facility does not sub-contract any production process for product produced at site.

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

- Facility Policy.
- Inward and out ward material register.
- Production records.
- Interaction with management.

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

<i>Process Subcontracted</i>	<i>Process 1</i>	<i>Process 2</i>
<i>Name of factory</i>	None	None
<i>Address</i>		

<i>Process Subcontracted</i>	<i>Process 3</i>	<i>Process 4</i>
<i>Name of factory</i>	None	None
<i>Address</i>		

<i>Process Subcontracted</i>	<i>Process 5</i>	<i>Process 6</i>
<i>Name of factory</i>		
<i>Address</i>		

Details:

a) Inward and out ward record

Any other comments: None

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:</p> <p>No Non-conformance observed on the day of the audit</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> Not Applicable</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>

Summary of sub-contracting – if applicable	
<input checked="" 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 type="checkbox"/> Yes  <input type="checkbox"/> No  A1: Please describe:</p>
<p>B: If sub-contractors are used, is there evidence this has been agreed with the main client?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No  B1: If <b>Yes</b>, summarise details:</p>
<p>C: Number of sub-contractors/agents used:</p>	
<p>D: Is there a site policy on sub-contracting?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>

	D1: If <b>Yes</b> , summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	

**Summary of homeworking – if applicable**  
 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:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?			
F: What processes are carried out by homeworkers?			
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No		



<p><b>9: No Harsh or Inhumane Treatment is Allowed</b>  <a href="#">(Click here to return to summary of findings)</a></p>
<p><b>ETI</b></p> <p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.                  Additional elements:                  9.2 companies should provide access to a confidential grievance mechanism for all workers</p>

<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:                  Suggestion box, grievance committee and health &amp; safety committee.</p>
<p>B: If <b>Yes</b>, are workers aware of these channels and have access? Please give details.</p>	<p>Workers are familiar with these channels. The workers could express their own feeling through suggestion box and committees. Further, workers can approach the union and management directly for any grievance.</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>Suggestion box.</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers  <input type="checkbox"/> Communities  <input type="checkbox"/> Suppliers  <input type="checkbox"/> Other</p> <p>D1: Please give details:                  Facility has effective grievance mechanism in place where workers can express their grievance through committees, union and Suggestion box.</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>E1: If yes, please give details: Not applicable</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</p> <p>F1: If no, please give details: Not applicable</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: Not applicable</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: Not applicable</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: Not applicable</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) Mr. Anup Pandey - Sr. GM R&D is responsible to ensure no harsh or inhumane treatment is practised on shop floors.
- 2) There is no evidence of harsh or inhumane treatment of employees.
- 3) All employees are treated with respect and dignity.
- 4) Facility's disciplinary policies are explained to all employees and all employees are well aware about their rights.
- 5) No evidence of physical abuse, sexual or any other harassment / verbal abuse is observed / reported.
- 6) Facility has a written disciplinary procedure that is displayed on the notice board of the facility.
- 7) Facility has formed Internal Complaint Committee (ICC Committee) to resolve grievance and harassment issues.

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

Details:

- Facility Policy
- Interaction with management and Employees.
- Review of committee meeting records.

Any other comments: None

**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:</p> <p>No Non-conformance observed on the day of the audit.</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>
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Observation:	
<p><b>Description of observation:</b> Not Applicable</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></p>

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

*(Click here to return to NC-table)*

**Additional Elements**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. Mr. Anup Pandey - Sr. GM R&D is responsible to ensure compliance with this code.
2. Facility has not employed any foreign employees.

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

Details:

- Recruitment policies
- Interaction with management and Employees

Any other comments: None

**Non-compliance:**

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

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

No Non-conformance observed on the day of the audit

**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:	
<b>Description of observation:</b> Not Applicable <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	Objective Evidence Observed:

Observation:	
<b>Description of observation:</b> <b>Local law or ETI/additional elements requirement:</b> <b>Comments:</b>	<b>Objective evidence observed:</b>

Good examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:

**10. Other issue areas 10B4: Environment 4–Pillar**

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

To be completed for a 4–Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar

**B.4. Compliance Requirements**

10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.

10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.

10B4.3 Businesses shall be aware of their end client’s environmental standards/code requirements

10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.

10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details).

10B4.7 Businesses shall make continuous improvements in their environmental performance.

10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation

10B4.9 Businesses should have a nominated individual responsible for co–ordinating the site’s efforts to improve environmental performance.

**B4. Guidance for Observations**

10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.

10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- 1) Mr. Anup Pandey - Sr. GM R&D is responsible for all environmental issues.
- 2) Facility has obtained Air and Water consent from pollution control department.
- 5) Facility has conducted stack emission test on June 16, 2020.
- 6) Facility has conducted noise assessment on June 08, 2020.
- 7) Facility has conducted ambient air quality test on June 08, 2020.
- 8) Facility has installed Effluent Treatment Plant (ETP) as it is required as per process requirement.

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

Details:

- Facility Policy.
- Air and water consent which is valid till June 30, 2021.
- Stack emission test, noise test and ambient air quality test records.

Any other comments: None

**Non-compliance:**

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

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

It was observed during the document review that the facility has not obtained the Authorization of the Hazardous Waste (Management Handling & Transport) from the concerned authority. The facility has applied for the same on 25.01.2021.

**ETI/Additional Elements requirement:** 10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.

**Recommended corrective action:** It is recommended that the facility shall obtain the Authorization of the Hazardous Waste (Management Handling & Transport) from the concerned authority.

**Action By:** Mr. Anup Pandey - Sr. GM R&D  
**Timescale:** 90days

**Objective evidence observed:**

*(where relevant please add photo numbers)*

Document Review

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

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

It was observed during the site tour that the wastewater generated from the screen washing department is drained directly into the drainage line and is not treated in the effluent treatment plant.

**ETI/Additional Elements requirement:** 10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g., energy use, water use.

**Recommended corrective action:** It is recommended that the facility shall ensure that the wastewater generated from the screen washing department is treated and not drained directly in the drainage line.

**Action By:** Mr. Anup Pandey - Sr. GM R&D  
**Timescale:** 90days

Site tour and see NC photo # 10

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

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

Site tour and see NC photo # 11

<p>It was observed during the site tour that the filled and used oil drums were stored directly under the sunlight and rainwater. Chemicals spills were observed on the ground and facility has not provided secondary containers to the oil drums.</p> <p><b>ETI/Additional Elements requirement:</b> 10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.</p> <p><b>Recommended corrective action:</b> It is recommended that the facility shall provide a shed to the oil drums to avoid direct sunlight and rainwater and shall also provide secondary containers to the oil drums.</p> <p><b>Action By:</b> Mr. Anup Pandey - Sr. GM R&amp;D  <b>Timescale:</b> 90days</p>	
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Observation:	
<p><b>Description of observation:</b> Not Applicable</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>

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



<b>Environmental Analysis</b> <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Mr. Anup Pandey - Sr. GM R&D
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility has conducted the risk assessment concerning to the environmental impact on 24.02.2020
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: ISO 14001:2015 – BSI Assurance UK Limited, Certificate No.: EMS 602582, Effective date: 27.09.2019 Valid till 26.09.2022.
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? Yes, the facility has posted the policy
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility has an environmental policy which address the key impacts from their operations and the commitment to improvement
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: None observed
H: Have all legally required permits been shown? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Consent Letter No. -CO 109808, Memo Number - 97/30/WPB-B (387)/98 dated 23.05.2017 valid till - 30.06.2021. Consent Letter No. -CO 125108, Memo Number - 65/30/WPB-B (387)/98 dated 30.06.2020 valid till - 30.06.2021 only for new boiler.
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: Site maintain the records of the hazardous chemicals used in the manufacturing process.
J: Is there a system for managing client's requirements and legislation in the destination	<input type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Not applicable, as there is no client requirement set in this specific audit

countries regarding environmental and chemical issues?	
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: The facility policy is framed to reduce the energy use.
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Site monitors the volume of the waste recycled and has maintained the records of the waste that is recycled.
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The facility has a system in place for the measurement and monitoring of the water, energy, by using the assessment system installed
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Not applicable, as there are no sub-contracting agencies or business partners operating on the premises

**Usage/Discharge analysis**

Criteria	Previous year: Please state period: <u>01.01.2020 to 31.12.2020</u>	Current Year: Please state period: <u>01.01.2021 to 28.02.2021</u>
Electricity Usage: <i>Kw/hrs</i>	13507296	2620638
Renewable Energy Usage: <i>Kw/hrs</i>	NA	NA
Gas Usage: <i>Kw/hrs</i>	NA	NA
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If <b>Yes</b> , please state result	NA	NA
Water Sources: <i>Please list all sources e.g. lake, river, and local water authority.</i>	<ul style="list-style-type: none"> <li>• Pond water</li> <li>• Ground water</li> <li>• River water</li> </ul>	<ul style="list-style-type: none"> <li>• Pond water</li> <li>• Ground water</li> <li>• River water</li> </ul>
Water Volume Used: <i>(m³)</i>	20291.167	3652.2166
Water Discharged: <i>Please list all receiving waters/recipients.</i>	<ul style="list-style-type: none"> <li>• NA</li> </ul>	<ul style="list-style-type: none"> <li>• NA</li> </ul>
Water Volume Discharged:	NA	NA

(m <sup>3</sup> )		
Water Volume Recycled: (m <sup>3</sup> )	NA	NA
Total waste Produced (please state units)	Thread waste – 342624kgs Gunny cutting – 188323.20 kgs. Jute Caddies – 2265 MT	Thread waste – 90953kgs Gunny cutting – 27459 kgs. Jute Caddies – 388 MT
Total hazardous waste Produced: (please state units)	710 kgs	135 kgs
Waste to Recycling: (please state units)	Thread Waste at Batching - 342624 kgs Gunny cutting at Batching – 18323.20 kgs	Thread Waste at Batching - 90953 kgs Gunny cutting at Batching – 27459 kgs
Waste to Landfill: (please state units)	NA	NA
Waste to other: (please give details and state units)	Jute Caddies boiler – 2265MT	Jute Caddies boiler – 388MT
Total Product Produced (please state units)	25541.589 MT	4580.07375 MT

**10C: Business Ethics – 4-Pillar Audit**

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

To be completed for a 4-Pillar SMETA Audit

**10C. Compliance Requirements**

- 10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
- 10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.
- 10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.
- 10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.
- 10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,
- 10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics
- 10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

**10C. Guidance for Observations**

- 10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.
- 10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- Mr. Anup Pandey - Sr. GM R&D was the designated person responsible for implementing standards concerning Business Ethics, and that site practices were conducted without any corruption and/or bribery.
- The site has established policy against bribery, corruption, or any type of fraudulent Business Practice and was communicated to workers through training.
- The site had received and read the Business Ethics policy of the auditor/audit company.

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

Details:

- Business practice policy
- Worker and 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:</p> <p>No Non-conformance observed on the day of the audit.</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> Not Applicable</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>A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy  <input checked="" type="checkbox"/> Policy for third parties including suppliers.</p> <p>A1: Please give details:</p> <p>There was a written policy on the need to avoid bribes and fraudulent practices.</p>
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<p>B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>B1: Please give details: The site has given training to relevant personnel on business ethics issues</p>
<p>C: Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>C1: Please give details: Reviewed on annual basis.</p>
<p>D: Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>D1: Please give details: As per the management they have never discussed this with the 3<sup>rd</sup> parties.</p>

Other findings

Other Findings Outside the Scope of the Code
None

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

## Appendix 1

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



<p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	
<p><b>ETI 1. Forced Labour</b></p>	<p><b>ETI 1. Forced Labour</b></p>
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.</p>	
<p><b>ETI 2. Freedom of association and the right to collective bargaining are respected</b></p>	<p><b>ETI 2. Freedom of association and the right to collective bargaining are respected</b></p>
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.</p>	
<p><b>ETI 3. Working conditions are safe and hygienic</b></p>	<p><b>ETI 3. Working conditions are safe and hygienic</b></p>
<p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>3.2 Workers shall receive regular and recorded Health &amp; Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p>	

<p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health &amp; Safety to a senior management representative.</p>	
<p><b>ETI 4. Child labour shall not be used</b></p>	<p><b>ETI 4. Child labour shall not be used</b></p>
<p>4.1 There shall be no new recruitment of child labour.</p> <p>4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	
<p><b>ETI 5. Living wages are paid</b></p>	<p><b>ETI 5. Living wages are paid</b></p>
<p>5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</p> <p>5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.</p> <p>5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.</p>	
<p><b>ETI 6. Working Hours are not excessive</b></p>	<p><b>ETI 6. Working Hours are not excessive</b></p>
<p>6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p>	

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









<p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p><b>Additional Elements: Responsible Recruitment</b>              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.</p>	
<p><b>8A: Sub-Contracting and Homeworking</b></p>	<p><b>8A: Sub-Contracting and Homeworking</b></p>
<p>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.</p>	
<p><b>ETI 9. No harsh or inhumane treatment is allowed</b></p>	<p><b>ETI 9. No harsh or inhumane treatment is allowed</b></p>
<p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.              Additional elements:              9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<p><b>10. Other Issue areas: 10A: Entitlement to Work and Immigration</b></p>	
<p><b>Additional Elements</b>              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.</p>	
<p><b>10. Other issue areas 10B2: Environment 2-Pillar</b></p>	

<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p>10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.</p> <p><i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	
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SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
Environment Section	Environment Section
<p><b>B.4. Compliance Requirements</b></p> <p>10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.</p> <p>10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.</p> <p>10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements</p> <p>10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.</p> <p>10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.</p> <p>10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).</p> <p>10B4.7 Businesses shall make continuous improvements in their environmental performance.</p> <p>10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation</p> <p>10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.</p> <p><b>B4. Guidance for Observations</b></p> <p>10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.</p> <p>10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p>	
Business Practices Section	

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

		
<p>Out side view of the facility</p>	<p>Security personnel's</p>	<p>NO Child Labour Employed displayed</p>
		
<p>Social accountability policy displayed</p>	<p>Environmental policy displayed</p>	<p>Non-operation building</p>
		
<p>Non-operation building</p>	<p>Safety instruction on COVID-19 displayed</p>	



Bio-metric attendance system

List of holidays displayed

Hand washing area



Suggestion box

Cycle stand

CCTV



Fire extinguisher

Abstracts displayed

Sand bucket



NO Smoking signages displayed

Assembly point defined

Fire hydrant system















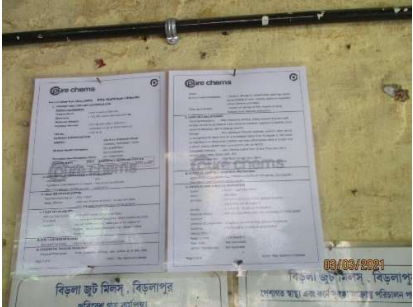
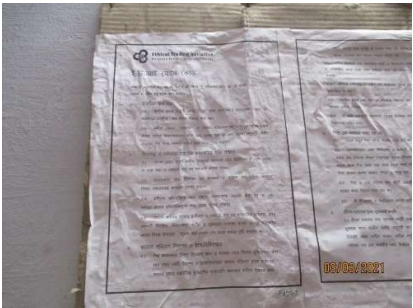
		
<p>Hand rail provided to ladder</p>	<p>SAVE Water signage displayed</p>	<p>Roll forming section</p>













		
<p>Raw material storage area</p>	<p>Fire extinguishers</p>	<p>Production area</p>



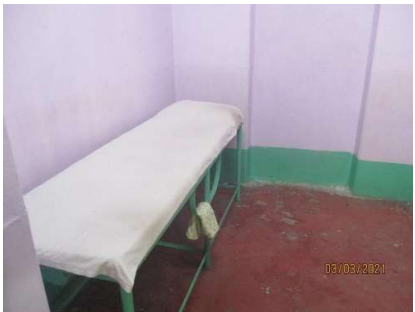






		
<p>Lockers facility provided</p>	<p>PPE usage instruction displayed</p>	<p>Workers wearing appropriate PPEs</p>

		
<p>Weaving area</p>	<p>Packed goods warehouse</p>	<p>Safety signages displayed</p>

		
<p>Gents sanitation facility</p>	<p>Female sanitation facility</p>	<p>Urinals</p>
		
<p>Hand washing area</p>	<p>Drinking water point</p>	<p>Dining area</p>
		
<p>Food serving area</p>	<p>Appropriate PPE provided to the food serving worker</p>	<p>Effluent treatment plant</p>
		

Filter tank	Aeration tank	Sludge drying area
		
First aid box	MSDS provided	Emergency light provided
		
Evacuation plan displayed	Secondary containers provided	ETI Base Code in local language displayed
		
Dyeing unit	Outside view of the bag unit building	Bag unit

		
<p>Fire hydrant point</p>	<p>Hose reel cabinet</p>	<p>Eye wash station</p>
		
<p>Screen printing section</p>	<p>Cutting area</p>	<p>Safety metal gloves provided</p>
		
<p>Unblocked pathways</p>	<p>Chewing of Tobacco Products prohibited displayed</p>	<p>Stitching area</p>
		

Emergency light tested on the date of the audit	Hose reel	Packing area
		
Packed goods	Occupational Health Centre	Inside view of the Occupational Health Centre
		
Medical devices	Boiler section	Boiler – 1st
		
Boiler – 2nd	Pump room	Fire engine

		
<p>Fire extinguisher types and selection displayed</p>	<p>Danger sign</p>	<p>Electrical panel room</p>

### Non-conformance photos


<p>NC Photo # 1 Handrail not provided</p>

		
<p>NC Photo # 2 Pulley guard not provided</p>		



NC Photo # 3 Faded aisle marking



NC Photo # 4 Tripping hazard



NC Photo # 5 Compressor in unsafe condition



NC Photo # 6 Hydro machines do not have the lid and safety switch



NC Photo # 7 PPE not provided



NC Photo # 8 Scissors and trimmers not secured, and needle guard not provided



NC Photo # 9 Diesel cargo not labelled and not stored in secured place

NC Photo # 10 Wastewater drained directly to drainage line



NC Photo # 11 Oil drums stored directly under the sunlight and rainwater, oil spills were observed on the ground and secondary containers not provided.





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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:

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