




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: (only available on Sedex System)	ZC: 409260299	Sedex Site Reference: (only available on Sedex System)	ZS: 410563685	
Business name (Company name):	Chittagong Fashion Specialised Textiles Ltd.			
Site name:	Chittagong Fashion Specialised Textiles Ltd.			
Site address: (Please include full address)	Plot # 26, Sector # 01, Road # 04, EPZ	Country:	Bangladesh	
Site contact and job title:	Taufiq Ahmed, Assistant Manager - HR & Compliance			
Site phone:	+8801678-039637	Site e-mail:		
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	June 16-17, 2021			

Audit Company Name & Logo: ELEVATE 	Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i> Chittagong Fashion Specialised Textiles Ltd.
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

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

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

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

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

Lead auditor:

Md. Amran Hossain

APSCA number: RA- 21700667

Lead auditor APSCA status: Registered Auditor

Team auditor:

Rashna Shamsuddin

APSCA Number: ASCA- 21701410

Interviewers:

Md. Amran Hossain

Report writer: Md. Amran Hossain

Report reviewer: Prakash Suryawanshi

Date of declaration: June 17, 2021

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

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

Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.	Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		-	-	NA
0B Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	02	02	-	NC: <ul style="list-style-type: none"> Factory did not provide mid-level management training. Service book not maintained. OBS: <ul style="list-style-type: none"> SAQ was not completed. Did not communicated the code to their supplier.
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	-	-	-	NA
2. Freedom of Association	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	01	-	-	NC: <ul style="list-style-type: none"> Worker welfare association expired
3. Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	13	-	-	NC: <ul style="list-style-type: none"> Fire escape mask expired. Insufficient fire hose reel and water pressure Fire hydrant was under installation. Missing fire safety committee and workers were not aware about fire safety.

									<ul style="list-style-type: none"> Machine safety guard displaced. Evacuation plan was not matching for floor layout. Aisles found partially blocked. Boiler license expired. Generator setup permission expired. Electrician competency certificate expired. No practice to conduct occupational health checks. Canteen facility was missing. Risk assessment did not cover full scope.
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	-	-	-	NA
5	<u>Living Wages and Benefits</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	02	-	-	NC: <ul style="list-style-type: none"> Earn leave encashment done based on basic wage instead of gross wage. Workers were not provided service benefit.
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	-	-	-	NA
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	-	-	-	NA
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-	-	-	NA
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-	-	-	NA
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-	-	-	NA

10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-	-	-	NA
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-	-	-	NA
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	NA
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	NA
General observations and summary of the site:									
<ul style="list-style-type: none"> The product manufactured at this site is woven garments. Overall responsibility for meeting the standards is taken by Taufiq Ahmed, Assistant Manager - HR & Compliance Legal minimum pay (BDT 8200) was paid to all employees. Correctly calculated OT hours were paid; Workers were paid 200% of basic salary for OT hours. Currently, 791 employees are working in the facility. Among 711 workers and 80 Staff and, 112 workers are male, and 599 workers are female. There was elected workers welfare association in the facility, but it was expired. Site uses no sub-contractors. Factory had all fixed rated employees. 42 workers were selected for interview purpose including 6 groups of 5 & 12 individual employees. 									

**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:	Chittagong Fashion Specialised Textiles Ltd.																												
B: Site name:	Chittagong Fashion Specialised Textiles Ltd.																												
C: GPS location: (If available)	GPS Address:	GPS Address:																											
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Trade License no: 88198 Validity: 30/06/2021 Plot Allotment No: 25(81)/97/1458 Dated: June 23, 1997 Fire License: CTG-7163/99-20000 Validity: 30/06/2021 Export Promotion Bureau Certificate no: BD02240 Validity: 30/06/2021																												
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Woven garments manufacturing with Cutting, Sewing and Finishing, Packing																												
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	01 Building and 02 Shed with total area of 72000 Square feet. <table border="1"> <thead> <tr> <th>Production Building no: 01</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground Floor</td> <td>Fabric Store, Finishing, Inspection, and Doctors Room.</td> <td>NA</td> </tr> <tr> <td>1st Floor</td> <td>Office, Sewing, Fusing, and Inspection & Maintenance Room.</td> <td>NA</td> </tr> <tr> <td>2nd Floor</td> <td>Office, Sewing, Fusing, and Inspection & Maintenance Room.</td> <td>NA</td> </tr> <tr> <td>3rd Floor</td> <td>Accessories Store & Finished Carton Store</td> <td>NA</td> </tr> <tr> <td>4th Floor</td> <td>Cutting, Finishing, Packing & Metal Detection Area.</td> <td>NA</td> </tr> <tr> <td>5th Floor</td> <td>Office, Conference room, Prayer room, & P&D.</td> <td>NA</td> </tr> <tr> <td>6th Floor</td> <td>Dining & Canteen.</td> <td>NA</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>NA</td> </tr> </tbody> </table>		Production Building no: 01	Description	Remark, if any	Ground Floor	Fabric Store, Finishing, Inspection, and Doctors Room.	NA	1 st Floor	Office, Sewing, Fusing, and Inspection & Maintenance Room.	NA	2 nd Floor	Office, Sewing, Fusing, and Inspection & Maintenance Room.	NA	3 rd Floor	Accessories Store & Finished Carton Store	NA	4 th Floor	Cutting, Finishing, Packing & Metal Detection Area.	NA	5 th Floor	Office, Conference room, Prayer room, & P&D.	NA	6 th Floor	Dining & Canteen.	NA	Is this a shared building?	No	NA
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6 th Floor	Dining & Canteen.	NA																											
Is this a shared building?	No	NA																											

	<table border="1"> <tr> <td>Shed 01</td><td>Security Post, Childcare and Wastage room</td><td>NA</td></tr> <tr> <td>Shed 02</td><td>Utility area</td><td>NA</td></tr> </table> <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: Bangladesh Accord inspection.</p>	Shed 01	Security Post, Childcare and Wastage room	NA	Shed 02	Utility area	NA
Shed 01	Security Post, Childcare and Wastage room	NA					
Shed 02	Utility area	NA					
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor						
H: Month(s) of peak season: (if applicable)	Round the year same						
I: Process overview: <i>(Include products being produced, main operations, number of production lines, main equipment used)</i>	Product manufactured: Woven garments. Main production process: Cutting, Sewing, Finishing and Packing. No. of production lines: 06 Machines used: Single and Double needle sewing machine, Buttonhole, Button attaching, Zigzag, Feed of the arm, Bartack, Overlock, Flat lock, Kansai, Snap button, Iron, Cutting machine etc. Total number of machines: 746						
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None						
K: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation						

M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No N1: If no, please give details Not Applicable

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 09:30 AM A2: Day 1 Time out: 04:30 PM	A3: Day 2 Time in: 09:05 AM A4: Day 2 Time out: 05:00 PM	A5: Day 3 Time in: NA A6: Day 3 Time out: NA
B: Number of auditor days used:	03 (2 Auditor X 1 Audit Days, 1 Auditor X 1 Audit Day)		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: Window detail: 02 weeks (13/06/2021 to 27/06/2021) <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If No, why not? Facility did not complete SAQ in the portal for this audit.		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause Not Applicable		
G: Who signed and agreed CAPR (Name and job title)	Taufiq Ahmed, Assistant Manager - HR & Compliance		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	June 21, 2020		
J: Previous audit type:	Full Initial		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A		

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

Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	112	0	0	0	0	0	0	112
Worker numbers – female	599	0	0	0	0	0	0	599
Total	711	0	0	0	0	0	0	711
Number of Workers interviewed – male	10	0	0	0	0	0	0	10
Number of Workers interviewed – female	32	0	0	0	0	0	0	32
Total – interviewed sample size	42	0	0	0	0	0	0	42



A: Nationality of Management	Bangladeshi	
<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: Bangladesh</p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</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:</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 100%</p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: _____% workers on piece rate</p> <p>D1: 100% hourly paid workers</p> <p>D2: _____% salaried workers</p> <p>Payment cycle:</p> <p>D3: _____% daily paid</p> <p>D4: _____% weekly paid</p> <p>D5: 100% monthly paid</p> <p>D6: _____% other</p> <p>D7: If other, please give details</p>	



Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	06 groups of 05	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 04	D2: Female: 08
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 type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	NA	
I: What did the workers like the most about working at this site?	Facility timely payment of wage and benefits, and good relationship with factory management.	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	Total working hour is within their expectation and overtime is voluntary.	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:		
M: Attitude of workers:		

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

42 workers were selected for interview including 10 male and 32 female employees, they were interviewed as 06 groups of 05, some mixed groups and some single sex and the balance of 12 workers were interviewed individually among them 04 were male and 08 females.

The workers were assured of confidentiality, and they spoke freely of their views of the factory. All workers said that they were satisfied with their employment at the factory, and they were satisfied with the current wages which was in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect.

They were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions being used. They felt that they can complain directly to their supervisors but also felt free to give their general concerns, such as working environment to the top or mid-level management.

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 committee representatives were happy with the working conditions, and they stated that they could give suggestions on all parts of the site's practices. Also, they are free to do all their activities as a worker committee member without any restriction.

O: Attitude of managers:

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

The factory management had a system in place to check their current practices against their clients' requirements and the local law, and they took notice of the findings of the internal audit team and had resolved all the raised findings but did not take required corrective actions with root cause analysis. Most of the practices were implemented as per the code and local law.

Managers responsible for implementing legal and code standards is Md. Mr. Taufiq Ahmed- Assistant Manager - HR & Compliance. He was the responsible person to manage quality of the internal audit.

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:

- Company had a policy, endorsed at the highest level, covering human rights impacts and issues, and it is communicated to all appropriate parties, including its own suppliers.
- The responsible person for implementation and monitoring is Mr. Taufiq Ahmed - Assistant Manager - HR & Compliance
- Company had identified their stakeholders and salient issues.
- Company measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- Where businesses have an adverse impact on human rights within any of their stakeholders, they address these issues and enable effective remediation.
- Company had a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the report.
- Company has policy and procedures for human rights.

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

Details:

- Company Code of Conduct
- Training on code of conduct and orientation to the staff and workers dated: 25/03/2021.
- Interviewed management on social compliance and implementation of the code.
- Supplier evaluation and monitoring record.

Any other comments:

None

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>A1: Please give details: Company has a policy named Company Code of Conduct, endorsed by the highest-level management, covering human rights impacts and issues. Also, factory conducted a training to all employees on Company Code of conduct 25/03/2021.</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</p> <p>Please give details: Facility has a dedicated person for implementing standards concerning Human Rights. The person responsible is. Name: Taufiq Ahmed Job title: Assistant Manager - HR & Compliance</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</p> <p>C1: Please give details:</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</p> <p>D1: If no, please give details Factory were using a confidential grievance mechanism including complaint box and employees can place their concerns confidentially through this box.</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</p> <p>E1: Please give details:</p> <p>Company has a written policy and procedure for employee's data and information confidentiality and is well implemented. Also, facility keep all the employee information and personal files in a secure place with lock and key.</p>

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

Good examples observed:	
<p>Description of Good Example (GE):</p> <p>None</p>	<p>Objective Evidence Observed:</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: 2020 3 %	A2: This year: 2021 2 %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	2.5%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2020 9 %	C2: This year: 2021 7 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	8%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: All the related incidents were recorded in accident and incident register.	
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: 8.2	F1: Last year: 2020 Number: 8.2
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]	3.2	
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: 2020 3.2	H2: This year: 2021 1.2
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 100% workers	I2: 12 months 100% workers

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

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

O.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
O.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
O.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
O.B.4 Suppliers are expected to communicate this Code to all employees.
O.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:

- Facility had developed and implemented code of practices regarding ETI based code and this standard within the organization. Company code of conduct covering all the applicable requirements on this standard.
- Facility had all the up to date legally required license except factory license. Facility trade license expired on 30/06/2021.
- Facility appointed one senior management as their management representative for ETI base code and overall social compliance.
- Facility communicated this code to the employees through training and posting the related policies and the code in different parts of the company premises, but this training did not cover mid-level management.
- Facility had a supplier evaluation policy and procedure. In discussion with management, they confirmed that they had not communicated the code to their own suppliers/sub-contractors or conducted social assessment for suppliers/sub-contractors. In addition, they had not
- Internal audit policy and practice was available in the company to ensure proper monitoring and periodic compliance assurance in the facility.
- Facility did not complete SAQ for this audit.

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

Details:

- Company code of conduct and all the related policies.
- Training on code of conduct dated: 25/03/2021.
- Internal Audit report that was conducted on: 23/06/2020.
- Interviewed management representative, staff, and workers.
- Trade License no: 88198, Validity: 30/06/2021
- Plot Allotment No: 25(81)/97/1458, Dated: June 23, 1997
- Fire License: CTG-7163/99-20000, Validity: 30/06/2021
- Export Promotion Bureau Certificate no: BD02240, Validity: 30/06/2021

Any other comments:
None

Management Systems:	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details:
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Facility implemented their own Code of Conduct which include policies that reduce the risk of forced labour, child labour, discrimination, harassment & abuse. Also, for those issues facility had separate dedicated detailed policy and procedure.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Policies were communicated to workers via poster and annual training. Through documents review and workers and staff interview, implementation of the code and related policy and procedures were verified. Training was provided to the workers on company code of conduct dated: 25/03/2021.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please give details: Facility did not provide mid-level management training in the standards for forced labour, child labour, discrimination, harassment & abuse
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Not Applicable
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details:
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Mr. Taufiq Ahmed - Assistant Manager - HR & Compliance, is the responsible person for Human resource management and compliance assurance in the company. He is in charge to look after the compliance department containing 02 members.

H: Is there a senior person / manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Mr. Taufiq Ahmed - Assistant Manager - HR & Compliance, was the responsible person for the implementation of the code
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Company has a policy for maintaining all the workers information in a confidential manner and all the confidential information is maintained in the HR office.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Company has a procedure for maintaining all the related data and worker information in a confidential way.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Risk assessment had been conducted by the facility by covering all the applicable individual sections and all the applicable point of risk.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1Please give details: Facility has the process to address issues found during risk assessments, including root-cause analysis and implementation of control measures to reduce identified risks.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Facility had a supplier evaluation policy and procedure. In discussion with management, they confirmed that they had not communicated the code to their own suppliers/sub-contractors or conducted social assessment for suppliers/sub-contractors. In addition, they had not established the procedure of controlling their own suppliers' conformance to the code.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details:

	Factory has approved lay-out plan & building approval from concerned authority.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: The factory has anti-corruption committee, anti-bribery policy to support due diligence in applying national laws and practices relating to land title.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC: Not Applicable, facility used rented land from BEPZA.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: Please give details: Not Applicable, facility used rented land from BEPZA.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No R1: Please give details: No such instances are practiced by the facility yet.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: No such instances are practiced by the facility yet.

Non-compliance:

<p>1. Description of non-compliance: <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>During current assessment it was noted that facility did not provided ETI base code training and other training to the Mid-level management.</p> <p>Local law and/or ETI requirement: In accordance with ETI Base, 0.B.4 Suppliers are expected to communicate this Code to all employees.</p> <p>Recommended corrective action: It is recommended that facility provide Mid-level training on social compliance and ETI base code.</p> <p>2. Description of non-compliance: <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>During current assessment it was noted that facility did not maintain service book for the workers as per legal regulation.</p> <p>Local law and/or ETI requirement: In accordance with ETI Base, 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>Recommended corrective action: It is recommended that facility shall maintain service book for all the workers.</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <ul style="list-style-type: none"> - Documentation review and management and worker's interview.
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Observation:	
<p>1. Description of observation:</p> <p>During current assessment it was noted that facility did not conducted SAQ.</p> <p>Local law or ETI requirement: NA</p> <p>Comments: Facility stated that, due to heavy workload, they had not managed to fill out the SAQ.</p> <p>2. Description of observation:</p> <p>In discussion with management, they confirmed that they had not communicated the code to their own suppliers/sub-contractors or conducted social assessment for suppliers/sub-contractors. In addition, they had not established the procedure of controlling their own suppliers' conformance to the code.</p> <p>Local law or ETI requirement:</p>	<p>Objective evidence observed:</p> <ul style="list-style-type: none"> - Documentation review and management interview.

<p>In accordance with ETI Base, 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.</p> <p>Comments: The HR responsible person stated that they shall start discussions with the suppliers on the code content.</p>	
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Good Examples observed:	
<p>Description of Good Example (GE):</p> <p>None</p>	<p>Objective evidence observed:</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:

- Facility had a policy which prohibits forced labour, and this was also available for review.
- Age verification documents (National ID card copy, educational certificate, nationality certificates) were available in employee personal files and company was not maintaining any original copy of them.
- Overtime was voluntary and was confirmed by both staff and workers.
- The terms and conditions of employment stated that the employees are free to leave the workplace after completion of their working hours.
- Company did not require any payment for work tools, PPE, ID/staff card, training, etc.
- Company did not use any prison labour.

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

Details:

- Policy on No-Forced labour and prison labour
- Sample employee personal files
- Resigned and letters in worker's personal file.
- Time record
- Management and worker interview

Any other comments:

None

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

	C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding:
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding:
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding:
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: Facility has a forced labour and bonded labour policy, also they have no such type of labour.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: Facility has a policy on forced labour. Facility has communicated it through notice board in different processing area. Overtime was totally voluntary. Employees can leave their workplace freely after their respective working hour/job.

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement Recommended corrective action:	Objective evidence observed: <i>(where relevant please add photo numbers)</i>

None	
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Observation:	
Description of observation: Local law or ETI requirement: Comments: None	Objective evidence observed:

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

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

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

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

ETI

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Current Systems and Evidence Examined

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

Current systems:

- There was no trade union in the company but there was a Workers welfare Association by election in the company.
- Worker's welfare Association has been formed by election on 14th July 2015 which is expired.
- Worker's welfare Association meeting is held once every two months. Most recent WWA meeting held was on 12/04/2021.
- Meeting minutes were posted in notice board and recorded in a register.
- There was a total of 05 members in the committee, from them 04 members were from employee side and 01 members were from management side.
- Participation Committee members are not treated less favourably than other workers.
- Participation Committee members can carry out their duties, activities within working hours without affecting their pay and without any restriction.

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

Details:

- Freedom of association for collective bargaining policy.
- Worker's welfare Association (WWA) formation/election records.
- WWA committee member list.
- WWA committee meeting minutes.
- WWA committee meeting attendance register.
- Staff, workers, and WWA committee member interview.

Any other comments:

None

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None	
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Facility has an effective grievance handling procedure. Workers can submit their grievance verbally or in written format through welfare officer or complaint box. D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Worker's welfare Association has been formed by election on 14 th July 2015 which is expired	
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: Once in every two months Workers participation committee members met with the management for periodic meeting, but in case of any emergency they can arrange for the meeting immediately – in urgent basis. In both case, facility arranges the related logistic support.	
F: Name of union and union representative, if applicable:		F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?		G1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A Worker's welfare Association has been formed by election on 14 th July 2015 which is expired
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 14 th July 2015
J: Do workers know what topics can be raised with their representatives?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: 02 among them 1 were male and 1 female	
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>	Participation Committee meeting held once in every two months. Last meeting held on 12/04/2021. Meeting minutes were recorded in register.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes , what percentage by trade Union/worker representation	M1: ____% workers covered by Union CBA Not applicable	M2: ____% workers covered by worker rep CBA Not applicable
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable	

Non-compliance:	
1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: During current assessment it was noted that facility had WWA formed on July 14, 2015, which had expired on July 13, 2018. However, facility stated that the are in process to reform the WWA immediately as per legal regulation. Local law and/or ETI requirement: In accordance with ETI Base Code, 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities. In accordance with EPZ labour Act 2019, Section; 106. Later election schedule: 1. The election of the Executive Council of a Workers' Welfare Association will be held within the preceding 90 days of its expiration. Recommended corrective action: It is recommended that facility shall take required initiative and reform and approve the executive council of WWA as per legal regulation.	Objective evidence observed: <i>(where relevant please add photo numbers)</i> - Documentation review and management and worker's interview

Observation:	
Description of observation:	Objective evidence observed:

Local law or ETI requirement: Comments: None		
Good Examples observed:		
Description of Good Example (GE): None		Objective evidence observed:

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- **General Health and Safety management**
- Potable water was freely available in all areas at both sites.
- Enough clean toilets were available which is segregated by gender.
- Lighting was adequate for the production processes, however ventilation and temperature at the facility is controlled by air circulation using exhaust fan system.
- Health and safety training including Personal Protective Equipment training has been conducted.
- All the other required safety trainings like applicable chemical handling training were also conducted.
- Noise level inspection was conducted in the company.
- Accident's register is available and reviewed for the sites.
- Health and safety risk assessment is conducted for the site but there was not no risk assessment for fire safety, electrical safety, and kitchen area. Moreover, facility did not provide training communicate the associated risk with employees.
- Company had appointed Taufiq Ahmed, Assistant Manager - HR & Compliance, as the health and safety responsible person.
- It was noted that facility did not conduct occupational health checks for the applicable workers who are working in hazardous area/activity.
- Facility did not have a canteen within the facility.
- **Fire Safety**
- There were enough exits in each floor as per local law.
- Sufficient assembly area was found in front of the factory building.
- Fire-fighting equipment was adequate, and monitoring is up to date.
- PA system and fire alarm were available in all areas and are sufficient.
- Facility did not have fire hose reel in metal detection area 4th floor and Office area 5th floor of the main production Building. Also, in the other area the installed hose reel did not have sufficient water pressure to fight fire.
- All the fire escape mask found expired.

- Factory has not installed the fire hydrant system (water raiser). However, facility in the process of installation of fire hydrant.
- Facility did not have a fire safety committee. Also, the interviewed firefighter found not aware about their responsibility. Also, facility did not provide any fire safety training in last 12 months.
- Fire evacuation plan was not matching with the practical layout of the machine and other equipment/arrangement in Ground to 4th floor of the main production building.
- 20% aisles found partially blocked in Cutting, Sewing, finishing section, and finished goods storage area by standing workers, semi-finished goods and finished garments and workstation.
- **Electrical, Machine safety**
- All electrical equipment had been maintained and were in good condition such as sockets, plugs, switches, and main fuse boards.
- Company checked all electric channels, distribution board and electric connection on a daily and monthly basis.
- Company maintained a scheduled maintenance plan for conducting maintenance of all the machines.
- 20% Needle and eye safety guard found displaced condition in sewing section.
- 02 out 02 facility boiler license expired on April 28, 2021. However, facility had already applied to the concerned authority on April 04, 2021.
- Facility generator setup permission expired on July 13, 2019. However, facility had already applied to the concerned authority on November 28, 2019
- 01 out 01 facility electrician competency certification expired on April 10, 2020.
- **Medical services**
- First aid kits were found in all the first aid box and were maintained properly.
- First Aid training was conducted on the site periodically.
- Facility had a dedicated medical centre with availability of registered doctor and nurse.

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

Details:

Details:

- Related policy and procedure.
- Building approval plan and layout approval plan.
- Safety inspection report (Fire, electrical and structural).
- Drinking Water Test Report.
- Accident registers and related injury records.
- Machine, Electric and other equipment maintenance Record.
- Risk Assessment Report.
- Training record (Fire training, First aid training, PPE training record)
- Fire Drill Record
- Air emission, noise level and light level test report.
- Management staff and worker's interview.
- Interview with staff, management, and workers

Any other comments:

None

<p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility has occupational health and safety policy which is periodically communicated with staff and workers through training. Also, all the policies were found posted in the policy board.</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: Policies were included in workers manual and discussed during orientation training. Last conducted orientation training was on 25/03/2021.</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:</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Visitors entering the site are informed on Health and Safety and provided with required personal protective equipment wherever necessary.</p>
<p>E: Is a medical room or medical facility provided for workers?</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><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility had a dedicated medical centre with availability of registered doctor and nurse. Also, in case of any emergency, facility can use central medical support provided by BEPZA.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: There were 01 Doctor and 01 Nurse available in the facility. First aiders were available in all production floors and were trained by medical officer periodically.</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Not applicable as the company does not provide transport facility to its workers and it is not mandated by law.</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: Not applicable, as no living space is provided to workers by facility, and it is not mandated by law.</p>
<p>I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Health and safety risk assessment is conducted for the site but there was not no risk assessment for fire safety, electrical safety,</p>

and are there controls to reduce identified risk?	and kitchen area. Moreover, facility did not provide training communicate the associated risk with employees.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility met all legal obligations on environmental requirements including required permits for use and disposal of natural resources like gas, water etc. Also, facility had conducted air emission, noise, and light level test and all the parameters were within the limit as per law.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Company meets the requirements on environmental standards, including the use of banned chemicals.

Non-compliance:

1. Description of non-compliance:

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

During current assessment it was noted that all the fire escape mask found expired.

Local law and/or ETI requirement

In accordance with ETI Base Code, 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. In accordance with EPZ labour Act 2019, Section 35, 2) Every owner shall take the following measures in the manner prescribed by the regulation in his administration:

e. Supply and maintenance of required number of suitable fire extinguishing equipment's on every floor of the primary medical equipment factory building and necessary instructions or notice for workers to use all these safety materials and equipment.

In accordance with standard IX (c) of S.R.O. 109 of 1999 of Fire Service Rules 1961: For workshop or warehouses of Garments Industries maintenance of alternative stair, PA system, safety lobby, escape routes, hose reel with wet raiser on both sides of each floor, smoke free stair, fire resistant door, automatic escape, battery operated emergency exit light & exit sign; fire, heat & smoke detector with alarm system, firefighting platform, firefighting stair, protective clothing, gas mask with refill, reserve water for firefighting on roof & underground.

Recommended corrective action:

It is recommended that factory shall ensure that fire escape mask is up to date.

Objective evidence observed:

(where relevant please add photo numbers)

- Site tour
- Interview with management and workers
- Documentation review

2. Description of non-compliance:

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

During current assessment it was noted that facility did not have fire hose reel in metal detection area 4th floor and Office area 5th floor of the main production Building. Also, in the other area the installed hose reel did not have sufficient water pressure to fight fire.

Local law and/or ETI requirement

In accordance with ETI Base Code, 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. In accordance with EPZ labour Act 2019, Section 35, 2) Every owner shall take the following measures in the manner prescribed by the regulation in his administration:

e. Supply and maintenance of required number of suitable fire extinguishing equipment's on every floor of the primary medical equipment factory building and necessary instructions or notice for workers to use all these safety materials and equipment.

In accordance with standard IX (c) of S.R.O. 109 of 1999 of Fire Service Rules 1961: For workshop or warehouses of Garments Industries maintenance of alternative stair, PA system, safety lobby, escape routes, hose reel with wet raiser on both sides of each floor, smoke free stair, fire resistant door, automatic escape, battery operated emergency exit light & exit sign; fire, heat & smoke detector with alarm system, firefighting platform, firefighting stair, protective clothing, gas mask with refill, reserve water for firefighting on roof & underground.

In accordance with BNBC (2006); section 4.2.5.a: Water Supply for Fire Protection in Tall Building: The building shall be divided into different water supply zones so that the firefighting equipment will serve within their maximum allowable limit of pressure. Separate automatic fire pump or combination of pressure tank and automatic pump shall be installed for supplying water to the firefighting equipment's in each zone.

Recommended corrective action:

It is recommended that factory shall ensure that hose reel is installed in all the applicable areas and are having sufficient water pressure.

3. Description of non-compliance:

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

During the current assessment, it was noted that factory has not installed the fire hydrant system (water raiser). However, facility in the process of installation of fire hydrant.

Local law and/or ETI requirement

In accordance with ETI Base Code, 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to

prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. In accordance with EPZ labour Act 2019, Section 35, 2) Every owner shall take the following measures in the manner prescribed by the regulation in his administration:

e. Supply and maintenance of required number of suitable fire extinguishing equipment's on every floor of the primary medical equipment factory building and necessary instructions or notice for workers to use all these safety materials and equipment.

In accordance with standard IX (c) of S.R.O. 109 of 1999 of Fire Service Rules 1961: For workshop or warehouses of Garments Industries maintenance of alternative stair, PA system, safety lobby, escape routes, hose reel with wet raiser on both sides of each floor, smoke free stair, fire resistant door, automatic escape, battery operated emergency exit light & exit sign; fire, heat & smoke detector with alarm system, firefighting platform, firefighting stair, protective clothing, gas mask with refill, reserve water for firefighting on roof & underground.

In accordance with BNBC (2006); section 4.2.5.a: Water Supply for Fire Protection in Tall Building: The building shall be divided into different water supply zones so that the firefighting equipment will serve within their maximum allowable limit of pressure. Separate automatic fire pump or combination of pressure tank and automatic pump shall be installed for supplying water to the firefighting equipment's in each zone.

Recommended corrective action:

During current assessment it was noted that facility shall install the fire hydrant system (water raiser).

4. Description of non-compliance:

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

During current assessment it was noted that facility did not have a fire safety committee. Also, the interviewed firefighter found not aware about their responsibility. Also, facility did not provide any fire safety training in last 12 months.

Local law and/or ETI requirement

In accordance with ETI Base Code, 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

In accordance with EPZ labour Act 2019, Section 35, 2) Every owner shall take the following measures in the manner prescribed by the regulation in his administration:

c. To ensure the workers' professional health and safety in the workplace, make every worker aware of the risks in the work by making necessary instructions and training as the case may be.

Recommended corrective action:

During current assessment it was noted that facility shall provide more frequent training of firefighter to the workers and make sure they aware about the basic responsibility of a firefighter.

5. Description of non-compliance:

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

During current assessment it was noted that 20% Needle and eye safety guard found displaced condition in sewing section.

Local law and/or ETI requirement

In accordance with ETI Base Code, 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. In accordance with EPZ labour Act 2019, Section 35, 2) Every owner shall take the following measures in the manner prescribed by the regulation in his administration:

a. Providing and maintaining safe plant buildings and buildings for man's life or safety stairs and transport and equipment or plant or work system.

Recommended corrective action:

It is recommended that facility shall ensure that machine safety guards are in proper place while working in the respective machine.

6. Description of non-compliance:

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

During current assessment it was noted that fire evacuation plan was not matching with the practical layout of the machine and other equipment/arrangement in Ground to 4th floor of the main production building.

Local law and/or ETI requirement

In accordance with ETI Base Code, 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. In accordance with EPZ labour Act 2019, Section 35, 1) The responsibility and duties to provide and maintain a safe and secure working environment for the health workers of every industrial firm or its workers in the factory or factory.

In accordance with standard IX (c) of S.R.O. 109 of 1999 of Fire Service Rules 1961: For workshop or warehouses of Garments Industries maintenance of alternative stair, PA system, safety lobby, escape routes, hose reel with wet raiser on both sides of each floor, smoke free stair, fire resistant door, automatic escape, battery operated emergency exit light & exit sign; fire, heat & smoke detector with alarm system, firefighting platform, firefighting stair, protective clothing, gas mask with refill, reserve water for firefighting on roof & underground

Recommended corrective action:

It is recommended that facility shall update the fire evacuation plan as per the practical arrangement of the area.

7. Description of non-compliance:

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

During current assessment it was noted that 20% aisles found partially blocked in Cutting, Sewing, finishing section, and finished goods storage area by standing workers, semi-finished goods and finished garments and workstation.

Local law and/or ETI requirement

In accordance with ETI Base Code, 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. In accordance with EPZ Labour Act 2019, Section 35, 1) The responsibility and duties to provide and maintain a safe and secure working environment for the health workers of every industrial firm or its workers in the factory or factory.

Recommended corrective action:

It is recommended that facility shall ensure that aisles are kept clear all the time.

8. Description of non-compliance:

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

During current assessment it was noted that 02 out 02 facility boiler license expired on April 28, 2021. However, facility had already applied to the concerned authority on April 04, 2021.

Local law and/or ETI requirement

In accordance with ETI Base Code, 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. In accordance with The Boilers Act, 1923, Section-6 [Save as otherwise expressly provided in this Act, no owner of a boiler shall use the boiler or permit it to be used (a) unless it has been registered in accordance with the provisions of this Act]

Recommended corrective action:

It is recommended that facility shall have up to date boiler and from the concerned authority.

9. Description of non-compliance:

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

During current assessment it was noted that facility generator setup permission expired on July 13, 2019. However, facility had already applied to the concerned authority on November 28, 2019.

Local law and/or ETI requirement

In accordance with ETI Base Code, 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. In accordance with Bangladesh Energy Regulatory Commission Act 2003, Section-27(1) [No person shall engage himself in the following business unless he is empowered by a licence or exempted from having it under this Act or any other Act, such as:- (a) power generation; (b) energy transmission; (c) energy distribution and marketing; (d) energy supply; and (e) energy storage.]

Recommended corrective action:

It is recommended that facility shall have up to date generator license from the concerned authority.

10. Description of non-compliance:

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

During current assessment it was noted that 01 out of 01 facility electrician competency certification expired on April 10, 2020.

Local law and/or ETI requirement

In accordance with ETI Base Code, 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. In accordance with EPZ labour Act 2019, Section 35, 1) The responsibility and duties to provide and maintain a safe and secure working environment for the health workers of every industrial firm or its workers in the factory or factory.

Recommended corrective action:

It is recommended that electrician shall have up to date competency certificate from the concerned authority.

11. Description of non-compliance:

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

During current assessment it was noted that facility did not conduct occupational health checks for the applicable workers who are working in hazardous area/activity.

Local law and/or ETI requirement

In accordance with ETI Base Code, 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. In accordance with EPZ Labour Act 2019, Section 35, 1) The responsibility and duties to provide and maintain a safe and secure working environment for the health workers of every industrial firm or its workers in the factory or factory.

Recommended corrective action:

It is recommended that facility conduct occupational health checks periodically.

12. Description of non-compliance:

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

During current assessment it was noted that facility did not have a canteen within the facility.

Local law and/or ETI requirement

In accordance with ETI Base Code, 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. In accordance with EPZ Labour Act 2019, Section 35, 2) Every owner shall take the following measures in the manner prescribed by the regulation in his administration:

j. Safety Record Book Saving, Safety Committee Structure, Welfare Officer Appointment, Washing Facility, Canteen, Child Care Room, etc. as the welfare facility.

Recommended corrective action:

It is recommended that facility shall arrange canteen facility for the workers.

13. Description of non-compliance:

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

During current assessment it was noted that there was not no risk assessment for fire safety, electrical safety, and kitchen area. Moreover, facility did not provide training communicate the associated risk with employees.

Local law and/or ETI requirement:

In accordance with ETI Base, 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.

In accordance with EPZ Labour Act 2019, Section 35, 2) Every owner shall take the following measures in the manner prescribed by the regulation in his administration:

c. To ensure the workers' professional health and safety in the workplace, make every worker aware of the risks in the work by making necessary instructions and training as the case may be.

Recommended corrective action:

It is recommended that facility risk assessment shall cover all the applicable areas to identify the associated risk and those identified risks are communicated with the employees.

Observation:

Description of observation:

Local law or ETI requirement:

Recommended corrective action:

None

Objective evidence observed:

Good Examples observed:

Description of Good Example (GE):

None

Objective Evidence Observed:

4: Child Labour Shall Not Be Used

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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:

- Facility has established a practice that they will never employ and use any child labour.
- Facility verified all workers' original national ID card, birth certificate, school certificate etc. at the time of recruitment and keeps the photocopies of workers' ID cards, birth certificate in their personal files.
- Facility verified the workers age by a registered doctor.
- Sample basis employees' personal files were taken for review. Each personal file included a bio-data sheet, recent photo, birth registration certificate / photocopied national identification card, age verification certificate and other documents.
- No child or young employee was observed in the facility during site visit.

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

Details:

- Child labour policy
- Employees Personal file including Birth certificate, primary/secondary education certificate, National ID card, etc. of sample employees.
- Age verification documents/ certificate.
- Interviewed staff, management, workers, and the doctor.

Any other comments:

None

A: Legal age of employment:	14 Years
B: Age of youngest worker found:	18 Years
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

D: % of under 18's at this site (of total workers)	0%
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: If yes, give details Not Applicable

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: Recommended corrective action: None	Objective evidence observed: <i>(where relevant please add photo numbers)</i>

Observation:	
Description of observation: Local law or ETI requirement: Comments: None	Objective evidence observed:

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

5: Living Wages are Paid

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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:

- Company had provided local legal minimum wage for all the workers as per the latest wages gazette published by government.
- Time keeping system is electronic finger Punch/face detection for the total processing zone.
- All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned, each time that they are paid.
- All social insurance payments were passed on to the relevant authorities in a timely manner; also, company had an updated group insurance covering the total manpower.
- Each employee was given a pay slip and signed for their wages.
- All employees are paid within 7 working days of each month by cash/bank transfer.
- Employees are aware of their minimum wage.
- Wages had been recorded according to documents checked.
- Facility provided earned leave encashment to the eligible workers, but the payment was done based on daily basic wage calculation instead of based on daily Gross wage calculation as per legal regulation. As per the facility management statement facility will pay the areas payment of the last paid earn leave immediately to applicable workers to ensure the payment as per legal regulation.
- Facility did not provide service benefit to the eligible workers. Facility only pays unused earned leave payment based on daily basic wage calculation. However, facility management confirmed that they will pay the service benefit to the eligible workers from the next case.

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

Details:

- Wage's sheet
- Overtime payment record.
- Payslip.
- Attendance register/timecard.
- Production record.
- Maintenance register.

- Maternity benefit register and payments records.
- Leave register and earned leave encasement records.
- Final settlement record.
- Notice file

Any other comments:

None

Non-compliance:

1. Description of non-compliance:

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

During current assessment it was noted that facility provided earned leave encashment to the eligible workers, but the payment was done based on daily basic wage calculation instead of based on daily Gross wage calculation as per legal regulation. As per the facility management statement facility will pay the areas payment of the last paid earn leave immediately to applicable workers to ensure the payment as per legal regulation.

Local law and/or ETI requirement:

In accordance with ETI Base Code, 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.

In accordance with EPZ Officer order published on February 04, 2020, Section 07, Earn leave encashment must be done by daily wage calculation based on previous months total wage.

Recommended corrective action:

It is recommended that facility pay unused earned leave by calculating daily wage based on most recent month total wage.

2. Description of non-compliance:

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

During current assessment it was noted that facility did not provided service benefit to the eligible workers. Facility only pays unused earned leave payment based on daily basic wage calculation. However, facility management confirmed that they will pay the service benefit to the eligible workers from the next case.

Local law and/or ETI requirement:

In accordance with ETI Base Code, 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.

Objective evidence observed:

(where relevant please add photo numbers)

- Documentation review, Manager and worker's interview.

In accordance with EPZ labour Act Section 23, (4) Where a permanent worker resigns from his service under this section, he shall be paid by the employer compensation-

(a) at the rate of fifteen days (15) wages for every completed year of service, if he has completed five years of continuous service or more but less than ten years.

(b) at the rate of thirty days (30) wages for every completed year of service if he has completed ten years of continuous service or more but less than twenty five (25) years;

Recommended corrective action:

It is recommended that facility shall provide service benefits for the eligible workers.

Observation:
Description of observation:
Local law or ETI requirement:
Comments:

None

Objective evidence observed:
Good Examples observed:
Description of Good Example (GE):

None

Objective Evidence Observed:
Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 08 hours per day 48 hours per week 208 hours per month	A1: 08 hours per day 48 hours per week 208 hours per month	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 04 hours per day 24 hours per week	B1: 02 hours per day 12 hours per week	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

		52 hours per month	
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 8200 BDT/Month	C1: 8200 BDT/Month	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: Per hour 200% of basic hourly rate	D1: Per hour 200% of basic hourly rate	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Wages analysis: (Click here to return to Key Information)	
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A1: If No , why not?	Not Applicable
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	42 samples from May 2021 (1st Current month) 42 samples from March 2021 (Random month) 22 samples from October 2020 (Random month) (As the facility peak season is round the year)
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: If Yes , please give details: The Government authority (BEPZA) announced latest pay structure on 27th November 2018 for the workers of the garment factories.
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A D1: If No , please give details:
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above E1: Lowest actual wages found: Note: full time employees and please state hour / week / month etc. 8200 BDT/month
F: Please indicate the breakdown of workforce per earnings:	F1: 0% of workforce earning under minimum wage. F2: 9% of workforce earning minimum wage. F3: 81% of workforce earning above minimum wage.
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc. - Festival bonus: Twice per year based on 0-100% of the basic salary to the workers.

<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>As per section 125 of the Bangladesh Labour Law, 2006, facility may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc. As per Bangladesh Stamp Act 1899 (Amendment 2010) factory may deduct BDT 10 for Government Revenue Stamp.</p>		
<p>I: Have these deductions been made?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Please list all deductions that have been made.</p>	<p>1. BDT 10 for Government Revenue Stamp. 2. Absent deduction.</p> <p>Please describe: As per section 125 of the Bangladesh Labour Law, 2006, facility may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc. As per Bangladesh Stamp Act 1899 (Amendment 2010) factory may deduct BDT 10 for Government Revenue Stamp.</p>
		<p>I2: Please list all deductions that have not been made.</p>	<p>1. For fines 2. Housing facility 3. Advance payments 4. loans,</p> <p>Please describe: No such instances of illegal deduction found in the facility.</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type</p> <p><input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:</p>	
<p>L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Yes, records reflected all the time worked in timecard, wages sheet and interview with management and workers.		
<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:</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time:		

Please see SMETA Best Practice Guidance and Measurement Criteria.	
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: Not applicable, as there is no defined living wage
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Not applicable, as there is not a defined living wage
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Facility implemented the pay structure as per local legal requirements.
Q: How are workers paid:	<input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- Through employees' interview, it was found that overtime is voluntary.
- Electronic finger Punch/face detection was used for calculation of working hours.
- All overtime is compensated at a premium rate for all employees- that is twice the basic wages.
- Factory working hour was within the legal weekly working hour limit of 60 hours.
- Facility provided one day weekly off in every seven days.

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

Details:

- Management and worker's interview
- Facility policy on working hours and overtime.
- Salary sheet
- Payslip

- Job card
- Production record
- Quality, maintenance records to cross check hours
- Related notice

Any other comments:

None

Non-compliance:

1. Description of non-compliance:

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

Objective evidence observed:

(where relevant please add photo numbers)

Local law and/or ETI requirement:

Recommended corrective action:

None

Observation:

Description of observation:

Local law or ETI requirement:

Comments:

None

Objective evidence observed:

Good Examples observed:

Description of Good Example (GE):

None

Objective Evidence Observed:

Working hours' analysis

Please include time e.g. hour/week/month
[\(Go back to Key information\)](#)

Systems & Processes			
A. What timekeeping systems are used: time card etc.	Describe: Electronic time keeping system (Finger punch/face detection)		
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details		
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:	
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:	
		<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other	
		If "Other", Please define:	
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details:	
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	Maximum number of days worked without a day off (in sample):		
	06 days		
Standard/Contracted Hours worked			
	<input type="checkbox"/> Yes	G1: If yes, % of workers & frequency:	

G: Were standard working hours over 48 hours per week found?	<input checked="" type="checkbox"/> No	
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:
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 02 hours/day, 12 hours/week 52 hours/month	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	70%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Based on worker's interviews, they can do overtime as per their willingness and it is not mandatory, or facility management never forces workers to do overtime. The employment contract also reflects the same.
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of standard wages: 200% of basic wage
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: 200% of basic wage for 100% of the workers.
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please	<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	

complete the boxes where relevant.	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other
	Not Applicable
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:
	Not Applicable as this not legally allowed.
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:

- There were no instances of discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- Gender discrimination was not available in the company; both female and male workers were distributed in all types of work.
- There was no evidence of sexual harassment observed and identified.
- There was an internal grievance process, all sampled employees were aware of the grievance channels to use in case they encountered any discrimination case.
- Facility provided the same wage amount to male/female employees of the same rank.
- There was no restriction for formation of trade union in the factory or any other parallel means for collective bargaining.

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

Details:

- Policy of Anti-Discrimination.
- Recruitment policy.
- Training record
- Termination records.
- Female employee rights
- Wages records
- Interviewed management, staff, and workers.

Any other comments:

None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 74 % A2: Female: 26 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	06

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:
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Professional Development	
A: What type of training and development are available for workers?	Orientation Training First Aid Training PPE Training Chemical Handling Training Firefighting training Specific SOP training

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

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: Recommended corrective action: None	Objective evidence observed: <i>(where relevant please add photo numbers)</i>

Observation:	
Description of observation: Local law or ETI requirement:	Objective evidence observed:

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

8: Regular Employment Is Provided

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

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

- All employees were recruited by the factory directly.
- No labour agency was used to hire workers. No temporary worker, apprenticeship schemes or home worker was identified in the facility.
- No subcontractors were used by the company during current assessment. If required, facility takes prior approval from their customer by ensuring all the required criteria.
- All employees were provided with signed labour contract and ID card during their recruitment.
- Facility maintains service books for all employees.

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

Details:

- Recruitment policy.
- Employees personal file.
- Appointment letter.
- Employee service book.
- Employment register

Any other comments:

None

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI requirement:

Recommended corrective action:

None

Objective evidence observed:

(where relevant please add photo numbers)

Observation:

Description of observation:

Local law or ETI requirement:

Comments:

None

Objective evidence observed:

Good Examples observed:

Description of Good Example (GE):

None

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?

- ☒ Terms & Conditions presented
- ☒ Understood by workers
- ☒ Same as actual conditions

A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:

B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?

- ☐ Yes
- ☒ No

B1: If yes, please describe details and specific category(ies) of workers affected:

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

workers, temporary and/or seasonal workers)	
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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

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

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

Contractors: <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 type="checkbox"/> Yes <input type="checkbox"/> No A1: If yes, how many contractors are present, please give details: Facility was not using any contractor.
B: If Yes , how many workers supplied by contractors?	Not Applicable
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not Applicable
D: If Yes , please give evidence for contractor workers being paid per law:	Not Applicable

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

- There were no outside process or subcontracting.

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

Details:

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

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

Objective evidence observed:

(where relevant please add photo numbers)

Local law and/or ETI /Additional Elements requirement:

Recommended corrective action:

None

Observation:

Description of observation: Local law or ETI/Additional elements requirement: Comments: None	Objective evidence observed:
--	-------------------------------------

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

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

Summary of homeworking – if applicable			
<input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If Yes , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:

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

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

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility has an open channel for reporting any violations of labour standard which is posted in the notice board. The facility has a designated team including the top management to conduct grievance handling procedure.
B: If Yes , are workers aware of these channels and have access? Please give details.	Workers were aware of these channels and have full access to these channels. Facility also has a grievance handling procedure posted with every complaint box.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Facility has posted hotline & provided grievance box in washroom to ensure confidentiality.
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: Employees/workers can place their grievance verbally or in written. They can also keep their identity confidential if required as per their prevailing grievance mechanism. Also, supplier can place their grievance through email at the same time facility collects feedback from their customer periodically.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain

H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: If yes, please give details As per section 125 of the Bangladesh Labour Law, 2006, facility may deduct wages for the bellow reason. - fines imposed under section 25. - deductions for unauthorized absence from duty. - deductions for damage to or loss of any goods given under the custody of a worker or for loss of money for which he is liable to account, where such damage or loss is directly attributable to his neglect or default. But no such instances observed in the company.

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:

- Company had established anti-harassment or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- By the factory management and employees' interviews, it was noted that no physical abuse was identified in the factory.
- There was an internal process for grievance, which is through grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, and any received complaint shall be handled by management, without any reprisal for the worker in question.

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

Details:

- Anti-Harassment policy.
- Grievance box open and management register.
- Orientation training record.
- Interview of management, staff and workers.

Any other comments:

Non-compliance:

1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: Recommended corrective action: None	Objective evidence observed: <i>(where relevant please add photo numbers)</i>
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Observation:	
Description of observation: Local law or ETI requirement: Comments: None	Objective evidence observed:

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

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

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

Additional Elements

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

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

Current Systems and Evidence Examined

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

Current systems:

- Only employees with a legal right to work had been employed or used by the facility. Also, there were no employment agency staff in the facility.
- The youngest age was 18 years old.

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

Details:

- Factory recruitment policy.
- Employees/workers personal file.

Any other comments:

None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

Local law and/or ETI /Additional Elements requirement:

Recommended corrective action:

None

Objective evidence observed:

(where relevant please add photo numbers)

Observation:

Description of observation: Local law or ETI/Additional Elements requirement: Comments: None	Objective evidence observed:
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Good examples observed:	
Description of Good Example (GE): None	Objective Evidence Observed:

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- Company had an environmental policy and procedure which was implemented within the facility.
- Company had provided awareness training to all related personnel.
- Company had conducted air emission, light, and noise level test.
- Hazardous and non-hazardous waste are maintained properly within the facility.

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

Details:

- Environmental policy
- Wastage management policy and management records.
- Waste contractor license and agreement.
- Air emission, light and noise level test reports

Any other comments:

None

Non-compliance:

1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law Local law and/or ETI/Additional Elements requirement: Recommended corrective action: None	Objective evidence observed: <i>(where relevant please add photo numbers)</i>
--	---

Observation:	
Description of observation: Local law or ETI/additional elements requirement: Comments: None	Objective evidence observed:

Good examples observed:	
Description of Good Example (GE): None	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:

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

Details:

Any other comments:

Non-compliance:	
<p>1. Description of non-compliance:</p> <p><input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local</p> <p><input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI/Additional Elements requirement:</p> <p>Recommended corrective action:</p> <p>2. Description of non-compliance:</p> <p><input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local</p> <p><input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI/Additional elements requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p>

Observation:	
<p>Description of observation:</p> <p>Local law or ETI/Additional elements requirements:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

Good examples observed:	
<p>Description of Good Example (GE):</p>	<p>Objective Evidence Observed:</p>

Environmental Analysis <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):	
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details:
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details:
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available?
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details:
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input 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 type="checkbox"/> No G1: Please give details:
H: Have all legally required permits been shown? Please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details:
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details:
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details:
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details:
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details:

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 type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details:	
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 type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details:	
Usage/Discharge analysis		
Criteria	Previous year: Please state period: _____	Current Year: Please state period: _____
Electricity Usage: Kw/hrs		
Renewable Energy Usage: Kw/hrs		
Gas Usage: Kw/hrs		
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
If Yes , please state result		
Water Sources: Please list all sources e.g. lake, river, and local water authority.	<ul style="list-style-type: none"> • • • 	<ul style="list-style-type: none"> • • •
Water Volume Used: (m³)		
Water Discharged: Please list all receiving waters/recipients.	<ul style="list-style-type: none"> • • • 	<ul style="list-style-type: none"> • • •
Water Volume Discharged: (m³)		
Water Volume Recycled: (m³)		
Total waste Produced (please state units)		
Total hazardous waste Produced: (please state units)		
Waste to Recycling:		

(please state units)		
Waste to Landfill: (please state units)		
Waste to other: (please give details and state units)		
Total Product Produced (please state units)		

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:

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

Details:

Any other comments:

Non-compliance:	
<p>1. Description of non-compliance:</p> <p><input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local</p> <p><input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI/Additional Elements requirement:</p> <p>Recommended corrective action:</p> <p>2. Description of non-compliance:</p> <p><input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local</p> <p><input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI/Additional elements requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p>

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

Good examples observed:	
<p>Description of Good Example (GE):</p>	<p>Objective Evidence Observed:</p>

A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	<input type="checkbox"/> Internal Policy <input type="checkbox"/> Policy for third parties including suppliers A1: Please give details:
B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details:
C: Is the policy updated on a regular (as needed) basis?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details:
D: Does the site require third parties including suppliers to complete their own business ethics training	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details:

Other findings

Other Findings Outside the Scope of the Code

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

Appendix 1

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

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

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

<p>6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:</p> <ul style="list-style-type: none"> – this is allowed by national law; – this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; – appropriate safeguards are taken to protect the workers' health and safety; and – The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies. <p>6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.</p>	
ETI 7. No discrimination is practised	ETI 7. No discrimination is practised
<p>7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p>	
ETI 8. Regular employment is provided	ETI 8. Regular employment is provided
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be 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>Additional Elements: Responsible Recruitment</p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p> <p>8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.</p> <p>8.5 Employment agencies must only supply workers registered with them.</p> <p>8.6 Workers pay no recruitment fee at any stage of the recruitment process.</p> <p>8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
8A: Sub-Contracting and Homeworking	8A: Sub-Contracting and Homeworking
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.</p> <p>8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
ETI 9. No harsh or inhumane treatment is allowed	ETI 9. No harsh or inhumane treatment is allowed
<p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.</p> <p>Additional elements:</p> <p>9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
10. Other Issue areas: 10A: Entitlement to Work and Immigration	
<p>Additional Elements</p> <p>10A.1 Only workers with a legal right to work shall be employed or used by the supplier.</p> <p>10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
10. Other issue areas 10B2: Environment 2-Pillar	

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

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.

Photo Form

Adding Images To help keep the size of the Report as small as possible for ease of sending and saving the document we recommend that you use Microsoft Paint to resize your photos. To do so please follow these instructions:

- 1) To start Microsoft Paint, click 'Start', 'Programs', 'Accessories', then 'Paint'.
- 2) Open the image file you wish to edit.
- 3) Click the 'Image' Menu at the top and select "Stretch/Skew Image".
- 4) Choose a percentage figure to resize the image: to avoid distortion, choose the same percentage for horizontal and vertical stretch. Click OK.
- 5) Once you have the desired size, click File > Save As... (To prevent overwriting the original image).
- Save As jpeg (this provides compression to make the file smaller).
- 6) Please delete this text once complete.








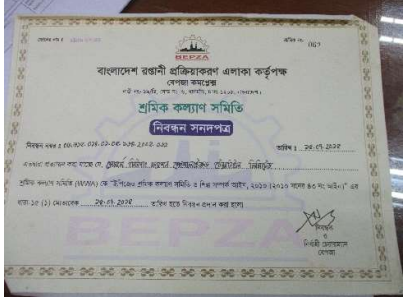


		
Factory License	Factory Entrance	Factory nameplate
		
Cutting Section	Sewing Section	Finishing Section

Finished goods area	Fabric store	Accessories store

Fire-fighting equipment	Fire extinguisher	Fire Hose

Emergency Exit Sign and Exit Door	Evacuation Plan	Fire Alarm

Dining Hall	Fire alarm switch and Control Panel	Drinking water point

		
Attendance recording system	First aid box	Medical Room
		
Child Care Room	Workers Toilet	Generator Room
		
Boiler room		
		
NC: WWA expired	NC: Fire escape mask expired	NC: Fire hydrant is under installation

		
NC: Insufficient water pressure in fire hose reel	NC: Machine safety guard displaced	NC: Fire evacuation plan was not matching with the practical layout
		
NC: Aisles partially blocked	NC: Boiler license expired	NC: Generator setup permission expired
		
NC: Earn leave encashment based on basic wage		



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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:

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

[Click here for Supplier \(B\) members:](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d

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