

Sedex Members Ethical Trade Audit Report



	Audit Details									
Sedex Company Reference: (only available on Sedex System)		ZC5000009428		Sedex Site Reference: (only available on Sedex System)			ZS1000010046			
Business name (C name):	ompany	GARDEN TEXTILES PRIVATE LIMITED.								
Site name:		GARDE	N TEXTILES	S PRIVA	ATE LIMITED					
Site address:		PLOT NO 592 PACE CITY II SECTOR 37 GURGAON 122001 IN		Country:		IN				
Site contact and jo	b title:	Mr. Girra	Mr. Girraj Sharma / Manager HR							
Site phone:		8510010015		Site e-mail:		girraj@venturesfashion.in				
SMETA Audit Pillars:			Health and Safety (plus Environ 4-pillar 2-Pillar)		ment		Business Ethics			
Date of Audit:		2023-08-21								
	Audit Company Name:									
		EUR	DCERT INS	PECTI	ON SERVICES	PVT	LTD			
Audit Conducted By										
Affiliate Audit Company	✓		Purchaser				Retailer			
Brand owner			NGO				Trade Ur	nion		
Multi-stakeholder					Combined Au	ıdit (s	elect all t	hat appl	y)	

2023-08-21

Audit Content:

SMETA

- (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 (March 2019) 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.

Auditor Team					
Lead Auditor:	Kashif Ali	APSCA Number:	21704937		
Additional Auditors:					
Date of declaration:	2023-08-21				

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.

Site Representation				
Full Name:	Mr. Girraj Sharma			
Title:	Manager HR			
Date of declaration:	2023-08-21			

Comments:

Any exceptions to this must be recorded here (e.g. different sample size):
Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just

started last Sep 2020).
The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives

Audit company:



Summary of Findings

Issue		a of informity	Nui	mber of iss	ues	Findings
(please click on the issue title to go direct to the appropriate audit results by clause)	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
0B - Management systems and code implementation	0.B.4		1	0	0	NC - ZAF600152714
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
3 - Working conditions are safe and hygienic	3.1 3.1 3.1 3.1	§1 §2 §3 §4	4	0	0	NC - ZAF600152715 NC - ZAF600152716 NC - ZAF600152717 NC - ZAF600152718
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid			0	0	0	
6 - Working hours are not excessive			0	0	0	
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is allowed			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2-pillar			0	0	0	
10B4 - Environment 4-pillar			0	0	0	
10C - Business ethics 4-pillar			0	0	0	

Version 6.1

Local Law Issues

Issue	Description
§1	According to Section 32(a) of The Factories Act, 1948, all floors, steps, stairs, passage and gangways shall be of sound construction and properly maintained and shall be kept free of obstruction and substances likely to cause persons to slip and where it is necessary to ensure safety, steps, stairs gangways shall be provided with substantial handrails.
§2	According to Section 38 (1a) of The Factories Act, 1948, Every factory shall provide and maintain safe means of escape for all person in the event of fire.
§3	According to Section 38 (1a) of the Factories Act, 1948, every factory shall provide and maintain safe means of escape for all persons in the event of fire.
§4	According to Section 21 of The Factories Act, 1948, Every moving part of a prime mover and every flywheel connected to a prime mover, whether the prime mover or fly wheel is in the engine house or not shall be securely fenced by safeguards of substantial construction which shall be constantly maintained and kept in position while the part of machinery they are fencing are in motion or in use.

2023-08-21

Site Details

	Site Details				
Company Name	GARDEN TEXTILES I	PRIVATE L	IMITED.		
Site Name	GARDEN TEXTILES I	PRIVATE L	IMITED		
GPS location (if available)	GPS Address:		Plot No-592,Pace City-II, Sector-37, Gurgaon, HR		
	Coordinates:		28.25'58.25" N 76.59'43.63" E		
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	(1) Fire NOC FS/2023/80 Dated: 09/03/2023 valid 08/03/2026, (Pollution Exempted- (3) Stability - Plan No-01 issued by Mr. R.K Singh BE (civil) Dt. 07/08/2023, (4) GST registration No: 06AAACG9525B1ZY, (5) PAN Number: AAACG9525B, (6) IEC Code: 0201018217, (7) ESIC Registration- 69410338830011001 (8) EPF Reg. WBPRB0053139000.			1 issued by Mr. R.K, stration No: .CG9525B, (6) IEC	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturer of Read	ymade Garı	ments		
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	Garden Textile Pvt. Ltd. is Located at 592, Pace City-II, Sector-37, Gurugram, Haryana. This unit is operating at current location since April-2023. total age of the building is 2 years. Factory is engaged in Manufacturing and Export of Readymade Garments. The total land area occupied by this audited facility is 1000 Square meters and the built-up area is 11711 square ft. The facility is shared building with Ground floor and one basement.			current location since s. Factory is engaged Garments. The total 1000 Square meters facility is shared	
Structure and number of buildings	Building Name:		GARDEN TEXTILES PRIVATE LIMITED (Shared Building)		
	Floor	Description	n	Remark	
	Basement	Fabric Sto / Sewing / Packing		N/A	
	Ground Floor	Office / Sh Sampling	owroom /	N/A	
Visible structural integrity issues (large cracks) observed?	☐ Yes ☑ No				
Clacks) Observed:	Please give details:				
	No any Structural inte	grity issues	observed.		
Does the site have a structural engineer	☑ Yes □ No				
evaluation?	Please give details:				
	Facility obtained valid Mr. R.K. Singh on 07/0	stability cer 08/2023.	tificate from	n competent Person	
Site function	□ Agent		✓ Factor Proces	ry sing/Manufacturer	
	☐ Finished Product	Supplier	☐ Growe	er	
	☐ Homeworker		□ Labou	r Provider	
	□ Pack house		□ Primai	ry Producer	
	☐ Service Provider		□ Sub-co	ontractor	
Months of peak season	October to February				

Report reference: Start Date: End Date: Audit company: 2023-08-21 2023-08-21

Process overview	Procurement of Raw Material - Cutting- Stitching- Finishing-Packing- Dispatch.			
What form of worker representation is there	□ Union	~	Worker Commitee	
on site?	□ Other		None	
Please give details:	Worker Committee			
Is there any night production work at the site?	☐ Yes ☑ No			
Are there any on site provided worker	☐ Yes ☑ No			
accommodation buildings	Please give details:			
Are there any off site provided worker	☐ Yes ☑ No			
accommodation buildings	Please give details:			
Were all site provided accommodation buildings included in this audit	☐ Yes ☑ No			
buildings included in this addit	Please give details:			
	None			

Audit Parameters					
Time in and time out	Day 1				
	In	09:42			
	Out	18:15			
Audit type:	FULL_INITIAL				
Was the audit announced?	SEMI_ANNOUNCED				
Was the Sedex SAQ available for review?	Yes				
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No				
Who signed and agreed CAPR		aj Sharma	/ Manager HR		
Is further information available	No				

Audit attendance	Management Worker Representatives					
	Senior management	Worker Committee representatives	Union representatives			
A: Present at the opening meeting?	Yes	Yes	No			
B: Present at the audit?	Yes	Yes	No			
C: Present at the closing meeting?	Yes	Yes	No			
Reason for absence at the opening meeting	There were no union present in factory.					
Reason for absence during the audit	There were no union present in factory.					
Reason for absence at the closing meeting	There were no union preser	There were no union present in 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*	Home		
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	workers	Total
Worker numbers – male	34	0	0	0	0	0	0	34
Worker numbers – female	7	0	0	0	0	0	0	7
Total	41	0	0	0	0	0	0	41
Number of Workers interviewed – male	7	0	0	0	0	0	0	7
Number of Workers interviewed – female	3	0	0	0	0	0	0	3
Total – interviewed sample size	10	0	0	0	0	0	0	10

End Date:

	Nationalities Structure			
Nationality of Management	Indian			
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationaility 1: INDIAN	approx %: 100%		
Was this list completed during peak season?	✓ Yes □ No Please give details:			
Worker remuneration	Workers on piece rate:	0%		
	Paid hourly:	0%		
	Salaried:	100%		
Payment cycle	Paid daily:	0%		
	Paid weekly:	0%		
	Paid monthly:	100%		
	Other:	0%		
	Details for other:	None		

W	orker Interview Summary
Were workers aware of the audit?	☑ Yes □ No
Were workers aware of the code?	☑ Yes □ No
Number of group interviews:	1 group of 4
Number of individual interviews:	Male: 4 Female: 2
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.	☑ Yes ☐ No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☑ Yes □ No
In general, what was the attitude of the workers towards their workplace?	☑ Favorable ☐ Non-favourable ☐ Indifferent
What was the most common worker complaint?	None
What did the workers like the most about working at this site?	Good working environment for working and co-operative management.
Any additional comment(s) regarding interviews:	None
Attitude of workers to hours worked:	No negative comment observed
Is there any worker survey information available?	☐ Yes ☑ No Please give details:

Report reference: Start Date: End Date: Audit company: 2023-08-21 2023-08-21

Attitude of workers:
No negative comment observed.
Attitude of worker's committee/union reps:
No negative comment observed.
Attitude of managers:
Good

0A - Universal Rights covering UNGP [Summary of Findings]

0A: Compliance Requirements

- 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

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:

Any other comments:

- 1) Mr. Girraj Sharma HR-Manager is responsible for implementing standards concerning Human rights.
- 2) Facility has not identified their stakeholders and salient issues.
- 3) Facility has not measured direct, in-direct and potential impacts on stack holder's human rights. Hence no rémedial action in place.
- 4) Facility does not have transparent system in place for confidential reporting and dealing with human rights impacts without fear of reprisal towards the reporter.
- 5) No discrimination related to human rights observed regardless of gender, nationality, place of residency, sex, ethnicity, religion, colour or and other categorization and all are treated equally.
- 6) No Slavery, forced labour and human trafficking observed. All employees are of Indian nationality.
- Employees are free to quit if they are not willing to work.
- 8) The facility have policy on "Human Right" which is duly endorsed by Management and management representative is responsible for implementation.

Evidence examined: Documented policy on human rights was not available. •Supplier's social compliance monitoring records was not available. Interaction with Management and Interview with employee

None		
Policy statement that expresses commitment to respect human rights?	☑ Yes □ No	
	Please give details:	
	Policy expressed commitment of human rights respect.	

	Please give details:
	Policy expressed commitment of human rights respect.
Are the policies included in workers' manuals?	☑ Yes □ No
	Please give details:
	Policy Included in workers manual.

Audit company: Report reference: Start Date: End Date:

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? Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, a source of continuous learning and based on stakeholder engagement) Does the business demonstrate effective data privacy procedures for workers' information, which is implemented? Does the business demonstrate effective data privacy procedures for workers' information, which is implemented? Measuring Workplace Impact 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)) Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period / 1 (Inumber of employees on the 1st day of the 90 day period / 1 (Inumber of employees on the 1st day of the year + number employees on the last day of the year + number employees on 1st of the period / 1 (Number of employees on 1st of the period / 1 (Number of employees on 1st of the period / 1 (Number of employees on 1st of the period / 2 (Number of employees on 1st of the period / 2 (Number of employees on 1st of the period / 2 (Number of employees on 1st of the period / 2 (Number of employees on 1st of the period / 2 (Number of employees on 1st of the period / 2 (Number of employees on 1st of the period / 2 (Number of employees on 1st of the period / 2 (Number of employees on 1st of the period / 2 (Number of employees on 1st of the period / 2 (Number of employees on 1st of the period / 2 (Number of employees on 1st of the period / 2 (Number of employees on 1st of the period / 2 (Number of employees on 1st of the period / 2 (Number of employees on 1st of the period / 2 (Number of employees on 1st of the period / 2 (Number of employees on 1st of the period / 2 (Number of employees on 1st of the period / 2 (Number of employees on 1st of the period / 2 (Number of employe		
Standards concerning Human Rights? Please give details: Mr. Girraj Sharma- HR-Manager is Responsible for Human rights code implementation.		☑ Yes □ No
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Rept under lock & key with limited access.		Please give details:
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)) Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]) Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year) Quarterly (90 days) % absence in the period / [(Number of employees on 1st of the period + Number of employees on 1st of the period / 2] * Number of available workdays in the month)		All personal data is with Human Resources Department which is kept under lock & key with limited access.
leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)) Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]) Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) Cuarterly (90 days) % absenteeism(Number of ays lost through job absence in the period / [(Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the number of employees on 1st of the number of employees on 1st of the number o	Me	easuring Workplace Impact
total number of workers on site over the year (annual worker turnover)) Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]) Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year) Quarterly (90 days) % absence in the period / [(Number of employees on 1st of the period / Number of employees on 1st of the period / Number of employees on 1st of the period / 2] * Number of available workdays in the month)	Annual worker turnover(Number of workers	Last year 4.0%
turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]) Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year) Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	total number of workers on site over the	This year 3.0%
through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year) Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month) This year 3.0%	turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of	2.0%
of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year) Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month) Inis year 3.0%		Last year 5.0%
absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in	This year 3.0%
Associated associated	absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the	2.0%
Are accidents recorded?	Are accidents recorded?	☐ Yes ☑ No
Please give details:		Please give details:
Facility has maintained the Accident Register Form -23 till Aug - 2023.		

Report reference: Start Date: End Date: Audit company:

Annual Number of work related accidents and injuries per 100 workers((Number of	Last year	0.0%
work related accidents and injuries * 100) / Number of total workers)	This year	0.0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%	
Lost day work cases per 100 workers([(Number of lost days due to work	Last year	0.0%
accidents and work related injuries * 100) / Number of total workers)	This year	0.0%
% of workers that work on average more	6 month	0.0%
than 48 standard hours / week in the last 6 / 12 months	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12	6 month	0.0%
months	12 month	0.0%

Audit company: Repor

Start Date: 2023-08-21



0B - Management Systems and code Implementation [Summary of Findings]

0B: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- Mr. Girraj Sharma- HR-Manager is responsible to ensure compliance with these code requirements.
- 2) Based from interaction with the factory management, it was understood that factory management has developed management system for implementing & maintaining social compliance code.
- 3) Facility managers are aware of the compliance requirements and does not have adequate knowledge on the legal/audit requirements.
- 4) Facility has applied for Factory License. however same has not been issued.
- 5) Facility has provide building layout plan and stability certificate for review.
- 6) Employees were found aware about the Ethical Trade Initiative (ETI) base code requirements.
- 7) Facility has communicated ETI base code requirement to their suppliers.
- 8) Facility has conducted risk assessment and internal audit to monitor effectiveness of social management system implemented at audited site.

09) Facility have system in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.
Evidence examined:
1) Fire NOC 2) Stability certificate. 3) Risk assessment 4) Internal Audit.
Any other comments:
None

	Management Systems
In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	☐ Yes ☑ No Please give details:
The compliance to any regulations.	None
Do policies and/or procedures exist that reduce the risk of forced labour, child	☑ Yes □ No
labour, discrimination, harassment &	Please give details:
abuse?	Facility were formed Human right policy and exist the reducing risk.
If Yes, is there evidence (an indication) of effective implementation? Please give details.	Facility provided training and hire employee directly.

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Audit company: Report reference: Start Date: End Date:

11	
Have managers and workers received training in the standards for forced labour,	☑ Yes □ No
child labour, discrimination, harassment & abuse?	Please give details:
abuse:	Facility provided the training to employee of code implementation.
If Yes, is there evidence (an indication) that training has been effective e.g. training	☑ Yes □ No
records etc.? Please give details	Please give details:
	Training record of Human rights on 3/06/2023 and ETI training on 20/05/2023.
Does the site have any internationally recognised system certifications e.g. ISO	☐ Yes ☑ No
9000, 14000, OHSAS 18000, SA8000 (or	Please give details:
other social audits)?	None
Is there a Human Resources	☑ Yes □ No
manager/department?	Mr. Girraj Sharma
Is there a senior person /manager responsible for implementation of the code?	☑ Yes □ No
	Please give details:
	Facility have Human resource department Mr. Girraj Sharma-Manager HR is responsible.
Is there a policy to ensure all worker	☑ Yes □ No
information is confidential?	Please give details:
	Mr. Mr. Girraj Sharma - HR-Manager is Responsible for code implementation.
Is there an effective procedure to ensure confidential information is kept confidential?	☑ Yes □ No
confidential information is kept confidential.	Please give details:
	As per the facility procedures, the data received from the employees are kept confidential. The data will not be disclosed to others without workers consent.
Are risk assessments conducted to evaluate policy and procedure	☑ Yes □ No
effectiveness?	Please give details:
	Facility have a system to conduct risk assessment to evaluate the effectiveness of policy and procedures and update the same if required.
Does the facility have a process to address issues found when conducting risk	☑ Yes □ No
assessments, including implementation of controls to reduce identified risks?	Please give details:
controls to reduce identified risks?	Facility have a system to conduct risk assessment to evaluate the effectiveness of policy and procedures and update the same if required.
Does the facility have a policy/code which	☑ Yes □ No
require labour standards of its own suppliers?	Please give details:
	Facility has communicated ETI code requirement to their suppliers.
	Land Rights

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Does the site have all required land rights licenses and permissions (see SMETA	☑ Yes □ No
Measurement Criteria)?	Please give details:
	Approval From the Appropriate authority received and it is in order. Factory License, Fire NOC.
Does the site have systems in place to conduct legal due diligence to recognize	☑ Yes □ No
and apply national laws and practices	Please give details:
relating to land title?	Rent agreement and owner registration of land as per detail.
Does the site have a written policy and	☐ Yes ☑ No
procedures specific to land rights?	Please give details:
	None
Is there evidence that facility/site	☐ Yes ☑ No
compensated the owner/lessor for the land prior to the facility being built or expanded?	Please give details:
	None
Does the facility demonstrate that	☑ Yes □ No
alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	Please give details:
	Facility have valid rent agreement, and the terms and conditions mentioned in agreement
Is there any evidence of illegal	☐ Yes ☑ No
appropriation of land for facility building or expansion of footprint?	Please give details:
	None

Audit company: Report reference: Start Date: End Date:

EUROCERT INSPECTION SERVICES PVT ZAA600021653 2023-08-21 2023-08-21

	Non-C	Compliance		Evidence
[Back to findings	summary]			
	Non-C	Compliance		
Status	OPEN			
Reference	ZAF600152714			
Clause	0B - Manageme	nt Systems and co	de Implementation	
Issue Title	34 - Site is oper licences and pe expired)	ating without all rec rmits (e.g. busines	quired in-date s / factory licence has	
Subcategory	Site's licenses 8	Certifications		
New or carried over?	☑ New	□ C	arried Over	
Root cause	☑ Training	☑ Sy	ystem	
	□ Costs	□ La	ack of workers	
	□ Other			
Root cause - Other				
ETI code	0.B.4 - Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with.			
Explanation to the non compliance	It was noted that during the review of records facility was not obtained factory license from concerned authority, however same has been applied on 19-08-2023.			
Follow up method	☐ Follow up au	ıdit ☑ De	esktop audit	
Timescale	□ Immediate	☑ 30 days	□ 60 days	
	□ 90 days	☐ 120 days	□ 180 days	
	☐ 365 days	□ Other		
Actions	It is recommend documents from facility in system	concerned author	nall obtained the legal ity to operate the	

Report reference: Start Date: End Date: Audit company: 2023-08-21

1 - Freely chosen Employment [Summary of Findings]

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

Current Systems and Evidence Examined

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

Current Systems:

- 1) Mr. Girraj Sharma- Partner is responsible to oversee that no forced, bonded, involuntary or prison labor is employed.
- 2) There was no presence of forced / bonded or prison labor at the work place.
- 3) Employees are not required to lodge any deposits, identity papers with the facility before or after joining the
- 4) All interviewed employees reported that there are no such illegal deposits to be deposited to the facility for recruitment and they are free to resign from the facility after serving a specified notice period of 01 month.
- 5) Employees are free to leave at the end of their shift and there is no compulsion to work overtime.

Evidence examined:

Facility Policy and Procedures.

- Personal files with application form and bio data including employment contract was available.
- Interaction with Management and Interview with employees

meraelen man management and merven man employees		
Any other comments:		
None		
Is there any evidence of retention of original ☐ Yes ☑ No		

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ☑ No Please give details: Employees are free to leave their job by giving 30 days' notice period as per terms of appointment letter.
If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	☐ Yes ☐ No ☑ Not Applicable Please give details: N/A

Audit company: Report reference: Start Date: End Date:

Is there evidence of any restrictions on workers' freedoms to leave the site at the	☐ Yes ☑ No
end of the work day?	Please give details:
	Worker leave the site without any restriction end of shift confirmed by workers interview and management interview workers representative interview.
Does the site understand the risks of forced / trafficked / bonded labour in its supply	☑ Yes □ No □ Not Applicable
chain	Please give details:
	Facility hired direct recruitment process and Internally audit in supply chain.
Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	☑ Yes □ No
	Please give details:
	Facility hired direct recruitment process and Internally audit in supply chain.

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2 - Freedom of Association and Right to Collective Bargaining are Respected [Summary of Findings]

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

Current Systems and Evidence Examined

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

Current Systems:

- 1) Mr. Girraj Sharma HR-Manager is responsible to ensure that 'Freedom of Association and Right to Collective Bargaining' is respected by the management.
- 2) Factory recognizes and encourages the right to freedom of association and collective bargaining under the law 3) Facility has provided suggestion box through which employees can report grievances. Further, employees can also approach management with their grievance and adequate actions are taken.
- 4) There was no evidence of suppression of employees' rights.

Evidence examined:

- Facility Policy and Procedures.
- •Interaction with Management and Interview with employees.
- ·Works Committee, Grievance committee and Health and safety Committee is made and record was available for review.

Any other comments:		
None		
What form of worker representation/union is	☐ Union	☑ Worker Commitee
there on site? (Please add the name of the union or committee in the textbox)	□ Other	□ None
Other details:	Work committee	
Is it a legal requirement to have a union?	☐ Yes ☑ No	
Is it a legal requirement to have a worker's committee?	☑ Yes □ No	
Is there any other form of effective	☑ Yes □ No	
worker/management communication channel? (Other than union/worker	Please give details:	

	and safety committee meeting record Dt. 30/05/2023 and Health and safety committee meeting on 16/06/2023.
Is there evidence of free elections?	☑ Yes □ No
Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	
	Based on the interview of worker's representative, he confirmed that adequate facilities are provided by supplier to allow the committee to conduct related business.

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Start Date:

End Date:

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committee e.g. H&S, sexual harassment)

Name of union and union representative, if applicable:	None
Is there evidence of free elections?	☐ Yes ☑ No ☐ Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Work committee
Is there evidence of free elections?	☑ Yes □ No □ Not Applicable
Are all workers aware of who their representatives are?	☑ Yes □ No
Toprocontativos are:	Please give details:
	During the interview all workers were confirmed their awareness about the worker representative.
Were worker representatives freely elected?	☑ Yes □ No
Date of last election:	2023-05-22
Do workers know what topics can be raised with their representatives?	☑ Yes □ No
Were worker representatives/union representatives interviewed?	☑ Yes □ No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The worker's committee is not applicable as the workers strength is below 100. However factory formed works committee last meeting conducted on 30/05/2023 and Factory has parallel formed grievance committee also.
Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ☑ No

Report reference: Start Date: End Date: Audit company: 2023-08-21 2023-08-21

3 - Working Conditions are Safe and Hygienic [Summary of Findings]

Compliance Requirements

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for
- new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined

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

Current Systems:

- 1. General Health and Safety management
- Mr. Girraj Sharma- HR-Manager is responsible for Health & Safety aspects for the site.
- Potable water was freely available in all areas and test certificates were up-to-date.
- Sufficient clean toilets were available all times to workers.
- Ventilation, temperature and lighting were adequate for the production processes.
- 2. Fire Safety
- Factory has Rcvd the Fire NOC from fire Department.
- -There were at least 2 exits from each work area and those were clearly marked.
- -Fire fighting equipment such as 11 fire extinguishers, 2 Hose Reel, 4 emergency lights, fire alarm call point-4, Sprinklers: 54, Smoke detector: 20

were provided in the facility.

- -Fire drills were organized and recorded every 3 months as per the law. Last fire drill was conducted on 10/07/2023 -Facility has marked all the exits and emergency exits in a language understood by majority of the employees
- 3. Electrical safety
- All Electrical equipment was maintained in good condition.
- There were competent mechanic & electricians at the site to do the electrical work.
- Facility had obtained periodic inspection certificate for all the machinery used.
- Chemical safety

Facility not using any chemical currently.

- Medical services
- -Facility has provided well equipped first aid boxes with basic first aid contents. 02 first aid and person trained 02 from Saint John Ambulance on dated 24/07/2023 valid for three year

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

Evidence examined:

- 1.Legal licenses
- 2.Structural stability certificate
- 3. Emergency Preparedness plan
- 4. Mock Drill reports
- 5. Safety committee minutes of meeting.
- 6. Health and safety Policy and Procedure.

Any other comments:

None

Audit company: Report reference: Start Date: End Date:

Does the facility have general and occupational Health & Safety policies and	☑ Yes □ No
procedures that are fit for purpose and are	Please give details:
these communicated to workers?	Facility has formed Health and safety Policy as per process and communicated to workers.
Are the policies included in workers' manuals?	☑ Yes □ No
manuais :	Please give details:
	Policy included in workers manual.
Are there any structural additions without required permits/inspections (e.g. floors	☐ Yes ☑ No
added)?	Please give details:
	Facility structure as per approved layout and Not observed and not applicable.
Are visitors to the site informed on H&S and provided with personal protective	☑ Yes □ No
equipment?	Please give details:
	Briefing about safety is given to visitors at the gate along with safety information card. During the site visit it was observed that specific instructions/displays were also displayed at the main gate for information of visitors.
Is a medical room or medical facility provided for workers?(This section is to list	☐ Yes ☑ No
evidence to support system description	Please give details:
(Documents examined & relevant comments. Include renewal/expiry date where appropriate))	Not Required by law
Is there a doctor or nurse on site or there is easy access to first aider/ trained medical	☑ Yes □ No
aid?	Please give details:
	First Aid Trained Person
Where the facility provides worker transport – is it fit for purpose, safe, maintained and	☐ Yes ☑ No
operated by competent persons e.g. buses and other vehicles?	Please give details:
and other vericles:	Facility not provided transportation facility.
Is secure personal storage space provided for workers in their living space and is fit for	☐ Yes ☑ No
purpose?	Please give details:
	No there is no living space inside of the premises.
Are H&S Risk assessments are conducted (including evaluating the arrangements for	☑ Yes □ No
workers doing overtime e.g. driving after a long shift) and are there controls to reduce	Please give details:
identified risk?	H&S Risk assessments have been conducted on 05/06/2023. including for workers doing overtime. As such organization has policy to discourage overtime. But in case required periodic refreshment breaks are given
Is the site meeting its legal obligations on	☑ Yes □ No
environmental requirements including required permits for use and disposal of	Please give details:
natural resources?	organization has Environmental policy.
	1 O

Audit company:

Report reference:

Start Date:

2023-08-21

End Date:



Sedex Audit Reference: ZAA600021653

Is the site meeting its customer requirements on environmental standards,	☑ Yes □ No
including the use of banned chemicals?	Please give details:
	Organization is aware about requirements & follows the same. They do get updates from customers from time to time. Required information is also submitted to client when ever asked.



	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	OPEN	
Reference	ZAF600152715	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	203 - Fire exits are inadequate by design/construction, location, etc.	
Subcategory	Fire Safety - Fire exits	I
New or carried over?	☑ New ☐ Carried Over	
Root cause	☑ Training ☑ System	
	☐ Costs ☐ Lack of workers	
	□ Other	
Root cause - Other		
Local law issue	According to Section 32(a) of The Factories Act, 1948, all floors, steps, stairs, passage and gangways shall be of sound construction and properly maintained and shall be kept free of obstruction and substances likely to cause persons to slip and where it is necessary to ensure safety, steps, stairs gangways shall be provided with substantial handrails. Nc-Missing safety lock	
ETI 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.	
Explanation to the non compliance	It was noted that during the facility tour safety locking device not installed in rolling shutter at ground floor.	
Follow up method	☐ Follow up audit ☐ Desktop audit	
Timescale	☐ Immediate ☐ 30 days ☐ 60 days	
	□ 90 days □ 120 days □ 180 days	
	□ 365 days □ Other	
Actions	It is recommended to the facility shall installed the safety locking device in rolling shutter at ground floor.	

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	Non-C	ompliance		Evidence
[Back to findings	summary]			
	Non-C	ompliance		1
Status	OPEN			
Reference	ZAF600152716			
Clause	3 - Working Cond	ditions are Safe ar	nd Hygienic	
Issue Title	214 - No evacua route	tion plan or desigr	nated emergency exit	
Subcategory	Fire Safety - Fire	alarms & Evacua	tion	
New or carried over?	☑ New	□ C	arried Over	
Root cause	☑ Training	☑ S	ystem	
	□ Costs	□ La	ack of workers	
	□ Other			
Root cause - Other				
Local law issue	Every factory sha		e Factories Act, 1948, iintain safe means of of fire.	
ETI 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.			
Explanation to the non compliance	It was noted that during the factory tour aisles marking was missing in cutting area.			
Follow up method	☐ Follow up audit ☐ Desktop audit			
Timescale	□ Immediate	☑ 30 days	□ 60 days	
	□ 90 days	☐ 120 days	☐ 180 days	
	□ 365 days	□ Other		
Actions	It is recommended to the facility shall marking of aisles in cutting area.			



	Non-Compliance	Evidence
[Back to findings		
	Non-Compliance	
Status	OPEN	
Reference	ZAF600152717	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	215 - Evacuation plan not adequately communicated to workers	
Subcategory	Fire Safety - Fire alarms & Evacuation	
New or carried over?	☑ New ☐ Carried Over	
Root cause	☑ Training ☑ System	
	☐ Costs ☐ Lack of workers	
	□ Other	
Root cause - Other		
Local law issue	According to Section 38 (1a) of the Factories Act, 1948, every factory shall provide and maintain safe means of escape for all persons in the event of fire.	
ETI 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.	
Explanation to the non compliance	It was noted that during factory tour evacuation plan was not displayed at one exit point in basement.	
Follow up method	□ Follow up audit ☑ Desktop audit	
Timescale	☐ Immediate ☑ 30 days ☐ 60 days	
	☐ 90 days ☐ 120 days ☐ 180 days	
	□ 365 days □ Other	
Actions	It is recommended to the facility shall displayed the evacuation plan at exit point.	

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	Non-Compliance	Evidence
[Back to findings s	summary]	
	Non-Compliance	
Status	OPEN	
Reference	ZAF600152718	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt / hand guards on other machines)	
Subcategory	Machinery	
New or carried over?	☑ New ☐ Carried Over	
Root cause	☑ Training ☑ System	
	□ Costs □ Lack of workers	
	□ Other	
Root cause - Other		
Local law issue	According to Section 21 of The Factories Act, 1948, Every moving part of a prime mover and every flywheel connected to a prime mover, whether the prime mover or fly wheel is in the engine house or not shall be securely fenced by safeguards of substantial construction which shall be constantly maintained and kept in position while the part of machinery they are fencing are in motion or in use. Nc-Missing needle guardjpg	
ETI 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.	
Explanation to the non compliance	It was noted that during factory tour needle guard was missing in 01 out of 36 running sewing machines in basement	
Follow up method	☐ Follow up audit ☑ Desktop audit	
Timescale	☐ Immediate ☐ 30 days ☐ 60 days	
	□ 90 days □ 120 days □ 180 days	
	□ 365 days □ Other	
Actions	It is recommended to the facility shall installed the safety needle guard in sewing machine.	



Audit company: EUROCERT INSPECTION SERVICES PVT ZAA600021653 LTD

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4 - Child Labour Shall Not Be Used [Summary of Findings]

- 4: Compliance Requirements
- 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 S	systems:
------------------	----------

- Mr. Girraj Sharma Proprietor is responsible to oversee that no child is employed.
- 2) There was no evidence of child labor or young labor throughout the facility. 3) No juvenile workers (under the age of 18) are employed at the facility.
- 4) Age proof records were not maintained in the facility.
- 5) Age of youngest worker was above 18 years.
- 6) Based on the employee and management interviews.

Evidence examined:

- 1. Child Labor and Child Labor Remediation Policy was available.
- 2.Age Proof records of random selected samples was available (10 workers).
- 3. Interaction with Management and Interview with employees.

	Any other comments:	
	None	
	Legal age of employment: 14	

Logar ago or omploymont.	
Age of youngest worker found:	23
Are there children present on the work floor but not working at the time of audit?	☐ Yes ☑ No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	☐ Yes ☑ No
3 1 1	Please give details:
	None

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5 - Living Wages are Paid [Summary of Findings]

5: Compliance Requirements

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

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

concerned each time that they are paid.

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

Current Systems and Evidence Examined

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

Current Systems:

1) Mr. Girraj Sharma- Manager HR is responsible to ensure that all employees are paid legal minimum wages with all

legal benefits on time as per law.

- 2) Based on employee's interview, wages are fixed on monthly wage and paid once in a month.
- 3) All employees are paid on monthly basis through bank transfer by 7th of every month regularly in past 12 months.
- 4) Based on the interview, all eligible employees are covered under social security benefit of Provident Fund (PF) and Employee State Insurance Fund (ESI).

6) Facility has extended Leave with Wage benefits to the employees. Leave with wage were found calculated accurately during full and final payment of employees record was available for review.

7) Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules but record was not available for review.

Evidence examined:

- Facility Policy was available.
- •Wage records, Pay slip and Time records for selected samples for 03 months i.e. April-2023. May-2023, July-2023 were available for review.
- •Provident Fund (PF) remittance receipts.
- Employee State Insurance (ESI) remittance receipts.
- Leave with wage records was available for review.
- •Full and final Settlement paid records was available for review.
- List of National and Festival Holidays.
- Interaction with management and Émployees

Any other comments:

None

Summary Information				
Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?	
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: 26.0	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	NO	

Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 6.0 Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO		
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 405.11 Per Week: null Per Month: 10532.84	Actual Per Day: 405.11 Per Week: 0.0 Per Month: 10532.84	NO		
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 101.3 Per Week: null Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO		
Wages Analysis:					
Were accurate records shown at the first request?	☑ Yes □ No				
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)	10 Workers Sample Month of April-2023. 10 Workers Sample Month of May-2023. 10 Workers Sample Month of July-2023.				
Are there different legal minimum wage grades? If Yes, please specify all.	☑ Yes ☐ No Unskilled- 10533, Semiskilled A- 11060, Semiskilled B- 11613, Skilled A- 12194, Skilled B - 12803				
If there are different legal minimum grades, are all workers graded and paid correctly?	✓ Yes ☐ No ☐ Not Applicable Please give details:				
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	□ Below legal min☑ Meet☑ Above				
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	11033				
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage				
Bonus Scheme found: Please specify details:	Bonus Scheme found:N/A Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.				
What deductions are required by law e.g. social insurance? Please state all types:	ESIC & EPF				
Have these deductions been made?	✓ Yes □ No				
Please list all deductions that have been made.	ESIC- 0.75% & EPF- 12% as legally required.				
Please list all deductions that have not been made.	None				
Were appropriate records available to verify hours of work and wages?	☑ Yes □ No				
Were any inconsistencies found? (if yes describe nature)	☐ Yes ☑ No				

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Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid	☐ Yes ☑ No Please give details:
for their time)	It was noted that all required meeting/training are conducted during working hours for which employees are paid. employees do not attend any meeting/training for which they will not be paid.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	☐ Yes ☑ No Please give details:
If yes, what was the calculation method	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage
used.	☐ Figures provided by Unions ☐ Living Wage Foundation UK
	☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation
	☐ Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers	☑ Yes □ No
	Please give details:
plus discretionary income).	The local government revises the minimum wage once in every six months which the facilities have to comply.
Are workers paid in a timely manner in line with local law?	☑ Yes □ No
Is there evidence that equal rates are being paid for equal work:	☑ Yes □ No
paid for equal work.	Please give details:
	From the review of available records it was noted that equal pay is given for same nature of work.
How are workers paid:	□ Cash □ Cheque
	☑ Bank Transfer ☐ Other

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6 - Working Hours are not Excessive [Summary of Findings]

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

Current Systems and Evidence Examined

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

Current Systems:

- 1. Mr. Girraj Sharma- HR-Manager is responsible for ensuring compliance with regular and overtime hours as per
- 2. Facility record IN/OUT time of all company employees.
- 3. During audit process and review of records, working hours, overtime hours and weekly rest was found to be in compliance with the legal requirements.
- 4. Facility has no compulsion on overtime
- 5. Working hours of the factory as below:
- 8 hours per day, 48 hours in a week. 1 weekly off on Sunday

Timings: 9:30 hrs. to 18:00 hrs. Lunch: 13:00 hrs. to 13:30 hrs

Evidence examined:

- ·Facility Policy.
- •In/Out time records for 10 selected samples for 03 months i.e. April-2023, May- 2023, July-2023.
- Production records (from work floors to check for discrepancies)

Any other comments:		
None		

Working hours' analysis		
Systems & Processes		
What timekeeping systems are used?	Bio Matrix	
Is sample size same as in wages section?	☑ Yes □ No Please give details:	
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	☑ Yes □ No	

Are there any other types of contracts/employment agreements used?	☐ Yes ☑ No	
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	☐ Yes ☑ No	
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	☑ 1 in 7 days ☐ 2 in 14 days ☐ No (please explain)	
Is this allowed by local law?	☑ Yes □ No	
Maximum number of days worked without a day off (in sample):	6	
Stand	ard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	☐ Yes ☑ No % of workers: null% Frequency:	
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	□ Yes ☑ No	
	Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	None	
Combined hours (standard or contracted + overtime hours = total) over 60 found?	☐ Yes ☑ No Please give details: None	
Approximate percentage of total workers on highest overtime hours:	0.0%	
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	 ✓ Yes □ No □ Conflicting Information Please give details: As per policy, overtime will be performed on voluntarily basis. 	
Overtime premium		
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	✓ Yes ☐ No ☐ N/A – there is no legal requirement to OT premium Please give details:	
	As per available data, no overtime performed by sampled employees in sampled months. However, facility has policy to compensate overtime at the rate of 200% of regular wage rate	
Is overtime paid at a premium?	✓ Yes ☐ No As per available data, no overtime performed by sampled	
	employees in sampled months. However, facility has policy to compensate overtime at the rate of 200% of regular wage rate	

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If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	☑ No □ Other	☐ Consolidated pay	☐ Collective Bargaining agreements
Please give details	None		
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any	☑ Overtime is voluntary	☐ Onsite Collective bargaining allows 60+ hours/week is voluntary	☐ Safeguards are in place to protect worker's health and safety
checked boxes above e.g. detail of consolidated pay / CBA or Other)	☐ Site can demonstrate exceptional circumstances	☐ Other reasons (please specify)	
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	None		
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ☑ No		
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	☐ Yes ☑ No		

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7 - No Discrimination is Practiced [Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

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

_				
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- Facility Policy.
- Appointment letter with terms and conditions of employment for 10 selected sampled employees.
- Salary and other benefit records.
- Interaction with management and employees

Anv	other	comn	nents:

None

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 83.0%		Female: 17.0%	
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	No			
Is there any evidence of discrimination	☐ Hiring	☐ Compensation	☐ Access to training	
based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	☐ Promotion	☐ Termination or retirement	No evidence of discrimination found	
Please give details	No evidence observed	b		
Р	rofessional Developme	nt		
What type of training and development are available for workers?	The facility provides training on safety like fire fighter training, first aid training and also on job training skill training to the unskilled workers if they are willing to develop their skills. Further, the facility also provides trainings to environment & Health & Safety, PPE Training.			
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	☑ Yes □ No			

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8 - Regular Employment Is Provided [Summary of Findings]

8: Compliance Requirements

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

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

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current Systems:

- 1) Mr. Girraj Sharma- HR-Manger is responsible to ensure compliance with these code requirements.
- 2) Employment contracts (appointment letters) were available and maintained for 10 of 10 selected employees. Terms and conditions of employment were clearly defined in appointment letter issued to the employees.

3) Facility does not follow and believe in the fixed term employment.

4) Facility understands recruitment process. Facility has not engaged any contractor. All recruitment process of are monitored by facility management only.

5) Facility does not employ any migrant workers.

- 6) Based on interaction with employees, no recruitment fee is required at any stage of the recruitment.
- 7) Photo identification card is issued to all the employees.

Evidence examined:

- ·Facility Policy.
- •Appointment letter with terms and conditions for 10 selected samples.

Salary and other benefit records.

Interaction with management and Employees

Anv	other	comme	ents

None

Responsible Recruitment			
All Workers			
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✓ Same as actual conditions	V	Understood by workers
Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	☐ Yes ☑ No		

	Migrant Workers
Type of work undertaken by migrant workers:	Facility does not employ any migrant workers.
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	☐ Yes ☑ No Please give details: Facility does not employ any migrant workers.
Is there any observation on this finding?	None
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	□ Yes ☑ No
	Non-employee workers
Recruitment Fees	
Are there any fees?	☐ Yes ☑ No
Agency Workers (if applicable) (Workers sou by the agency. Usually the agencies are paid	rced from a local agent who are not directly paid by the site, but paid d by the site and the wages of the individual workers are paid by the agency.)
Number of agencies used (average):	0
Please provide the names of agencies if applicable	None
Were agency workers' age / pay / hours included within the scope of this audit?	☐ Yes ☑ No
Were sufficient documents for agency workers available for review?	☐ Yes ☑ No
Is there a legal contract agreement with all agencies?	☐ Yes ☑ No Please give details: None
Does the site have a system for checking labour standards of agencies?	☐ Yes ☑ No Please give details: N/A
the contractors are paid by the site and the	generally individuals who supply several workers to a site. Usually e wages of the workers are paid by the contractor. Common terms , gang bosses, labor provider.)
Any contractors on site?	☐ Yes ☑ No
	Please give details:
	Facility has currently not using any contractor at site.
Do all contractor workers understand their terms of employment?	☐ Yes ☑ No
,	Please give details:
	Facility has currently not using any contractor at site.

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8A - Sub-Contracting and Homeworking [Summary of Findings]

8A: Compliance Requirements

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

Current S	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 currently not using any sub contracted	d process.	
Evidence examined:		
1.Production record. 2.Inward and outward challans. 3.Process flow Chart.		
Any other comments:		
None		
Summary	of sub-contracting - if applicable	
Is there any sub-contracting at this site?	☐ Yes ☑ No	
Summar	y of homeworking – if applicable	
Is homeworking used at this site?	☐ Yes ☑ No	

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9 - No Harsh or Inhumane Treatment is Allowed [Summary of Findings]

9: Compliance Requirements

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.

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

Current Systems and Evidence Examined

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

Current Systems:

- 1) Mr. Girraj- HR-Manager is responsible to ensure no harsh or inhumane treatment is practised in facility.
- 2) There is no evidence of harsh or inhumane treatment of employees.

3) All employees are treated with respect and dignity.

- 4) Facility's disciplinary policies are explained to all employees and all employees were well aware about their rights.

6) No evidence of physical abuse, sexual or any other harassment / verbal abuse is observed / reported. 6) Facility has a written disciplinary procedure that is displayed on the notice board of the facility.		
Evidence examined:		
•Facility Policy. •Interaction with management and Employees		
Any other comments:		
None		
Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or	☑ Yes □ No	
	Please give details:	

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 3rd party?	☑ Yes □ No Please give details:
	Suggestion box. Health and safety committee and the grievance can be directly reported to them.
If yes, are workers aware of these channels and have access? Please give details.	Workers are familiar with these channels. The workers could express their own feeling through suggestion box. Further, workers can approach the management directly for any grievance.
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion box and Employees may directly communicate during meeting.
Which of the following groups is there a grievance mechanism in place for?	
	□ Suppliers □ Other
Please provide grievance mechanism details	Worker Committee
Are there any open disputes?	☐ Yes ☑ No
	Please give details:
Does the site encourage its business partners (e.g. suppliers) to provide	☑ Yes □ No
individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	Please give details:

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Is there a published and transparent disciplinary procedure?	☑ Yes □ No
	Please give details:
If yes, are workers aware of these the disciplinary procedure?	☑ Yes □ No
	Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	□ Yes ☑ No
	Please give details:

10A - Entitlement to Work and Immigration [Summary of Findings]

10A: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

1) Mr. Girraj Sharma- Partner is responsible to ensure compliance with this code.

2) Facility has not employed any foreign employees.

3) Facilitý has maintained personnel files for all sampled 10 workers with photocopies & documentation showing that they have local citizenship and do not need any special permission to work in India.

Evidence examined:

Recruitment policies.

Interaction with management and employees.

•Personal data files (10 personnel files were checked for proof of identity documentation).

Any other comments:

None

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EUROCERT INSPECTION SERVICES PVT ZAA600021653

10B2 - Environment 2-Pillar [Summary of Findings]

10B2: Compliance Requirements

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

10.B2.2 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:

There is defined EHS policy signed by Mr. Girraj Sharma-HR-Manager, it has been displayed at various places in the factory area.

Factory follows all procedures policy and instructions.

Air and water exemption consent no: HSPCB/PLG/2012/2936-56 Dt. 16/11/2012, issued by:

Chairman Pollution Control Board.
Evidence examined:
EHS Policy
Any other comments:
None

Attachments



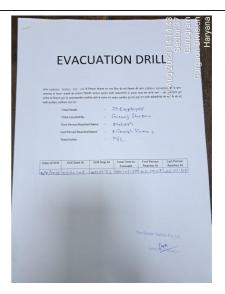
Suggestion box.jpeg



Bio Matrix.jpeg

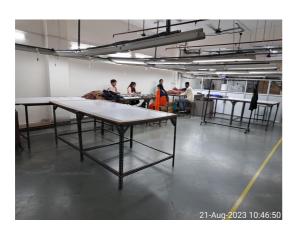


Fire Call point.jpg



Evacaution drill.jpg





Finishing area.jpg



Drinking water point.jpg



Smoke detactor.jpg



Sprinklers.jpg



Fire Alarm.jpg



Health & safety Committee.jpg





Policies.jpg



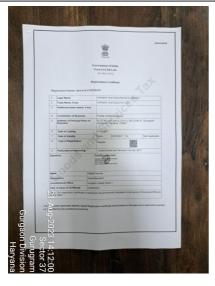
First aid box.jpg



Fire hose reel.jpg



ESI.jpg

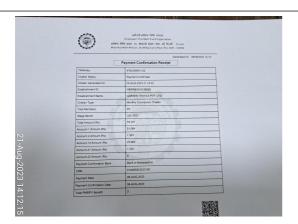


GST.jpg



Fire Extinguisher.jpg





EPF.jpg



Emergency Light.jpg



Office area.jpg



Sampling.jpg



First aid certificate.jpg



Packing area.jpg





Fire hydrant & hose reel.jpg



Cutting area.jpg



Show room.jpg



Fabric store.jpg



Ironing area.jpg



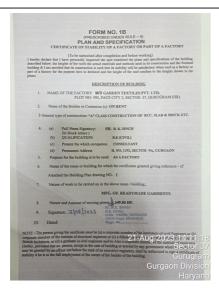
Assembly area.jpg



Factory name.jpg



Sewing area.jpg



Stability Certificate.jpg



Security Guard.jpg



Factory Building.jpg



Toilet.jpg



Signed Capr.pdf



Signed Capr.pdf



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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

Click here for Supplier (B) members:

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

Click here for Auditors:

https://www.surveymonkey.co.uk/r/BRTVCKP