




# Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 405186157	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 405196598	
Business name (Company name):	Resourzburg			
Site name:	Resourzburg			
Site address: <i>(Please include full address)</i>	Survey No.: 8/526A, Amman Avenue, Arul Industrial Estate, Sedapalayam Road, Karaipudur Post, Arulpuram, Palladam Taluk, Tirupur District – 641605, Tamil Nadu, India.	Country:	India	
Site contact and job title:	Mr. S. Jayaprakash – Admin Manager			
Site phone:	91-9578722799	Site e-mail:	<a href="mailto:jp@resourzburg.in">jp@resourzburg.in</a>	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	15 <sup>th</sup> October 2022			

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

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

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

## Audit Content:

- (1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.
- (2) The audit scope was against the following reference documents
  - 2-Pillar SMETA Audit**
    - ETI Base Code
    - SMETA Additions
      - Universal rights covering UNGP
      - Management systems and code implementation,
      - Responsible Recruitment
      - Entitlement to Work & Immigration,
      - Sub-Contracting and Home working,
  - 4-Pillar SMETA**
    - 2-Pillar requirements plus
    - Additional Pillar assessment of Environment
    - Additional Pillar assessment of Business Ethics
    - The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

## SMETA Declaration

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

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

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

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

Lead auditor: **Ms. Subhadrishia. S, Auditor** APSCA number: **RA21704222**

Lead auditor APSCA status: **Registered Auditor**

Team auditor: Nil APSCA number: **RA21704222**

Interviewers: **Ms. Subhadrishia. S, Auditor** APSCA number: **RA21704222**

Report writer: **Ms. Subhadrishia. S, Auditor**

Report reviewer: Gangadharaiah.MK (Reviewer)

Date of declaration: **15<sup>th</sup> October 2022**

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

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

## Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> <i>Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A <a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>		Nil	Nil	None Observed
0B <a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	01	Nil	Nil	<b>Summary of Non-Compliance finding 1</b> It was noted during audit process that; 05 out of 10 sampled employees was not aware of the ETI Base code content. However, it was noted that facility had a system to provide the trainings to their employees periodically. Recent training date was 13/08/2022.
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	Nil	Nil	Nil	None Observed
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	Nil	Nil	Nil	None Observed
3. <a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	02	02	Nil	<b>Summary of Non-Compliance finding 1</b> It was noted during facility tour that the facility had not provided secondary containment for the chemicals stored near toilet area and no labelling and MSDS provided,  <b>Summary of Non-Compliance finding 2</b> It was noted from the facility tour that facility has not insulated the steam pipelines connected with mini boilers in ironing section.

										<p><b>Summary of Observation 01</b></p> <p>It was noted from facility tour that; 03 out 03 exit/emergency exit not opening in the direction of evacuation (Inward opening door-2 and sliding door-1) on the ground floor of building 1. Further facility had provided safety latches to keep these doors open during working hours.</p>
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	Nil	Nil	Nil	None Observed	
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	Nil	NIL	Nil	None Observed	
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	Nil	Nil	Nil	None Observed	
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	Nil	Nil	Nil	None Observed	
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	01	Nil	Nil	None Observed	
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Nil	Nil	Nil	None Observed	
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Nil	Nil	Nil	None Observed	
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Nil	Nil	Nil	None Observed	
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Nil	Nil	Nil	None Observed	
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	Not applicable	
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	Not applicable	

General observations and summary of the site:

**Site summary:**

1. This periodic audit was conducted by Intertek India Private Limited. One (1) auditor in one day – 1 Man-day assessed / verified the facility's operations against the ETI Base Code and local legislations on a sampling basis.
2. Auditor entered the facility at 09.50 am on 15-Oct-2022 and conducted an opening meeting with facility management according to the ETI Base Code. Mr. G. Rajesh-GM present in the meeting and assured full co-operation to this audit.
3. 10 employees were interviewed, and same number of records (Timecard and Payroll) reviewed for the month of September 2022 (Recent month), April 2022 (Random month) and November 2021 (Random Month).
4. The facility is involved in the manufacturing of Knitted Garments.
5. Overall responsibility for meeting the standards is taken by Mr. G. Rajesh-GM
6. Facility had total strength of 66 employees, which included 52 production employees and 15 non- production employees. Out of 66 employees who include 45 are male and 21 are female employees. All the employees are directly engaged by the management.
7. There is evidence of both male & Female in management and among supervisors. The distribution was Male 68% & Female 32%.
8. 10 workers were selected for interview of which 06 males & 04 females, they were interviewed as 01 groups of 04 employees and balance 06 workers were interviewed individually.
9. The age of young work found on the day of audit is 24 years old.
10. No union exists at this facility.
11. Employees were satisfied with their work and management.
12. Facility is providing Sunday as weekly off to their employees.
13. They also said they were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used.
14. Scope of the audit period covered from October 2021 to September 2022.
15. Based on review of time records, the working hours could be summarized as follows:

- For September 2022 (Current month), the average working hours of 10 selected samples were 43.75 hours/week including overtime hours.
- For April 2022 (Random month) the average working hours of 10 selected samples were 40.61 hours/week including overtime hours.
- For November 2021 (Random month) the average working hours of 10 selected samples were 21.78 hours/week including overtime hours.

16. The employees work 6 days a week in single shift and the details are as below. The working hours are as under:

Working hours	08:30 am to 05:30 pm
Tea breaks	10:30 am to 10:45 am & 03:30 pm to 03:45 pm
Lunch break	12:30 pm to 01:30 pm
Weekly holiday	Sunday

**Positive observations:**

Below observations are based on the tour of the facility, review of records, interviews with employees and interaction with facility management:

1. After interviewing workers, it was confirmed that no physical abuse, threat of physical abuse, sexual or other harassment and verbal abuse in the factory.
2. There was no evidence of forced/bonded/involuntary labour in the factory.
3. There was no evidence of child labour in the factory.
4. No discrimination was found on any grounds as confirmed from employee's interview.
5. Factory has not engaged any home workers.
6. Factory has adequate number of fire extinguishers, Smoke detectors, Fire buckets and Fire alarms installed within the factory premises.
7. Adequate numbers of first aid boxes are also installed in the factory.
8. Management has installed suggestion box in the factory.
9. Factory management was cooperative during the audit.



10. Overall general working conditions of the facility was found to be in order, the workers on physical appearance seemed to be above 18 years of age.

**Summary of Noncompliance Noted:**

**0B. Management systems and code implementation**

It was noted during audit process that; 05 out of 10 sampled employees was not aware of the ETI Base code content. However, it was noted that facility had a system to provide the trainings to their employees periodically. Recent training date was 13/08/2022.

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

1. It was noted during facility tour that the facility had not provided secondary containment for the chemicals stored near toilet area and no labelling and MSDS provided,

2. It was noted from the facility tour that facility has not insulated the steam pipelines connected with mini boilers in ironing section.

**Observation**

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

It was noted from facility tour that; 03 out 03 exit/emergency exit not opening in the direction of evacuation (Inward opening door-2 and sliding door-1) on the ground floor of building 1. Further facility had provided safety latches to keep these doors open during working hours.

**Good Examples:**

None observed

**Auditor Notes:**

None observed

*\*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:	Resourzburg																
B: Site name:	Resourzburg																
C: GPS location: (If available)	GPS Address:	Latitude: NA Longitude: NA															
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business license number – TPR21843 Valid up to 31/12/2022																
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturing of Knitted garments																
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>This Audited Site "Resourzburg" is located at Survey No.: 8/526A, Amman Avenue, Arul Industrial Estate, Sedapalayam Road, Karaipudur Post, Arulapuram, Palladam Taluk, Tirupur District – 641605, Tamil Nadu, India. The total land area occupied by the facility is about 1622.05 square meter and constructed area is about 1850.12 square meter. Facility had operated in the existing location since 2020. The facility building descriptions are as under:</p> <p>For below, please add any extra rows if appropriate.</p> <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Building 1 - Ground Floor</td> <td>Office, Cutting, Fabric Storage, Creche, and Accessories Stores, Sampling.</td> <td>None</td> </tr> <tr> <td>Building 1 – First Floor</td> <td>Office, Sewing, Checking, Ironing, Packing, and Finished goods storage area.</td> <td>None</td> </tr> <tr> <td>Periphery area</td> <td>DG set, Compressor, Male &amp; Female toilets, Dining hall, Store, Waste storage area.</td> <td>None</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>None</td> </tr> </tbody> </table> <p>F1: Visible structural integrity issues (large cracks) observed?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: NA</p> <p>F3: Does the site have a structural engineer evaluation?</p>		Production Building no	Description	Remark, if any	Building 1 - Ground Floor	Office, Cutting, Fabric Storage, Creche, and Accessories Stores, Sampling.	None	Building 1 – First Floor	Office, Sewing, Checking, Ironing, Packing, and Finished goods storage area.	None	Periphery area	DG set, Compressor, Male & Female toilets, Dining hall, Store, Waste storage area.	None	Is this a shared building?	No	None
Production Building no	Description	Remark, if any															
Building 1 - Ground Floor	Office, Cutting, Fabric Storage, Creche, and Accessories Stores, Sampling.	None															
Building 1 – First Floor	Office, Sewing, Checking, Ironing, Packing, and Finished goods storage area.	None															
Periphery area	DG set, Compressor, Male & Female toilets, Dining hall, Store, Waste storage area.	None															
Is this a shared building?	No	None															

	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  F4: Please give details: Stability certificate valid till 02-Mar-2024
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)	None
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<ul style="list-style-type: none"> <li>The facility is involved in the manufacturing of Knitted Garments.</li> <li>The main production processes are listed as follows: Fabric Receipt – Cutting – Sewing – Checking – Ironing – Packing – Dispatch.</li> <li>The main equipment used by the facility for the production process are Band knife cutting machine, Overlock, Flatlock machine, Single needle machine, Stain remover machine, and Ironing table.</li> <li>Facility has Three (3) production line in which only Two (2) production line used by facility so far. Remaining 1 production line found ideal and not used by the facility.</li> </ul>
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Grievance Committee) <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 If yes approx.
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes approx. % of workers:
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No If No, please give details Not applicable.

**Audit Parameters**

A: Time in and time out	Day 1 Time in: 09:50 AM Day 1 Time out: 05:30 PM	Day 2 Time in: NA Day 2 Time out:	Day 3 Time in: NA Day 3 Time out:
B: Number of auditor days used:	One (1) auditor in One (1) day – One (1) Man-day Assessed		
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 checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail:    weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. G. Rajesh – General Manager		
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:	28.10.2022		
J: Previous audit type:	Initial Audit		
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	
	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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	Worker representative was not present in the closing meeting as his shift timing over during closing meeting time.
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	Not applicable

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	45	0	0	0	0	0	0	38
Worker numbers – female	21	0	0	0	0	0	0	25
Total	66	0	0	0	0	0	0	63
Number of Workers interviewed – male	6	0	0	0	0	0	0	6
Number of Workers interviewed – female	4	0	0	0	0	0	0	4
Total – interviewed sample size	10	0	0	0	0	8	8	10



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

Commented [GRH1]: Please answer

Commented [SSI2R1]: Added

Commented [RSI3R1]: IN case ticked No, clarify in below statement also like no specified peak or lean season etc.

Commented [SSI4R1]: Added



Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	1 group of 4 employees
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 2      D2: Female: 4
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	Employees do not have any complaints.
I: What did the workers like the most about working at this site?	Nice Working Environment & Supportive Management.
J: Any additional comment(s) regarding interviews:	None
K: Attitude of workers to hours worked:	Good
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: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>	



10 workers (06 Male & 04 Female) were selected for interview, they were interviewed in 01 groups of 04 employees and 06 workers were interviewed individually.

The workers were assured of confidentiality, and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory and that they were satisfied with the current wages which in their view were 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 who treated them with respect. They were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used. They were able to complain directly to their supervisors and to give their general concerns to their committee representative who would take it to the 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*

Based on the interaction with workers committee representative, it was noted that workers committee representatives are not discriminated, and their grievances stated by the workers were effectively solved by the facility management. Further no negative comments were received.

**O: Attitude of managers:**  
*(Include attitude to audit, and audit process. Both positive and negative information should be included)*

The facility management was found to be cooperative throughout the audit and accepted to take necessary corrective action for the non-compliances noted.

## 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:

1. Facility had established policies and procedures on Universal Rights covering UNGP.
2. Mr. G. Rajesh-GM is responsible for compliance with the code.
3. Based on review of records and interaction with management facility has communicated the Universal Rights covering UNGP to their suppliers / stack holders and obtained a commitment from them to comply with this code requirement.
4. Facility has identified their stakeholder's and salient issues.
5. Facility has system to measure their direct, indirect, on potential impacts on stockholder's human rights.
6. Facility has a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter.

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

##### Details:

- Facility Policies & Procedures
- Interaction with Management and Interview with employees

Any other comments: None

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

Yes  
 No

	A1: Please give details: Facility had established a policy that express commitment to respect human rights.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: Facility has appointed designated person responsible for implementing standards concerning Human rights.  Name: Mr. G. Rajesh Job title: General Manager
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Facility has a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter.
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility has established Data Privacy policy to ensure all worker, supplier and customer information is confidential.

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

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

## Measuring Workplace Impact

Workplace Impact		
<b>A: Annual worker turnover:</b> Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	<b>A1: Last year: January 2021 to December 2022</b> 25 %	<b>A2: This year: January 2021 to September 2022</b> 15 %
<b>B: Current % quarterly (90 days) turnover:</b> Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	10 %	
<b>C: Annual % absenteeism:</b> Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	<b>C1: Last year: January 2021 to December 2022</b> 5 %	<b>C2: This year : January 2021 to September 2022</b> 2 %
<b>D: Quarterly (90 days) % absenteeism:</b> Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	1 %	
<b>E: Are accidents recorded?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Facility had maintained Form-26 & 26A, however no accidents were occurred till date.	
<b>F: Annual Number of work related accidents and injuries per 100 workers:</b> [(Number of work related accidents and injuries * 100) / Number of total workers]	<b>F1: Last year:</b> Number: No accidents and injuries were occurred till date.	<b>F2: This year:</b> Number: No accidents and injuries were occurred till date.
<b>G: Quarterly (90 days) number of work related accidents and injuries per 100 workers:</b> [(Number of work related accidents and injuries * 100) / Number of total workers]	No accidents and injuries were occurred till date.	
<b>H: Lost day work cases per 100 workers:</b> [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	<b>H1: Last year:</b> No accidents and injuries were occurred till date.	<b>H2: This year:</b> No accidents and injuries were occurred till date.
<b>I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:</b>	<b>I1: 6 months</b> 0 % workers	<b>I2: 12 months</b> 0 % workers

Commented [SSI6R5]: Added  
 Commented [RSI7R5]: Add duration.  
 Commented [SSI8R5]: Added  
 Commented [GRH5]: Please verify and include the year.

Commented [SSI10R9]: Added  
 Commented [RSI11R9]: Add duration  
 Commented [SSI12R9]: Added  
 Commented [GRH9]: Please verify and include the year.

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**

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. Based on facility tour and review of records, facility has implemented the ETI base code.
2. Mr. S. Jayaprakash – Admin Manager is responsible for compliance with the code.
3. Based on review of records and interaction with management facility has communicated the ETI base code to their employees and suppliers.
4. Based on review of records that facility had obtained legally required Business license and approved plant layout from the concerned authority.

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

Details:

- Facility Policy and Procedures.
- ETI base code.
- Interaction with Management and Interview with employees

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: No such fine imposed on the site till date.
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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: The facility has established the policies and procedure with
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	respect to social compliance that includes reducing the risk of forced labour, child labour, discrimination, harassment & abuse.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Facility had effectively implemented the social compliance system and ensuring the same by conducting an audit in a periodic manner, necessary corrective and preventive action has been taken by the facility for the non-compliance raised during the audit. Further the report of the same was maintained by the facility.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: All the employees have undergone an induction training where the social compliance policies and procedures were explained.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility provides training on the ETI base code to all employees and records were maintained.
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: Facility does not have any internationally recognised system certifications.
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: All activities handled by the Admin Manager
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. G. Rajesh-GM is responsible for compliance with 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: Facility has established Data Privacy policy to ensure all worker, supplier and customer information is confidential.
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: Facility has a system to ensure whether the information was shared on a need to know basis only.

<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      K1: Please give details: Facility has a system of conducting risk assessment to evaluate the effectiveness of policy and procedures and update the same if required.</p>
<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      L1: Please give details: Based on the interaction with the management and review of record that effective action has been taken for the risk identified during risk assessment.</p>
<p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      M1: Please give details: Facility has a policy which requires labour standards of its own suppliers.</p>
<p><b>Land rights</b></p>	
<p>N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      N1: Please give details: Facility had obtained "Business License" and "Approved Plant Layout" from the concerned authority which is found valid.</p>
<p>O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      O1: Please give details: Facility have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.</p>
<p>P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      P1: If yes, how does the company obtain FPIC: Facility had written policy and procedures specific to land rights.</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      Q1: Please give details: The facility ensures that the landowner has a legal acquisition over the land.</p>
<p>R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      R1: Please give details: Facility had converted non-agriculture land to the facility which does not adhere any adverse effect.</p>

<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  S1: Please give details: There are no evidence of illegal appropriation of land for facility building.</p>
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Non-compliance: 01	
<p><b>1. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI    <input type="checkbox"/> NC against Local Law:    <input type="checkbox"/> NC against customer code:                  It was noted during audit process that; 05 out of 10 sampled employees was not aware of the ETI Base code content. However, it was noted that facility had a system to provide the trainings to their employees periodically. Recent training date was 13/08/2022.</p> <p><b>Local law:</b>                  Not applicable</p> <p><b>ETI Base Code:</b>                  In accordance with 0.B.4 Suppliers are expected to communicate this Code to all employees.</p> <p><b>Recommended corrective action:</b>                  It is recommended the facility to provide adequate ETI base code training to all employees in the facility.</p> <p><b>Action by:</b> Mr. G. Rajesh-GM</p> <p><b>Time Scale:</b> 30 days</p> <p><b>Verification Method:</b> Desktop</p>	<p><b>Objective evidence observed:</b>                  (where relevant please add photo numbers)                  Not applicable</p>

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

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



**1: Freely Chosen Employment**

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- 1. Based on employees' interview, the facility does not require any deposit or deposit of employee's identification such as education certificates, passport etc.
- 2. Based on employee's interview, the facility does not limit the employee's freedom in any way.
- 3. Based on the facility tour and interview with employees, there are no evidence of involuntary labour.
- 4. Based on employee's interview, all are free to leave their employment by giving reasonable notice.

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

Details:

- Facility Policy and Procedures.
- Appointment Letter of 10 out of 10 selected samples and payroll records.
- Interaction with Management and Interview with employees.

Any other comments: None

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

published a 'modern day slavery statement'?	<input checked="" type="checkbox"/> Not applicable - Facility does not have any part of business with UK 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 type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable - Facility does not involve on any forced / trafficked labour. G1: If yes, please give details and category of workers affected:
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: Not applicable - Facility does not involve on any forced / trafficked labour.

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

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

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

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

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- 1. Based on employee's interview, employees can approach top management directly to report their grievances and necessary corrective action is taken by the management.
- 2. Facility has formed a Grievance Committee and conducted meetings once in every 2 months and the minutes of meetings are recorded for verification and future reference.
- 3. Based on employee's interview, the facility does not restrict employees from organizing trade unions and has an open mind approach towards the activities of trade unions and their organizational activities.
- 4. Based on the employee's interview and interaction with facility management, Grievance committee employee representatives are not discriminated and they are free to carry out their functions like meetings on periodical basis.

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

Details:

- Facility Policy and Procedures.
- Suggestion Box.
- Grievance Committee Minutes dated 12-Sep-2022.
- Interaction with Management and Interview with employees.

Any other comments: None

<p>A: What form of worker representation/union is there on site?</p>	<p><input type="checkbox"/> Union (name)  <input type="checkbox"/> Worker Committee  <input checked="" type="checkbox"/> Other (Grievance Committee)  <input type="checkbox"/> None</p>
<p>B: Is it a legal requirement to have a union?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>

C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" 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 provided suggestion box, where employees are free to express their problems / suggestions / complaints for any grievances. While interviewing, all employees reported that they are free to approach the management for any problem.  D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Based on the employee's interview and review of records that, Grievance committee employee representatives are free to carry out their functions like meetings with adequate facilities on periodical basis and the record of the same was maintained.	
F: Name of union and union representative, if applicable:	No union exists in the facility.	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Workers Committee and Grievance committee	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Based on interaction with employees that all of them aware of their workers representative, the same was displays in the notice board also.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 02-Mar-2022
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: 02	
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>	Facility had conducted last meeting on 08-Sep-2021. Topics discussed during the committee meeting was regarding employees' grievances if any and general Safety concerns. Meeting minutes were communicated to all employees through notice board posters.	

M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If <b>Yes</b> , what percentage by trade Union/worker representation	M1: <u>0</u> % workers covered by Union CBA	M2: <u>0</u> % workers covered by worker rep CBA
M3: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable - There is no CBA in the facility	

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

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

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

**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:**

**A. General Health and Safety management**

- 1. Mr. G. Rajesh-GM is responsible for Health & Safety aspects for the site.
- 2. Potable water was freely available and test certificates were up to date.
- 3. Sufficient toilets were available at all times to workers.
- 4. Ventilation, temperature and lighting were adequate for the production processes.

**B. Fire Safety**

- 1. There were 08 exits/emergency exits throughout the facility and these were clearly marked.
- 2. Firefighting equipment such as 17 fire extinguishers, 15 fire alarm call point, 13 Emergency lights, 4 Fire buckets and 9 Smoke detectors were provided in the facility which was found to be sufficient and in operable condition.
- 3. Evacuation diagrams were posted in all areas and understood by all workers.
- 4. Firefighting training had been given by Eagle Fire Safety Solutions and 59 numbers of employees were trained on 18-Sep-2022.
- 5. Fire Drill conducted once in 2 months. Last drill was conducted on 16/07/2022.
- 6. Facility has marked all the exits and emergency exits in a language understood by majority of the employees.

**C. Machine & Electrical safety**

- 1. All machine and electrical equipment was maintained in good condition
- 2. There were competent electrician at the site to do the electrical work
- 3. Facility had obtained periodic inspection certificate for all the machineries used

**D. Chemical safety**

- 1. All chemicals were correctly labelled.
- 2. Material Safety Data Sheets were available for the Diesel, machine oil, and cleaning chemical used by the facility.

**E. Medical services**

1. Facility has provided well equipped first aid boxes 03 No's & 04 employees were training for first-aid through private agency on 29-Sep-2021.

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

Details:

- Health and Safety Policy.
- Factory License – Valid till 31/12/2022.
- Fire License – Valid till 03/05/2023.
- Sanitation Certificate dated 02/05/2020 which is valid for one year.
- Industrial accident records – Updated till September 2022.
- Compressor certificate dated on 08/08/2022 which is valid for 6 months.
- Health & Safety Committee meeting minutes dated 14/09/2022.
- Last Portability Drinking Water Test report dated 17/09/2022.
- Fire Drill conducted once in 2 months. Last drill was conducted on 16/07/2022.
- Firefighting training had been given by Eagle Fire Safety Solutions and 59 numbers of employees were trained on 18-Sep-2022
- Interaction with Management and Interview with employees.

Any other comments: None

<p>A: Does the facility have general and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility had established general Health &amp; Safety, occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers during induction training.</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: Facility had included the social compliance policies in worker's manual.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: No Such additions of floors added prior without approval.</p>
<p>D: Are visitors to the site informed on H&amp;S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Facility visitors are informed on H&amp;S and provided with appropriate personal protective equipment.</p>
<p>E: Is a medical room or medical facility provided for workers?  If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: Facility had not provided medical room and the same was not required by law.</p>

F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: There are 4 first aider presents in the facility.
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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: No transport facility provided and not mandated by law.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: Facility has not provided space for personal storage and not mandated by law.
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Facility had conducted risk assessment and the appropriate corrective and preventive action has been by the facility for the identified risks.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility is meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Based on interaction with facility management that the facility does not use any banned chemicals and meet all the environmental standards based on customer requirement.

**Non-compliance: 01**

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

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

It was noted during facility tour that the facility had not provided secondary containment for the chemicals stored near toilet area and no labelling and MSDS provided,

**Local law:**

**In accordance with The Manufacture, Storage and Import of hazardous Chemicals Rules (1989), Rule 17(1-4)** all chemicals shall be labelled and stored with suitable secondary containment.

**ETI requirement:**

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

**Objective evidence observed:**

*(where relevant please add photo numbers)*

**Based on facility tour**

**Refer NC Photo No. 1 & 2**



<p>as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Recommended corrective action:</b> It is recommended the facility to provide secondary containment and label the chemicals stored near toilet area.</p> <p><b>Action by:</b> Mr. G. Rajesh-GM</p> <p><b>Time Scale:</b> 30 days</p> <p><b>Verification Method:</b> Desktop</p>	
<p><b>2. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI    <input checked="" type="checkbox"/> NC against Local Law    <input type="checkbox"/> NC against customer code:</p> <p>It was noted from the facility tour that facility has not insulated the steam pipelines connected with mini boilers in ironing section.</p> <p><b>Local law:</b>  <b>In accordance with Factories Act 1948, Section 7A (1)</b> every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.</p> <p><b>ETI requirement:</b>  3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Recommended corrective action:</b> It is recommended the facility to insulate the steam pipelines installed in mini boilers at ironing section.</p> <p><b>Action by:</b> Mr. G. Rajesh-GM</p> <p><b>Time Scale:</b> 30 days</p> <p><b>Verification Method:</b> Desktop</p>	<p><b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i></p> <p><b>Based on document review</b></p>

Observation:	
<p><b>Description of observation:</b> It was noted from facility tour that; 03 out 03 exit/emergency exit not opening in the direction of evacuation (Inward opening door-2 and sliding door-1) on the ground floor of building 1. Further facility had provided safety latches to keep these doors open during working hours.</p> <p><b>Local law or ETI requirement:</b></p>	<p><b>Objective evidence observed:</b> Not applicable</p>

<p>In accordance with Tamil Nadu Factories Rules 1950, Chapter IV, Rule 61 (9): (u), exit doorways shall open outwards, that is away from the room but shall not obstruct the travel along any exit. No door when opened shall reduce the required width of stairway or landing to less than 90 centimeters. Overhead or sliding doors shall not be installed for this purpose.</p> <p><b>Comments:</b> It is recommended to the facility to provide all Exits and Emergency exit doors to open outward direction in all sections.</p>	
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Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p><b>Objective Evidence Observed:</b> Not applicable</p>

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

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- 1. Based on interaction with HR, all employees are hired by the management only.
- 2. Based on review of hiring policy documents, employee's ID for age proof such as Voter ID, Driving License, Dental Certificate and School Certificate was checked by HR department prior to hiring. The employees without valid ID certificates are not being hired.
- 3. Based on the policy review, the minimum hiring age of the facility is 18 years old.
- 4. Based on employees' interview, any suspect of child labour can be reported to facility management.
- 5. Based on the employee interviews, review of facility's Anti Child Labour & Hiring Policy and age proof documents, the facility has complied with ILO Standards for Child Labor. Youngest employee found within the samples is 24 years.

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

Details:

- Child Labor and Child Labor Remediation Policy.
- Age Proof records of 10 out of 10 selected samples.
- Interaction with Management and Interview with employees.

Any other comments: None

A: Legal age of employment:	14 Years old for young employees and 18 years old for adult workers
B: Age of youngest worker found:	24 years old
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0%

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

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

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

**5: Living Wages are Paid**

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

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

**ETI**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. Based on review of wage records, the facility has followed Tamil Nadu Hosiery Industry minimum wages and the wages are paid according to that for all the employees.
2. Based on employee's interview, wages are fixed on daily rate, calculated and monthly basis paid on or before 5<sup>th</sup> of every following month.
3. Based on employee's interview, wage slips are provided to all the employees and employees are aware of their wage calculations.
4. Based on wage record review, all employees are covered under social security benefit of Employees provident fund and Employee state Insurance.
5. Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules.
6. Based on employee's interview and record review all the employees have received appointment letter with written and understandable information about their employment conditions in respect to wages.
7. Based on record review and from employee's interview overtime hours are compensated at 200% of the normal rate of wages for all employees.

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

Details:

- Facility Policy.
- Salary register Pay slip and Time records for 10 selected samples for 3 Random months.
- Employees Provident Fund Remittance and Challans.
- Leave with wage records (Form No: 15) and Leave encashment records.
- Bonus paid records.
- Settlement and Gratuity paid records.
- List of National and Festival Holidays.
- Interaction with management and employees

Any other comments: None

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

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

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

**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: 8 hours per day / 48 hours per week	A1: 8 hours per day / 48 hours per week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 2 hours per day / 12 hours per week / 50 hours per quarter	B1: 1 hour per day / 6 hours per week	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: INR 223.08 per day	C1: INR 240.00 per day	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: 200% of normal rate of wages	D1: 200% of normal rate of wages	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<b>Wages analysis:</b> <a href="#">(Click here to return to Key Information)</a>	
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A1: If <b>No</b> , why not?	Not applicable
B: Sample Size Checked (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)	A total of 10 employees were interviewed and the same numbers of records were reviewed for the months of September 2021 (Current month) April 2021 (Random Month) and December 2020. (Random Month)
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: If Yes, please give details: Legal minimum: Hosiery Wages Minimum Wage for Employment in Hosiery Industry w. e. f. April 1, 2021, to March 31, 2022 – Checker- INR 246.15/Day, Tailor, Cutter, Ironer, Packer – 315.38/Day, Labelling- INR 234.62/Day, Hand folding – 228.85/Day and Fold and Tie like assistant – 223.08/Day.
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 <b>No</b> , 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 type="checkbox"/> Meet <input checked="" type="checkbox"/> Above E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i>  Helper: INR 240 per day.
F: Please indicate the breakdown of workforce per earnings:	F1: ___% of workforce earning under minimum wage F2: ___% of workforce earning minimum wage F3: <u>100</u> % of workforce earning above minimum wage
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i>

	Facility had paid bonus for the period of October 2020 to September 202 with 8.5%.		
H: What deductions are required by law e.g. social insurance? Please state all types:	Employee State Insurance, Employees Provident fund		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that <b>have</b> been made.	1. Employee State Insurance 2. Employee Provident Found  Please describe:
		I2: Please list all deductions that <b>have not</b> been made.	1. 2.  Please describe:
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type  <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Facility maintained time records reflecting all time worked by the employees.		
M: Is there a defined living wage: <i>This is <b>not normally</b> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	M1: Please specify amount/time: Facility did not define any living wages. At present facility is following the applicable minimum wages as notified by the State Government.	
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:		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Tamil Nadu Government will revise the minimum wages on the month of April every year and the same will be paid to the employees accordingly.		



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: Based on review of wage records, equal rates are being paid for equal work
Q: How are workers paid:	<input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input 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:**

1. A total of 10 employees were interviewed and the same numbers of records were reviewed for the months of September 2022 (Current month), April 2022 (Random month) and November 2021 (Random month).
2. Facility has restricted normal working hours to 8 hours per day and 48 hours per week. Overtime work 2 hours per day and 10 hours per week.
3. Based on tour of the facility, it was noted that the working hours and weekly rest day are displayed on notice board.
4. The facility has Biometric fingerprint system to record IN/OUT time recording.

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

Details:

- For September 2022 (Current month), the average working hours of 10 selected samples were 43.75 hours/week. Maximum working hours per week were 50 hours. Further, facility had engaged 01 hour per day to their employees for overtime.
  - For April 2022 (Random month) the average working hours of 10 selected samples were 40.61 hours/week. Maximum working hours per week were 48 hours. Further, facility did not engage their employees for overtime.
  - For November 2021 (Random month) the average working hours of 10 selected samples were 21.78 hours/week. Maximum working hours per week were 48 hours. Further, facility did not engage their employees for overtime.
- Any other comments: None

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

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

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

Working hours' analysis	
Please include time e.g. hour/week/month <i>(Go back to Key information)</i>	
<b>Systems &amp; Processes</b>	
A. What timekeeping systems are used: time card etc.	Describe: Biometric Finger print system
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details
C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: If YES, please complete as appropriate:
	<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other
	If "Other", Please define:
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If <b>yes</b> , please detail hours, %, types of workers affected and frequency. Please give details:
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <b>In accordance with Factories Act 1948, Chapter VI, Section 52 (1), No adult worker shall be required or allowed to work</b>

	If 'No', please explain:	<i>in a factory on the first day of the week (hereinafter referred to as the said day) unless- (a) He has or will have a holiday for a whole day on one of the three days immediately before or after the said day, and (b) The manager of the factory has, before the said day or the substituted day under clause (a) whichever is earlier, - (i) Delivered a notice at the office of the Inspector of his intention to require the worker to work on the said day and of the day which is to be substituted, and (ii) Displayed a notice to that effect in the factory: Provided that no substitution shall be made which will result in any worker working for more than ten days consecutively without a holiday for a whole day</i>
	Maximum number of days worked without a day off (in sample):	
	6 days	
<b>Standard/Contracted Hours worked</b>		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: <i>01 hours of overtime performed in the sampled month of September 2022. No Overtime performed in the sampled month of April 2022. No Overtime performed in the sampled month of November 2021.</i>	
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:	_1_%	
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 interview with employees' overtime is engaged on voluntary basis.

**Overtime Premiums**

M: Are the correct legal overtime premiums paid?  
 Yes  
 No  
 N/A – there is no legal requirement to OT premium  
 M1: Please give details of normal day overtime premium as a % of **standard** wages: **200%**

N: Is overtime paid at a premium?  
 Yes  
 No  
 N1: If yes, please describe % of workers & frequency: All the employees are paid with 200% of normal rate of wages as overtime premium as per the legal requirement which was paid along with salary.

O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.  
 No  
 Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium)  
 Collective Bargaining agreements  
 Other  
 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.  
 **Overtime is voluntary**  
 Onsite Collective bargaining allows 60+ hours/week  
 Safeguards are in place to protect worker's health and safety  
 Site can demonstrate exceptional circumstances  
 Other reasons (please specify)  
 P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:  
 Not applicable

Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?  
 Yes  
 No  
 Q1: If yes, please give details:

R: If sufficient workers cannot be hired, are  
 Yes  
 No

new working time arrangements explored to ensure that overtime is the exception rather than the rule.	
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**7: No Discrimination is Practiced**

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. Based on review of wage records and employees' interview, no discrimination was noted in hiring, compensation, access to training, promotion, termination, or retirement.
2. Mr. G. Rajesh-GM is responsible for the investigation and disposal of discrimination case.
3. Based on wage records review, the facility provides the same pay for male/female employees for same work of similar nature.

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

**Details:**

- Facility Policy.
- Appointment letter with terms and conditions for 10 out of 10 selected samples.
- Salary and other benefit records.
- Interaction with management and Employees

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: <u>68</u> % A2: Female: <u>32</u> %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	1
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 type="checkbox"/> No evidence of discrimination found  C1: Please give details: Not applicable



Professional Development	
A: What type of training and development are available for workers?	Facility had a system of professional development of their employees.

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

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

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

**8: Regular Employment Is Provided**

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

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**ETI**

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

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

**Additional Elements: Responsible Recruitment**

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. Based on record review and employee's interview appointment letters issued to all 10 out of 10 selected employees.
2. Based on interaction with the facility management, it was noted that all employees are employed on regular basis; and no casual, and apprentice employees were engaged.
3. Facility does not employ any migrant workers.
4. Based on interaction with employees, no recruitment fees are required at any stage of the recruitment process.

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

**Details:**

- Facility Policy
- Appointment letter with terms and conditions for 10 out 10 selected samples
- Salary and other benefit records
- Interaction with management and Employees

Any other comments: None

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

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

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

### Responsible Recruitment

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

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

<b>Migrant Workers:</b>	
<i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>	
A: Type of work undertaken by migrant workers:	Not applicable – Migrant employees not hired by 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:
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:  C2: Observations:
D: Are Any migrant workers in skilled, technical, or management roles  <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: If yes, number and example of roles:

**NON-EMPLOYEE WORKERS**

<b>Recruitment Fees:</b>	
A: Are there any fees?	<input type="checkbox"/> Yes <input 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:
C: If any checked, give details:	Not applicable

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

	D1: Please give details:
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:

<b>Contractors:</b> <i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details: 01 labour contractor used for suppling 04 employees for security services.
B: If <b>Yes</b> , how many workers supplied by contractors?	0
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please describe finding: The sampled contract employee found not provided with terms of engagement.:
D: If <b>Yes</b> , please give evidence for contractor workers being paid per law:	The contractor paid the applicable minimum wages to the concern employees as per the legal requirement.

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

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

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

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

*Note to auditor on homeworking:*

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. Based on the interaction with the facility management and employees' interview, it is noted that the facility has used 03 subcontractors for their production process of Printing and Embroidery.
2. Facility is not using any home workers.

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

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

Process Subcontracted	Process 1: Printing	Process 2: Embroidery
Name of factory	Casual Screen Prints	Nithya Embroideries
Address	10/519, Near Thirumurugan mills Verapandi po), Tiruppur-641605, Tamil Nadu, India.	9/380, Kettaikanu, Park College Road, Karaipudur, Tiruppur-641605, Tamil Nadu, India.

**Details:**

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

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

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

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

Summary of sub-contracting – if applicable <input type="checkbox"/> Not Applicable please x	
<p>A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      A1: Please describe: Based on review of production records, the capacity with workers workload found balanced, hence no chance of unrecorded work hours.</p>
<p>B: If sub-contractors are used, is there evidence this has been agreed with the main client?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                      B1: If <b>Yes</b>, summarise details:                      Not applicable since it was a self-reference audit.</p>
<p>C: Number of sub-contractors/agents used:</p>	<p>2</p>
<p>D: Is there a site policy on sub-contracting?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>



	D1: If <b>Yes</b> , summarise details: The facility has a policy that all the subcontractor of the facility should comply with the local legal regulation as well as the Clients Code of Conduct.
E: What checks are in place to ensure no child labour is being used and work is safe?	The facility representative visits the subcontracting unit in a regular time interval to ensure no child labour is being used.

Summary of homeworking – if applicable			
<input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If <b>Yes</b> , summarise details:		
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 <sup>rd</sup> party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility has invited NGO in Anti sexual harassment committee and the grievance was directly to them if any.
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	Facility Anti sexual harassment committee representative will communicate the details to their employees in their respective section and workers are aware of these channels and have access to the same.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Direct communication during meeting and suggestion box.
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: Facility has effective grievance mechanism in place where workers, communities & suppliers can express their grievance through Suggestion box, Committee meetings etc.
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No
II: If yes, please give details	

Current Systems and Evidence Examined
<i>To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.</i>
<p><b>Current systems:</b> Based on the interaction with the facility management and employee's interview, it is noted that no case of abuse or discipline has happened in the facility and the facility has a written disciplinary procedure that is displayed in the notice board of the facility.</p> <p><b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b> Details:</p> <ul style="list-style-type: none"> <li>• Facility Policy</li> <li>• Last Anti-Sexual Harassment Committee Meeting was conducted on 10/09/2022.</li> <li>• NGO last training was provided on 10/09/2022.</li> <li>• Interaction with management and Employees.</li> </ul> <p>Any other comments: None</p>

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

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

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

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

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

**Additional Elements**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. Based on the review of employee attendance records and employee's interview, the facility has not employed any foreign nationals.
2. Based on the review of employee personal files, all the employees are holding the legal rights to work.

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

Details:  
 Interaction with Management and Employees  
 Any other comments: None

**Non-compliance:**

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

NC against ETI/Additional Elements  NC against Local Law

NC against customer code:

None Observed

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

Not applicable

**Recommended corrective action:**

Not applicable

**Objective evidence observed:**

*(where relevant please add photo numbers)*

Not applicable

**Observation:**

**Description of observation:**

None Observed

**Local law or ETI/Additional Elements requirement:**

Not applicable

**Comments:**

Not applicable

**Objective evidence observed:**

Not applicable

**Good examples observed:**

**Description of Good Example (GE):**

None Observed

**Objective Evidence Observed:**

Not applicable

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. The facility has established and maintained environmental policy & Mr. S. Jayaprakash – Admin Manager is responsible for environmental aspects.
2. Based on management interaction, facility and their suppliers are aware the environmental requirements.

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

Details:

- Facility Policy.
- Facility comes under white category; hence air and water consent are not applicable.
- Air Ambient, Illumination, Noise and Indoor air quality test conducted 05/05/2022.
- Stack monitoring test 2 Generators conducted on 05/05/2022.
- Interaction with management and Employees.

Any other comments: None

**Non-compliance:**

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

NC against ETI/Additional Elements  NC against Local Law

None Observed

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

Not applicable

**Recommended corrective action:**

Not applicable

**Objective evidence observed:**

(where relevant please add photo numbers)  
Not applicable

**Observation:**

**Description of observation:**

None Observed

**Objective evidence observed:**

<p><b>Local law or ETI/additional elements requirement:</b> Not applicable</p> <p><b>Comments:</b> Not applicable</p>	Not applicable
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Good examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p><b>Objective Evidence Observed:</b> Not applicable</p>

Other findings

Other Findings Outside the Scope of the Code
None Observed

Community Benefits
<i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
None Observed

## Appendix 1

<p><b>Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."</b></p> <p><input checked="" type="checkbox"/> Not Applicable please x</p>	
<p><b>NOTE:</b> The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p><b>Instruction to Audit Company:</b> fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
<p><b>ETI Code / Additional Elements</b></p>	<p><b>Customer's Supplier Code equivalent</b></p>
<p><b>0.A. Universal Rights covering UNGP</b></p>	<p><b>0.A. Universal Rights covering UNGP</b></p>
<p><b>0.A. Guidance for Observations</b>            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.</p>	
<p><b>0.B. Management Systems &amp; Code Implementation</b></p>	<p><b>0.B. Management Systems &amp; Code Implementation</b></p>
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p>	

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



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

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

<p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p><b>Additional Elements: Responsible Recruitment</b>              8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.              8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.              8.5 Employment agencies must only supply workers registered with them.              8.6 Workers pay no recruitment fee at any stage of the recruitment process.              8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
<p><b>8A: Sub-Contracting and Homeworking</b></p>	<p><b>8A: Sub-Contracting and Homeworking</b></p>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.              8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<p><b>ETI 9. No harsh or inhumane treatment is allowed</b></p>	<p><b>ETI 9. No harsh or inhumane treatment is allowed</b></p>
<p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.              Additional elements:              9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<p><b>10. Other Issue areas: 10A: Entitlement to Work and Immigration</b></p>	
<p><b>Additional Elements</b>              10A.1 Only workers with a legal right to work shall be employed or used by the supplier.              10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
<p><b>10. Other issue areas 10B2: Environment 2-Pillar</b></p>	

<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.          10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.  <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:
<b>Environment Section</b>	<b>Environment Section</b>
<p><b>B.4. Compliance Requirements</b>            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.  <b>B4. Guidance for Observations</b>            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.</p>	
<b>Business Practices Section</b>	

**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.











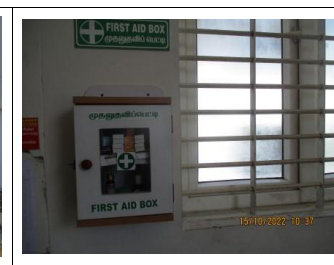

## Photo Form

### Non-Compliance Photo

<p>1. Secondary containment not provided</p>	<p>2. Secondary containment not provided</p>	<p>3. Steam pipeline not insulated</p>
		<p>NA</p>
<p>4. Inward open door provided as emergency exit</p>	<p>5. Latches Provided</p>	<p>NA</p>

## General Photos

 <p>RESOURZBURG No: 8/526 A, Amman Avenue, Arul Industrial Estate, Sedapalayam Road, Karaiyudur (Po), Arulapuram, Tirupur - 641 605. GSTIN:33AVWPS6793H22K</p>		
<p>1. Facility Name Board</p>	<p>2. Facility entrance</p>	<p>3. Facility overview</p>
 <p>WORKING HOURS வேலை நேரம் 08:30am to 05:30pm TEA BREAK தேய் இடைவேளை 10:30am to 10:45pm 03:30pm to 03:45pm LUNCH BREAK உணவு இடைவேளை 12:30pm to 01:30pm</p>		
<p>4. Working Hours Displayed</p>	<p>5. Notice board</p>	<p>6. Law &amp; abstracts Displayed</p>
	 <p>NO CHILD LABOUR அடையாளம் காட்டப்பட்டது EMERGENCY NUMBER தீவிர சம்பவங்களுக்கான தொடர்பு எண்கள் Ambulance 0442 252222 Police/Police/Police 0442 252222 Fire Station/Fire Station 0442 252222 CB Office 0441 347588 Rango Ambulance 0942 02199 ABC Hospital 0942 71464 Admin Manager 09741 22198</p>	
<p>7. ETI base code displayed</p>	<p>8. Emergency contact number displayed</p>	<p>9. Fire Extinguisher</p>

		
<p>10. Power type sprinkler</p>	<p>11. Fire Alarm Call Point</p>	<p>12. Fire siren</p>
		
<p>13. Smoke detector</p>	<p>14. Fire Buckets</p>	<p>15. Illuminated Emergency light</p>
		
<p>16. Fingerprint System</p>	<p>17. Passage marking</p>	<p>18. Evacuation Map</p>
		



19. Safe assembly point	20. First Aid Box	21. Accessories store
		
22. Fabric storage area	23. Cutting section	24. Sewing section
		
25. Checking section	26. Packing section	27. Ironing section
		
28. Drinking water point	29. Suggestion Box	30. Gender marked toilets (Male)

		
<p>31. Gender marked toilets (Female)</p>	<p>32. Compressor area</p>	<p>33. Diesel generator</p>



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

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

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